

Iowa Department of Natural Resources

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) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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

1. Principal Life Insurance Company, located at 711 High Street, Des Moines, Iowa 50392 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Ms. Teri Button, Vice President.
2. Principal Life Insurance Company is a producer of Insurance Services (SIC 6311), and has supporting Electric Services (SIC 4911). This facility consists of twenty-six (26) 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}	11.39
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	11.65
Particulate Matter	PM	11.72
Sulfur Dioxide	SO ₂	98.59
Nitrogen Oxides	NO _x	255.85
Volatile Organic Compounds	VOC	9.90
Carbon Monoxide	CO	55.12
Hazardous Air Pollutants ⁽¹⁾	HAP	1.47

⁽¹⁾ May include the following: formaldehyde, n-hexane, toluene, ethylbenzene, xylene, ethylene glycol, and methyl isobutyl ketone.

3. Principal Life Insurance Company submitted a Title V Operating Permit renewal application on June 13, 2013 and any additional information describing the facility on February 1, 2016. Based on the information provided in these documents, IDNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. IDNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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

1. The public comment period for the proposed permit will run from May 2, 2016 through June 1, 2016. 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. During this time, anyone may submit written comments on the permit. Mail signed comments to Brent Blanchard at the Polk County address shown below.
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. IDNR 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 Brent Blanchard at the Polk County address shown below.
3. IDNR 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, IDNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Mr. Brent Blanchard
Polk County Public Works
Air Quality Division
5885 NE 14th Street
Des Moines, Iowa 50313
Phone: (515) 286-2284
E-mail: brent.blanchard@polkcountyiowa.gov

IDNR concludes that:

1. IDNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-31, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. IDNR 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 20-31.
4. IDNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the IDNR from pursuing enforcement action for any violation.

Applicant: Principal Life Insurance Co.**Review Engineer:**

EIQ Number: 92-6877

Brent Blanchard

Facility File Number: 77-01-174

Application Evaluation

A. Project Briefing:

The facility consists of emission units located at seven (7) buildings in downtown Des Moines, including buildings identified as Corporate 1, Corporate 2, Corporate 3, Corporate 4, Corporate 5, 680 8th Street, and 801 Grand. The facility grounds also include Lot B, Lot G, Colony Lot, and 901 Grand parking.

This project regards a Part 70 Title V permit renewal application to operate the following significant emission units: six (6) 1825 kW Caterpillar Model 3516 Dita generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP 3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6); two (2) 14.65 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7); one (1) 6.277 MMBTU/ Hr. Cleaver Brooks dual fuel Boiler, (EU 9.1, 9.2 / EP 7); one (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10); one (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11); one (1) 1.338 MM BTU/ Hr. Kewanee Boiler, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12); one (1) 1.505 MM Btu/ Hr. Kewanee Boiler, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13); one (1) 711 High St. Emergency Generator, Cummins Model DQFAS, 1,112 kW, Diesel, (EU 14A / EP 14); one (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18); one (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19); one (1) 25,000 gallon underground diesel storage tank, (EU 20 / EP 20); one (1) 20,000 gallon underground diesel storage tank, (EU 21 / EP 21); one (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24); and one (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28).

The facility has two (2) 2.9 MMBTU Natural Gas Kewanee Boilers, located at their 680 8th Street location (EU 25.1 and 25.2); a welding booth with exhaust hood at the Corporate 1 location (EU 27); and (2) 2.088 MMBtu Natural Gas Fired Smith Boilers (EU 12.1 and 13.1); which meet the definition of insignificant emission units, per 567 IAC 22.102- 103.

One (1) 3.4121 MM BTU/ Hr., 1000 kW Computer Support Generator, Detroit Model DD12EE0009897, Diesel, (EU 14 / EP 14) was permanently removed June 2015.

One (1) 2.559 MM BTU/ Hr. and 750 kW, Computer Support Emergency Generator, Caterpillar Model D349 620-483361111, Diesel, (EU 16 / EP 16) was permanently removed June 2015.

One (1) 25,000 gallon underground diesel storage tank, (EU 22 / EP 22) permitted under Polk County Construction Permit 1454 was permanently closed in place and the construction permit was rescinded on 1/7/2013.

One (1) Paint Room in corporate 1 (EU 17 / EP 17), was permanently removed in June 2015

One (1) 25,000 gallon underground diesel storage tank, (EU 23 / EP 23) permitted under Polk County Construction Permit 1455 was permanently closed in place and the construction permit was rescinded on 1/7/2013.

Two (2) 1.462 MM BTU/ Hr. Kewanee Boilers, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 12.1, 12.2 / EP 12; EU 13.1, 13.2 / EP 13) were permanently removed 4/2/2013.

Two (2) 1.6 MM BTU/ Hr. Bryant Boilers, Natural Gas/Electric Fired, located at their Corporate 3 Location, (EU 26.1 and 26.2) have been permanently removed.

One (1) Welding booth (insignificant source EU 27) was removed from Corporate 1 in June 2015.

B. Applicable rules and regulations:

1. Emission limits and conditions:

Polk County Construction Permit #s 1107, 1108, 1109, 1110, 1111, and 1112 limit PM₁₀ emissions to 0.79 TPY; opacity to 20%; SO_x to 0.895 TPY; NO_x to 21.95 TPY; VOC to 0.445 TPY; CO to 3.595 TPY, for each of six (6) 1825 kW Caterpillar Model 3516 Dita diesel generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP 3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6). Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

Two (2) 14.65 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7) are permitted under Polk County Construction Permits 1457 and 1458. Limits of each permit are: PM₁₀: 0.49 TPY; Opacity: 20%; SO_x: 32.53 TPY; NO_x: 9.16 TPY; VOC: 0.16 TPY; CO: 2.20 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) 6.277 MMBTU/ Hr. Cleaver Brooks dual fuel Boiler, (EU 9.1, 9.2 / EP 7) is permitted under Polk County Construction Permit 1459. Limits are: PM₁₀: 0.39 TPY; Opacity: 20%; SO_x: 13.93 TPY; NO_x: 3.92 TPY; VOC: 0.14 TPY; CO: 2.20 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. Limits are: PM₁₀: 2.72 TPY; Opacity: 20%; SO_x: 2.54 TPY; NO_x: 38.63 TPY; VOC: 3.15 TPY; CO: 8.32 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462, which limits the unit to 500 hrs./ yr. Limits are: PM₁₀: 0.29 TPY; Opacity: 20%; SO_x: 1.03 TPY; NO_x: 6.52 TPY; VOC: 0.18 TPY; CO: 1.73 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) 1.338 MM BTU/ Hr. Kewanee Boilers, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12); One (1) 1.505 MM BTU/ Hr. Kewanee Boilers, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13) are grandfathered from construction permitting requirements.

One (1) 1,112 kW Emergency Generator, Cummins Model DQFAS, Diesel (EU 14A / EP 14) is permitted under Polk County Construction Permit 2929, which limits the unit to 500 hours/yr. Limits are: PM/PM₁₀/PM_{2.5}: 0.20 gram/kW-hr, 0.49 lb/hr, 0.12 TPY; Opacity: <15% during lugging, <20% at all other times; SO₂: 0.02 lb/hr, 0.005 TPY; NMHC+NO_x: 6.4 gram/kW-hr, 15.69 lb/hr, 3.92 TPY; VOC: 1.05 lb/hr, 0.26 TPY; CO: 3.5 gram/kW-hr, 8.58 lb/hr, 2.15 TPY

One (1) Paint Room in Corporate 1 with Mat or panel filter (EU 17 / CE-01 / EP 17) is grandfathered from construction permitting requirements.

One (1) 5.64686 MM BTU/ Hr., 1655 kW Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18) is permitted under Polk County Construction Permit 0754 Modified, which limits the unit to 1700 hours/yr. Limits are PM/ PM₁₀: 0.14 lb/hr, 1.72 TPY; opacity: 20%; SO_x: 2.91 lb/hr, 2.48 TPY; NO_x: 46.14 lb/hr, 39.22 TPY; VOC: 1.29 lb/hr, 1.10 TPY; CO: 12.26 lb/hr, 10.42 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./yr. Limits are: PM₁₀: 0.01 TPY; Opacity: 20%; SO_x: 0.01 TPY; NO_x: 0.01 TPY; VOC: 0.01 TPY; CO: 0.01 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) 25,000 gallon underground diesel storage tank, (EU 20 / EP 20) is permitted under Polk County Construction Permit 1453. Throughput is limited to 907,500 gallons per 12 month period, rolled monthly. Limits are: no visible emissions and VOC: 0.02 TPY.

One (1) 20,000 gallon underground diesel storage tank, (EU 21 / EP 21) is permitted under Polk County Construction Permit 1456. Throughput is limited to 387,400 gallons per 12 month period, rolled monthly. Limits are: no visible emissions and VOC: 0.01 TPY.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./yr. Limits are: PM₁₀: 0.49 TPY; Opacity: 20%; SO_x: 1.77 TPY; NO_x: 11.2 TPY; VOC: 0.32 TPY; CO: 2.98 TPY. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits the unit to 500 hrs./yr. Limits are: PM/PM₁₀: 0.3 gram/kW-hr, 0.08 lbs./hr, 0.02 TPY; Opacity: <20%; SO₂: 0.34 lbs./hr, 0.08 TPY; 0.5 lb/MMBtu; NMHC+NO_x: 4.0 gram/kW-hr, 1.10 lbs/hr, 0.28 TPY; VOC: 0.42 lbs./hr, 0.11 TPY; CO: 5.0 gram/kW-hr, 1.38 lbs./hr, 0.34 TPY.

2. Opacity for the facility and EP 28: Less than 20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9.

Opacity for EP 14: Less than 15% during lugging, less than 20% at all other times – Polk County Construction Permit 2929, §89.113

Opacity for EP 1 through EP 7, 10, 11, 18, 19, and 24: no more than 20% opacity. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20% for these EPs.

Opacity of EP 20 and EP 21: no visible emissions.

3. NSPS: One (1) 25,000 and one (1) 20,000 gallon underground diesel storage tanks, (EUs 20, 21), are subject to NSPS Subpart Kb. Applicable NSPS requirements are found in the tanks' construction permits, Polk County Construction Permits 1453, 1456.

NSPS 40 CFR 60 Subpart IIII- *Stationary Compression Ignition Internal Combustion Engines* is applicable to (EU 14A / EP 14) and (EU 28 / EP 28). Applicable requirements are placed into the Polk County AQD Construction Permits Numbered 2929 and 2065 and the facility's Title V Renewal Permit.

Per §60.40c 40CFR 60 Subpart Dc-*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is not applicable to EPs 7, 12 or 13 as these emission units were installed prior to June 9, 1989.

4. NESHAP: Facility combined HAP PTE is 1.50 TPY. NESHAP 40 CFR 63 Subpart ZZZZ- *Emission Standards for Stationary Reciprocating Internal Combustion Engines* is applicable to (EU 14A / EP 14) and (EU 28 / EP 28). Applicable requirements are placed into the Polk County AQD Construction Permits Numbered 2929 and 2065 and the facility's Title V Renewal Permit. Per §63.6590(c) the facility satisfies all requirements of this subpart by complying with 40 CFR 60 subpart IIII.

Engines (generators or pumps) EUs 1, 2, 3, 4, 5, 6, 10, 11, 18, 19, and 24 are affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and ZZZZ [National

Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR §63.6580 – 40 CFR §63.6675] of the National Emission Standard for Hazardous Air Pollutants (NESHAP). Applicable requirements are placed into the facility's Title V Renewal Permit.

Per §63.7485 as a minor source of HAPs Subpart DDDDD—*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to EPs 7, 12 and 13.

Per §63.11194 EPs 7, 12, and 13 are not in a subcategory listed in §63.11200 and defined in §63.11237 (the facility is operating and intends to continue to operate the boilers in a way to meet the definition of a gaseous boiler); therefore, 40 CFR 63 Subpart JJJJJ—*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable.

5. PSD: Source is currently major (PSD) for NO_x. If the facility makes any future qualifying changes, then they will need to submit a PSD permit application, i.e., applying for a significant increase of any pollutant.
 6. NAAQS: Facility is located in an attainment area. Air modeling is not required at this time.
 7. Title IV: Not applicable.
 8. Stratospheric ozone: the only ozone depleting chemicals (regulated by 40 CFR 82) at the facility are those used for air conditioning. 40 CFR 82, Subpart F, applies to the disposal of appliances containing Class I or Class II substances (i.e. air conditioners).
 9. CAM: Facility has only one control equipment device, a mat or panel filter on the paint room. Pre-control PM PTE is 0.47 TPY, indicating that CAM does not apply.
10. PM-10: Polk County Construction Permit #s 1107, 1108, 1109, 1110, 1111, and 1112 limit PM₁₀ emissions to 0.79 TPY for each of six (6) 1825 kW Caterpillar Model 3516 Dita diesel generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6).

Two (2) 14.645 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7) are permitted under Polk County Construction Permits 1457 and 1458. PM₁₀ limits for each permit are 0.49 TPY.

Polk County Construction Permit 1459 limits PM₁₀ to 0.39 TPY from a Cleaver Brooks 6.277 MMBtu/hr Duel Fuel Boiler (EU 9.1, 9.2 / EP 7).

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. The permit limits PM₁₀ to 2.72 TPY.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462. The permit limits PM₁₀ to 0.29 TPY.

One (1) 1,112 kW Cummins Model DQFAS diesel fired Emergency Generator (EU 14A / EP 14) is permitted under Polk County Construction Permit 2929, which limits the unit to 500hrs/yr of operation. The permit limits PM/PM₁₀/PM_{2.5} to 0.49 lb/hr, 0.12 TPY, 0.20 gram/kW-hr.

One (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel Generator (EU 18 / EP 18) is permitted under Polk County Construction Permit 0754 Modified. The permit limits PM/PM₁₀ emissions to 0.14 lb./hr. and 1.72 TPY.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./yr. The permit limits PM₁₀ to 0.01 TPY.

Polk County Construction Permits 1453 and 1456 issued for Underground Diesel Storage Tanks (EU 20 / EP 20, EU 21 / EP 21) have no PM₁₀ emission limits.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./ yr. The permit limits PM₁₀ to 0.49 TPY.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits the unit to 500 hrs./ yr. The permit limits PM/PM₁₀ to 0.08 lbs./ hr, 0.02 TPY, and 0.3 g/kW-hr.

C. Monitoring Consideration:

PM:

Six (6) 1825 kW Caterpillar Model 3516 Dita generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6) are each uncontrolled minor, 0.79 TPY, for PM₁₀. The EUs each have a 500 hour per 12 month period operating limit. Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

Two (2) 14.645 MMBTU/ Hr., Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7) are permitted under Polk County Construction Permits 1457 and 1458. Limits of each permit are: PM₁₀: 0.49 TPY, (uncontrolled minor). There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 6.277 MMBTU/ Hr., Cleaver Brooks dual fuel Boiler (EU 9.1, 9.2 / EP 7) is permitted under Polk County Construction Permit 1459. The permit limits PM₁₀ to 0.39 TPY, (uncontrolled minor). There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. Limits are: PM₁₀: 2.72 TPY, (uncontrolled minor). There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462, which limits the unit to 500 hrs./ yr. Limits are: PM₁₀: 0.29 TPY, (uncontrolled minor). Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 1.338 MM BTU/ Hr., Kewanee Boilers, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12); is grandfathered, but is subject to 0.6 lb./MMBtu under 567 IAC 23.3(2)"b"(2) and Polk County Board of Health Rules and Regulations Chapter V, Article VI, Section 5-15(b). Uncontrolled PM PTE is 0.08 TPY, based on max throughput and WebFire emission factors. There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 1.505 MM BTU/ Hr., Kewanee Boiler, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13) is grandfathered, but is subject to 0.6 lb./MMBtu under 567 IAC 23.3(2)"b"(2) and Polk County Board of Health Rules and Regulations Chapter V, Article VI, Section 5-15(b). Uncontrolled PM PTE is 0.09 TPY, based on max throughput and WebFire emission factors. There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 1,112 kW Cummins Model DQFAS, Diesel, emergency generator located at Corp. #1 (EU 14A / EP 14) is permitted under Polk County Construction Permit Number 2929 which limits operation to 500 hrs/ yr. Limits are PM/PM₁₀/PM_{2.5}: 0.49 lb/hr, 0.12 TPY, 0.20 gram/Kw-hr (uncontrolled minor). Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18) is uncontrolled minor, 1.72 TPY, for PM/ PM₁₀. This EU has a 1,700 hour per 12 month period operating limit, along with record keeping. Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./ yr. Limits are: PM₁₀: 0.01 TPY, (uncontrolled minor). Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

Two (2) underground Diesel Storage Tanks (EU 20 / EP 20, EU 21 / EP 21) are not expected to have any PM emissions. There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./ yr. Limits are: PM₁₀: 0.49 TPY, (uncontrolled minor). Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits the unit to 500 hrs./ yr. Limits are: PM / PM₁₀: 0.08 lbs./ hour; 0.02 TPY; and 0.3 g/kW-hr, (uncontrolled minor). Record keeping is the only requirement under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

Opacity:

Six (6) 1825 kW Caterpillar Model 3516 Dita generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6) each have a not greater than 20% opacity limit in their respective construction permits. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces allowable opacity to <20%. An action level of no visible emissions will be placed into each EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the generators are operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

Two (2) 14.645 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, and one (1) Boiler, Cleaver Brooks Model L-79794 (EU 7.1, 7.2, 8.1, 8.2, 9.1, 9.2 / EP 7) are permitted under Polk County Construction Permits 1457, 1458, and 1459. Limits of each permit are: Opacity 20%. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces allowable opacity to <20%. An action level of no visible emissions will be placed into each EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the generators are operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. Limits are: Opacity 20%. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces allowable opacity to <20%. An action level of no visible emissions will be placed into the EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the fire pump is operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462. Limits are: Opacity 20%. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%. An action level of no visible emissions will be placed into the EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the generator is operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 1.338 MM BTU/ Hr. Kewanee Boiler, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12) is grandfathered, but is subject to < 20% opacity under Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. EU 12.3 is when the boiler is natural gas fired, and no VEs are expected. No opacity monitoring will be required for this EU. EU 12.4 is when the boiler is #2 Fuel Oil fired. An action level of no visible emissions will be placed into this EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the boiler is operated on fuel oil. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 1.505 MM BTU/ Hr. Kewanee Boiler, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13) is grandfathered, but is subject to < 20% opacity under Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. EU 13.3 is when the boiler is natural gas fired, and no VEs are expected. No opacity monitoring will be required for this EU. EU 13.4 is when the boiler is #2 Fuel Oil fired. An action level of no visible emissions will be placed into this EPs' Monitoring, and an observer from the facility will have to check for visible emissions each time the boiler is operated on fuel oil. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 1,112 kW Cummins Model DQFAS, Diesel, Emergency Generator (EU 14A / EP 14), located at Corporate #1 is limited by Polk County Construction Permit to < 20% opacity. An action level of no visible emissions will be placed into the EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the generator is operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18) is permitted under Polk County Construction Permit Number 0754 Modified. The permit has a not greater than 20% opacity limit, but is subject to < 20% opacity under Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. An action level of no visible emissions will be placed into EP 18's Monitoring, and an observer from the facility will have to check for visible emissions each time the generator is operated for maintenance or testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./ yr. Limits are: Opacity 20%. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%. The unit is natural gas fired, and no VEs are expected. No opacity monitoring will be required for this EU.

One (1) 25,000 gallon and one (1) 20,000 underground diesel storage tanks, (EU 20 / EP 20, EU 21 /EP 21) are permitted under Polk County Construction Permits 1453 and 1456. Limits are: no visible emissions. Monitoring for opacity will not be required since these are VOC sources only and VEs are not expected.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./ yr. Limit is: Opacity 20%. Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9 reduces the allowable opacity to <20%. An action level of no visible emissions will be placed into the EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the emergency generator is operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits the unit to 500 hrs./ yr. Limit is: Opacity <20%. An action level of no visible emissions will be placed into the EP's Monitoring, and an observer from the facility will have to check for visible emissions each time the emergency generator is operated for maintenance and testing. This will allow the company to avoid having to have a Method 9 certified opacity reader in house, and will correct any problems before they become significant.

VOC:

Six (6) 1825 kW Caterpillar Model 3516 Dita generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6) are limited to 0.445 TPY, for VOC (uncontrolled minor). The EUs each have a 500 hour per 12 month period operating limit. Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

Two (2) 14.65 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7) and one (1) 6.277 MMBTU/ Hr. Cleaver Brooks dual fuel Boiler, (EU 9.1, 9.2 / EP 7) are permitted under Polk County Construction Permits 1457, 1458, and 1459. Limits of each permit are: VOC: 0.16 TPY, 0.16 TPY, and 0.14 TPY, respectively, (uncontrolled minors). There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. Limits are: VOC: 3.15 TPY, (uncontrolled minor). There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462, which limits the unit to 500 hrs./ yr. Limits are: VOC: 0.18 TPY, (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

One (1) 1.338 MM BTU/ Hr. Kewanee Boiler, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12) is grandfathered. VOC PTE is 0.03 TPY (uncontrolled minor), based on max throughput and WebFire emission factors. There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 1.505 MM BTU/ Hr. Kewanee Boilers, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13) is grandfathered. VOC PTE is 0.03 TPY (uncontrolled minor), based on max throughput and WebFire emission factors. There are no requirements under IDNR's Monitoring Guidance Policy. CAM is not applicable as there is no control equipment.

One (1) 1,112 kW Cummins Model DQFAS Diesel, Emergency Generator, (EU 14A / EP 14) is permitted under Polk County Construction Permit Number 2929, which limits operation to 500 hrs/yr. VOC is limited to 1.05 lb/hr, 0.26 TPY (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

One (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18) is permitted under Polk County Construction permit Number 0754 Modified. This EU has a 1,700 hour per 12 month period operating limit and is limited to 1.10 TPY, for VOC (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./ yr. Limits are: VOC: 0.01 TPY, (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

One (1) 25,000 gallon underground diesel storage tank, (EU 20 / EP 20) is permitted under Polk County Construction Permit 1453. Limits are: VOC: 0.02 TPY, (uncontrolled minor). Throughput is limited to 907,500 gallons diesel per 12 month period, rolled monthly. Recordkeeping of throughput will ensure compliance with the emission limit for monitoring purposes. CAM is not applicable as there is no control equipment.

One (1) 20,000 gallon underground diesel storage tank, (EU 21 / EP 21) is permitted under Polk County Construction Permit 1456. Limits are: VOC: 0.01 TPY, (uncontrolled minor). Throughput is limited to 387,400 gallons diesel per 12 month period, rolled monthly. Recordkeeping of throughput will ensure compliance with the emission limit for monitoring purposes. CAM is not applicable as there is no control equipment.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./ yr. Limits are: VOC: 0.32 TPY, (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits VOC: 0.42 lbs./ hour and 0.11 TPY, (uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

HAPs:

The facility doesn't have any short term or long term limits on HAPs. Total PTE of HAPs from the facility is 1.493 TPY. Under IDNR's Monitoring Guidance Policy, nothing is required.

CO, NO_x, and SO₂

Six (6) 1825 kW Caterpillar Model 3516 Dita generators, (EU 1 / EP 1), (EU 2 / EP 2), (EU 3 / EP3), (EU 4 / EP 4), (EU 5 / EP 5), and (EU 6 / EP 6) are each uncontrolled minor, 3.595 TPY for CO, 21.95 TPY for NO_x, and 0.895 TPY for SO_x. The EUs each have a 500 hour per 12 month period operating limit. Diesel fuel sulfur content certification from the vendor is required to be maintained on site and made available to Polk County AQD by each of the generators' construction permits. Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

Two (2) 14.65 MMBTU/ Hr. Cleaver Brooks dual fuel Boilers, (EU 7.1, 7.2, 8.1, 8.2 / EP 7); one (1) 6.277 MMBTU/ Hr. Cleaver Brooks dual fuel Boiler, (EU 9.1, 9.2 / EP 7) are permitted under Polk County Construction

Permits 1457, 1458, and 1459. Uncontrolled CO PTE is 2.20 TPY (each permit), (uncontrolled minors), and uncontrolled NO_x PTE is 9.16 TPY, 9.16 TPY, and 3.92 TPY, (uncontrolled minors). CO and NO_x, have no short-term limits. Under IDNR's Monitoring Guidance Policy, nothing is required. SO₂ is limited to 32.53 TPY (each boiler) for EU 7.1, 7.2 and 8.1, 8.2 and 13.93 TPY for EU 9.1 and 9.2, (uncontrolled minors). This requires that a maximum 0.5% sulfur content be utilized in the fuel oil. Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, nothing is required except for monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) Detroit-Clark Model DDFP-08GT 195 hp Fire Pump, Diesel, (EU 10 / EP 10) is permitted under Polk County Construction Permit 1461. Limits are: SO_x: 2.54 TPY, NO_x: 38.63 TPY, and CO: 8.32 TPY, (uncontrolled minor). CO and NO_x, have no short-term limits. Under IDNR's Monitoring Guidance Policy, nothing is required. The applicable SO₂ standard of 0.5 lb./MM BTU equates to an allowable uncontrolled PTE of 14.31 TPY for EU 10. WebFIRE and a maximum 0.5% sulfur content yields a PTE of 14.11 TPY. The reliability of WebFIRE emission factors indicates that the allowable will not be exceeded. Under IDNR's Monitoring Guidance Policy, nothing is required except for monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 Diesel. CAM is not applicable as there is no control equipment.

One (1) 8.8 MM BTU/ Hr., 750 kW Emergency Generator, Caterpillar Model 3508 (EU 11 / EP 11) is permitted under Polk County Construction Permit 1462, which limits the unit to 500 hrs./ yr. Limits are: SO_x: 1.03 TPY, NO_x: 6.52 TPY, and CO: 1.73 TPY, (uncontrolled minors). SO_x, NO_x, and CO have no short-term limits. The applicable SO₂ standard of 0.5 lb./MM BTU equates to an allowable uncontrolled PTE of 19.27 TPY for EU 11. WEBFIRE and a maximum 0.5% sulfur content yields a PTE of 19.01 TPY. The reliability of WEBFIRE emission factors indicates that the allowable will not be exceeded. Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required and monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) 1.338 MM BTU/ Hr. Kewanee Boilers, Model 3R-10, South Annex, Natural Gas and #2 Fuel Oil, (EU 12.3, 12.4 / EP 12) is grandfathered. Uncontrolled CO PTE is 0.47 TPY, and uncontrolled NO_x PTE is 1.0 TPY, based on max throughput and FIRE emission factors. CO and NO_x, have no short-term limits. Under IDNR's Monitoring Guidance Policy, nothing is required. The applicable SO₂ standard of 0.5 lb./MM BTU equates to an allowable uncontrolled PTE of 2.93 TPY for EU 12.4. WEBFIRE and a maximum 0.5% sulfur content yields a PTE of 2.97 TPY. Being an uncontrolled minor, under IDNR's Monitoring Guidance Policy, nothing is required except for monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) 1.505 MM BTU/ Hr. Kewanee Boilers, Model 3R-11, North Annex, Natural Gas and #2 Fuel Oil, (EU 13.3, 13.4 / EP 13) is grandfathered. Uncontrolled CO PTE is 0.53 TPY, and uncontrolled NO_x PTE is 1.13 TPY, based on max throughput and FIRE emission factors. CO and NO_x, have no short-term limits. Under IDNR's Monitoring Guidance Policy, nothing is required. The applicable SO₂ standard of 0.5 lb./MM BTU equates to an allowable uncontrolled PTE of 3.30 TPY for EU 13.4. WEBFIRE and a maximum 0.5% sulfur content yields a PTE of 3.34 TPY. Being an uncontrolled minor, under IDNR's Monitoring Guidance Policy, nothing is required except for monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) 1,112 kW Cummins Model DQFAS, Diesel, emergency generator (EU 14A / EP 14); is permitted under Polk County Construction Permit Number 2929, which limits the unit to 500 hrs./yr. Limits are: SO_x 0.02 lb/hr, 0.005 TPY, 0.5 lb/MMBtu; NO_x (as NMHC+NO_x) 15.69 lb/hr, 3.92 TPY, 6.4 gram/kW-hr; and CO 8.58 lb/hr, 2.15 TPY, 3.5 gram/kW-hr. Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required and monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) 5.64686 MM BTU/ Hr., 1655 kW, Corporate 4 Generator Set, Cummins-Onan Model D28 KTTA50-G2, Diesel, (EU 18 / EP 18) is permitted under Polk County Construction Permit Number 0754 Modified, which limits the unit to 1700 hr/yr of operation. Limits are: CO 12.26 lbs./ hr., 10.42 TPY; SO_x 2.91 lbs./ hr., 2.48 TPY; NO_x EU 18 46.14 lb./ hr. and 39.22 TPY. Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, only

hours of operation record keeping is required and monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) Corporate 3 Emergency Generator, Ford Model LSGD8751, 150 kW and 0.000486 MMCF / Hr., Natural Gas Fired, (EU 19 / EP 19) is permitted under Polk County Construction Permit 1463, which limits the unit to 500 hrs./ yr. Limits are: SO_x: 0.01 TPY, NO_x: 0.01 TPY, and CO: 0.01 TPY, (all uncontrolled minor). Under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required. CAM is not applicable as there is no control equipment.

Two (2) Underground Diesel Storage Tanks, (EU 20 / EP 20, EU 21 / EP 21) permitted under Polk County Construction Permits 1453 and 1456 are VOC sources only and not expected to have any CO, NO_x or SO_x emissions.

One (1) 801 Grand Emergency Generator, Kato-Waukesha Model L6670, 1175 kW, Diesel, (EU 24 / EP 24) is permitted under Polk County Construction Permit 1464, which limits the unit to 500 hrs./ yr. Limits are: SO_x: 1.77 TPY, NO_x: 11.2 TPY, and CO: 2.98 TPY, (all uncontrolled minor). Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required and monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

One (1) 701 Park Street Parking Ramp Generator, Caterpillar Model D125-6, 125 kW, Diesel, (EU 28 / EP 28) is permitted under Polk County Construction Permit 2065, which limits the unit to 500 hrs./ yr. Limits are: SO₂: 0.34 lbs./ hour; 0.08 TPY; and 0.5 lb/MMBtu, (uncontrolled minor); NMHC+NO_x: 1.10 lbs./ hour; 0.28 TPY; and 4.0 g/kW-hr, (uncontrolled minor); and CO: 1.38 lbs./ hour; 0.34 TPY; and 5.0 g/kW-hr, (uncontrolled minor). Being uncontrolled minor, under IDNR's Monitoring Guidance Policy, only hours of operation record keeping is required and monitoring sulfur content of each fuel oil shipment received to ensure it stays equal to or below the 0.5% ASTM standard for #2 fuel oil. CAM is not applicable as there is no control equipment.

D. Facility Proposed Limits:

No facility wide-limits proposed by the facility.

E. Responsible Official: Ms. Teri Button, Vice President, is in charge of a principle business function, that of selling financial services and making a profit for Principal Life Insurance Company. She meets the definition of Responsible Official found in 567 IAC 22.100. Polk County received notification of the RO change in a letter dated 2/1/2016.

F. Other Considerations: On 11/10/2015 Polk County Air Quality completed a full compliance review at the facility. The facility was found to be in compliance with all of its' current Title V requirements.

The facility submitted comments during the facility review period. They requested that additional recordkeeping requirements be inserted for the boilers. The reasons stated for the additional recordkeeping requirements were to improve accuracy of the annual EIS and to ensure that the operators were operating the boilers under the definition of a "gaseous boiler" per §63.11237.

The facility also requested that EP 14 have the same language from §60.4214 inserted that was contained in the record keeping conditions as EP 28