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. Xerxes Corporation, located at 515 West South Street, Tipton, Iowa 52772 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Thomas L. Tietjen.
2. Xerxes Corporation is a reinforced plastic operation facility. This facility consists of 15 emission units with potential emissions of:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Abbreviation</th>
<th>Potential Emissions (Tons per Year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (≤ 2.5 µm)</td>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>0.75</td>
</tr>
<tr>
<td>Particulate Matter (≤ 10 µm)</td>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>0.75</td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>PM</td>
<td>0.75</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>0.00</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>0.00</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>VOC</td>
<td>172.95</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>CO</td>
<td>0.00</td>
</tr>
<tr>
<td>Lead</td>
<td>Lead</td>
<td>0.00</td>
</tr>
<tr>
<td>Hazardous Air Pollutants&lt;sup&gt;(1)&lt;/sup&gt;</td>
<td>HAP</td>
<td>161.59</td>
</tr>
</tbody>
</table>

<sup>(1)</sup> May include the following: Styrene, N,N-Dimethylaniline (DMA), and Xylenes.

3. Xerxes Corporation submitted a Title V Operating Permit renewal application on December 20, 2021. 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 an operating permit specified in 567 IAC 22.107.

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 June 9, 2022 through July 9, 2022. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Jeremy James 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 Jeremy James 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 renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Jeremy James
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Des Moines, Iowa 50319-0034
Phone: (515) 725-9580
E-mail: Jeremy.james@dnr.iowa.gov

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 does not preclude the DNR from pursuing enforcement action for any violation.
Title V Permit Review Notes

Applicant: Xerxes Corporation
SIC Code: 3089 (Manufacturing of Reinforced Plastic)
City: Tipton
County: Cedar
EIQ#: 92-5586
Facility#: 16-01-004
Permit #: 99-TV-049R4
Reviewer: Jeremy James
Date: 6/9/22

Facility Identification

| Facility Name: | Xerxes Corporation |
| Facility Location: | 515 West South Street, Tipton, Iowa 52772 |
| Responsible Official: | Mr. Thomas L. Tietjen |
| Phone: | (952) 887-1816 |

Background:

Xerxes Corporation is a Reinforced Plastic Manufacturer plant (SIC 3089). Xerxes Corporation has applied to renew their Part 70 Title V Operating Permit. The facility consists of fifteen (15) significant emission units and four insignificant units. Xerxes Corporation manufactures underground storage tanks form reinforced plastic composite materials. The reinforced plastic operation at Xerxes Corporation in Tipton has the potential to emit over 100 ton/yr of styrene, a hazardous air pollution (HAP).

Regulatory Status:

Title V Major Source Status by Pollutant; see table below for details.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Major for Title V?</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>❌</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>❌</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>❌</td>
</tr>
<tr>
<td>VOC</td>
<td>✗</td>
</tr>
<tr>
<td>CO</td>
<td>❌</td>
</tr>
<tr>
<td>Lead</td>
<td>❌</td>
</tr>
<tr>
<td>Individual HAP</td>
<td>✗</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>✗</td>
</tr>
</tbody>
</table>

HAP emissions may include Styrene, N,N-Dimethylaniline (DMA), and Xylenes.
**Program Applicability**

PSD: NO  
Part 61 NESHAP: NO  
NSPS: NO  
Part 63 NESHAP: YES
  - NESHAP Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production and  

Acid Rain: NO  
Stratospheric Ozone Protection: NO  
Prevention of Accidental Releases: NO  
CAM: NO

**Potential Emissions (tons/yr)**

<table>
<thead>
<tr>
<th>PM$_{2.5}$</th>
<th>PM$_{10}$</th>
<th>PM</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
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<tr>
<td>0.75</td>
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Emission Point-Specific Comments

- These UST fiberglass tank fabrication molds have been grouped together into a CAP permit because of their similarities in rated capacities and applicable requirements.
- Furthermore, EP-S109C is a new emission point currently in the process of construction. Its estimated completion date is October 2022. All operational requirements for this emission point will become applicable at that time.
- No control equipment is associated with EP-S101~EP-S109C.
- The VOC limit is 162.9 tons per year.
- Stack testing is not required at this time.
- No O&M plan is required at this time.

EP-S110:
- This emission unit is used for the grinding and cutting operations. A two-stage mechanical separator and baghouse (fabric filter) is the control equipment. The dust collector was replaced with a modern unit in 2017.
- Limit for opacity is 40%.
- Limit for PM and PM10 is 0.171 lb/hr.
- No operational limits are required at this time.
- Facility O&M plan is required.

EP-S112:
- EP-S112 contains two polymer resin storage tanks. Since the previous Title V permit, two of the four existing resin storage tanks were permanently retired from service. Only two resin tanks are currently in operation at the plant.
- Emission limits for this emission point are not applicable at this time. These storage tanks are subject to NESHAP Subpart WWWW. See Plant-Wide Condition in the permit for detailed requirements.
- No O&M Plan is required at this time.

NOTE: There are hundreds of small styrene containers, including tanks, totes, vessels and buckets at the facility. These small containers are subject to NESHAP WWWW. However, considering the number and size of these small styrene containers, it is not practical to include them individually in the Title V permit. The DNR therefore included all these small containers under the work practice in the Plant-Wide Conditions section.

MISC-VOC:
- This emission point summarizes the plant-wide manufacturing aids and may include, but is not limited to putty, mold sealing, release agents, mold stripping and cleaning agents. The VOC limit is 10-tons per year. This emission point is subject to NESHAP Subpart WWWW and Subpart PPPP. See Plant-Wide Condition in the permit for detailed requirements.
- No O&M plan is required at this time.