

# 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.

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

1. University of Northern Iowa – Main Campus, located at 1801 West 31st Street, Cedar Falls, IA 50614, has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Brent Maitland.
2. University of Northern Iowa – Main Campus is a State University. This facility consists of 50 emission units with potential emissions of:

<b>Pollutant</b>	<b>Abbreviation</b>	<b>Potential Emissions (Tons per Year)</b>
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	25.25
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	26.08
Particulate Matter	PM	28.43
Sulfur Dioxide	SO <sub>2</sub>	0.55
Nitrogen Oxides	NO <sub>x</sub>	21.06
Volatile Organic Compounds	VOC	9.70
Carbon Monoxide	CO	11.12
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	5.31

<sup>(1)</sup> May include the following: See application.

3. University of Northern Iowa – Main Campus submitted a Title V Operating Permit renewal application on December 29, 2023 and any additional information describing the facility on April 30, 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.

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

1. The public comment period for the draft permit will run from June 20, 2024 through July 20, 2024. 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:	<b>University of Northern Iowa – Main Campus</b>
SIC Code:	8221 (College/University)
City:	Cedar Falls
County:	Black Hawk (FO #1)
EIQ#:	92-5628
Facility#:	07-02-006
Permit #:	02-TV-016R4
Reviewer:	Zane Peters
Date:	05/02/2024

### **Facility Identification**

Facility Name:	University of Northern Iowa – Main Campus
Facility Location:	1901 West 30th Street, Cedar Falls, IA 50614-0192
Responsible Official:	Brent Maitland
Phone:	(319) 273-6393

### **Background**

There are two Title V facilities at the University of Northern Iowa that are considered to be one stationary source for purposes of Title V and PSD. This permit is for the Main Campus of the University of Northern Iowa. The emission units are mainly generators and boilers in the various buildings that make up the main campus; other emission units include spray booths, metal working equipment, and storage tanks.

This is the fourth renewal permit for the Main Campus. The initial Title V permit was issued July 25, 2002; the first renewal permit was issued February 23, 2009; and the second renewal permit was issued July 14, 2014. One administrative modification request was filed for this facility in March 2016; however, a modified permit was not issued. The third renewal for this facility was issued July 9, 2019.

**Regulatory Status**

The University of Northern Iowa is a major source for Title V. See Table 1 major source by pollutant (combined for both the Main Campus and Power Plant).

**Table 1  
Title V Major Source by Pollutant**

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

HAPs emitted from the Main Campus emission units may include Toluene, Xylene, Methyl Isobutyl Ketone (MIK), Ethylene Glycol, Ethylbenzene, Cobalt Compounds, Dichloromethane, and Methanol.

**Program Applicability:**

- PSD: YES. This facility is considered a major stationary source and is one of the 28 listed source categories for PSD.
- Part 61 NESHAP: YES. Subpart M, National Emission Standard for Asbestos.
- NSPS: YES. See Table 2.
- Part 63 NESHAP: YES. See Table 2.

**Table 2  
NSPS and NESHAP Applicability**

<b>EP</b>	<b>Source Description</b>	<b>Permit#</b>	<b>NSPS and NESHAP Subparts</b>
EP-012-1	Emergency Generator 201 bhp CI	Exempt	NESHAP ZZZZ
EP-070-1	Emergency Generator 40 bhp CI		
EP-109-3	Emergency Generator 308 bhp CI		
EP-175-1	Emergency Generator 168 bhp CI		
EP-224-1	Emergency Generator 100 bhp CI		
EP-016-1	Emergency Generator 60 bhp SI		
EP-023-1	Emergency Generator 40 bhp SI		
EP-031-1	Emergency Generator 162 bhp SI		
EP-033-1	Emergency Generator 40 bhp SI		

EP-055-1	Emergency Generator 60 bhp SI		
EP-068-1	Emergency Generator 44 bhp SI		
EP-175-2	Emergency Generator 74 bhp SI		
EP-190-1	Emergency Generator 27 bhp SI		
EP-201-1	Emergency Generator 100 bhp SI		
EP-210-1	Emergency Generator 201 bhp SI		
EP-303-1	Emergency Generator 47 bhp SI		
EP-305-1	Emergency Generator 27 bhp SI		
EP-311-1	Emergency Generator 10 bhp SI		
EP-312-1	Emergency Generator 25 bhp SI		
EP-058-1	Emergency Generator 635 bhp CI	08-A-543	NSPS IIII, NESHAP ZZZZ
EP-180-1	Back-up Generator bhp CI	07-A-090	NESHAP ZZZZ
EP-108-1	Emergency Generator 134 bhp CI	Exempt	NSPS IIII, NESHAP ZZZZ
EP-110-1	Emergency Generator 134 bhp CI		
EP-062-2	Emergency Generator 320 bhp CI		
EP-024-1	Emergency Generator 134 bhp SI	Exempt	NSPS JJJJ, NESHAP ZZZZ
EP-030-3	Emergency Generator 174 bhp SI		
EP-202-3	Emergency Generator 134 bhp SI		
EP-305-4	Emergency Generator 103 bhp SI		
EP-115-1	Emergency Generator 40 bhp SI		
EP-174-1	Emergency Generator 54 bhp SI		
EP-115-4	NFH Boiler 1	Exempt	NESHAP DDDDD
EP-115-5	NFH Boiler 2		
EP-174-2	Panther Village Boiler 1		
EP-174-3	Panther Village Boiler 2		
EP-174-4	Panther Village Boiler 3		
EP-174-5	Panther Village Boiler 4		

- Acid Rain: NO. The facility does not generate electricity for wholesale or retail sale and does not own or operate one of the Phase I or Phase II units listed in 40 CFR 73.10.
- Stratospheric Ozone Protection: YES
- Prevention of Accidental Releases: NO
- CAM: NO. All potential pre-control emissions are less than the major source thresholds.

### **Compliance Status**

The facility is in compliance.

### **Periodic Monitoring**

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document. According to the calculations submitted with the renewal application, CAM does not apply to any emission points in this permit. However, due to the nature of some emission points, some O&M plans will be required.

EPs 070-4 and 070-5 are Spray Booths with filters (CE-070-4, CE-070-5) controlling emissions. Due to the Department's policy towards spray coating operations, an Agency Approved O&M plan will be required for this renewal. Details of the plan can be found in the body of the permit. (pp. 13)

EP 070-2 is a Clay Processing area with a baghouse (CE-070-1) controlling emissions. The previous renewal's Facility Maintained O&M plan will be upheld due to the nature of the powder clay mixing process. (pp. 44)

EP 070-3 is a Metal Working area with a baghouse (CE-070-3) controlling emissions. Due to the nature of the metal cutting/grinding process, the previous renewal's Facility Maintained O&M plan will be upheld. (pp. 46)

EP 190-3 is a Carpenter Shop with a baghouse (CE-190-3) controlling emissions. Due to the nature of woodworking processes, the previous renewal's Facility Maintained O&M plan will be upheld. (pp. 48)

EP 305-2 is a Green Sand Muller, Reclaimer, and Blast Machine with a baghouse (CE-305-1) controlling emissions. Due to the nature of foundry processes, the previous renewal's Facility Maintained O&M plan will be upheld. (pp. 52)

EP 190-4 is a Paint Booth with a dry filter (CE-190-2) controlling emissions. Due to the Department's policy towards spray coating operations, an Agency Approved O&M plan will be required for this renewal. Details of the plan can be found in the body of the permit. (pp. 53)

### **Stack Testing**

Stack testing is not required at this time.

## **Changes Made To the Title V Permit Since the Previous Issuance**

### **General Changes**

- Permit numbers and relevant dates updated
- Supervisor of Air Operating Permits updated

### **Emission Point Specific Changes**

- EU-070-KILN5 removed from the Insignificant Activities List (pp. 7)
- EP-305-4 – NEW EMISSION POINT added to the permit, construction permitting exempt (pp. 32)
- EP-305-3 - NEW EMISSION POINT added to the permit in accordance with DNR Construction Permit 24-A-040 (pp. 53)

### **Notes**

- EP-070-4 and EP-070-5 are emissions from glazing spray booths (EU-070-SPRAY-1 and EU-070-SPRAY-2). The glazing booths spray glazing material on clay pottery items.
- EP-070-4 and EP-070-5 are NOT subject to any surface coating NESHAP since the surface being coated is clay pottery.
- EP-190-4 is NOT subject to NESHAP JJ – Wood Furniture Manufacturing Operations since the material usage is well below the 250 gal/month and 3,000 gal/rolling 12-month period threshold for the NESHAP.
- EPs 190-8, 190-9, & 190-10 are not subject to NESHAP CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities as the University of Northern Iowa (07-02-006-1 & 07-02-006-2) is a major source of HAPs. They are also not subject to NSPS Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, as the storage capacity is less than 19,800 gal (75 m3).