# Iowa Department of Natural Resources
# Title V Operating Permit

## Name of Permitted Facility: Industrial Energy Applications, Inc. (Norplex)
## Facility Location: 665 Lybrand Street, Postville, IA 52162
## Air Quality Operating Permit Number: 21-TV-003
## Expiration Date: May 18, 2026

**Permit Renewal Application Deadline: December 18, 2025**

**EIQ Number: 92-6769**
**Facility File Number: 03-02-007**

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**Responsible Official**
**Name: Mr. Bryan McGlothlin**
**Title: Vice President**
**Mailing Address: 2050 Boyson Road Suite 100, Hiawatha, IA 52233**
**Phone #: (319) 551-2541**

**Permit Contact Person for the Facility**
**Name: Mr. Steve Kent**
**Title: Director of Operations**
**Mailing Address: 2050 Boyson Road Suite 100, Hiawatha, IA 52233**
**Phone #: (319) 361-9514**

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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 exist for Industrial Energy Applications, Inc. (Norplex) and Industrial Laminates/Norplex, Inc. These two facilities constitute one stationary source. This permit is for Industrial Energy Applications, Inc. (Norplex) (Facility # 03-02-007).

**For the Director of the Department of Natural Resources**

Marnie Stein

05/18/2021

Marnie Stein, Supervisor of Air Operating Permits Section — Date

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## Abbreviations

acfm.....actual cubic feet per minute
CFR.....Code of Federal Regulation
CE .....control equipment
CEM.....continuous emission monitor
$^{o}$F .....degrees Fahrenheit
EIQ.....emissions inventory questionnaire
EP.....emission point
EU .....emission unit
gr./dscf .....grains per dry standard cubic foot
gr./100 cf .....grains per one hundred cubic feet
IAC.....Iowa Administrative Code
IDNR.....Iowa Department of Natural Resources
MVAC.....motor vehicle air conditioner
NAICS.....North American Industry Classification System
NSPS .....new source performance standard
ppmv .....parts per million by volume
lb./hr .....pounds per hour
lb./MMBtu .....pounds per million British thermal units
SCC .....Source Classification Codes
scfm.....standard cubic feet per minute
SIC Standard Industrial Classification
TPY .....tons per year
USEPA.....United States Environmental Protection Agency

Pollutants
PM.....particulate matter
$PM_{10}$.....particulate matter ten microns or less in diameter
$SO_2$.....sulfur dioxide
$NO_x$ .....nitrogen oxides
VOC volatile organic compound
CO.....carbon monoxide
HAP.....hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Industrial Energy Applications, Inc. (Norplex)
Permit Number: 21-TV-003

Facility Description: Electric Services (SIC 4911)

**Equipment List**

| Emission Point Number | Emission Unit Number | Emission Unit Description | IDNR Construction Permit Number |
|---|---|---|---|
| EP-1 | EU-1 | Diesel IC Engine used for non-emergency power (Generator #1) | 93-A-156-S2 |
| EP-003 | | | 20-A-175 |
| EP-S02 | EU-2 | Non-Emergency Diesel Engine 1000 kW | 14-A-297 |

# II. Plant-Wide Conditions

Facility Name: Industrial Energy Applications, Inc. (Norplex)
Permit Number: 21-TV-003

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

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**Permit Duration**

The term of this permit is: 5 years
Commencing on: May 18, 2021
Ending on: May 18, 2026

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.

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**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 ($SO_2$): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter:
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 on or 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"

Fugitive Dust: Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits 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 roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) 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 public 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 be 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, fertilizer 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.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

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

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# III. Emission Point-Specific Conditions

Facility Name: Industrial Energy Applications, Inc. (Norplex)
Permit Number: **21-TV-003**

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## Emission Point ID Numbers: EP-1, EP-003

Associated Equipment

| Emission Point # | Emission Unit # | Emission Unit Description | Maximum Design Capacity | Control Equipment Description | Permit # | Stack Testing |
|---|---|---|---|---|---|---|
| EP-1 | EU-1 | Diesel IC Engine used for non-emergency power (Generator #1) | 1616 BHP | Diesel Oxidation Catalyst (CE-1) on exhaust | 93-A-156-S2 | Yes |
| EP-003 | | | | Crankcase Filter (CE-003) | 20-A-175 | No |

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**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(s): 40%[(1)]
Authority for Requirement: 567 IAC 23.3(2)"d"
DNR Construction Permit 93-A-156-S2, 20-A-175

[(1)]An exceedance of the indicator opacity of 25% will require the owner or 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)
Emission Limit(s): 3.17 lb/hr, 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
DNR Construction Permit 93-A-156-S2, 20-A-175

Pollutant: Sulfur Dioxide ($SO_2$)
Emission Limit(s): 2.5 lbs/MMBTU
Authority for Requirement: 567 IAC 23.3(3)"b"(2)
DNR Construction Permit 93-A-156-S2, 20-A-175

Pollutant: Nitrogen Oxides ($NO_x$)
Emission Limit(s): 44.9 lb/hr
Authority for Requirement: DNR Construction Permit 93-A-156-S2, 20-A-175

Pollutant: Carbon Monoxide (CO)[(2)]
Emission Limit(s): 70% reduction or 23 ppmvd @ 15% $O_2$
Authority for Requirement: 567 IAC 23.1(4)"cz", 40 CFR Part 63, Subpart ZZZZ
DNR Construction Permits 93-A-156-S2, 20-A-175

[(2)]With exception of the CO limit, emission limit is applicable to the engine's exhaust stack and crankcase vent. The CO limit applies to the engine's exhaust stack only.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability:
*The following subparts apply to the emission unit(s) in these permits.*

| EU ID | Subpart | Title | Type | State Reference (567 IAC) | Federal Reference (40 CFR) |
|---|---|---|---|---|---|
| EU-1 | A | General Conditions | NA | 23.1(4) | §63.1 – §63.15 |
| | ZZZZ | Stationary Reciprocating Internal Combustion Engines | Existing | 23.1(4)"cz" | §63.6580 – §63.6675 |

**Operational Limits & Associated Recordkeeping**

A*ll records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:*

A. The owner or operator shall not operate the engine (EU-1) more than 500 hours per rolling twelve-month period.
    i. The owner or operator shall maintain the following monthly records:
        a. The number of hours that the engine operated; and
        b. The rolling 12-month total amount of the number of hours that the engine operated;
B. The engine (EU-1) is limited to burning diesel fuel oil that meets the requirements of Condition 5.C.
C. The diesel fuel oil burned in the engine (EU-1) shall meet the following specifications from 40 CFR 80.510(b) for nonroad diesel fuel:
    i. A maximum sulfur content of 15 ppm (0.0015%) by weight; and
    ii. A minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume.
D. The owner or operator of the engine (EU-1) shall comply with the requirements of Condition 5.C. listed above by one of the following methods:
    i. Have the fuel supplier certify that the fuel delivered meets the definition of non-road diesel fuel as defined in 40 CFR 80.510(b);
    ii. Obtain a fuel analysis from the supplier showing the sulfur content and cetane index or aromatic content of the fuel delivered; or
    iii. Perform an analysis of the fuel to determine the sulfur content and cetane index or aromatic content of the fuel received.

E. In accordance with §63.6625(g)(2) the crankcase of the engine (EU-1) is required to be equipped with a crankcase filtration emission control system. The filtration emission control system shall reduce emissions from the crankcase by removing oil mist, particulates, and metals.

F. The owner or operator must operate and maintain a continuous temperature monitoring device on the inlet of the catalytic oxidizer (CE-1) that meets the requirements of §63.6625(b). The owner or operator shall maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F, based on a 4-hour rolling average.

    i. The owner or operator shall maintain a record of the inlet temperature to the catalytic oxidizer (CE-1). The data shall be reduced to 4-hour rolling averages.

G. In accordance with Table 2b to Subpart ZZZZ of Part 63, the owner or operator shall maintain the catalyst (CE-1), so that the pressure drop across it does not change by more than 2 inches of water column from the pressure drop that was measured during the initial performance test. The average pressure drop measured during the initial performance test was 7 inches water column.

    i. The owner or operator shall maintain a record of the pressure drop across the catalyst (CE-1). The pressure drop shall be recorded at least once per month.

H. The owner or operator shall minimize the engine's time spent at idle and shall minimize each engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitation for CO apply.

I. The owner or operator shall submit semiannual compliance reports that shall cover the periods from January 1 to June 30 and from July 1 to December 31 of each year. The reports shall be submitted by July 31 or January 31, whichever is the first date after the end of the reporting period.[1] The report shall contain the following information:

    i. Company name and address;

    i. Statement by the responsible official, with that official's name, title and signature, certifying the accuracy and the content of the report;

    ii. Date of the report and the beginning and ending dates of the reporting periods;

    iii. A brief description of any:

        a. Malfunctions that may have caused any applicable emission limit to be exceeded. This shall include the date and duration of the malfunction and a description of what actions were taken during the malfunction to minimize emissions and to correct the malfunction;

        b. Deviations from any emission or operating limitations. This shall include the date and duration of the deviation and a description of what actions were taken to correct the deviation.

        c. Periods of time during which the continuous monitoring system was not operating.

    iv. If there were no malfunctions or deviations from the emission or operating limitations during the reporting period, a statement to that effect.

J. The owner or operator shall develop an operating and maintenance plan for the Diesel Oxidation Catalyst (CE-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

    i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Diesel Oxidation Catalyst (CE-1).

K. The owner or operator shall follow the manufacturer's specified maintenance requirements for operating and maintaining the open crankcase filtration system (CE-003) and for replacing the crankcase filter or can request that the Iowa DNR approve different maintenance requirements that are as protective as the manufacturer's requirements.

    i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the crankcase filter.

    ii. The owner or operator shall maintain a record on when the crankcase filter is changed.

Authority for Requirement: DNR Construction Permit 93-A-156-S2, 20-A-175

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

| EP ID | Stack Height, Feet | Discharge Style | Stack Opening, inches | Stack Temperature, °F | Exhaust Flowrate, SCFM |
|---|---|---|---|---|---|
| EP-01 | 20 Feet | Vertical, unobstructed | 12 inches | 780°F | 3700 scfm |
| EP-003 | 4 Feet | Horizontal | 2.25 inches | 100°F | 7 scfm |

Authority for Requirement: DNR Construction Permit 93-A-156-S2, 20-A-175

The temperature and flowrate 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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

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

**Stack Testing:**

Pollutant – Carbon Monoxide (CO)
1st Stack Test to be Completed by (date) – September 1, 2021
2nd Stack Test to be Completed between (dates) – Every 3 years[(1)]
Test Method – Method 10
Authority for Requirement: 40 CFR Part 60, Appendix A, Method 10[(2)]
40 CFR Part 63, Subpart ZZZZ
DNR Construction Permit 93-A-156-S2

[(1)] In accordance with Table 3 of 40 CFR Part 63, Subpart ZZZZ, the exhaust of the engine is required to be tested every 8760 hours of operation or every 3 years, whichever comes first. EU-1 was last tested on September 17, 2015. By the April 13, 2016 approval letter from the Department, the next performance test shall be conducted by September 1, 2021. The CO emissions standard to test against is either 23 ppmvd @ 15% $O_2$ in the exhaust gases or 70% reduction.

[(2)]Or, with Iowa DNR approval, alternative methods as indicated in Table 4 to Subpart ZZZZ.

**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-S02

Associated Equipment

| Emission Point # | Emission Unit # | Emission Unit Description | Maximum Design Capacity | Control Equipment Description | Permit # | Stack Testing |
|---|---|---|---|---|---|---|
| EP-S02 | EU-2 | Non-Emergency Diesel Engine 1000 kW | 71.6 gal/hr | Catalytic Oxidizer (CE-2) | 14-A-297 | Yes |

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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(s): 40%
Authority for Requirement: 567 IAC 23.3(2)"d"
DNR Construction Permit 14-A-297

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
DNR Construction Permit 14-A-297

Pollutant: Carbon Monoxide (CO)
Emission Limit(s): 70% reduction or 23 ppmvd @ 15% $O_2$
Authority for Requirement: 567 IAC 23.1(4)"cz"
40 CFR Part 63, Subpart ZZZZ
DNR Construction Permit 14-A-297

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability:
*The following subparts apply to the emission unit(s) in these permits.*

| EU ID | Subpart | Title | Type | State Reference (567 IAC) | Federal Reference (40 CFR) |
|---|---|---|---|---|---|
| EU-2 | A | General Conditions | NA | 23.1(4) | §63.1 – §63.15 |
| | ZZZZ | Stationary Reciprocating Internal Combustion Engines | Existing | 23.1(4)"cz" | §63.6580 – §63.6675 |

**Operational Limits & Requirements**

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

Operating limits

A. This generator is limited to burn diesel only.
B. The sulfur content of diesel fuel used in this generator shall not exceed 15 ppm, as required in 40 CFR §63.6604(a).
C. The operation hours of this generator shall not exceed 500 hours per 12-month rolling period.
D. The owner or operator shall maintain the catalytic oxidizer so that the pressure drop across the catalyst does not change by no more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial compliance testing, as required in Table 2b, 40 CFR §63.6603(a) [(1)].
E. The owner or operator shall install a continuous temperature monitoring device that meets the requirements in 40 CFR §63.6625(b), on the inlet of the catalytic oxidizer. The owner or operator shall maintain the generator exhaust temperature so that the catalyst inlet temperature is maintained between 450°F and 1,350°F.
F. The owner or operator shall follow the manufacturer's specified maintenance requirements for operating and maintaining the crankcase ventilation systems and replacing the crankcase filters, as required in 40 CFR §63.6625 (g).
G. The owner or operator shall minimize the generator idle time and start up time as required in 40 CFR §63.6625 (h).

Authority for Requirement: DNR Construction Permit 14-A-297

[(1)] Since the issuance of construction permit 14-A-297 this facility became one source with Norplex and therefore a major source. While this change doesn't affect the requirements the engine is subject to the citations are different for an engine at a major source. The reference to Table 2b, 40 CFR §63.6603(a) should be Table 2b, 40 CFR §63.6600(d).

Reporting & Record keeping

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:*

A. The owner or operator shall keep records of sulfur content in the diesel fuel.
B. The owner or operator shall keep records of the operating hours in this generator on the basis of 12-monthly rolling period.
C. The owner or operator shall maintain records of catalyst inlet temperature.
D. The owner or operator shall measure and record the pressure drop across the catalyst at least once per month.
E. The owner or operator shall meet the requirements of notifications, reports, and records in 40 CFR §63.6645, §63.6650, §63.6655, and §63.6660.

Authority for Requirement: DNR Construction Permit 14-A-297

**Emission Point Characteristics**
*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 32
Stack Opening, (inches, dia.): 12
Exhaust Flow Rate (scfm): 3,360
Exhaust Temperature (°F): 890
Discharge Style: Vertical, unobstructed
Authority for Requirement: DNR Construction Permit 14-A-297

The temperature and flowrate 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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

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

**Stack Testing:**

Pollutant: Carbon Monoxide (CO)
Periodic Testing to be Completed: Every 3 years(1)
Test Method: Method 10
Authority for Requirement: 40 CFR 60, Appendix A, Method 10(2)
40 CFR Part 63, Subpart ZZZZ
DNR Construction Permit 14-A-297

(1) In accordance with Table 3 of 40 CFR Part 63, Subpart ZZZZ, the exhaust of the engine is required to be tested every 8760 hours of operation or every 3 years, whichever comes first. EU-2 was last tested on September 10, 2018. By the April 13, 2016 approval letter from the Department, the next performance test shall be conducted by September 10, 2021 or as approved by the department. The CO emissions standard to test against is either 23 ppmvd @ 15% $O_2$ in the exhaust gases or 70% reduction.
(2)Or, with Iowa DNR approval, alternative methods as indicated in Table 4 to Subpart ZZZZ.

**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)

# 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"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"*

**G2. Permit Expiration**

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source’s right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *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 submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, 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 U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. 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 emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
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) 725-8694 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. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. 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. Initial 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 initial 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 initial report may be made by electronic mail (E-mail), 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 initial 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 situation 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 fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *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 (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 - 22.144(455B));.

e. The changes comply with all applicable requirements.

f. For each such 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. *567 IAC 22.110(1)*

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 does 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 Title V Permit Modification.

a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

i. Do not violate any applicable requirement;

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 an 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 under rule 567 - 22.113(455B).

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 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, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V 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, as those requirements that apply to Title V issuance and renewal.

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 22.111-567 IAC 22.113*

**G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *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 (*567 IAC 23.1(3)"a");* training fires and controlled burning of a demolished building *(567 IAC 23.2).*

**G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 <u>except</u> 23.2(3)"j"; 567 IAC 23.2(3)"j" - 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 or greenhouse gas generating substances 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 May 15, 2001.

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 July 21, 1992, 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)*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 22.114(3)*

**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 consistent with the requirements of 567 IAC 22.111(1). *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 applicable requirements of 567 – Chapter 23 or a permit condition. 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. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. 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
Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(515) 725-9526

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:

Iowa Compliance Officer
Air Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
(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
Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(515) 725-8200

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**
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**
Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(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**
Air Quality Branch
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

# V. Appendices

## Appendix A: Reference Web Links

40 CFR 63 Subpart A – General Provisions
http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.10.63.a

40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&r=SUBPART&n=sp40.14.63.zzzz

# Appendix B: Stack Testing Agreement

ES / Initials Con ID-1 / BH
CITY ID 03-02-007
ACT / Doc Code CO / GC

Fields of Opportunities

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

April 13, 2016

Charles Shain
Industrial Energy Applications, Inc.
200 1st Street SE, Suite 1500
Cedar Rapids, IA 52401

RE: RICE NESHAP Stack Testing Request

Dear Mr. Shain:

On September 1, 2015 Industrial Energy Applications, Inc. (IEA) submitted a request to the Iowa Department of Natural Resources (DNR) and Linn County Public Health (LCPH) to waive certain stack tests in accordance with 40 CFR 63.7(h). DNR and LCPH has determined that it is appropriate in this case to waive certain stack tests as proposed in IEA's supplemental request dated January 29, 2016.

**Background**

Based on information provided in the September 1, 2015 letter and discussions with IEA representatives on January 29, 2016, IEA operates several reciprocating internal combustion engines (RICE). IEA's engines are subject to the RICE National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart ZZZZ), including the emission limitations at 40 CFR 63.6603. IEA is required to either limit the concentration of carbon monoxide (CO) in the stationary RICE exhaust to 23 ppmvd at 15% $O_2$ or reduce CO emissions by 70% or more. In order to demonstrate compliance with either CO emission limitation, IEA is required to conduct stack testing in accordance with 40 CFR 63.6612, 63.6615, and 63.6620. IEA is required to conduct an initial stack test on each engine and then conduct subsequent stack tests in accordance with the RICE NESHAP.

On April 27, 2009, the Environmental Protection Agency (EPA) released a memorandum entitled "Clean Air Act National Stack Testing Guidance." Section VII.2 of this guidance document addresses stack test waivers. The guidance document states that units, although identical in terms of design and control devices, may have process operations that significantly alter their performance and ability to comply with the underlying regulatory requirements on a continuing basis and that stack tests should not be waived without adequate justification. A waiver may be appropriate on a case-by-case basis when criteria such as the following are met:

(1) the units are located at the same facility;
(2) the units are produced by the same manufacturer, have the same model number or other manufacturer's designation in common, and have the same rated capacity and operating specifications;
(3) the units are operated and maintained in a similar manner; and
(4) the delegated agency, based on documentation submitted by the facility,
  (a) determines that the margin of compliance for the identical units tested is significant and can be maintained on an on-going basis; or
  (b) determines based on a review of sufficient emissions data that, though the margin of compliance is not substantial, other factors allow for the determination that the variability of emissions for identical tested units is low enough for confidence that the untested unit will be in compliance. These factors may include, but are not limited to, the following:
    (i) historical records at the tested unit showing consistent/invariant load;

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515-725-9500 FAX 515-725-9501 www.IowaCleanAir.gov

(ii) fuel characteristics yielding low variability (e.g., oil) and therefore assurance that emissions will be constant and below allowable levels;
(iii) statistical analysis of a robust emissions data set demonstrate sufficiently low variability to convey assurance that the margin of compliance, though small, is reliable.

IEA's engines are not all located at the same facility, however IEA owns, controls, operates, and maintains all of the engines in its fleet. IEA has established groups of engines for representative testing having the same manufacturer, model number, and rating. Each engine is equipped with the same diesel oxidation catalyst (DOC) system and parametric monitoring system. All engines are operated and maintained in a similar manner. In addition, all of the engines completed testing for the initial RICE compliance demonstration. The CO concentrations and/or CO reduction measured during initial testing showed a large margin of compliance with little variability in the measurements. For these reasons, DNR and LCPH is approving the attached stack test schedule with the following conditions.

1) If any of the stack tests within a group of engines shows a violation of the applicable CO emission limitation then DNR or LCPH may require additional stack testing on all engines.

2) If any of the Limited Use engines change designation then DNR and LCPH shall be notified and may require additional stack testing.

3) Each engine within a group shall be tested at the same rate in order to be representative for the group.

If you have any questions regarding this letter, please contact Brian Hutchins at DNR or Shane Dodge at LCPH.

Sincerely,

Brian Hutchins
Air Quality Bureau
Iowa Department of Natural Resources
E-Mail: brian.hutchins@dnr.iowa.gov
Phone: (515) 725-9550

Shane Dodge
Air Quality Division
Linn County Public Health
E-Mail: Shane.Dodge@linncounty.org
Phone: (319) 892-6015

C: Field Office 1, 2 and 5 – DNR Field Services & Compliance Bureau (with attachment)

JJ

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21-TV-003, 05/18/2021

**DOC / DPF Environmental Testing Summary-Non Emergency Engines**
**(Note: All Engines Manufacturer is Caterpillar unless noted otherwise)**

| Site Name | Engine number | Mfg/Model | Rated KW (Prime) | Engine Load | Percent Load | DP | Avg. Inlet PPM | Avg. Outlet PPM | Reduction | Designated Limited Use | Test Date | Linn County vs IDNR | Proposed OC Testing Schedule | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| HyVee Marion | 1 | 3412 | 545 | 528 | 97% | 5 | 232 | 4 | 98.3% | Yes | 5/28/2013 | Linn County | 5/1/2018 | 5/1/2023 | | | |
| HyVee Johnson | 1 | 3508 | 725 | 679 | 94% | 5 | 365 | 4 | 98.9% | Yes | 5/29/2013 | Linn County | 5/1/2018 | | | | |
| HyVee Marshalltown | 1 | 3508 | 725 | 624 | 86% | 7 | 328 | 6 | 98.2% | Yes | 5/31/2013 | IDNR | | 5/1/2023 | | | |
| Life Investors | 1 | 3512 | 1050 | 953 | 91% | 7.3 | 251 | 7 | 97.0% | Yes | 9/11/2012 | Linn County | 9/1/2017 | | | | |
| Life Investors | 2 | 3512 | 1050 | 996 | 95% | 6.6 | 171 | 7 | 96.0% | Yes | 9/10/2012 | Linn County | | 9/1/2022 | | | |
| Marion Sub | 3 | 3512 | 1100 | 1058 | 96% | 5.8 | 361 | 9 | 97.0% | Yes | 8/15/2012 | Linn County | 6/1/2017 | | | | |
| Life Investors | 3 | 3512 | 1100 | 1003 | 95% | 7.7 | 306 | 17 | 95.0% | Yes | 9/11/2012 | Linn County | | 6/1/2022 | | | |
| Penford | 4 | 3512 | 1135 | 1125 | 99% | 10 | 247 | 22.33 | 91.0% | Yes | 6/25/2012 | Linn County | 6/1/2017 | | | | |
| Prairie Farms | 2 | 3512 | 1135 | 1099 | 97% | 9.2 | 220 | 6 | 97.0% | Yes | 9/18/2012 | IDNR | 6/1/2017 | | | | |
| Data Center | 2 | 3512 | 1135 | 1065 | 94% | 3.8 | 229 | 21 | 91.0% | Yes | 9/28/2012 | Linn County | | 6/1/2022 | | | |
| GE Capital | 1 | 3512 | 1135 | 1074 | 95% | 5 | 139 | 0.7 | 99.5% | Yes | 5/24/2013 | Linn County | | 6/1/2022 | | | |
| AY McDonald | 1 | 3512 | 1500 | 1450 | 97% | 5.9 | 260 | 12 | 95.0% | Yes | 9/17/2012 | IDNR | 9/1/2017 | 9/1/2022 | | | |
| Marion Sub | 1 | 3516 | 1500 | 1493 | 100% | 5.5 | N/A | 7 | <23 ppm | Yes | 8/14/2012 | Linn County | 6/1/2017 | | | | |
| Marion Sub | 2 | 3516 | 1500 | 1501 | 100% | 5.5 | 392 | 8 | 98.0% | Yes | 8/16/2012 | Linn County | 6/1/2017 | | | | |
| Marion Sub | 4 | 3516 | 1500 | 1503 | 100% | 5.5 | N/A | 3.3 | <23 ppm | Yes | 8/15/2012 | Linn County | | 6/1/2022 | | | |
| Data Center | 1 | 3516 | 1500 | 1401 | 93% | 7.9 | 42 | 2 | 95.0% | Yes | 9/28/2012 | Linn County | | 6/1/2022 | | | |
| Penford | 3 | 3516 | 1600 | 1576 | 99% | 8 | 158.33 | 11.33 | 92.8% | Yes | 6/25/2012 | Linn County | 6/1/2017 | | | | |
| AY McDonald | 2 | 3516 | 1600 | 1571 | 98% | 5.5 | 218 | 10 | 95.0% | Yes | 9/17/2012 | IDNR | 6/1/2017 | | | | |
| Donaldson | 1 | 3516 | 1600 | 1603 | 100% | 8.7 | 156 | 7 | 96.0% | Yes | 9/20/2012 | IDNR | 6/1/2017 | | | | |
| Rockwell | 1 | 3516 | 1600 | 1519 | 95% | 7.8 | 79.8 | 8.6 | 89.3% | Yes | 10/29/2012 | Linn County | 6/1/2017 | | | | |
| Rockwell | 2 | 3516 | 1600 | 1523 | 95% | 7.8 | 100.1 | 8 | 92.1% | Yes | 10/29/2012 | Linn County | 6/1/2017 | | | | |
| Rockwell | 3 | 3516 | 1600 | 1520 | 95% | 8.8 | 121.6 | 8 | 93.4% | Yes | 10/30/2012 | Linn County | 6/1/2017 | | | | |
| Rockwell | 4 | 3516 | 1600 | 1520 | 95% | 8.8 | 75.4 | 4.8 | 93.7% | Yes | 10/30/2012 | Linn County | 6/1/2017 | | | | |
| Rockwell | 5 | 3516 | 1600 | 1513 | 95% | 7.7 | 86.3 | 4.6 | 94.7% | Yes | 10/30/2012 | Linn County | | 6/1/2022 | | | |
| Rockwell | 6 | 3516 | 1600 | 1519 | 95% | 8.8 | 107.5 | 6.8 | 93.7% | Yes | 10/30/2012 | Linn County | | 6/1/2022 | | | |
| Rockwell | 7 | 3516 | 1600 | 1529 | 96% | 8.8 | 91 | 4.6 | 94.9% | Yes | 10/30/2012 | Linn County | | 6/1/2022 | | | |
| Rockwell | 8 | 3516 | 1600 | 1530 | 96% | 8.8 | 85.7 | 3.8 | 95.6% | Yes | 10/30/2012 | Linn County | | 6/1/2022 | | | |
| Rockwell | 9 | 3516 | 1600 | 1525 | 95% | 10 | 131.4 | 7.9 | 94.0% | Yes | 10/31/2012 | Linn County | | 6/1/2022 | | | |
| Rockwell | 10 | 3516 | 1600 | 1521 | 95% | 8.8 | 88.8 | 6 | 93.2% | Yes | 10/31/2012 | Linn County | | 6/1/2022 | | | |
| JBS USA | 1 | 3516 | 1600 | 1528 | 96% | 7 | 72.6 | 3.2 | 95.6% | Yes | 11/27/2012 | IDNR | 6/1/2017 | | | | |
| JBS USA | 2 | 3516 | 1600 | 1517 | 95% | 7 | 79.5 | 3.1 | 96.1% | Yes | 11/27/2012 | IDNR | 6/1/2017 | | | | |
| JBS USA | 3 | 3516 | 1600 | 1516 | 95% | 7 | 77.3 | 1 | 98.8% | Yes | 11/27/2012 | IDNR | 6/1/2017 | | | | |
| JBS USA | 4 | 3516 | 1600 | 1519 | 95% | 7 | 113.3 | 2.7 | 97.7% | Yes | 11/28/2012 | IDNR | | 6/1/2022 | | | |
| JBS USA | 5 | 3516 | 1600 | 1522 | 95% | 7 | 138.1 | 6.4 | 95.4% | Yes | 11/28/2012 | IDNR | | 6/1/2022 | | | |
| JBS USA | 6 | 3516 | 1600 | 1529 | 96% | 8 | 178.5 | 6.7 | 96.2% | Yes | 11/29/2012 | IDNR | | 6/1/2022 | | | |
| Penford | 2 | 3516 | 1600 | 1582 | 99% | 17.9 | N/A | 0 | <23 ppm | Yes | 12/20/2012 | Linn County | | 6/1/2022 | | | |
| Penford | 1 | 3516 | 1825 | 1830 | 100% | 17.5 | N/A | 0.55 | <23 ppm | Yes | 12/19/2011 | Linn County | 9/1/2016 | | | | |
| Prairie Farms | 1 | 3516 | 1825 | 1746 | 96% | 8.5 | 184 | 9 | 95.0% | Yes | 9/18/2012 | IDNR | | 9/1/2021 | | | |
| JBS USA | 7 | 3516 | 1825 | 1713 | 94% | 10 | 322.3 | 9.7 | 97.0% | Yes | 11/29/2012 | IDNR | | 9/1/2021 | | | |
| HyVee Collins (2 exhaust stacks) | North DOC | Cummins 750DFJA | 750 | 630 | 84% | 4 | 75.33 | 0.666 | 100.0% | Yes | 5/30/2013 | Linn County | 5/1/2018 | 5/1/2023 | | | |
| | South DOC | | | | | 4 | 68 | 0.333 | 99.7% | Yes | 5/30/2013 | Linn County | 5/1/2018 | 5/1/2023 | | | |
| North Pointe | 1 | Cummins KTTA50-G2 | 1500 | 1493 | 100% | 10.8 | 172 | 11 | 94.0% | Yes | 9/21/2012 | Linn County | 9/1/2017 | 9/1/2022 | | | |
| Toyota | 1 | 3516 (Gas) | 1040 | 994 | 96% | 3.3 | 255 | 5 | 98.0% | Yes | 9/12/2012 | Linn County | 9/1/2013 | 9/1/2014 | 9/1/2016 | 9/1/2018 | |
| Norplex | 1 | 3512 | 1135 | 1037 | 91% | 8 | 106 | 5 | 95.0% | No | 9/19/2012 | IDNR | 9/17/2015 | | 9/1/2021 | | |
| Norplex | 2 | 3512 | 1000 | 991 | 99% | 6 | NA | 15 | <23 ppm | Yes | 7/10/2014 | IDNR | | 9/1/2018 | | | |
| Eaton | 1 | 3516 | 1825 | 1706 | 94% | 5 | 354.7 | 12.7 | 96.4% | No | 7/23/2013 | IDNR | 7/1/2016 | | 7/1/2022 | | |
| Eaton | 2 | 3516 | 1825 | 1708 | 94% | 4 | 359.3 | 24.3 | 93.2% | No | 7/23/2013 | IDNR | 7/1/2016 | | 7/1/2022 | | |
| Eaton | 3 | 3516 | 1825 | 1712 | 94% | 7 | 417.7 | 20.7 | 95.1% | No | 7/22/2013 | IDNR | | 7/1/2019 | | | |
| Vertis/Quadgraphics | 1 | 3516 | 1500 | 1700 | 103% | 10 | 208.3 | 10 | 95.2% | Yes | 11/12/2012 | IDNR | Site decommisioned, engines in long-term layup, all fuel removed, testing to be scheduled based on recommissioning of site | | | | |
| Vertis/Quadgraphics | 2 | 3512 | 1000 | 1115 | 112% | 12.1 | 224.2 | 24.6 | 89.0% | Yes | 11/14/2012 | IDNR | | | | | |
| Vertis/Quadgraphics | 3 | 3512 | 1135 | 1150 | 115% | 12.1 | 176.2 | 24.5 | 86.1% | Yes | 11/13/2012 | IDNR | | | | | |

Industrial Energy Applications, Inc.
200 1st Street SE, Suite 1500
Cedar Rapids, IA 52401

1 September 2015

**Shane Dodge**
Air Quality Supervisor
Linn County Public Health
501 13th Street NW, Cedar Rapids, IA 52405

**BRIAN HUTCHINS**
Environmental Program Supervisor
Iowa Department of Natural Resources
7900 Hickman Rd., Suite 1,| Windsor Heights, IA 50324

Shane and Brian,

This letter is a formal request from Industrial Energy Applications to modify the testing schedule for the oxidation catalyst installed on our fleet of standby CI and SI RICE engines at required by Environmental Protection Agency (EPA) 40 CFR Part 63 subpart zzzz, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE NESHAP).

Earlier this year on 10 April 2015 a conference phone call between Charles Shain, Shane Dodge, and Brian Hutchins the requirements of testing were discussed and a plan was tentatively agreed upon by all three parties. A summary of the discussion and plan follows below:

In following the lead of EPA region 7 for national stack testing IEA will group their fleet of CI RICE by engine manufacture, engine model, engine use, and control device. This grouping is shown on the attached document along with the proposed testing schedule. All the current engines have completed initial compliance testing. Subsequent performance testing will be divided into two test cycles where ½ of the engines will be tested in each cycle. For limited use engines this is a five year test cycle and for the engines not designated limit use it is a three year test cycle. At the completion of this test plan, IEA while formally request through IDNR and Linn County Public health the testing schedule for the next round of stack testing. For IEA's one SI RICE the initial testing was performed in September 2012 with subsequent annual compliance test performed in September 2013 and 2014. Continued performance testing going forward shall be performed on a bi-annual basis with the next in September 2016.

Charles Shain, Maintenance Manager
Industrial Energy Applications