

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. Northern Natural Gas Co. – Garner LNG Plant, located at 2315 Yale Ave, Garner, IA has applied for a Title V Operating Permit. The designated responsible official of this facility is Brian Mundt.
2. Northern Natural Gas Co. – Garner LNG Plant is a Natural Gas Transmission facility. This facility consists of 8 significant emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	10.03
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	10.03
Particulate Matter	PM	10.03
Sulfur Dioxide	SO ₂	1.47
Nitrogen Oxides	NO _x	111.16
Volatile Organic Compounds	VOC	55.02
Carbon Monoxide	CO	110.85
Lead	Lead	0.00023
Hazardous Air Pollutants ⁽¹⁾	HAP	1.5

⁽¹⁾ May include the following: Acrolein, Benzene, Formaldehyde, Hexane, Toluene and Xylenes (mixed isomers).

3. Northern Natural Gas Co. – Garner LNG Plant submitted a Title V Operating Permit application on August 21, 2024. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. 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.

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

1. The public comment period for the draft permit will run from February 13, 2025 through March 15, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Jason Dowie at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jason Dowie at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the permit application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. 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.

DRAFT Title V Initial Application Review Notes

Facility Name:	Northern Natural Gas Company – Garner LNG Plant
City:	Garner
County:	Hancock
Facility #:	41-02-020
EIQ #:	92-3878
Date:	12/30/2024
Permit #:	25-TV-xxx
Reviewer:	Jason Dowie

Background:

Northern Natural Gas Company – Garner LNG Plant has applied for an initial Title V Operating Permit for their natural gas transmission facility located in Garner, IA. The facility currently consists of eight (8) significant emission units and six (6) insignificant emission units.

The facility was previously operated under a different Title V operating permit, but the facility dropped out of Title V. As a result of Construction Permitting project number 23-050, the facility now falls under Title V once again and has applied for a new initial Title V operating permit. The Title V Initial application was received on August 21, 2024.

Pollutant	Major for Title V?
PM ₁₀	<input type="checkbox"/>
SO ₂	<input type="checkbox"/>
NO _x	<input checked="" type="checkbox"/>
VOC	<input type="checkbox"/>
CO	<input checked="" type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input type="checkbox"/>
Total HAPs	<input type="checkbox"/>

Program Applicability:

- PSD: No
- 40 CFR Part 60 NSPS: Yes
- 40 CFR Part 61 NESHAP: No
- 40 CFR Part 63 NESHAP: Yes
- Acid Rain and CSAPR: No

PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Lead	Total HAPs
Potential Emissions								
10.03	0	0	1.47	111.16	55.02	110.85	0.00023	1.5

Emission Point Specific Comments:

EP-1, EP-2, and EP-3 (Linde Vaporizers) are subject to 40 CFR Part 60, Subpart Dc

- All three are restricted to only combust natural gas.
- At least one vaporizer unit (EU-1, EU-2, or EU-3) is restricted to operate no more than 500 hours per rolling 12-month period.
- The stack dimensions of all three points are reflective of Construction Permitting project number 24-036.

EP 4 (Reactivation Heater) is subject to 40 CFR Part 60, Subpart Dc

- The unit (EU 4) is restricted to only combust natural gas.

EP-0005 (Process Safety Flare)

- Shall not exceed 100 million scf process gas burned per rolling 12-month period.
- Shall operate with no visible emissions.
- Shall be operated at all times with a flame present, which shall be monitored using a thermocouple or equivalent device.
- The pilot flame shall be equipped with an automatic spark igniter.

EP-010A (Gas Turbine) is subject to 40 CFR Part 60, Subpart KKKK

- Varying emission limits based on ambient temperatures or operating load percentage.
- Restricted to only using natural gas as fuel source.
- Operation is restricted to no more than 960 hours while ambient temperature is below 0 degrees Fahrenheit per 12-month period.
- Must meet specific requirements for turbine component and/or engine core replacements.

EP-010B (Gas Turbine Bypass Stack)

- Same as EP-010A above.

EP-013 (Emergency Gas Engine) is subject to 40 CFR Part 60, Subpart JJJJ

- Limited to a maximum of 500 operating hours per 12-month rolling period

EP FP (Fire Water Pump) is subject to 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart IIII.