

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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

1. John Deere-Davenport Works, located at 1175 E 90th Street, Davenport, IA 52804 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Thomas Johnson.
2. John Deere-Davenport Works is a manufacturer of construction machinery. This facility consists of 51 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	84.67
Particulate Matter	PM	80.81
Sulfur Dioxide	SO ₂	1.09
Nitrogen Oxides	NO _x	175.16
Volatile Organic Compounds	VOC	221.12
Carbon Monoxide	CO	78.00
Single Hazardous Air Pollutants ⁽¹⁾	HAP	1.40
Total Hazardous Air Pollutants ⁽¹⁾	HAP	22.48

⁽¹⁾ May include the following: ethylbenzene, toluene, hexane, cresol/cresylic acid, xylene, formaldehyde, benzene, acetaldehyde, naphthalene, cumene, arsenic, beryllium compounds, cadmium compounds, cobalt compounds, chromium compounds, glycol ethers, mercury compounds, manganese compounds, and nickel compounds.

3. John Deere-Davenport Works submitted a Title V Operating Permit renewal application on January 13, 2023, with additional information submitted on August 20, 2023, and May 21, 2024. Based on the information provided in these documents, the DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. The DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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

1. The public comment period for the draft permit will run from January 30, 2025 through March 1, 2025. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. The DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. The DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, the DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. The DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. The DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. The DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Review Notes

Facility: John Deere Davenport Works

EIQ#: 92-1314

Facility #: 82-01-043

Reviewer: Zane Peters

John Deere Davenport Works has applied for a Part 70 Title V Permit renewal. The application was received on January 13, 2023, with additional information submitted on August 20, 2023, May 21, 2024, and January 13, 2025

The facility manufactures construction machinery and has 51 emission units. Sources of emissions are exhaust from testing vehicles, painting operations including paint booths, paint drying ovens, and paint mixing and storage rooms, welding operations, plasma and thermal cutting operations, natural gas-fired boilers, storage tanks, diesel engines, and various, miscellaneous fugitive VOC emitting sources. The Responsible Official for the facility is Mr. Thomas Johnson, General Manager.

Program Applicability

CAM: CAM applies to EU 57, EU 58, EU 73, and EU 74.

Acid Rain: The source is not subject.

PSD: Construction permits make the facility a synthetic minor, so it is not subject to PSD

Stratospheric Ozone: Not subject.

112(r): Not subject.

NSPS: John Deere Davenport Works has two storage tanks which are listed in the construction permits as subject to 40 CFR Subpart Kb (EUT03 and EUT04) and a hot water boiler subject to 40 CFR Subpart Dc (EU61). Kb was modified and no longer applies to tanks smaller than 75 m³ (approximately 20,000 gal.). Thus, EUT03 and EUT04 (15,000 gal. each) are no longer subject to Subpart Kb, and the old Kb requirements in the construction permits were not incorporated into the last Title V Permit. EU 61 (Hot Water Boiler) is subject to Subpart Dc.

NESHAP: The facility is subject to 40 CFR 63 Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories because it is engaged in Industrial Machinery and Equipment Finishing Operations. The affected emission units are welding (EU30 and EU35) and shot blasting (SB01-SB11).

The Back Up Fire Pump Engines (EU200 and EU201) and Emergency Generators (EU49 and EU50) are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP) [40 CFR Part 63 Subpart ZZZZ].

EPT05, EUT05; is a 1000-gallon lead free gasoline tank that was removed from the insignificant list and added to the Storage Tank list (significant). Dispensing from the gasoline tank, EPT05 is subject to 40 CFR Part 63, Subpart CCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

Changes since the Last Permit

General Changes

- Permit number and relevant dates updated
- Responsible Official updated (pp. 1)
- Permit contact updated (pp. 1)
- Supervisor of Air Operating Permits Section updated (pp. 1)
- Insignificant Activities Equipment List updated (pp. 7)
- IAC rule references updated in accordance with Executive Order 10 (throughout permit)

Emission Point-Specific Changes:

- FUGPC – Emission Point REMOVED from the permit per request of the facility in the permit renewal application. No construction permit was associated with this emission point.
- JV04 - Emission Point REMOVED from the permit per request of the facility in the permit renewal application. No construction permit was associated with this emission point.
- EP36 - Emission Point REMOVED from the permit per request of the facility in the permit renewal application. No construction permit was associated with this emission point.
- EPs AE17, AE18, AE19, AE20, AE25, AE26, AE27, AE29, & AE29 – Emission limits and Operating Requirements section updated in accordance with DNR Construction Permits 05-A-161-S7, 05-A-162-S7, 05-A-163-S8, & 05-A-164-S8, 12-A-027-S4, 12-A-028-S4, 12-A-029-S4, 12-A-030-S4, 12-A-031-S4, 12-A-032-S4, 12-A-033-S4, & 12-A-075-S3 (pp. 11-19)
- EPs FUGWELD & OE15 – Emission limits and Operating Requirements updated in accordance with DNR Construction Permits 12-A-065-S1 & 98-A-452-S1 (pp. 27-29)
- EPs JE09 & JE08 – Emission points removed from the permit.
- Backup Fire Pump engines replaced with like models (EP200 & EP201) (pp. 28-30)
- EP FUGVOC - Operating Requirements updated in accordance with DNR Construction Permit 05-A-459-S1 (pp. 44-45)
- EPs SB0, SB03, & SB04 – New emission points added to the permit in accordance with DNR Construction Permits 18-A-417, 18-A-419, & 18-A-420 (pp. 55-56)
- EP SB07 - New emission point added to the permit in accordance with DNR Construction Permit 19-A-090 (pp. 58-61)
- EP SB08 - New emission point added to the permit in accordance with DNR Construction Permit 19-A-135 (pp. 62-64)
- EP SB10 - New emission point added to the permit in accordance with DNR Construction Permit 21-A-195 (pp. 65-67)
- EP SB11 - New emission point added to the permit in accordance with the submitted renewal permit application. No construction permit is associated with this emission point (pp. 68-69)
- EPs PC1, PC2, PC3 - Emission limits and Operating Requirements updated in accordance with DNR Construction Permits 13-A-432-S1, 13-A-433-S1, 13-A-434-S1 (pp. 70-72)

- EP PC4 - REMOVED from the permit in accordance with the request of the facility.
- EP PC6 - New emission point added to the permit in accordance with DNR Construction Permit 21-A-195-S1 (pp. 73-75)
- EP TC2 & TC3 - New emission points added to the permit in accordance with DNR Construction Permits 22-A-082 & 22-A-189-S1 (pp. 76-78)

Stack Testing

None at this time.

Periodic Monitoring

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

EU57 and EU58 are Primer Paint Booths with a 2-Stage Dry Filtration System to control emissions. Calculations submitted in the permit renewal application indicate that this unit is subject to CAM for this renewal. The plan is found in the appendix of the permit.

EU 73 and EU74 are Robotic Paint Booths with a 2-Stage Dry Filtration System to control emissions. Calculations submitted in the permit renewal application indicate that this unit is subject to CAM for this renewal. The plan is found in the appendix of the permit.