

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

Name of Permitted Facility: IPL - Ottumwa Generating Station

**Facility Location: 20775 Power Plant Road
Ottumwa, Iowa 52501**

Air Quality Operating Permit Number: 98-TV-009R1-M001

Expiration Date: September 14, 2010

EIQ Number: 92-2774

Facility File Number: 90-07-001

Responsible Official

Name: James H. Allen

Title: Plant Manager

Mailing Address: 20775 Power Plant Road, Ottumwa, IA 52501

Phone#: 641-935-2905

Permit Contact Person for the Facility

Name: Kevin Brehm

Title: E&S Specialist

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Phone #: 641-935-2904

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit. Two Title V Permits are being issued for the IPL - Ottumwa Generating Station (OGS) and the Chariton Valley Resource Conservation & Development, Inc. – OGS Switchgrass Processing Facility (CVRCD, Facility No. 90-07-002). The CVRCD supports electricity generating activities at the OGS. Therefore, the two facilities are considered one stationary source. This permit is for the OGS.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Operating Permits Section

Date

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Abbreviations

acfm.....	actual cubic feet per minute
BACT.....	Best Available Control Technology
CFR.....	Code of Federal Regulations
EIQ.....	emissions inventory questionnaire
°F.....	degrees Fahrenheit
gr./dscf.....	grains per dry standard cubic foot
hp.....	horsepower
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
lb./hr.....	pounds per hour
lb./MMBtu.....	pounds per million British thermal units
MMBtu/hr.....	million British thermal units per hour
MVAC.....	motor vehicle air conditioner
ng/J.....	nanograms per joule
NSPS.....	new source performance standards
ppmv.....	parts per million by volume
scfm.....	standard cubic feet per minute
SIC.....	Standard Industrial Classification
TR.....	A Transformer-Rectifier set in an electrostatic precipitator
USEPA.....	United States Environmental Protection Agency

Pollutants

PM.....	particulate matter
PM ₁₀	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
SO _x	Sulfur Oxides
NO _x	nitrogen oxides
VOC.....	volatile organic compound
CO.....	carbon monoxide
CO ₂	carbon dioxide
HAPs.....	hazardous air pollutants

I. Facility Description and Equipment List

Facility Name: IPL - Ottumwa Generating Station

Permit Number: 98-TV-009R1-M001

Facility Description: Electric Services (SIC 4911)

Equipment List

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Iowa DNR Construction Permit
1	1	Boiler, Dry Bottom Tangentially Fired	78-A-019-S6
2	2-6	Coal Pile, Open Storage	N/A
3	3-59	West Rotary Car Dumper	78-A-096-S1
4	4-59	East Rotary Car Dumper	78-A-097-S2
8	8-60	Coal Conveying in Transfer House	78-A-098-S1
10	10-61	Coal Crusher House	95-A-508-S4
11	11-15	Coal Pile Stack/Reclaimer	N/A
12	12-14	Emergency Conveyor to Coal Pile	N/A
38	38-56	West Lime Silo	99-A-174-S2
38a	38-56a	East Lime Silo	02-A-191
56	56-100	#2 Fuel Oil Tank, 846,000 Gallons, Vertical Fixed Roof	N/A
57	57-101	#2 Fuel Oil Tank, 846,000 Gallons, Vertical Fixed Roof	N/A
67	67-34	Boiler for Plant Heat	04-A-816
69	69-31	NUVA Feeder Room Vent (29 Fans)	N/A
71	71-29	Welding Booth	04-A-817
72	72-27	West Side Coal Silo	78-A-093-S1
73	73-28	East Side Coal Silo	78-A-092-S1
75	23	Parts Washer, Main Building	99-A-175-S2
78	78-18	Cargill Coal Silo	04-A-818
79	79-18	Cargill Silo Truck Loading Chute	N/A
80	80-22	Fly Ash Silo Unloading Chute and C-Stone Production	N/A
81	81-17	Soda Ash Silo	84-A-050-S3
92	92-48	Emergency Generator	99-A-177
94	94-36	Economizer Hydrovevor Fly Ash Separator	99-A-178-S2
98	98	Ash Pond Dredging	N/A
99	99	Portable Coal Screener	96-A-979-S1

Equipment List

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Iowa DNR Construction Permit
100	100	Coal Pile Bulldozing	N/A
200	200	Fly Ash Facility	05-A-613
201	200	Fly Ash Facility	05-A-614

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
65-91-48	Fuel Oil Retention Tank (100 Gallons)
65-91-48a	Lube Oil Tank (8,550 Gallons)
85-12	FD Fan Lubricating Oil System
54-20	Sulfuric Acid Tank (8,150 Gallons)
47-47	Lube Oil Vapor Extractor
66	Soot-blower Air Receiving Tank (3,700 Gallons)
57	Condensate Storage Tank (484,575 Gallons)
55-9	Diesel Fuel Tank (2,000 Gallon)
53	Plant Vacuum System
37	HX Auz Detraining Section of HX
13	Chlorine Storage Room
12	FD Fan Lubricating Oil System
22	Fly Ash Silo
101	Ash Pile Bulldozing
102	Ash Pile Open Storage
103	550 Gallon Gasoline Tank

II. Plant-Wide Conditions

Facility Name: IPL - Ottumwa Generating Station

Permit Number: 98-TV-009R1-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: 5 years

Commencing on: September 15, 2005

Ending on: September 14, 2010

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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 (SO₂): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)¹:

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 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" (as revised 7/21/1999)

¹ Pending approval into Iowa's State Implementation Plan (SIP), paragraph 567 IAC 23.3(2)"a" (as revised 7/21/1999) is considered state enforceable only.

Particulate Matter ²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

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"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, IPL – Ottumwa Generating Station is in compliance with all applicable requirements and shall continue to comply with all such

² Paragraph 567 IAC 23.3(2)"a" (prior to 7/21/1999) is the general particulate matter emission standard currently in the Iowa SIP.

requirements. For those applicable requirements which become effective during the permit term, IPL – Ottumwa Generating Station shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

40 CFR 60 Subpart D Requirements

This facility is subject to Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 – 40 CFR 60 subpart D and the affected unit is EU 1 (EP 1: Main Plant Boiler). Applicable subpart D requirements are incorporated into the Emission-Point Specific Conditions Section.

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 78-A-019-S6)

40 CFR 60 Subpart D

40 CFR 63 Subpart DDDDD Requirements

This facility is subject to National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters – 40 CFR 63 subpart DDDDD. The subpart was promulgated on September 12, 2004 and the effective date was November 12, 2004. The affected unit is EU 67-34(Boiler for Plant Heat).

EU 67-34 is an existing large liquid boiler. Per 40 CFR 63.7506(b) and (b)(2), this boiler is subject to only the initial notification requirements in 40 CFR 63.9(b) and is not subject to the emission limits, work practice standards, performance testing, monitoring, startup, shutdown, and malfunction plan (SSMP), site-specific monitoring plans, recordkeeping and reporting requirements of subpart DDDDD or any other requirements in subpart A of part 63. The information that must be included in the initial notification is specified in 40 CFR 63.7545(b).

Authority for Requirement: 40 CFR 63 Subpart DDDDD

40 CFR 63 Subpart ZZZZ Requirements

This facility is subject to National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – 40 CFR 63 subpart ZZZZ and the affected unit is EU 92-48 (Emergency Generator) because it has the rated capacity of 1,207 hp which is greater than the threshold of 500 hp. 40 CFR 63.6590(a).

Because the affected unit is an existing compression ignition stationary RICE, the facility does not have to meet the requirements of this subpart and of subpart A of part 63. No initial notification is necessary. 40 CFR 63.6590(b)(3).

Authority for Requirement: 40 CFR 63 Subpart ZZZZ

III. Emission Point-Specific Conditions

Facility Name: IPL - Ottumwa Generating Station
Permit Number: **98-TV-009R1-M001**

Emission Point ID Number: 1

Associated Equipment

Associated Emission Unit ID Number: 1
Emissions Control Equipment ID Number: CE1
Emissions Control Equipment Description: Electrostatic Precipitator
Continuous Emissions Monitors ID Numbers: ME1, ME2, ME3, ME4, ME5, and ME6

Emission Unit vented through this Emission Point: 1
Emission Unit Description: Boiler, Dry-Bottom Pulverized Coal, Tangentially Fired, with Low NOx Burners
Raw Material/Fuel: Coal, #1 and #2 fuel oil, waste oil, natural gas, and switchgrass
Rated Capacity: 6,370 MMBtu/hr

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: 20%⁽¹⁾

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 78-A-019-S6)
40 CFR 60 Subpart D

⁽¹⁾ Opacity shall not exceed 20% (6-minute average) except for one (1) 6-minute period per hour of not more than 27% opacity.

Pollutant: Particulate Matter

BACT Emission Limit: 0.1 lb/MMBtu (Front Half – EPA Method 5)

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 78-A-019-S6)
40 CFR 60 Subpart D

EPA PSD Permit Dated 12/1/1976 and Revision Dated 3/30/78

Pollutant: Particulate Matter

Emission Limit: 2,798 tpy (Total of Front Half and Back Half – Iowa Method 5) expressed as
12-month rolling total

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

Pollutant: Sulfur Dioxide (SO₂)

BACT Emission Limit: 520 ng/J heat input ⁽¹⁾

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 78-A-019-S6)
40 CFR 60 Subpart D

EPA PSD Permit Dated 12/1/1976 and Revision Dated 3/30/78

⁽¹⁾ 520 ng/J heat input = 1.2 lb/MMBTU. When different fossil fuels are burned simultaneously in any combination, the applicable SO₂ emission limit is determined by the following formula:

$$PS_{SO_2} = [y(340) + z(520)]/(y + z)$$

where:

PS_{SO₂} is the prorated standard for sulfur dioxide when burning different fuels simultaneously, in nanograms per joule heat input derived from all fossil fuels fired or from all fossil fuels and wood residue fired.

y is the percentage of total heat input derived from liquid fossil fuel, and

z is the percentage of total heat input derived from solid fossil fuel.

Compliance shall be based on total heat input from all fossil fuels burned, including gaseous fuels.

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 33,541 tpy expressed as 12-month rolling total

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: Sulfur Dioxide Allowances

Authority for Requirement: 567 IAC 22.108(7) (Attached Phase II Acid Rain Permit)

Pollutant: Nitrogen Oxide (NO_x)

Emission Limit: 300 ng/J heat input ⁽²⁾

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 78-A-019-S6)
40 CFR 60 Subpart D

⁽²⁾ 300 ng/J heat input = 0.70 lb/MMBTU. When different fossil fuels are burned simultaneously in any combination, the applicable NO_x emission limit is determined by the following formula:

$$PS_{NO_x} = [w(260) + x(86) + y(130) + z(300)]/(w + x + y + z)$$

where:

PS_{NO_x} is the prorated standard for nitrogen oxides when burning different fuels simultaneously, in nanograms per joule heat input derived from all fossil fuels fired or from all fossil fuels and wood residue fired.

w is the percentage of total heat input derived from lignite,

x is the percentage of total heat input derived from gaseous fossil fuel,

y is the percentage of total heat input derived from liquid fossil fuel, and

z is the percentage of total heat input derived from solid fossil fuel (except lignite).

Pollutant: Nitrogen Oxide (NO_x)

Emission Limit: See Attached Phase II Permit

Authority for Requirement: 567 IAC 22.125(4) (Attached Phase II Permit)
40 CFR 76.5(a)(1)

Operational Limits & Requirements

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

NSPS Requirements:

This emission unit is subject to Subparts A (40 CFR § 60.1 – 40 CFR §60.19) and D (40 CFR § 60.40 – 40 CFR §60.46) of the New Source Performance Standards (NSPS).

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6
NSPS Subpart D

Acid Rain Requirements:

The facility (plant number 90-07-001) is considered an affected source under 40 CFR 72, 73, 75, 76, 77, and 78 definitions as this emission unit is subject to the acid rain emission reduction requirements or the acid rain emission limitations, as adopted by the Department by reference (See 567 IAC 22.120 – 567 IAC 22.148).

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

Operating Limits:

1. This emission unit is limited to firing on the following fuels: coal, oil (distillate #1, distillate #2, and waste), natural gas, and switchgrass.
2. The ratio of gallons of oil to tons of coal shall be no more than two (2) gallons of waste oil per ton of coal.
3. The usage of oil shall not exceed 7.2 million gallons per twelve-month rolling period.

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

Reporting & Record keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources:

1. A record of the fuels fired and the amount of each fuel fired.
2. The owner or operator shall maintain a record of the amount oil used per month, in gallons, and calculate a twelve-month rolling total.
3. Whenever coal and oil are used simultaneously, the owner or operator shall maintain a record of the amount oil (in gallons) and coal (in tons) used simultaneously.
4. The owner or operator shall maintain a record of the three hour rolling average of the NO_x emissions in lbs/MMBtu.
5. The owner or operator shall maintain a record of the SO_x emissions (in tons) per month and calculate a twelve-month rolling total.
6. The owner or operator shall submit quarterly reports on opacity, SO₂, NO_x, CO₂ and airflow to the IDNR. These reports shall conform to the requirements of 40 CFR Part 75.

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

7. To demonstrate the compliance with the PM limit of 2,798 tons per year, the owner or operator shall maintain a record of the total PM emissions on a 12-month rolling basis, rolled monthly using the most recent stack test results or other approved emission factors. The PM emissions shall include both filterable and condensable emissions.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 600

Stack Opening (inches, dia): 300

Exhaust Temperature (°F): 300

Exhaust Flowrate (scfm): 1,314,400

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - Particulate Matter

1st Stack Test to be Completed by – September 14, 2006

2nd Stack Test to be Completed between – March 14, 2008 and March 13, 2009

Test Method ^(*) - 40 CFR 60, Appendix A, Method 5 and
Iowa Compliance Sampling Manual Method 5 or
Other Approved Alternate Methods

^(*)The front-half and the back-half emissions shall be measured. The front-half emission data shall be used to demonstrate the compliance with the PM limit of 0.1 lb/MMBtu. The total of both front-half and back-half emission data shall be used to demonstrate the compliance with the PM limit of 2,798 tons per year on a 12-month rolling (rolled monthly) basis.

Authority for Requirement - 567 IAC 22.108(3)

Continuous Emissions Monitoring:

Pollutant - Opacity

Operational Specifications - 40 CFR Part 75

Initial System Calibration/Quality Assurance - 11/96

Ongoing System Calibration/Quality Assurance - 40 CFR Part 75

Reporting & Record keeping - 40 CFR Part 75

Authority for Requirement - 567 IAC 25.1(1) and 567 IAC 25.2

Iowa DNR Construction Permit 78-A-019-S6

Pollutant - Sulfur Dioxide (SO₂)

Operational Specifications - 40 CFR Part 75

Initial System Calibration/Quality Assurance – 4/4/2001

Ongoing System Calibration/Quality Assurance - 40 CFR Part 75

Reporting & Record keeping - 40 CFR Part 75

Authority for Requirement - 567 IAC 25.2

Iowa DNR Construction Permit 78-A-019-S6

Pollutant - Nitrogen Oxides (NO_x)

Operational Specifications - 40 CFR Part 75

Initial System Calibration/Quality Assurance - 4/4/2001

Ongoing System Calibration/Quality Assurance - 40 CFR Part 75

Reporting & Record keeping - 40 CFR Part 75

Authority for Requirement - 567 IAC 25.2

Iowa DNR Construction Permit 78-A-019-S6

Other Parameters

Pollutant - Carbon Dioxide (CO₂)
Operational Specifications - 40 CFR Part 75
Initial System Calibration/Quality Assurance - 4/4/2001
Ongoing System Calibration/Quality Assurance - 40 CFR Part 75
Reporting & Record keeping - 40 CFR Part 75
Authority for Requirement - 567 IAC 25.2
Iowa DNR Construction Permit 78-A-019-S6

Flow
Operational Specifications - 40 CFR Part 75
Initial System Calibration/Quality Assurance - 7/94
Ongoing System Calibration/Quality Assurance - 40 CFR Part 75
Reporting & Record keeping - 40 CFR Part 75
Authority for Requirement - 567 IAC 25.2
Iowa DNR Construction Permit 78-A-019-S6

The owner of this equipment or his authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the tests shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No
Relevant requirements of O&M plan for this equipment: Particulate Matter

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)

**AGENCY OPERATION & MAINTENANCE PLAN
ELECTROSTATIC PRECIPITATORS FOR PARTICULATE CONTROL**

Facility:	IPL - Ottumwa Generating Station
EQ Number:	92-2774
Emission Unit:	EU 1 - Boiler #1
Emission Point:	EP 1 - Stack #1
Control Equipment:	CE 1 - Electrostatic Precipitator

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, or the presence of a monitored abnormal condition. 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 excursion to the department and conduct source testing within 90 days of the excursion to demonstrate compliance with applicable requirements. If the test demonstrates compliance with the 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, will propose a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

Monitoring Methods and Corrective Actions

General

- Periodic Monitoring is not required when the source is not operated for time periods greater than one day.

Continuous Monitoring & Corrective Actions

- Precipitator Malfunction Alarm

The precipitator malfunction alarm will continuously monitor the following parameters:

1. Each TR for Abnormal Operations.
2. Rapper Control Malfunctions

Corrective actions will be implemented upon the discovery of a malfunction alarm. The appropriate measures and/or action plan for remediation will be implemented within 8 hours, and if necessary, within an additional period of time until alternate generating capacity is available to meet consumer demand.

- **Opacity Monitoring**

Opacity is continuously monitored and recorded via analog readouts in the boiler control room. Additionally, ESP performance is also continuously monitored via TR amperage and voltage readouts in the precipitator control room for each section of the ESP's.

The Continuous Opacity Monitoring System (COMS) will continuously monitor the stack gas for opacity. Corrective actions will be implemented when the opacity exceeds twenty (20) percent (6-minute average) except for one (1) 6-minute period per hour of not more than 27% opacity.

The appropriate measures and/or action plan for remediation will be implemented within 8 hours, and if necessary, within an additional period of time until alternate generating capacity is available to meet consumer demand.

Weekly Monitoring

- Observation of rapper operation.
- Observation of T-R set operation.
- Observation of ash removal system operation.

Corrective action measures will be implemented on the occurrence of an abnormal condition. The appropriate measures and/or action plan for remediation will be implemented within 8 hours, and if necessary, within an additional period of time until alternate generating capacity is available to meet consumer demand.

Abnormal conditions include the following:

1. Rapper system failure
2. Ash transport system failure
3. High ash hopper

Each Major Unit Overhaul

- Inspect plate and electrode alignment and adjust if necessary.
- Check plates and electrodes for excess fouling and signs of corrosion.
- Check the T-R set mechanical condition.
- Inspect the insulator housings for mechanical condition.
- Inspect internal structural components for signs of corrosion, air leakage, and mechanical failure.

Corrective actions will be devised and implemented upon the occurrence of an abnormal condition. The appropriate actions to correct the abnormal condition will be implemented in a timely manner and be in place before the end of the outage period.

Record Keeping and Reporting

- Opacity reports and supporting data will be kept in accordance with 567 IAC 25.
- Maintain a written/electronic record of all corrective actions performed on the equipment for five (5) years.
- Records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

Quality Control

- The opacity monitor will be maintained and calibrated in accordance with 567 IAC 25
- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's specifications.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 2**Associated Equipment**

Associated Emission Unit ID Number: 2-6

Emission Unit vented through this Emission Point: 2-6
Emission Unit Description: Coal Pile, Open Storage Area
Raw Material/Fuel: Coal
Size: 30.3 acres

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 3**Associated Equipment**

Associated Emission Unit ID Number: 3-59
Emissions Control Equipment ID Number: CE2
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 3-59
Emission Unit Description: West Rotary Car Dumper
Raw Material/Fuel: Coal
Rated Capacity: 3,500 Tons/Hour

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: 20%
Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 78-A-096-S1)
40 CFR 60 Subpart Y

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf expressed as the average of 3 runs
Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 78-A-096-S1)

Pollutant: Particulate Matter
Emission Limit: 15.0 lb/hr expressed as the average of 3 runs
Authority for Requirement: Iowa DNR Construction Permit 78-A-096-S1

Pollutant: PM₁₀
Emission Limit: 15.0 lb/hr expressed as the average of 3 runs
Authority for Requirement: Iowa DNR Construction Permit 78-A-096-S1

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 60

Stack Opening (inches, dia): 60

Exhaust Temperature (°F): Ambient

Exhaust Flowrate (scfm): 82,500

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-096-S1

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than

20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 3-59

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: West Rotary Car Dumper
Identification: EU 3-59

B. Control Equipment

Description: Baghouse
Identification: CE2

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 78-A-096-S1
PM₁₀ Emission Limit: 15.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 4**Associated Equipment**

Associated Emission Unit ID Number: 4-59
Emissions Control Equipment ID Number: CE12
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 4-59
Emission Unit Description: East Rotary Car Dumper
Raw Material/Fuel: Coal
Rated Capacity: 3,500 Tons/Hour

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: 20%
Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 78-A-097-S2)
40 CFR 60 Subpart Y

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf expressed as the average of 3 runs
Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 78-A-097-S2)

Pollutant: Particulate Matter
Emission Limit: 10.0 lb/hr expressed as the average of 3 runs
Authority for Requirement: Iowa DNR Construction Permit 78-A-097-S2

Pollutant: PM₁₀
Emission Limit: 10.0 lb/hr expressed as the average of 3 runs
Authority for Requirement: Iowa DNR Construction Permit 78-A-097-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 60

Stack Opening (inches, dia): 60

Exhaust Temperature (°F): Ambient

Exhaust Flowrate (scfm): 66,500

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-097-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

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

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 4-59

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: East Rotary Car Dumper
Identification: EU 4-59

B. Control Equipment

Description: Baghouse
Identification: CE12

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 78-A-097-S2
PM₁₀ Emission Limit: 10.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 8**Associated Equipment**

Associated Emission Unit ID Number: 8-60
Emissions Control Equipment ID Number: CE3
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 8-60
Emission Unit Description: Coal Conveying in Transfer House
Raw Material/Fuel: Coal
Rated Capacity: 3,500 Tons/Hour

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: 20%

Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 78-A-098-S1)
40 CFR 60 Subpart Y

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 78-A-098-S1)

Pollutant: PM₁₀

Emission Limit: 8.0 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 78-A-098-S1

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing

emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 69

Stack Opening (inches, dia): 54

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 31,967

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-098-S1

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts

for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

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

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 8-60

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: Coal Conveying in Transfer House
Identification: EU 8-60

B. Control Equipment

Description: Baghouse
Identification: CE3

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 78-A-098-S1
PM₁₀ Emission Limit: 8.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 10**Associated Equipment**

Associated Emission Unit ID Number: 10-61
Emissions Control Equipment ID Number: CE4
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 10-61
Emission Unit Description: Coal Crusher House
Raw Material/Fuel: Coal
Rated Capacity: 990 Tons/Hour

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: 20%
Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 95-A-508-S4)
40 CFR 60 Subpart Y

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 95-A-508-S4)

Pollutant: PM₁₀
Emission Limit: 4.0 lb/hr expressed as the average of 3 runs
Authority for Requirement: Iowa DNR Construction Permit 95-A-508-S4

Operational Limits & Requirements

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

Process throughput:

The amount of coal processed in the crusher shall not exceed 990 tons per hour based on a 24-hour rolling average.

Authority for Requirement: Iowa DNR Construction Permit 95-A-508-S4

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR.

Record the amount of coal processed in the crusher per hour based on a 24-hour rolling average. (Note: Averaging time shall include operating time only. If the coal crusher is not operating it shall not be included in the 24-hour average.)

Authority for Requirement: Iowa DNR Construction Permit 95-A-508-S4

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 90

Stack Opening (inches, dia.): 50

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 41,053

Discharge Style: Vertical w/o Obstruction

Authority for Requirement: Iowa DNR Construction Permit 95-A-508-S4

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 10-61

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: Coal Crusher House
Identification: EU 10-61

B. Control Equipment

Description: Baghouse
Identification: CE4

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 95-A-508-S4
PM₁₀ Emission Limit: 4.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 11**Associated Equipment**

Associated Emission Unit ID Number: 11-15

Emission Unit vented through this Emission Point: 11-15

Emission Unit Description: Coal Pile Stacker/Reclaimer

Raw Material/Fuel: Coal

Rated Capacity: 3,500 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 12**Associated Equipment**

Associated Emission Unit ID Number: 12-14

Emission Unit vented through this Emission Point: 12-14
Emission Unit Description: Emergency Conveyor to Coal Pile
Raw Material/Fuel: Coal
Rated Capacity: 3,500 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 38**Associated Equipment**

Associated Emission Unit ID Number: 38-56
Emissions Control Equipment ID Number: CE10
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 38-56
Emission Unit Description: West Lime Silo
Raw Material/Fuel: Lime
Rated Capacity: 25 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 99-A-174-S2)

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence 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 exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 99-A-174-S2)

Operational Limits & Requirements

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

Operating Limit (Requested by the Facility):

1. The lime throughput from this unit shall not exceed 22,727 tons per year.

Authority for Requirement: 567 IAC 22.108(14)

Reporting & Record keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources:

1. The owner or operator shall maintain a record of the lime throughput from this unit per month, in tons, and calculate a twelve-month rolling total.

Authority for Requirement: 567 IAC 22.108(4)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 71

Stack Opening (inches, dia.): 38.5

Exhaust Temperature (°F): Ambient

Exhaust Flowrate (scfm): 900

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 99-A-174-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan 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 22.108(3)

Emission Point ID Number: 38a**Associated Equipment**

Associated Emission Unit ID Number: 38-56a
Emissions Control Equipment ID Number: CE10a
Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: 38-56a
Emission Unit Description: East Lime Silo
Raw Material/Fuel: Lime
Rated Capacity: 25 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 02-A-191)

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence 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 exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 02-A-191)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 83.5

Stack Opening (inches): 32 × 14.5

Exhaust Temperature (°F): Ambient

Exhaust Flowrate (acfm): Displacement

Discharge Style: Downward

Authority for Requirement: Iowa DNR Construction Permit 02-A-191

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan 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 22.108(3)

Emission Point ID Number: EP-56

Associated Equipment

Associated Emission Unit ID Numbers: 56-100

Emission Unit vented through this Emission Point: 56-100
Emission Unit Description: #2 Fuel Oil Tank, Vertical Fixed Roof
Raw Material/Fuel: #2 Fuel Oil
Rated Capacity: 846,000 Gallons

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.

There are no emission limits at this time.

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 22.108(3)

Emission Point ID Number: EP-57

Associated Equipment

Associated Emission Unit ID Numbers: 57-101

Emission Unit vented through this Emission Point: 57-101
Emission Unit Description: #2 Fuel Oil Tank, Vertical Fixed Roof
Raw Material/Fuel: #2 Fuel Oil
Rated Capacity: 846,000 Gallons

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.

There are no emission limits at this time.

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 22.108(3)

Emission Point ID Number: 67**Associated Equipment**

Associated Emission Unit ID Numbers: 67-34

Emission Unit vented through this Emission Point: 67-34

Emission Unit Description: Boiler for Plant Heat

Raw Material/Fuel: #1 and #2 Fuel Oil

Rated Capacity: 150 gal/hr (21 MMBtu/Hour)

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 04-A-816)

⁽¹⁾ An exceedence 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 exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.6 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b" (Iowa DNR Construction Permit 04-A-816)

Pollutant: PM₁₀

Emission Limit: 0.60 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 04-A-816

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3) (Iowa DNR Construction Permit 04-A-816)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

- Stack Height (feet, from the ground): 219
- Stack Opening (inches, dia): 48
- Exhaust Temperature (°F): 520
- Exhaust Flowrate (scfm): 18,259
- Discharge Style: Vertical Unobstructed
- Authority for Requirement: Iowa DNR Construction Permit 04-A-816

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Operating Limits

- A. The emission unit is permitted to burn No. 1 or No. 2 fuel oil.
- B. The sulfur content of the fuel oil burned shall not exceed 0.5 percent by weight.

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR

The permittee shall perform an analysis and shall maintain records on the sulfur content of each shipment of oil received. Alternatively, the permittee shall have the oil supplier provide analyses on the sulfur content of the oil received.

Authority for Requirement: Iowa DNR Construction Permit 04-A-816

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 22.108(3)

Emission Point ID Number: 69

Associated Equipment

Associated Emission Unit ID Numbers: 69-31

Emission Unit vented through this Emission Point: 69-31
Emission Unit Description: NUVA Feeder Room (29 Fans)
Raw Material/Fuel: Fly Ash
Rated Capacity: 1.71 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 71**Associated Equipment**

Associated Emission Unit ID Number: 71-29

Emission Unit vented through this Emission Point: 71-29

Emission Unit Description: Welding Booth

Raw Material/Fuel: Welding Wire/Rods

Rated Capacity: 50 lbs/hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 04-A-817)

⁽¹⁾An exceedence 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 exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 04-A-817)

Pollutant: PM₁₀

Emission Limit: 0.20 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 04-A-817

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 15

Stack Opening (inches): 42 × 42

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 14,200

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-019-S6

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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 22.108(3)

Emission Point ID Number: 72**Associated Equipment**

Associated Emission Unit ID Number: 72-27

Emissions Control Equipment ID Number: CE5

Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 72-27

Emission Unit Description: West Side Coal Silo

Raw Material/Fuel: Coal

Rated Capacity: 550 Tons/Hour

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: 20%

Authority for Requirement: Iowa DNR Construction Permit 78-A-093-S1
567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 78-A-093-S1
567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limit: 15.0 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 78-A-093-S1

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution

control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 219

Stack Opening (inches, dia): 48

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 27,143

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-093-S1

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 72-27

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: West Side Coal Silo
Identification: EU 72-27

B. Control Equipment

Description: Baghouse
Identification: CE5

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 78-A-093-S1
PM₁₀ Emission Limit: 15.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 73**Associated Equipment**

Associated Emission Unit ID Number: 73-28
Emissions Control Equipment ID Number: CE6
Emissions Control Equipment Description: Pulse Jet Baghouse

Emission Unit vented through this Emission Point: 73-28
Emission Unit Description: East Side Coal Silo
Raw Material/Fuel: Coal
Rated Capacity: 550 Tons/Hour

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: 20%

Authority for Requirement: Iowa DNR Construction Permit 78-A-092-S1
567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 78-A-092-S1
567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limit: 20.0 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 78-A-092-S1

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution

control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 219

Stack Opening (inches, dia): 50.75

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 37,631

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-092-S1

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Relevant requirements of CAM plan for this equipment: PM₁₀

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan for EU 73-28

The facility shall develop procedures to implement this CAM plan within 15 days after the issuance date of this permit.

I. Background

A. Emissions Unit

Facility: IPL – Ottumwa Generating Station
Description: East Side Coal Silo
Identification: EU 73-28

B. Control Equipment

Description: Baghouse
Identification: CE6

C. Applicable Regulation and Emission Limit

Regulation No.: Iowa DNR Construction Permit 78-A-092-S1
PM₁₀ Emission Limit: 20.0 lb/hr

II. Monitoring Approach

A. Indicator

Pressure drop across the filter bags is the indicator of the performance of the baghouse.

B. Indicator Range

Normal operating pressure drop range is between 2 and 10 inches of water. An excursion is triggered when the pressure drop across the filter bags is outside the normal operating range for a period of more than five (5) minutes.

C. Measurement Approach

Pressure drop shall be checked daily to ensure that the baghouse is operating inside the normal operating pressure drop range.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is triggered when total number of excursions exceeds ten (10) times during a semi-annual reporting period (January 1 to June 30, or July 1 to December 31). A deviation shall be reported in the semi-annual report when the QIP threshold is triggered.

E. Performance Criteria

Data representativeness: Pressure drop of less than 2 or more than 10 inches of water would indicate a decrease in the performance of the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the baghouse is in operation. If a pressure drop of less than 2 or more than 10 inches of water for more than five (5) minutes is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the baghouse is in operation. Records of the readings shall be maintained for five years.

III. Routine Maintenance

A. Weekly Monitoring and Corrective Actions

- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the screw conveyor, rotary airlock, reducer, and drive motor for signs of jamming, leakage, wear or broken parts.

If there is a problem with any of this equipment, corrective actions will be taken to diagnose the problem and make repairs.

B. Annual Inspections During Planned Unit Outages

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect and lubricate the screw conveyor, rotary airlock, reducer, and drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

C. Recordkeeping

Records of all weekly inspections and any actions resulting from these inspections and records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

D. Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)
40 CFR 64

Emission Point ID Number: 75**Associated Equipment**

Associated Emission Unit ID Numbers: 23

Emission Unit vented through this Emission Point: 23
Emission Unit Description: Parts Washer, Main Building
Raw Material/Fuel: Parts Washing Solvent
Rated Capacity: 125 Gallons

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: 40%⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 99-A-175-S2)

⁽¹⁾ An exceedence 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 exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 99-A-175-S2)

Pollutant: PM₁₀

Emission Limit: 0.257 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 99-A-175-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 0.50 tpy

Authority for Requirement: Iowa DNR Construction Permit 99-A-175-S2

Operational Limits & Requirements

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

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR

1. Maintain records demonstrating VOC emissions do not exceed 0.5 tons per twelve-month rolling total.
2. Maintain all MSDS sheets for materials used in the parts washer.

Authority for Requirement: Iowa DNR Construction Permit 99-A-175-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 45

Stack Opening (inches, dia): 6

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 300

Discharge Style: Vertical w/ Obstructing Rain Cap

Authority for Requirement: Iowa DNR Construction Permit 99-A-175-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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 22.108(3)

Emission Point ID Number: 78**Associated Equipment**

Associated Emission Unit ID Number: 78-18
Emissions Control Equipment ID Number: CE8
Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: 78-18
Emission Unit Description: Cargill Coal Silo
Raw Material/Fuel: Coal
Rated Capacity: 350 Tons/Hour

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: 20%

Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 04-A-818)
40 CFR 60 Subpart Y

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 04-A-818)

Pollutant: PM₁₀

Emission Limit: 0.20 lb/hr expressed as the average of 3 runs

Authority for Requirement: Iowa DNR Construction Permit 04-A-818

Operational Limits & Requirements

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

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are

being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)
40 CFR 60 Subpart Y

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 79
Stack Opening (inches): 6 × 11
Exhaust Temperature (°F): 70
Exhaust Flowrate (scfm): 1,034
Discharge Style: Vertical Unobstructed
Authority for Requirement: Iowa DNR Construction Permit 04-A-818

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes No
Relevant requirements of O & M plan for this equipment: Particulate Matter

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)

**AGENCY OPERATION & MAINTENANCE PLAN
BAGHOUSE FOR PARTICULATE CONTROL**

Facility:	IPL - Ottumwa Generating Station
EQ Number:	92-2774
Emission Unit:	EU 78-18 Coal Handling System
Emission Point:	EP 78 Exhaust vents from Dust Control Baghouses
Control Equipment:	CE8

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, or the presence of a monitored abnormal condition. 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 excursion to the department and conduct source testing within 90 days of the excursion to demonstrate compliance with applicable requirements. If the test demonstrates compliance with the 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, will propose a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

Monitoring Methods and Corrective Actions

General

- Periodic Monitoring is not required when the source is not operated for time periods greater than one day.

Weekly Monitoring and Corrective Actions

- Inspect the differential pressure across the bags. Confirm that the pressure is within the manufacturer's recommended operating range (2 – 10 inches of water).
- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the drive motor for signs of jamming, leakage, wear or broken parts.
- Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity of greater than

20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity 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 all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Inspections During Planned Unit Outages (Annually)

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.
- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect the drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

Record Keeping and Reporting

- Records of all weekly inspections and any actions resulting from these inspections will be kept for five (5) years, including the differential pressure readings and the visual opacity observations.
- Records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 79**Associated Equipment**

Associated Emission Unit ID Number: 79-18

Emission Unit vented through this Emission Point: 79-18
Emission Unit Description: Cargill Silo Truck Loading Chute
Raw Material/Fuel: Coal
Rated Capacity: 700 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 80**Associated Equipment**

Associated Emission Unit ID Number: 80-22

Emission Unit vented through this Emission Point: 80-22

Emission Unit Description: Fly Ash Silo Unloading Chute and C-Stone Production

Raw Material/Fuel: Fly Ash

Rated Capacity: 1,000 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 81**Associated Equipment**

Associated Emission Unit ID Number: 81-17
Emissions Control Equipment ID Number: CE7
Emissions Control Equipment Description: Reverse Pulse Baghouse

Emission Unit vented through this Emission Point: 81-17
Emission Unit Description: Soda Ash Silo
Raw Material/Fuel: Soda Ash
Rated Capacity: 30 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 84-A-050-S3)

⁽¹⁾ An exceedence 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 exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 84-A-050-S3)

Pollutant: PM₁₀

Emission Limit: 0.0143 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 84-A-050-S3

Operational Limits & Requirements

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

Word Practice Requirements:

The control equipment shall be operated and maintained according to manufacturer's specifications.

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR.

A record of all maintenance and repair to the control equipment.

Authority for Requirement: Iowa DNR Construction Permit 84-A-050-S3

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 113

Stack Opening (inches): 48 × 48

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 16.7 scfm (displacement)

Discharge Style: Downward

Authority for Requirement: Iowa DNR Construction Permit 84-A-050-S3

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes No

Relevant requirements of O & M plan for this equipment: Particulate Matter

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)

**AGENCY OPERATION & MAINTENANCE PLAN
BAGHOUSE FOR PARTICULATE CONTROL**

Facility:	IPL - Ottumwa Generating Station
EQ Number:	92-2774
Emission Unit:	EU 81-17 Soda Ash Handling System
Emission Point:	EP 81 Exhaust vents from Dust Control Baghouses
Control Equipment:	CE7

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, or the presence of a monitored abnormal condition. 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 excursion to the department and conduct source testing within 90 days of the excursion to demonstrate compliance with applicable requirements. If the test demonstrates compliance with the 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, will propose a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

Monitoring Methods and Corrective Actions

General

- Periodic Monitoring is not required when the source is not operated for time periods greater than one day.

Weekly Monitoring and Corrective Actions

- Inspect the differential pressure across the bags. Confirm that the pressure is within the manufacturer's recommended operating range (2 – 10 inches of water).
- Inspect the compressed air pulsing system for any abnormal conditions.
- Inspect the drive motor for signs of jamming, leakage, wear or broken parts.

Inspections During Planned Unit Outages (Annually)

- Thoroughly inspect bags for leaks and wear. Bag removal is not required during this inspection.

- Inspect the compressed air pulsing system for loose connections, air leaks, and excessive wear.
- Inspect the drive motor according to the manufacturer's service bulletins.
- Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts, and access doors.

The appropriate measures and/or action plan for remediation will be implemented to assure the control equipment will operate properly before the end of the unit outage period.

Record Keeping and Reporting

- Records of all weekly inspections and any actions resulting from these inspections will be kept for five (5) years, including the differential pressure readings and the visual opacity observations.
- Records of all planned unit outage inspections and any actions resulting from these inspections will be kept for five (5) years.

Quality Control

- All instruments and equipment will be calibrated, maintained, and operated according to the manufacturer's recommendations.
- An inventory of spare parts will be maintained. Parts will be re-ordered as they are used.

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 92**Associated Equipment**

Associated Emission Unit ID Number: 92-48

Emission Unit vented through this Emission Point: 92-48
Emission Unit Description: Emergency Generator
Raw Material/Fuel: # 2 Fuel Oil
Rated Capacity: 88.7 Gallons/Hour, 1,207 hp

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: 40% ⁽¹⁾

⁽¹⁾ An exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 99-A-177)

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

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

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"

Operational Limits & Requirements

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

Hours of operation:

- A. The facility is limited to operating the emergency generator for a maximum of 500 hours per year.

Authority for Requirement: Iowa DNR Construction Permit 99-A-177

Process throughput:

- A. The facility is limited to operating the emergency generator with an indicator opacity of 10% or less.
- B. The facility is limited to consuming a maximum of 44,350 gallons of diesel fuel with a sulfur content of 0.5 weight percent or less per rolling 12-month period.

Authority for Requirement: Iowa DNR Construction Permit 99-A-177

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR.

- A. Record the time the generator is operated on a rolling 12-month basis.
- B. Record the amount of fuel used on a rolling 12-month basis, this may be done using fuel bills or a fuel meter.
- C. Record the sulfur content of the fuel when each new shipment of fuel is received and maintained records on a rolling 12-month basis, this may be done using fuel bills.

Authority for Requirement: Iowa DNR Construction Permit 99-A-177

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 92

Stack Opening (inches, dia): 24

Exhaust Temperature (°F): 900

Exhaust Flowrate (acfm): 29,700

Discharge Style: Vertical Obstructed

NOTE: The stack is greater than 100 feet away from any property line, emissions are below all regulatory standards, and the stack is limited to a vertical obstructed stack (rain cap).

Authority for Requirement: Iowa DNR Construction Permit 99-A-177

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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 22.108(3)

Emission Point ID Number: 94**Associated Equipment**

Associated Emission Unit ID Number: 94-36

Emission Unit vented through this Emission Point: 94-36
Emission Unit Description: Economizer Hydroveyor Fly Ash Separator
Raw Material/Fuel: Fly Ash
Rated Capacity: 15 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 99-A-178-S2)

⁽¹⁾ An exceedence of the indicator opacity of (20%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 99-A-178-S2)

Pollutant: PM₁₀

Emission Limit: 0.20 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 99-A-178-S2

Operational Limits & Requirements

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

The facility shall operate the Fly Ash Hydroveyor according to manufacture's specifications.

Authority for Requirement: Iowa DNR Construction Permit 99-A-178-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 219

Stack Opening (inches, dia): 12

Exhaust Temperature (°F): 70

Exhaust Flowrate (scfm): 374

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 99-A-178-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

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 22.108(3)

Emission Point ID Number: 98

Associated Equipment

Associated Emission Unit ID Number: 98

Emission Unit vented through this Emission Point: 98

Emission Unit Description: Ash Pond Dredging

Raw Material/Fuel: Ash

Rated Capacity: 20 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 99**Associated Equipment**

Associated Emission Unit ID Number: 99

Emission Unit vented through this Emission Point: 99

Emission Unit Description: Portable Coal Screener

Raw Material/Fuel: Coal

Rated Capacity: 400 Tons/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

Pollutant: Opacity

Emission Limit: 20%

Authority for Requirement: 567 IAC 23.1(2)"v" (Iowa DNR Construction Permit 96-A-979-S1)
40 CFR 60 Subpart Y

Operational Limits & Requirements

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

Operating Limits

A. This source shall not screen more than 300,000 tons of coal per year.

Authority for Requirement: Iowa DNR Construction Permit 96-A-979-S1

Reporting & Record keeping:

All records, as required below, shall be satisfactory for demonstrating compliance with all applicable operating limits. Records shall be kept on-site for at least five (5) years and shall be available for inspection by the IDNR

Record the annual amount of coal that is screened on a rolling-12-month basis for each month of operation.

Authority for Requirement: Iowa DNR Construction Permit 96-A-979-S1

NSPS Requirements:

The opacity standard shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. 40 CFR 60.11(c)

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. 40 CFR 60.11(d)

The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. 40 CFR 60.12

Authority for Requirement: 567 IAC 23.1(2)"v"
40 CFR 60 Subpart Y

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Opacity Monitoring:

The following opacity monitoring is not required if the unit does not operate any time during a calendar month.

The facility shall check the opacity monthly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The facility shall use EPA Method 9 with a certified smoke reader for the monitoring method. The observation time shall not be less than 30 minutes.

If an opacity > 20% 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.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

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 22.108(3)

Emission Point ID Number: 100

Associated Equipment

Associated Emission Unit ID Number: 100

Emission Unit vented through this Emission Point: 100

Emission Unit Description: Coal Pile Bulldozing

Raw Material/Fuel: Coal

Rated Capacity: 2 Bulldozers/Hour

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: Fugitive Dust

Emission Limit: 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, without taking reasonable precautions to prevent a nuisance. All persons 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.

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

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 22.108(3)

Emission Point ID Number: 200

Associated Equipment

Associated Emission Unit ID Number: 200
Emissions Control Equipment ID Number: CE200
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 200
Emission Unit Description: Fly Ash Facility
Raw Material/Fuel: Fly Ash
Rated Capacity: 15 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.1(2)"d"

Iowa DNR Construction Permit 05-A-613

⁽¹⁾ 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: PM₁₀

Emission Limit: 1.0 lb/hr^(3,4)

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

Iowa DNR Construction Permit 05-A-613

⁽³⁾ Emission limit set to ensure the project is not major for Prevention of Significant Deterioration (PSD) purposes.

⁽⁴⁾ Emission rate used in facility-wide modeling to demonstrate no exceedances of the National Ambient Air Quality Standards (NAAQS).

Pollutant: PM

Emission Limit: 0.1 gr/dscf , 1.0 lb/hr⁽²⁾

Authority for Requirement: 567 IAC 23.1(2)"a"

Iowa DNR Construction Permit 05-A-613

⁽²⁾ Emission limit set to ensure the project is not major for Prevention of Significant Deterioration (PSD) purposes.

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 7

Stack Opening (inches, dia): 20 x 48

Exhaust Temperature (°F): 150

Exhaust Flowrate (scfm): 20,000

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 05-A-613

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant: Opacity⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-613 issued on 7/12/05)

Test Method: 40 CFR 60, Appendix A, Method 9

Test Run Time=1-hour

Authority for Requirement: Iowa DNR Construction Permit 05-A-613

Pollutant: PM⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-613 issued on 7/12/05)

Test Method: Iowa Compliance Sampling Manual Method 9

Test Run Time=3-hours

Authority for Requirement: Iowa DNR Construction Permit 05-A-613

Pollutant: PM10⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-613 issued on 7/12/05)

Test Method: 40 CFR 51, Appendix M, 201A with 202

Test Run Time=5-hours

Authority for Requirement: Iowa DNR Construction Permit 05-A-613

⁵ Testing on this emission point is required to be done simultaneously with the initial compliance testing required on EP 201 (permit number 05-A-614).

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.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan 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 22.108(3)

Emission Point ID Number: 201

Associated Equipment

Associated Emission Unit ID Number: 200
Emissions Control Equipment ID Number: CE201
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 201
Emission Unit Description: Fly Ash Facility
Raw Material/Fuel: Fly Ash
Rated Capacity: 15 Tons/Hour

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: 40% ⁽¹⁾

Authority for Requirement: 567 IAC 23.1(2)"d"

Iowa DNR Construction Permit 05-A-614

⁽¹⁾ 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: PM₁₀

Emission Limit: 1.0 lb/hr^(3,4)

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

Iowa DNR Construction Permit 05-A-614

⁽³⁾ Emission limit set to ensure the project is not major for Prevention of Significant Deterioration (PSD) purposes.

⁽⁴⁾ Emission rate used in facility-wide modeling to demonstrate no exceedances of the National Ambient Air Quality Standards (NAAQS).

Pollutant: PM

Emission Limit: 0.1 gr/dscf, 1.0 lb/hr⁽²⁾

Authority for Requirement: 567 IAC 23.1(2)"a" (Iowa DNR Construction Permit 05-A-614)

⁽²⁾ Emission limit set to ensure the project is not major for Prevention of Significant Deterioration (PSD) purposes.

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 7

Stack Opening (inches, dia): 20 x 48

Exhaust Temperature (°F): 150

Exhaust Flowrate (scfm): 20,000

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 05-A-614

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant: Opacity⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-614 issued on 7/12/05)

Test Method: 40 CFR 60, Appendix A, Method 9

Test Run Time=1-hour

Authority for Requirement: Iowa DNR Construction Permit 05-A-614

Pollutant: PM⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-614 issued on 7/12/05)

Test Method: Iowa Compliance Sampling Manual Method 9

Test Run Time=3-hours

Authority for Requirement: Iowa DNR Construction Permit 05-A-614

Pollutant: PM10⁽⁵⁾

1st Stack Test to be Completed – Within **60** days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment. (05-A-614 issued on 7/12/05)

Test Method: 40 CFR 51, Appendix M, 201A with 202

Test Run Time=5-hours

Authority for Requirement: Iowa DNR Construction Permit 05-A-614

⁵ Testing on this emission point is required to be done simultaneously with the initial compliance testing required on EP 200 (permit number 05-A-613).

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.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan 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 22.108(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 chapter 22.

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 22.108(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 22.105 (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 22.108 (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 22.108 (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 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(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 present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. 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 22.105(2). *567 IAC 22.105*

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 22.107 (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 22.108 (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 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 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 following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
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 22.115(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 22.108 (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 22.108 (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 24.2(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 22.108(4), 567 IAC 22.108(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 22;
- b. Compliance test methods specified in 567 Chapter 25; 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 22.108(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) 281-8694 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. 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. Oral 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 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(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 oral report may be made 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 oral 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 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

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 22.108(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 22.
 - 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.
 - e. The changes comply with all applicable requirements.
 - f. For such a 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.
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 22.110(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 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(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 22.110(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 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do 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 Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

- i. Do not violate any applicable requirements
- 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 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.

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 22.107(4), that the proposed modification meets the criteria for use of a 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 22.107(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 22.112(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, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant 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 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 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 22.105(1)"a"(4)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 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, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 *except* 23.2(3)"h"; 567 IAC 23.2(3)"h" - 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 22.108(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 substance 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 22.108(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 June 25, 1993.
 - 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 22.108(17)"a"*, *567 IAC 22.108(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 June 25, 1993, 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 22.114(1)*
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 22.114(2)*

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 22.108 (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 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (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 to determine transferability of the permit. *567 IAC 22.111 (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 an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. 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. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. 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 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
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

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 25.1(7)"a", 567 IAC 25.1(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:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(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
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

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

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
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

401 SW 7th Street, Suite I
Des Moines, IA 50309
(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 Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

VI. Appendix A: Acid Rain Phase II Permit

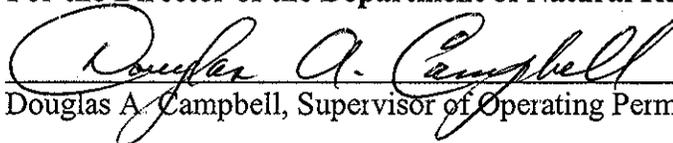


AIR QUALITY BUREAU
7900 Hickman Rd., Suite 1
Urbandale, IA 50322

Phase II Acid Rain Permit

Issued to: Ottumwa Generating Station
Operated by: Alliant Power
ORIS code: 6254
Effective: September 15, 2005 through September 14, 2010

For the Director of the Department of Natural Resources


Douglas A. Campbell, Supervisor of Operating Permits Section

9/15/05
Date

Acid Rain Permit comprises the following:

- 1) Statement of Basis.
- 2) SO₂ allowances allocated under this permit and NO_x requirements for each affected unit.
- 3) Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements or conditions.
- 4) The permit application submitted for this source, as corrected by the Iowa Department of Natural Resources (IDNR), Air Quality Bureau, Operating Permit Section. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

1) Statement of Basis

Statutory and Regulatory Authorities: In accordance with Iowa Code paragraph 455B 133[8"a"], and Titles IV and V of the Clean Air Act, the Iowa Department of Natural Resources (IDNR), Air Quality Bureau, Operating Permit Section issues this permit pursuant to 567 Iowa Administrative Code (IAC) 22.135(455B) to 22.145(455B) and 567 IAC 22.100(455B) to 22.116(455B). The compliance options are approved as proposed in the attached application.

2) SO₂ Allowance Allocations and NO_x Requirements for each affected unit

		2005	2006	2007	2008	2009	2010
Unit 1	SO ₂ allowances, under Table 2 of 40 CFR part 73.	19,088*	19,088*	19,088*	19,088*	19,088*	19,127*
	NO _x limit (Early Elect through Dec 31, 2007)	<p>Pursuant to 40 CFR part 76, The Iowa Department of Natural Resources approves a NO_x emissions limitation compliance plan for Unit 1. The early election portion of the NO_x compliance plan is effective beginning September 15, 2005 through December 31, 2007. Under the NO_x compliance plan, this unit's the annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emissions limitation under 40 CFR 76.5(a)(1), which is 0.45 lbs/mmBtu for tangentially fired units.</p> <p>On January 1, 2008, under the remainder of the NO_x compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation under 40 CFR 76.7(a)(1), which is 0.40 lbs/mmBtu for tangentially fired units.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and the requirements covering excess emissions.</p>					

* The number of allowances allocated to Phase II affected units by U.S. EPA in 40 CFR part 73 Table 2 (Revised September 28, 1998). In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to the unit SO₂ allowance allocations identified in this permit (See 40 CFR 72.84).

3) Comments, Notes and Justifications:

Renewal of the Phase II SO₂ and NO_x permit.

Note that the annual average nitrogen oxides (NO_x) emission limits are covered by the EPA approved NO_x Early Election Plan which is in effect from January 1, 1997 through December 31, 2007. On January 1, 2008 the NO_x emission limits change to the Revised NO_x emission limitations for Group 1, Phase II boilers (40 CFR 76.7).

4) Permit Application: Attached.

STEP 3

**Read the
standard
requirements**

Permit Requirements

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

**STEP 3,
Cont'd.**

Nitrogen Oxides Requirements The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

Ottumwa Generating Station
Plant Name (from Step 1)

Step 3,
Cont'd.

Liability, Cont'd.

- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Certification

Read the certification statement, sign, and date

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Daniel L. Mineck	
Signature		Date
		3-21-02



Phase II NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: New Revised

STEP 1
Indicate plant name, State, and ORIS code from NADB, if applicable.

Ottumwa Generating Station	IA	6254
Plant Name	State	ORIS Code

STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

ID#	ID#	ID#	ID#	ID#	ID#
1					
T					
Type	Type	Type	Type	Type	Type

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

(c) EPA-approved early election plan under 40 CFR 76.3 through 12/31/97 (also indicate above emission limit specified in plan)

(d) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

(f) Standard annual average emission limitation of 0.62 lb/mmBtu (for cell burner boilers)

(g) Standard annual average emission limitation of 0.62 lb/mmBtu (for cyclone boilers)

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

(i) Standard annual average emission limitation of 0.34 lb/mmBtu (for wet bottom boilers)

(j) NO_x Averaging Plan (include NO_x Averaging form)

(k) Common stack pursuant to 40 CFR 76.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)

(l) Common stack pursuant to 40 CFR 76.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include O₃ Averaging form)

Ottumwa Generating Station
Plant Name (from Step 1)

STEP 2, cont'd.

ID#	ID#	ID#	ID#	ID#	ID#
Type	Type	Type	Type	Type	Type

(m) EPA-approved common stack apportionment method pursuant to 40 CFR 76.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)

(n) AEL (include Phase II AEL Demonstration Period, Final AEL Permit, or AEL Renewal form as appropriate)

(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing

(p) Repowering extension plan approved or under review

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.8 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Daniel L. Mineck	
Signature	Date 12/9/97