

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. WB Scott Area LLC, located at 11555 110th Avenue, Davenport, IA 52804 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Germain Lefevre.
2. WB Scott Area LLC is an Industrial Gases facility. This facility consists of 1 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	0
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	0.81
Particulate Matter	PM	0
Sulfur Dioxide	SO ₂	5.39
Nitrogen Oxides	NO _x	3.13
Volatile Organic Compounds	VOC	0.26
Carbon Monoxide	CO	14.30
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	0.29

⁽¹⁾ May include the following: Methane.

3. WB Scott Area submitted a Title V Operating Permit renewal application on January 17, 2025. 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 April 17, 2025 through May 16, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the 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. 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.

Title V Application Review Notes

Applicant:	WB Scott Area LLC
SIC Code:	2831
City:	Davenport
County:	Scott
EIQ#:	92-7021
Facility#:	82-01-187
Permit #:	25-TV-003
Reviewer:	Zane Peters
Date:	02/28/2025

Facility Identification

Facility Name:	WB Scott Area LLC
Facility Location:	11555 110th Avenue, Davenport, Iowa
Responsible Official:	Germain Lefevre
Phone:	484-431-5173

Background:

WB Scott Area LLC is applying for a new Title V Operating Permit for facility number 82-01-187 Waga Energy Inc. - Scott Area's Renewable Natural Gas (RNG) Facility which been recently constructed. In determination Construction Permit Project 24-049, the Department determined that Waga Energy Inc. – Scott Area (92-7021) and the Scott County Landfill (92-6872) are a single stationary source. This combined facility (i.e. Waga Energy and Scott County Landfill) is currently a major stationary source for the Title V Operating Permit Program Carbon Monoxide (CO) potential emissions of the facility are above the Title V applicability thresholds.

The facility currently consists of one significant emission unit. The initial permit application was submitted on 01/17/2025.

Title V Applicability

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

Although this facility itself does not have the potential to emit above the Title V threshold, it is considered to be a single source with the Scott County Landfill and is therefore required to obtain a Title V Operating Permit.

Program Applicability:

- Major for PSD: No
- 40 CFR 60 NSPS: Yes
 - Subpart XXX¹ – New Source Performance Standard (NSPS) -- Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
¹ This facility will be treating landfill gas that comes from a landfill (i.e. Scott County Landfill, facility ID 82-01-121) that is of the source category affected by the following federal regulation: Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014 [40 CFR Part 60, Subpart XXX]. U.S. EPA has determined that the Renewable Natural Gas facility is subject to Subpart XXX.
- 40 CFR Part 61 NESHAP: No
- 40 CFR Part 63 NESHAP: Yes
 - Subpart AAAA² – Municipal Solid Waste Landfills
² This facility will be treating landfill gas that comes from a landfill (i.e. Scott County Landfill, facility ID 82-01-121) that is of the source category for 40 CFR Part 63 Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills; 40 CFR §63.1930-§63.1990).
- Major Source of HAPs: No
- Acid Rain: No.
- Stratospheric Ozone Protection: No
- Prevention of Accidental Releases: No

Stack Testing:

EP-1

Pollutant – Opacity

Stack Test to be Completed by (date) - ¹

Test Method - 40 CFR 60, Appendix A, Method 22

Authority for Requirement: DNR Construction Permit 24-A-123

Pollutant – Sulfur Dioxide (SO₂)

Stack Test to be Completed by (date) - ¹

Test Method - ²

Authority for Requirement: DNR Construction Permit 24-A-123

Pollutant – Volatile Organic Compounds (VOC)

Stack Test to be Completed by (date) - ¹

Test Method - 40 CFR 60, Appendix A, Method 3C, 40 CFR 60, Appendix A, Method 2, 2A, 2C, or 2D as appropriate

Authority for Requirement: DNR Construction Permit 24-A-123

¹ Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

² Compliance with the hourly SO₂ limit shall be determined by complying with the H₂S limit of 300 ppmv for the gas processed by the RNG facility. Testing shall be done in accordance with Condition 5.G. of the construction permit.

³ No test is required for VOC emissions. However, the actual exit velocity of the flare and the net heating value of the gas being combusted shall be determined. The actual exit velocity of the flare shall be determined in accordance with §60.18(f)(4); the net heating value of the gas being combusted shall be determined in accordance with §60.764(e) and §60.18(f)(3).

EP-2

Pollutant – Sulfur Dioxide (SO₂)

Stack Test to be Completed by (date) - ¹

Test Method - ²

Authority for Requirement: DNR Construction Permit 24-A-124

¹ Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

² Compliance with the hourly SO₂ limit shall be determined by complying with the H₂S limit of 300 ppmv for the gas processed by the RNG facility. Testing shall be done in accordance with Condition 5.G. of the construction permit.

Periodic Monitoring:

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

No requirements at this time.

Other Notes:

This facility is no longer subject to 40 CFR 60 Subpart WWW as indicated on several construction permits referenced throughout the Title V, but it is instead subject to 40 CFR 60 Subpart XXX. Since the State of Iowa has not yet adopted 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA, the construction permits for certain emission points that reference the out-of-date subpart applicability have not been modified because the facility is not required to do so. In light of the new applicability, the facility has requested that only the correct applicable requirements be included in the Title V permit. Rule references have been corrected throughout the permit as needed.

To reflect the updates in NSPS applicability, the facility is encouraged to modify their construction permits at their earliest convenience.