

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Loparex, LLC, located at 2000 Industrial Park Road, Iowa City, Iowa 52240 has applied for a significant modification to their Title V Operating Permit. The designated responsible official of this facility is David Behr.
2. Loparex, LLC is a paper coated and laminated packaging plant. This facility consists of 67 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	31.52
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	31.52
Particulate Matter	PM	31.52
Sulfur Dioxide	SO ₂	0.15
Nitrogen Oxides	NO _x	25.68
Volatile Organic Compounds	VOC	981.41
Carbon Monoxide	CO	21.57
Lead	Lead	0.00
Hazardous Air Pollutants ⁽¹⁾	HAP	969.00

⁽¹⁾ May include the following: Arsenic, Benzene, Beryllium, Cadmium, Chromium, Cobalt, Ethyl Benzene, Ethylene Glycol, Formaldehyde, Hexane, Manganese, Mercury, Naphthalene, Nickel, Toluene, and Xylene..

3. Loparex, LLC submitted an application for a significant Title V Operating Permit modification on April 13, 2020. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of a significant permit modification specified in 567 IAC 22.107 and 567 IAC 22.113.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from October 15, 2020 through November 14, 2020. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Chris Kjellmark at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Chris Kjellmark at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the application for permit modification. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit modification does not preclude the DNR from pursuing enforcement action for any violation.

Title V Application Review Notes R2-M001

Applicant:	Loparex, LLC
SIC Code:	2672
City:	Iowa City
County:	Johnson, Field Office 6
EIQ#:	92-2346
Facility#:	52-01-037
Permit #:	01-TV-005R2-M001
Reviewer:	Chris Kjellmark
Date:	10/13/2020

Facility Identification

Facility Name:	Loparex, LLC
Facility Location:	2000 Industrial Park Rd., Iowa City, IA 52240
Responsible Official:	Mr. David Behr
Phone:	(319) 341-5015

The Part 70 Title V Operating Permit for Loparex, LLC. The facility is a paper coated and laminated packaging plant. The Loparex, LLC. has 67 significant emission units and 2 insignificant emission units.

Title V Major Source Status by Pollutant:

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

The following amendments have been made to the Title V permit:

1. TV Permit number has been updated to 01-TV-005R2-M001 (pp. 1, 4, 7, 10, and footer).
2. The general conditions have been updated to the latest version.

Emission Point – Specific Conditions Changes

1. The stack testing requirements for Line 014/016, 17 and 18 have been removed as discussed below.

Loparex requested a reevaluation of the stack testing requirements for VOC sources at their facility. The Title V permit had required testing based on the Department's Periodic Monitoring Guidance but omitted the dates for testing in the final permit. What requirement the facility was supposed to demonstrate compliance with was not well documented in the permit writer notes. It is possible that the ton/yr threshold for requiring a test was exceeded but there are no short term (lb/hr) VOC limits to demonstrate compliance with in the Title V permit.

Loparex has a tons per year VOC limit for each of the oxidizers as well as a destruction efficiency requirement. Lines 17 and 18 were last tested in 2006. Line 014/016 was tested in 2012. These tests provided documentation of the capture efficiency, and the destruction efficiency. An oxidizer temperature was established during these tests in accordance with 40 CFR 63.3370(k). That temperature is used to demonstrate compliance in 15-minute intervals during operation of the oxidizer. Loparex submits quarterly monitoring reports to the IDNR summarizing the data collected by these CEMS.

Control equipment CE 014/016, CE 017, and CE 018 (Thermal Oxidizers) do qualify for VOC Compliance Assurance Monitoring (CAM) plans. However, the associated coating lines are subject to 40 CFR 63 Subpart JJJJ which requires monitoring meeting the CAM requirements and separate CAM plans are not needed. This decision was based on the fact that the facility has chosen to use an add-on control option from Subpart JJJJ. The facility will comply with the monitoring requirements in Subpart JJJJ for the oxidizers and capture systems.

Based on the fact that Loparex is doing continuous monitoring of the thermal oxidizers, has demonstrated the control efficiency of the control equipment in accordance with 40 CFR 63.3370(k) and has no short term limits to demonstrate compliance with the Department is removing the stack test requirements for Line 014/016, 17 and 18.