



Permitting Guidance for Prepared Feeds Manufacturing (Feed Mills) Facilities Subject to National Emission Standards for Hazardous Air Pollutants (NESHAP)

Subpart 7D Using the Small Unit Exemption

This permitting guidance is only for facilities affected under the “7D NESHAP” (40 Code of Federal Regulations (CFR) Part 63 Subpart DDDDDDD) that have been or will be using the **Small Unit Exemption**. It should not be used by facilities that are not subject to the 7D NESHAP.

Air Construction Permit – Directions for Obtaining a Construction Permit

Step One – Inventory the equipment or operations that have air emissions

- A. Make a list of every piece of equipment at the facility that has the potential to emit an air contaminant into the air. This includes, but is not limited to: grain receiving pits/areas, grain handling, feed mixers, grain cleaning equipment, roller mills, hammermills, pellet cooler, feed load-out operations into truck or rail, storage bins, and boilers. It is not necessary to include plant roadways.
- B. After the equipment list is complete, indicate if the equipment: 1.) exhausts to the outside air, or 2.) is located outside, or 3.) is located inside a building and exhausts inside¹.
- C. For the equipment that exhausts outside or is located outside, indicate if the equipment was installed after September 23, 1970. If the installation date is unknown, assume that it was installed after September 23, 1970.
- D. Determine if any of the equipment identified in Step C above was ever issued an air construction permit. Check your plant records, and if you are unsure, contact Michael Hermsen (515-725-9577) or John Curtin (515-725-9522) of the Iowa DNR, Air Quality Bureau.
- E. Determine if any of the equipment identified in Step C is currently under the Small Unit Exemption (SUE). To be eligible for the SUE, you must have a signed Exemption Justification Document.
- F. For the equipment identified in Step C that does not have an air construction permit or is currently under the SUE, go to Step Two below.

Step Two – Determine if equipment is eligible for an exemption

- A. Check to see if an exemption from construction permitting applies. The exemptions can be found at 567 Iowa Administrative Code (IAC) rule 22.1. A copy of rule [22.1](#) is available on the DNR’s website (click on Prepared Feeds) and on the [Construction Permitting Materials](#) page of the DNR’s website (scroll to Specific Application Forms & Guidance and click on Prepared Feeds). Or, contact Michael Hermsen (515-725-9577) or John Curtin (515-725-9522) of the Iowa DNR.
- B. The following equipment must obtain a permit because there is not an applicable exemption in rule 567-22.1: ingredient bins, feed mixers, pellet making equipment, pellet coolers², feed handling, feed bagging operations, bulk loadout of feed. The SUE can no longer be used for this equipment because the equipment is subject to requirements under the 7D NESHAP and must obtain a permit³. [PERMIT REQUIRED]
- C. The following equipment may still be eligible for a permit exemption: grain receiving pits/areas, grain storage bins, grain handling, grain grinding/milling equipment, and boilers. Review the list of exemptions in IAC 22.1(2) and confirm the applicability of the specific exemption. If the Small Unit Exemption will be used, prepare a Small Unit Exemption Justification Document (EJD). If an exemption cannot be used, a permit must be obtained. [PERMIT MAY BE REQUIRED]

¹ The Department is not pursuing permit applications for equipment that exhausts inside. A company may choose to permit this equipment, however, to limit its annual emissions. Emissions from indoor vented equipment are not excluded from determining a facility’s potential to emit for purposes of the Title V Operating Permit and New Source Review (NSR) programs. Therefore, a company may choose to permit this equipment to limit its potential annual emissions. For additional information on indoor venting sources see the [Indoor Venting Equipment Fact Sheet](#).

² If the pellet cooler is located at a facility whose average daily feed production is greater than 50 tons per day.

³ If the equipment does not contain or process a HAP, it is not subject the requirements of the rule and can use the small unit exemption.

Step Three – Apply for Air Construction Permits and Modify EJD (if necessary)

- A. Apply for an air construction permit for the equipment identified in Step Two that is required to have a permit [PERMIT REQUIRED] or that is not eligible for an exemption [PERMIT MAY BE REQUIRED]. If your facility has been operating under the SUE, please inform the DNR of this on Form CP.

If your facility had used one EJD to document compliance with the SUE, modify the EJD to include only the equipment that is still eligible for exemption (See B. and C. of Step Two).

- B. By rule, the Department requires that applicants use the online application system called [Iowa EASY Air](#) to apply for construction permits. Additional information about using the EASY Air system can be found at the link above.

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

Please direct any system-related comments or questions to the EASY Air Help Desk at easyair@dnr.iowa.gov, or by phone to 515-725-9569 or 515-725-9547.

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

Instructions for completing the application forms are located on the Iowa EASY Air site.

Complete the following forms⁴:

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| 1. Form FI – Facility Information | ┌ | |
| 2. Form AF – Construction Permit Application Fee | | |
| 3. Form CP – Application Cover Page | → | One of each form |
| 4. Form EI – Emission Inventory | | per submittal |
| 5. Form GHG – Greenhouse Gas Emission Inventory | └ | |
| 6. Form EU – Emissions Unit Information | → | One per equipment/operation |
| 7. Form EP – Emission Point Information | → | One per emission point |
| 8. Form EC or Excel calculation spreadsheet | → | One per equipment or submittal |
| 9. Form CE - Control Equipment Information | ┌ | |
| Form CE1 – Fabric Filter Information | → | One form for each control Form CE2 – Cyclone |
| Information | └ | device used |

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

⁴ Additional information may be required by the DNR review engineer.