

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. Ajinomoto Animal Nutrition North America, Inc., located at 1116 Highway 137, Eddyville, IA 52553 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Heather Hoskins.
2. Ajinomoto Animal Nutrition North America, Inc. is a prepared animal food manufacturer. This facility consists of 70 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	50.76
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	80.69
Particulate Matter	PM	827.76
Sulfur Dioxide	SO ₂	1.32
Nitrogen Oxides	NO _x	173.14
Volatile Organic Compounds	VOC	32.28
Carbon Monoxide	CO	240.02
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	3.56

⁽¹⁾ May include the following: Hexane, formaldehyde, hydrochloric acid.

3. Ajinomoto Animal Nutrition North America, Inc. submitted a Title V Operating Permit renewal application on February 28, 2024 and any additional information describing the facility on August 19, 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 December 19, 2024 through January 18, 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 Permit Writer Notes

Facility: Ajinomoto Health and Nutrition North America

Facility Number: 68-09-002

Title V Permit Number: 00-TV-028R4

Reviewer: Zane Peters

Ajinomoto Health and Nutrition North America has applied for the fourth renewal of their Part 70 Title V Operating Permit. The facility submitted the original application on February 28, 2024, and submitted additional information on August 19, 2024. This facility manufactures industrial organic chemicals (SIC 2869).

Title V Applicability

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"/>

Applicable Requirements

- Boilers 1, 2, 3, and 4 are subject to 40 CFR 60 Subpart Dc.
- Boiler 5 is subject to the regulations of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60 Subpart Db, 567 IAC 23.1(2)"ccc"].
- Fire Pump Engines, EP-G1 and G2 are subject to 40 CFR 63 Subpart ZZZZ. For this subpart, these units are considered existing, compression ignition, emergency engines located at an area source.
- Boilers 1-5 are of the source category covered by 40 CFR 63 Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources); however, natural gas fired boilers located at an area source are not subject to this subpart per 40 CFR 63.11195(e).
- Manufacturing operations EP-9, EP-10, EP-14, EP-33, EP-39, EP-45, EP-112, EP-122, & EP-136 are subject to 40 CFR 63 Subpart VVVVVV (National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources).
- Manufacturing operations EP-9, EP-10, EP-11, EP-14, EP-33, EP-39, EP-41, EP-45, EP-112, EP-122, & EP-136 are subject to 40 CFR 63 Subpart DDDDDDD (National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing).

Changes Since the Last Issuance

General Changes

- Permit number and relevant dates updated
- Responsible Official and Permit Contact information updated (pp. 1)
- Supervisor of Air Operating Permits updated (pp. 1)
- General conditions updated to include the most recent version
- Relevant IAC rule references updated in accordance with Executive Order 10 (EO10)
- Appendix B Executive Order 10 (EO10) Rules Crosswalk added
- Insignificant Emission Unit List updated

Emission Point Specific Changes

- EP-09 – Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 84-A-111-S3 (pp. 9-12)
- EP-10 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 90-A-278-S3 (pp. 13-15)
- EP-11 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 90-A-279-S2 (pp. 16-18)
- EP-14 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 97-A-523-S2 (pp. 21-23)
- EP-29 – Emission point REMOVED from the permit in accordance with a rescission request submitted by the facility
- EP-33 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 05-A-309-S3 (pp. 38-40)
- EP-39 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 07-A-727-S4 (pp. 44-46)
- EP-41 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 19-A-041-S1 (pp. 47-49)
- EP-45 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 13-A-010-S2 (pp. 50-53)
- EP-112 - Emission units reorganized; rated capacities, emission limits, and operating requirements updated in accordance with DNR Construction Permit 15-A-166-S3 (pp. 54-57)
- EP-120 – NEW emission point added to the permit in accordance with DNR Construction Permit 24-A-146 (pp. 64-66)
- EP-122 – Rated capacity, emission limits, and operating requirements updated in accordance with DNR Construction Permit 19-A-278-S1 (pp. 67-70)

- EP-125 – NEW emission point added to the permit in accordance with DNR Construction Permit 24-A-007-S1 (pp. 71-73)
- EP-136 – NEW emission point added to the permit in accordance with DNR Construction Permit 24-A-147 (pp. 74-76)
- EP-127 & EP-128 – NEW emission points added to the permit that is exempt from construction permitting (pp. 79)

Periodic Monitoring

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

The following pieces of control equipment are required to have Facility Maintained Operation & Maintenance (O&M) Plans.

- S-2735 – Baghouse (EP-11)
- S-5110 – Wet Scrubber (EP-12)
- T-4222 – Packed Bed Scrubber (EP-15)
- S-6701 – Bag Filter (EP-38)
- CY-2741A – Cyclone (EP112)
- CY-2741B – Cyclone (EP-122)
- FL-2820 – Baghouse (EP-120)
- FL-2630 – Baghouse (EP-125)

The following pieces of control equipment are required to have Compliance Assurance Monitoring (CAM) plans, because the associated emission units have potential uncontrolled emissions of greater than 100 tons per year.

- S-2612 – Cyclone (PM & PM10), EP-9
- S-2611 – Baghouse (PM & PM10), EP-9
- S-2666 – Cyclone (PM), EP-10
- S-2661 – Baghouse (PM), EP-10
- S-2672 – Cyclone (PM & PM-10), EP-14
- S-2671 – Baghouse (PM & PM-10), EP-14
- FL-2615 – Baghouse (PM & PM-10), EP-22
- CY-2613 – Cyclone (PM & PM-10), EP-22
- CY-2613B – Cyclone (PM & PM-10), EP-33
- FL-2615B – Baghouse (PM & PM-10), EP-33
- CY-2613C – Cyclone (PM), EP-39
- FL-2615C – Baghouse (PM), EP-39
- S-2682 – Cyclone (PM & PM-10), EP-45
- S-2683 – Baghouse (PM & PM-10), EP-45

The CAM plans can be found in Appendix C of the permit.

Stack Testing and Compliance Demonstration

None at this time.