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. Templeton Rye Spirits, LLC, located at 209 E 3rd St, Templeton, IA 51463, has applied for a Title V Operating Permit. The designated responsible official of this facility is Kevin Monroe.
2. Templeton Rye Spirits, LLC is a distillery. This facility consists of 41 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>PM2.5</td>
<td>4.23</td>
</tr>
<tr>
<td>Particulate Matter (≤ 10 μm)</td>
<td>PM10</td>
<td>3.40</td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>PM</td>
<td>3.62</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>SO2</td>
<td>6.57</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>NOx</td>
<td>7.14</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>VOC</td>
<td>236.48</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>CO</td>
<td>12.14</td>
</tr>
<tr>
<td>Lead</td>
<td>Lead</td>
<td>0</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (1)</td>
<td>HAP</td>
<td>1.67</td>
</tr>
</tbody>
</table>

(1) May include the following: Hexane, methane.

3. Templeton Rye Spirits, LLC submitted a Title V Operating Permit application on November 22, 2019 and any additional information describing the facility on May 10, 2022. 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 July 14, 2022 through August 13, 2022. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters 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 Zane Peters 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 permit application. The responsiveness summary and the final permit will be available to the public upon request.

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Des Moines, Iowa 50319-0034
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E-mail: zane.peters@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 Application Review Notes

Applicant: Templeton Rye Spirits, LLC
SIC Codes: 2085
City: Templeton
County: Caroll
EIQ#: 92-6990
Facility#: 14-07-002
Permit #: 22-TV-XXX
Reviewer: Zane Peters
Date: 7/13/22

Facility Identification

Facility Name: Templeton Rye Spirits, LLC
Facility Locations: 209 E 3rd St
Templeton, Iowa 51463
Responsible Official: Kevin Monroe
Phone: 712-669-8792

Background

Templeton Rye Spirits, LLC has applied for a Title V Operating Permit for their distillery facility located in Templeton. The original renewal application was received on 11/22/19. The facility currently consists of 41 significant emission units and 4 insignificant emission units.

Title V Applicability

<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>
Program Applicability

- PSD: NO
- Part 61 NESHAP: No
- Part 60 NSPS: Yes – Dc, VVa
- Major Source of HAPs: No
- Part 63 NESHAP: No
- Acid Rain: No
- Stratospheric Ozone Protection: No
- Prevention of Accidental Releases: No
- State Implementation Plan: No

General Facility Notes

On November 1, 2019, Plant Number 14-07-002 (currently known as Templeton Rye Spirits, LLC) submitted a construction permit application requesting changes to permits issued to this facility under Construction Permit Project No. 17-133.

Based on the review engineer’s site visit on 12/19/2019, the Department determined that the layout in the 2017 application for this warehouse (four rooms and each room with a fan and a stack) was not used to construct the warehouse. Instead, the warehouse is divided into two areas. Area #1 includes a barrel filling operation and Area #2 includes the barrel aging operation. These areas have been permitted separately under Construction Permit Project No. 19-373.

At the time of the Construction Permit Application for Project No. 17-133, Templeton Rye was minor for Title V and requested that the emissions from the barrel aging operation be considered fugitive. When Construction Permit 19-A-743 was issued on 09/01/2020, the Department determined that the emissions in the barrel aging building do not meet the definition of “fugitive emissions” and, as indicated in EPA’s fugitive emissions memo, “EPA is aware of warehouses in other source categories that collect emissions and thus a presumption is created that whiskey warehouse emissions could reasonably be collected. In addition, in a factual determination for a whiskey warehouse in the State of Indiana, EPA Region V found, after careful review, that emissions of the warehouse were not fugitive.”

This determination added 189.26 tons/yr of potential VOC emissions and therefore made the facility major for Title V.

Periodic Monitoring

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

The calculations provided with the permit applications indicated that no periodic monitoring is required for any emission points at this time.