



## Permitting Guidance for Prepared Feeds Manufacturing (Feed Mills) Facilities Not Subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart 7D

This permitting guidance is for facilities that are **not** subject the “7D NESHAP” (40 Code of Federal Regulations (CFR) Part 63, Subpart DDDDDDD).

### **Air Construction Permit – Directions for Obtaining a Construction Permit**

#### **Step One – Determine 7D NESHAP Applicability**

- A. First determine if your facility is subject to the 7D NESHAP. General information about rule applicability is given below.

##### **Applicability**

Rule applies to each prepared feeds manufacturing facility that:

- Is primarily engaged<sup>1</sup> in the manufacture of animal feed<sup>2</sup>;
- Uses a material containing chromium<sup>3</sup> or manganese<sup>4</sup>; and
- Is an area source of Hazardous Air Pollutants (HAP) emissions.

The rule does **not** apply to:

- Research or laboratory facilities as defined in section 112(c)(7) of the Clean Air Act;
- Facilities primarily engaged in raising or feeding animals; or
- Facilities engaged in the growing of crops that are used in the manufacture of feed.

##### **Affected Source**

The affected source is the collection of all equipment and activities necessary to produce animal feed from the point in the process where a material containing chromium or a material containing manganese is added, to the point where the finished animal feed product leaves the facility. This includes, but is not limited to, areas where materials containing chromium and manganese are stored, areas where materials containing chromium and manganese are temporarily stored prior to addition to the feed at the mixer, mixing and grinding processes, pelleting and pellet cooling processes, packing and bagging processes, crumblers and screens, bulk loading operations, and all conveyors and other equipment that transfer the feed materials throughout the manufacturing facility.

If you need additional information to make the applicability determination, you may [reference the rule](#).

For additional assistance in making this determination, please contact Michael Hermsen (515-725-9577), John Curtin (515-725-9522), or the Construction Permitting Helpline (877-247-4692) of the Iowa DNR, Air Quality Bureau.

- B. If you determine that you are **not** subject to the 7D NESHAP move on to step two.

#### **Step Two – Inventory the equipment or operations that have air emissions**

- A. Make a list of every piece of equipment at the facility that has the potential to emit an air contaminant into the air. This includes, but is not limited to: grain receiving pits/areas, grain handling, feed mixers, grain cleaning

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<sup>1</sup> A facility is *primarily engaged* in manufacturing animal feed if the production of animal feed comprises greater than 50 percent of the total production of the facility on an annual basis.

<sup>2</sup> Feed products produced for dogs and cats are not considered animal feed for the purposes of this subpart.

<sup>3</sup> *Material containing chromium* means a material that contains chromium (Cr) in amounts greater than or equal to 0.1 percent by weight.

<sup>4</sup> *Material containing manganese* means a material that contains manganese (Mn) in amounts greater than or equal to 1.0 percent by weight.

equipment, roller mills, hammermills, pellet cooler, feed load-out operations into truck or rail, storage bins, and boilers. It is not necessary to include plant roadways.

- B. After the equipment list is complete, indicate if the equipment: 1.) exhausts to the outside air, or 2.) is located outside, or 3.) is located inside a building and exhausts inside<sup>5</sup>.
- C. For the equipment that exhausts outside or is located outside, indicate if the equipment was installed after September 23, 1970. If the installation date is unknown, assume that it was installed after September 23, 1970.
- D. Determine if the equipment identified in Step C above was ever issued an air construction permit. Check your plant records, and if you are unsure, contact Michael Hermsen (515-725- 9577) or John Curtin (515-725-9522) of the Iowa DNR, Air Quality Bureau.
- E. For the equipment identified in Step C that does not have an air construction permit, go to Step Three below.

### Step Three – Determine if equipment is eligible for an exemption

- A. Check to see if an exemption from construction permitting applies. The exemptions can be found at 567 Iowa Administrative Code (IAC) rule 22.1. A copy of [rule 22.1](#) (click on Prepared Feeds) is available on the DNR’s website and on the [Construction Permitting Materials](#) page of the DNR’s website (scroll to Specific Application Forms & Guidance and click on Prepared Feeds). Or, contact Michael Hermsen (515-725-9577) or John Curtin (515-725-9522) of the Iowa DNR.
- B. If the equipment is eligible for a permit exemption, a permit is not required. If the Small Unit Exemption will be used, prepare a Small Unit Exemption Justification Document (EJD). [PERMIT NOT REQUIRED].
- C. If an exemption cannot be used, a permit must be obtained. [PERMIT REQUIRED].

### Step Four – Apply for Air Construction Permits

- A. Apply for an air construction permit for the equipment identified in Step Three that is required to have a permit [PERMIT REQUIRED].
- B. The Department highly encourages applicants to use the online application system called [Iowa EASY Air](#) to apply for construction permits. Additional information about using the EASY Air system can be found at the link above.

First, you will need to set up an account in Easy Air. Instructions for setting up an account are located on the [Iowa EASY Air](#) site.

If you have any questions about setting up your account, please direct your questions to the EASY Air Help Desk at [easyair@dnr.iowa.gov](mailto:easyair@dnr.iowa.gov), or by phone to 515-725-9569 or 515-725-9523.

Once you have obtained an account, login and go to your *Dashboard* and click on *Apply for a New Submittal* (you can also do this under the *Submittal* tab and *Start a New Submittal*). Then click on the *Start* button located under *Construction Standard Application* box. Follow the directions in the system to complete the application. For assistance completing the application, contact Michael Hermsen, [Michael.Hermsen@dnr.iowa.gov](mailto:Michael.Hermsen@dnr.iowa.gov) (515-725-9577), John Curtin, [John.Curtin@dnr.iowa.gov](mailto:John.Curtin@dnr.iowa.gov) (515-725-9522) or the Permit Help Line (1-877-AIR- IOWA).

You may also apply with a paper application. Paper application forms can be obtained from the DNR’s [Construction Permitting Materials](#) website.

#### Complete the following forms<sup>6</sup>:

- 1. Form FI – Facility Information
  - 2. Form AF – Construction Permit Application Fee
  - 3. Form CP – Application Cover Page
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|  
| → One of each form

<sup>5</sup> The Department is not pursuing permit applications for equipment that exhausts inside. A company may choose to permit this equipment, however, to limit its annual emissions. Emissions from indoor vented equipment are not excluded from determining a facility’s potential to emit for purposes of the Title V Operating Permit and New Source Review (NSR) programs. Therefore, a company may choose to permit this equipment to limit its potential annual emissions. For additional information on indoor venting sources see the [Indoor Venting Equipment Fact Sheet](#).

<sup>6</sup> Additional information may be required by the DNR review engineer.

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|---|---|---|--|
| 4. Form EI – Emission Inventory                 |   |   | per submittal                                  |
| 5. Form GHG – Greenhouse Gas Emission Inventory |   | ┘ |  |
| 6. Form EU – Emissions Unit Information         | → |   | One per equipment/operation                    |
| 7. Form EP – Emission Point Information         | → |   | One per emission point                         |
| 8. Form EC or Excel calculation spreadsheet     | → |   | One per equipment or submittal                 |
| 9. Form CE - Control Equipment Information      |   | ┘ |  |
| Form CE1 – Fabric Filter Information            |   |   | → One form for each control Form CE2 – Cyclone |
| Information                                     |   | ┘ | device used                                    |

- C. To complete each form please follow the individual instructions contained on the forms or in the Easy Air System. For the emissions calculations requested on Form EC, please use the calculator provided by the Iowa DNR (available from the DNR’s [Construction Permitting Materials](#) website (scroll down and click on Prepared Feeds)). Complete the spreadsheet for the equipment you are permitting and print and submit the results along with forms or attach them to the application if using Easy Air. To use the spreadsheet, input the required information, indicated by the highlighted (yellow) cells in the spreadsheet, and your emissions will be automated calculated. If you are requesting an annual limit on hours or throughput to limit the annual emissions, input these limits as part of the required information in the spreadsheet.
- D. For assistance, contact Michael Hermsen, [Michael.Hermsen@dnr.iowa.gov](mailto:Michael.Hermsen@dnr.iowa.gov) (515-725-9577), John Curtin, [John.Curtin@dnr.iowa.gov](mailto:John.Curtin@dnr.iowa.gov) (515-725-9522) or the Permit Help Line (1-877-AIR- IOWA).
- E. If a paper application is used, one signed copy of the application should be submitted to: Iowa DNR – Air Quality Bureau, Permit Log In, 502 E 9<sup>th</sup> St, Des Moines IA 50319.