



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

December 18, 2009

«FirstName» «LastName»
«Title»
«FacilityName»
«MailingAddress»
«MailingAddress2»
«City», «State» «Zip»

Re: REMINDER – 2009 Air Emission Inventory and other Title V Reporting Requirements
EIQ #: «EIQ_No», Facility #: «Facility_No»

Dear «Greeting» «LastName»:

This is to remind you of 2009 emission inventory and several other reporting requirements due for facilities subject to Title V of the Clean Air Act. Please note that your facility may have additional reporting requirements not listed below.

Title V Report	Due Date
Emissions Inventory	March 31, 2010
Fee Payment	July 1, 2010
Annual Compliance Certification	*March 31, 2010
Semi-Annual Monitoring Report	*March 31, 2010 & **September 30, 2010

* Required only if your initial Title V permit was issued prior to January 1, 2010.
** Required only if your initial Title V permit was issued prior to July 1, 2010.

As required for the 2007 and 2008 emission years, you must continue to report greenhouse gas (GHG) emissions for 2009 on the separate spreadsheet(s) designed by the DNR. Do not include GHG emissions on Form 4.0 or Form 5.0. No fees are required for GHG emissions. Please see the attached "DNR Greenhouse Gas Reporting Requirements for 2009" for detailed information on how to submit GHG inventories.

Please contact the following DNR staff if you have questions regarding various reporting requirements.

Report	Contact	Contact Phone No.
TV Emissions Inventory or Fee Payment	Chris Kjellmark or Weston Li	(515) 281-7826 (515) 281-8549
Greenhouse Gas Inventory	Marnie Stein	(515) 281-8468
Annual Compliance Certification Semi-Annual Monitoring Report	Dennis Thielen	(515) 281-4899

Sincerely,

Douglas A. Campbell
Supervisor, Air Operating Permits Section

Enclosures: Title V Emissions Inventory FAQ
DNR Greenhouse Gas Reporting Requirements for 2009
Title V Workshop and SPARS Training Announcement

Title V Emissions Inventory FAQ

When is the emissions inventory due?

It must be post-marked by March 31.

What forms are required?

Forms 1.0, 4.0, 5.0, and Part 3.

Note: only the bottom section of Part 3 needs to be signed - "Certification of Truth, Accuracy and Completeness"

Where can I get the forms and instructions?

The forms can be downloaded from the Air Quality Bureau's web page (www.iowacleanair.com). First click on the 'Operating Permits' link on the left side of the page. Then click on 'Title V/CAIR Applications, Emissions Inventory/Fee Payment - Forms & Instructions.' To request a paper copy call (515) 281-7826.

How many copies should be submitted?

Two, unless your facility is located in Linn or Polk County.

Three copies are required if your facility is located in Linn or Polk County.

Where do I send the emissions inventory?

Attention: Douglas A. Campbell
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324

Have any of the inventory forms changed since last year?

Yes, there were some minor updates made to the inventory forms in December 2009 and you should use the updated forms when submitting the inventory. Please note the following 2 updates when you submit the inventory.

1. NAISC code and description were added to Form 1.0 in addition to the SIC code. A specific 6-digit NAICS code for your facility can be found at the US Census Bureau's website: <http://www.census.gov/eos/www/naics/>; and
2. CAS No column was added to page 2 of Form 4.0 in addition to pollutant name for HAPs. Please identify a HAP by both the CAS No and pollutant name when you submit the inventory.

Can I submit electronically?

Yes. You may use the web version of the State Permitting and Reporting System (SPARS) software to submit your emissions inventory electronically.

Please note that if you submit your inventory using SPARS Web, you do not need to mail a hard copy to DNR. This includes facilities located in Linn or Polk County.

If you wish to submit your emissions inventory electronically, but do not have access to SPARS Web, please contact Rachel Quill at 515-281-8983 or rachel.quill@dnr.iowa.gov. For more information about

SPARS Web, visit our web page (www.iowacleanair.com) and click on the 'SPARS' link.

When is the fee payment due? Will I be notified of the fee rate?

It must be post-marked by July 1. The Title V fee rate will be set in May by the Environmental Protection Commission. Your company will be notified in writing after the fee rate is set. The fee rate notification will also be posted on our web page (www.iowacleanair.com).

How do I report greenhouse gas (GHG) emissions?

You should use the spreadsheet(s) designed by DNR to report greenhouse gas (GHG) emissions as instructed in the enclosed "DNR Greenhouse Gas Reporting Requirements for 2009." Do not report GHG emissions on Form 4.0 or Form 5.0 and please note that no fees are required for greenhouse gas (GHG) emissions.

How should actual emissions be calculated?

Emission estimations should be based on continuous emission monitoring data, stack test data, mass balance, or EPA approved emission factors. If none of these methods are available, an emission factor from a similar source can be substituted, considering the characteristics of the material being processed or handled are similar.

Do I need to submit Form CA-01 and other supporting documents with the inventory?

Yes, unless it is a straight forward calculation based on a widely available emission factor multiplied by a throughput. Otherwise, please include a Form CA-01 for each individual Form 4.0 to document how you arrived at certain calculated values. You may substitute this form with other documents, such as spreadsheets, as long as all the required information is included.

All the calculations, the parameters used in the calculations, and a description of any assumptions used in making the calculations must be clearly documented so that DNR staff can follow the calculations.

If the source of an emission factor is not a widely available source (such as WebFIRE, AP-42, etc.), a copy of the document must be submitted with the inventory. If emissions are calculated using program models (such as TANKS, LandGEM, etc.), the program outputs must be submitted with the inventory.

If the source of an emission factor is a stack test, please indicate the test date and the test method used and include a copy of the REPORT SUMMARY. Do not submit the entire stack test report. The most recent and approved stack test should be used.

Title V Emissions Inventory FAQ (Continued)

Do I need to calculate emissions and pay fees for emissions from insignificant activities?

No. According to subrule 567 IAC 22.106(7), fees are not required for insignificant activities.

Is there a de minimus level for reporting emissions?

Yes. Emission totals reported on Form 4.0 only need to be reported to the nearest hundredth of a ton (### tons/yr). Emission totals greater than or equal to 0.005 tons/yr should be rounded up to the nearest hundredth of a ton, and reported on Form 4.0. Emission totals less than 0.005 tons/yr do not need to be reported.

Can I include just a total of all the HAPs emitted on Forms 4.0 and 5.0, instead of reporting them separately?

No. HAP emissions need to be listed separately on Forms 4.0 and 5.0, along with the appropriate CAS number.

How do I avoid double-counting HAP emissions?

Most Hazardous Air Pollutants (HAPs) are also considered VOCs (VOC HAP) or Particulate Matter (PM HAP). For a listing of these, please visit the technical guidance portion of the Operating Permits section's web page. You are required to report the totals for each HAP emitted on Forms 4.0 and 5.0. However, you are not required to pay fees twice for the same emissions.

If a HAP you reported on page 2 of Form 5.0 is also included in the VOC or PM₁₀ total reported on page 1 of Form 5.0, **DO NOT** include the value in the Emissions Subject to Fees column. Enter "0.00" instead.

If I do not need to pay fees on PM_{2.5}, total particulate matter, carbon monoxide, or ammonia emissions, then why do I need to report them on Forms 4.0 and 5.0?

Although they are considered regulated pollutants, you are not required to pay fees on PM_{2.5}, total particulate matter (PM), and carbon monoxide (CO) emissions. However, you are still required to report PM_{2.5}, PM, and CO emissions on Forms 4.0 and 5.0 because many sources have applicable requirements for these pollutants. The DNR also uses the totals for planning and inventory purposes and that is the sole purpose for requiring ammonia inventories at this time. Please note that fees are required for PM₁₀ emissions. Please also note that no fees are required for greenhouse gas (GHG) emissions and DO NOT include GHG emissions on Form 4.0 and Form 5.0.

Additional FAQ

◆ **Propylene Carbonate and Dimethyl Carbonate are no longer VOC**

Propylene Carbonate (CAS# 108-32-7) and Dimethyl Carbonate (CAS# 616-38-6) are no longer considered VOC based on EPA's revised definition published January 23, 2009. Therefore, you should not include their emissions in your VOC emissions for 2009 and future inventories.

◆ **WebFIRE (Factor Information Retrieval System)**

WebFIRE is the EPA's internet version of FIRE. The FIRE application web site provides complete access to EPA's air emission factor information, and will allow for more frequent updates. WebFIRE replaced the software application, FIRE version 6.25, and the MS Access version of the database. (<http://www.epa.gov/ttn/chief/>)

◆ **Filterable vs. Condensable vs. Primary Particulate Matter (PM)**

Primary (sum of filterable and condensable) PM_{2.5}, PM₁₀, and PM emissions should be reported on Forms 4.0 and 5.0. DNR recognizes that some emission units may be subject to filterable PM emission limits from federal regulations. The compliance demonstration method will remain the same in these instances. However for emissions inventory purposes, DNR reports primary PM_{2.5}, PM₁₀, and PM emissions to the EPA to meet the National Emissions Inventory obligations.

◆ **What compounds are included in the glycol ethers category?**

Glycol ethers are hazardous air pollutants as defined in IAC rule 22.100. Thousands of compounds are included in the glycol ethers category. The DNR suggests referring to the EPA document entitled "Toxics Release Inventory: List of Toxic Chemicals within the Glycol Ethers Category" for a list of compounds that are considered glycol ethers. This document is available at <http://www.epa.gov/ttn/atw/glycol2000.pdf>. Please note that ethylene glycol mono-butyl ether (CAS #111-76-2, also known as EGBE or 2-Butoxyethanol) was delisted from the HAP list and you should not report it as a HAP.

◆ **Will DNR send another reminder as the deadline gets closer?**

Yes, as the March 31 deadline approaches, the DNR will send a reminder on the Air Quality Bureau's listserver. Directions for subscribing to the listserver are as follows:

DNR Air Quality Listserver

The DNR is offering a listserver to deliver timely air pollution control information directly to your email. Targeted to those actively engaged in permitting and regulatory compliance, the "iairtech" listserver offers the regulated public and consultants regulatory news, program updates, and technical guidance.

To subscribe, send a blank E-mail to:

join-iairtech@lists.ia.gov

The subject line is blank.

If you have questions, comments or ideas for list serve topics, please contact the DNR's Mindy Kralicek at 515-281-7832 or email mindy.kralicek@dnr.iowa.gov.

DNR Greenhouse Gas (GHG) Reporting Requirements for 2009

WHAT?

By March 31, 2010, **all** facilities subject to the Title V Air Operating Permit Program are required to complete and submit the following GHG inventory document:

- 2009 Title V Greenhouse Gas Reporting Spreadsheet (*includes GHG emissions from Fossil Fuel Combustion, HFC emissions, PFC emissions, and SF₆ emissions*)

In addition, facilities that fall into these seven categories will be required to complete an industry-specific spreadsheet:

1. Ethanol Production
2. Cement Manufacturing (SIC 3241)
3. Lime Manufacturing (SIC 3274)
4. Ammonia Production and Urea Application (SIC 2873)
5. Nitric Acid Production (SIC 2873)
6. Iron and Steel Production (SIC 3312)
7. Soda Ash Use (SIC 284, 2819, 32)

These requirements are the same as last year's reporting requirements. Only direct GHG emissions should be reported. GHG emissions from any indirect sources such as vehicle transportation, offsite waste disposal, or electricity consumption should not be reported. SF₆ emissions from electric power transmission and distribution are not required to be reported.

HOW?

Facilities may download the instructions and spreadsheets from <http://www.iowadnr.gov/air/prof/ghg/ghg.html>. **DNR is currently updating the spreadsheets and will post them online no later than January 4, 2010.** DO NOT use the reporting spreadsheets from last year.

After completion, the spreadsheets can be submitted either one of two ways:

- Electronically (SPARS Web) - Attach electronically to Form 1.0 of your Title V inventory
- Hard Copy - Print and attach to your Title V inventory

WHY?

Iowa Code 455B.152 requires the DNR to establish a method for collecting data from Iowa's producers of greenhouse gas emissions (GHGs). The methods for collecting the data will be phased in over several years by producer sectors and geographic areas.

In 2008, the DNR began requiring reporting of direct GHG emissions from fossil fuel combustion and ethanol fermentation that occurred in 2007. In 2009, DNR then expanded the scope of the requirements to include emissions of hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆) that occurred in 2008. Facilities in six additional industrial sectors were also required to begin reporting GHG emissions from their specific industrial processes.

The GHG data collected each year is tallied and submitted to the Governor and Iowa General Assembly by September as required by Iowa Code 455B.851. Results of the 2007 and 2008 GHG reporting are available at <http://www.iowadnr.gov/air/prof/ghg/ghg.html> under the heading "Iowa Greenhouse Gas Inventories".

HELP!

If you have questions on the reporting requirements or need assistance with the reporting spreadsheets, please contact:

Marnie Stein

marnie.stein@dnr.iowa.gov

515-281-8468

Final Mandatory Reporting of Greenhouse Gases Rule

On September 22, 2009 EPA Administrator Lisa Jackson signed EPA's Mandatory Reporting of Greenhouse Gases (GHG) Rule. Under the rule, suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons of carbon dioxide equivalents (mtCO₂e) or more per year are required to submit annual reports to EPA.

While EPA did not include specific subparts for electronics manufacturing, ethanol production, food processing, industrial landfills, oil and natural gas systems, wastewater treatment, etc. in the final rule, facilities in these source categories could be covered by the rule based on GHG emissions from stationary fuel combustion.

The rule will become effective on December 29, 2009. **The first emission report will be due to EPA on March 31, 2011 for CY 2010 emissions.** The rule also requires several new monitoring requirements that must be in place by April 1, 2010.

DNR has posted a Frequently Asked Questions (FAQ) document regarding EPA's rule at <http://www.iowadnr.gov/air/prof/ghg/ghg.html>. This FAQ is intended to be a resource for Iowa facilities that have questions on how the EPA rule will impact DNR's mandatory GHG reporting program and does not address all requirements of the EPA rule. The final rule, industry-specific fact sheets, and an on-line applicability tool are available at <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>.



Title V Workshop and SPARS Training

February 2010

The Air Quality Bureau will host three afternoon training sessions for clients wishing to use SPARS Web to submit their Year 2009 Title V Annual Emissions Inventory. In just three hours, SPARS users will learn how to: (1) Create a 2009 emissions inventory using their company's 2008 Emissions Inventory as a template; (2) Update the newly created inventory to reflect the 2009 emissions data; and (3) Submit the 2009 Emissions Inventory to DNR via the Internet.

Additionally, the Air Quality Bureau will hold three morning workshop sessions on Title V application forms and compliance as half-day complements to the half-day SPARS training sessions. The Title V Group will cover application forms, emissions calculations, periodic monitoring, CAM plans and a summary of common application deficiencies. The Title V training will be based on a green-field model facility and cover examples of construction permit applications, resulting construction permits, a Title V application, the resulting Title V permit, a Title V EIQ and Title V Compliance certifications. The Compliance Group will review the semi-annual and annual Title V reporting forms and common errors found in the submittals.

Question and answer sessions will be held during all presentations.

The location will be the Air Quality Bureau's office at 7900 Hickman Rd., Suite 1, Windsor Heights, IA. Please contact Barb Stock at 515-242-5100 or at barb.stock@dnr.iowa.gov to make your reservations. You will be able to sign up to attend a SPARS training session and a Title V workshop session in one day.

Sessions will be held in the morning from 8:30 a.m. to no later than noon and 1:00 p.m. to no later than 4:30 p.m.

Title V Workshop Sessions

Title V Workshop - February 2, 2010 one a.m. session

Title V Workshop - February 3, 2010 one a.m. session

Title V Workshop - February 4, 2010 one a.m. session

SPARS Training Sessions

SPARS Training - February 2, 2010 one p.m. session

SPARS Training - February 3, 2010 one p.m. session

SPARS Training - February 4, 2010 one p.m. session