

[Wendy Walker (Iowa DNR)] 18:53:09  
Okay, so show captions...

[Wendy Walker (Iowa DNR)] 18:53:12  
And... transcript.

[Wendy Walker (Iowa DNR)] 18:53:16  
Okay, I'm going to turn the captions off.

[Marnie Stein - DNR] 18:53:22  
Are we transcribed right now?

[Zane Peters (Iowa DNR)] 18:53:23  
Mm-hmm.

[Wendy Walker (Iowa DNR)] 18:53:24  
Yes.

[Marnie Stein - DNR] 18:53:25  
Okay, I would like to win another 2 minutes.

[Wendy Walker (Iowa DNR)] 18:53:28  
Okay, I'll turn it off.

[Marnie Stein - DNR] 18:53:29  
Before we let people in.

[Wendy Walker (Iowa DNR)] 18:53:32  
And... oh, nope, it's there.

[Wendy Walker (Iowa DNR)] 18:53:36  
We're just...

[Wendy Walker (Iowa DNR)] 18:53:48  
Ooh, we're up to 6 now.

[Wendy Walker (Iowa DNR)] 18:53:50  
Javier Franco, Lori...

[Wendy Walker (Iowa DNR)] 18:53:52  
Larry Duran.

[Marnie Stein - DNR] 18:53:57  
That's the president.

[Wendy Walker (Iowa DNR)] 18:54:04  
Do you want me to share the slides?

[Wendy Walker (Iowa DNR)] 18:54:07  
right as we're opening it?

[Wendy Walker (Iowa DNR)] 18:54:11  
So they see that?

[Zane Peters (Iowa DNR)] 18:54:16  
And I would, that way, you know...

[Marnie Stein - DNR] 18:54:18  
I would, and I would put it on...

[Marnie Stein - DNR] 18:54:21  
the discrimination slide.

[Wendy Walker (Iowa DNR)] 18:54:24  
Okay. Share?

[Wendy Walker (Iowa DNR)] 18:54:30  
And... share...

[Wendy Walker (Iowa DNR)] 18:54:32  
Okay, can you guys see that?

[Zane Peters (Iowa DNR)] 18:54:35  
Yes, beautiful.

[Wendy Walker (Iowa DNR)] 18:54:36  
Okay. Zita.

[Marnie Stein - DNR] 18:54:37  
Or maybe we should do the first screen.

[Marnie Stein - DNR] 18:54:41  
Yeah, let's do that one.

[Zane Peters (Iowa DNR)] 18:54:41  
Yeah, that's nice. And then when we start, you can go right to the...

[Wendy Walker (Iowa DNR)] 18:54:44  
Okay. Do you want me to hit admit?

[Marnie Stein - DNR] 18:54:49  
Mmm, that's wait till 6.55.

[Wendy Walker (Iowa DNR)] 18:54:50  
Okay.

[Marnie Stein - DNR] 18:55:09  
Jeremy, feel free to interrupt me if I'm being stupid.

[Wendy Walker (Iowa DNR)] 18:55:12  
Okay. 3, 2, 1, are we all ready?

[Marnie Stein - DNR] 18:55:21  
Yep.

[Wendy Walker (Iowa DNR)] 18:55:22  
Okay, I'm gonna hit admit all, here they come.

[Marnie Stein - DNR] 18:55:50  
Wendy, how do I change my settings so I can see multiple people?

[Marnie Stein - DNR] 18:56:02  
We may not be able to since I'm sharing.

[Marnie Stein - DNR] 18:56:05  
But, um, if you go under video...

[Marnie Stein - DNR] 18:56:09  
up Carrot.

[Marnie Stein - DNR] 18:56:10  
That should adjust, um...

[Zane Peters (Iowa DNR)] 18:56:12  
Hey, Marnie, I figured out a way that you could...

[Marnie Stein - DNR] 18:56:15  
Oh.

[Zane Peters (Iowa DNR)] 18:56:16  
do a little bit. If you... there's a bar between the screen we're sharing  
and all the faces.

[Marnie Stein - DNR] 18:56:21  
Gotcha.

[Zane Peters (Iowa DNR)] 18:56:22  
You can click and drag that.

[Marnie Stein - DNR] 18:56:24  
Thank you.

[Wendy Walker (Iowa DNR)] 18:57:32  
Okay.

[Marnie Stein - DNR] 18:57:47  
Good evening, everybody.

[Marnie Stein - DNR] 18:57:53  
Can you hear me?

[Marnie Stein - DNR] 18:57:56  
Yeah, just nod your head since you're muted.

[Marnie Stein - DNR] 18:58:08  
We're about 2 minutes before, we're gonna wait a couple minutes after to  
make sure everyone can get on that wants to get on.

[Marnie Stein - DNR] 18:58:46  
How many were you at? 31.

[Marnie Stein - DNR] 18:59:17

Welcome to everybody that has joined. It's 1 minute before 7. We're gonna wait till probably 3 or 4 minutes after, just to make sure that people...

[Marnie Stein - DNR] 18:59:26  
are still able to get in and get admitted.

[Marnie Stein - DNR] 19:00:12  
Wendy, when you have a chance, could you, uh, share the presentation?

[Marnie Stein - DNR] 19:00:49  
Could you please move it to the anti-discrimination slide?

[Marnie Stein - DNR] 19:00:54  
Thank you.

[Marnie Stein - DNR] 19:00:58  
Welcome to everyone that's signed in so far. Um, we still have people entering the waiting room, so we're gonna give it another 2 or 3 minutes to make sure we can get folks in.

[Marnie Stein - DNR] 19:01:08  
And then we will get started, um...

[Marnie Stein - DNR] 19:01:12  
While we're waiting folks to get in, um, we are showing our public non-discrimination clause for the DNR.

[Marnie Stein - DNR] 19:01:20  
Um...

[Marnie Stein - DNR] 19:01:22  
If you would like to take a look at that. And there's contact information if you have, um, an issue or complaint.

[Marnie Stein - DNR] 19:01:35  
Okay, we're currently at...

[Marnie Stein - DNR] 19:01:39  
43?

[Marnie Stein - DNR] 19:02:11  
Wendy, could you move to the agenda slide?

[Marnie Stein - DNR] 19:02:18  
Thank you.

[Marnie Stein - DNR] 19:02:36  
Yeah. Wendy, are we still admitting people, or has it slowed down?

[Wendy Walker (Iowa DNR)] 19:02:49  
A few have come in, it's stopped at the moment.

[Marnie Stein - DNR] 19:02:57  
Let's give it another 2 minutes.

[Marnie Stein - DNR] 19:03:48  
Okay.

[Marnie Stein - DNR] 19:04:17  
It's 7.04, I think we're gonna go ahead and get started.

[Marnie Stein - DNR] 19:04:21  
Uh, for some reason, the only person I can see is Wendy.

[Marnie Stein - DNR] 19:04:27  
So, uh, Wendy, I'm gonna rely on you to be my eyes and ears. Um, I can't even see myself. I'm not..

[Marnie Stein - DNR] 19:04:34  
Quite sure what's up with that.

[Marnie Stein - DNR] 19:04:36  
Oh, I just figured it out. I'm sorry. So..

[Marnie Stein - DNR] 19:04:39  
Welcome, everyone. My name is Marnie Stein. I am the supervisor of the Title V Operating Permit.

[Marnie Stein - DNR] 19:04:46  
program development and support sections.

[Marnie Stein - DNR] 19:04:49  
We want to welcome you to our public hearing tonight for the draft.

[Marnie Stein - DNR] 19:04:54  
Title V, Renewal Number 4 for the Highcast Foundry.

[Marnie Stein - DNR] 19:04:58  
I want to thank you all for taking time out of your schedule to participate tonight. Um, we know

[Marnie Stein - DNR] 19:05:04  
This is very important to you.

[Marnie Stein - DNR] 19:05:07  
And we want to assure you that we are not taking this lightly.

[Marnie Stein - DNR] 19:05:10  
Um, and we've been very pleased to see all the comments we've received and the level of detail.

[Marnie Stein - DNR] 19:05:16  
Um, and your engagement is just, um, incredible.

[Marnie Stein - DNR] 19:05:20  
And our goal tonight is to give you more background on the permit,

[Marnie Stein - DNR] 19:05:24

And how the process works, and then we will, um...

[Marnie Stein - DNR] 19:05:30  
start a recording and take your formal public verbal comments.

[Marnie Stein - DNR] 19:05:35  
So, um...

[Marnie Stein - DNR] 19:05:37  
Wendy, is the..

[Marnie Stein - DNR] 19:05:40  
there's the presentation. Okay, so can you all see the presentation? We have you muted, so if you could nod, that would be great.

[Marnie Stein - DNR] 19:05:49  
Okay, perfect.

[Marnie Stein - DNR] 19:05:51  
Um, so I like the other staff from DNR here to please introduce yourselves.

[Marnie Stein - DNR] 19:05:57  
And what you do here.

[Marnie Stein - DNR] 19:06:00  
Jeremy.

[Jeremy Arndt IDNR] 19:06:02  
Okay, uh, my name is Jeremy Arndt, I, um...

[Jeremy Arndt IDNR] 19:06:06  
Environmental Specialist Senior with a Title V permitting section.

[Jeremy Arndt IDNR] 19:06:11  
I've been with this section for 26 years now.

[Zane Peters (Iowa DNR)] 19:06:18  
Uh, my name is Zane Peters. I am the environmental specialist, the permit writer on this particular

[Zane Peters (Iowa DNR)] 19:06:25  
Uh, Permit and I have been with the department for, uh, it'll be 6 years this year.

[Wendy Walker (Iowa DNR)] 19:06:31  
My name is Wendy Walker. I am an environmental specialist senior in the Program Development section, and I've been with the agency since 2000, so 25 years.

[Marnie Stein - DNR] 19:06:42  
Okay, thank you. I guess I neglected to say I've been here for 28 years, so...

[Marnie Stein - DNR] 19:06:49  
Okay, so the purpose and overview of the meeting, um..

[Marnie Stein - DNR] 19:06:54  
We'll go through that, and then we have a pre-hearing information presentation for you on the permit.

[Marnie Stein - DNR] 19:07:01  
Then we will move to an informal question and answer session.

[Marnie Stein - DNR] 19:07:05  
Um, questions asked during that period do not count as public comments. It's just, um..

[Marnie Stein - DNR] 19:07:12  
like it says, an informal question and answer session and an opportunity for you to ask questions before we get to the comment period.

[Marnie Stein - DNR] 19:07:18  
And then we'll do the formal comment period.

[Marnie Stein - DNR] 19:07:21  
That section will be recorded.

[Marnie Stein - DNR] 19:07:24  
And then, um, at the end, we will do next steps. Next slide, please, Wendy.

[Marnie Stein - DNR] 19:07:30  
So...

[Marnie Stein - DNR] 19:07:32  
The purpose of this meeting is to collect and record verbal public comments on the draft Title V renewal for permit.

[Marnie Stein - DNR] 19:07:40  
We'll give an overview of the permit process and hope...

[Marnie Stein - DNR] 19:07:43  
Post the brief Q&A. We may shorten the Q&A based on the number of people in the meetings, depending on how many people want to comment, and we'll get to that in a little bit.

[Marnie Stein - DNR] 19:07:53  
Um, like I said, it will be recorded.

[Marnie Stein - DNR] 19:07:56  
If there's not enough time for everyone to comment in the two hours, then the comments may be emailed or mailed to DNR after the hearing.

[Marnie Stein - DNR] 19:08:04  
Um, a verbal comment and a written comment carry the same weight, so if you're not able to give them verbally tonight, um,

[Marnie Stein - DNR] 19:08:11  
Please send them to us in writing or email.

[Marnie Stein - DNR] 19:08:14  
Um, and then at the end, we'll record the next... we'll talk about the next steps for the Title V permit process.

[Marnie Stein - DNR] 19:08:20  
Next slide.

[Marnie Stein - DNR] 19:08:22  
So,

[Marnie Stein - DNR] 19:08:24  
Um, the way you communicate with us is if you would like to ask a question during that period, or if you would like

[Marnie Stein - DNR] 19:08:31  
to, um, give a formal public comment.

[Marnie Stein - DNR] 19:08:33  
We'll ask you to raise your hand,

[Marnie Stein - DNR] 19:08:35  
And then Wendy will unmute you and call on you one by one.

[Marnie Stein - DNR] 19:08:39  
So, to unmute your...

[Marnie Stein - DNR] 19:08:41  
To raise your hand, I'm sorry, on the bottom of the screen, there should be, um, an icon for React.

[Marnie Stein - DNR] 19:08:47  
That looks like a heart. If you click on that,

[Marnie Stein - DNR] 19:08:50  
Um, it should pop up a screen that gives you an option to raise your hand.

[Marnie Stein - DNR] 19:08:55  
And then we ask, after you ask your question or, um, give your comment, that what you're done, you

[Marnie Stein - DNR] 19:09:01  
lower your hand. So...

[Marnie Stein - DNR] 19:09:03  
What we like to do right now is do a little test practice, so...

[Marnie Stein - DNR] 19:09:08  
Um, I'd like to find out, um, how many of you are here to listen, and how many of you are actually wanting to give a public comment later, so...

[Marnie Stein - DNR] 19:09:16  
If you could all... everyone who wants to give a public comment later,

[Marnie Stein - DNR] 19:09:20  
Raise your hand so we have an idea of how many.

[Marnie Stein - DNR] 19:09:28  
You're on mute, Wendy.

[Wendy Walker (Iowa DNR)] 19:09:29  
I'm looking in the participant chapter, or the participant thing, so I have 1, 2, 3...

[Wendy Walker (Iowa DNR)] 19:09:36  
I have 3 hands raised, is what I see at the moment.

[Marnie Stein - DNR] 19:09:40  
I see 4...

[Wendy Walker (Iowa DNR)] 19:09:41  
Okay.

[Marnie Stein - DNR] 19:09:43  
So, Steve Boggs...

[Marnie Stein - DNR] 19:09:45  
Richard Beale.

[Marnie Stein - DNR] 19:09:47  
Margaret Dwyer, Susan Fagan, Sus Ol Fegel.

[Marnie Stein - DNR] 19:09:52  
Anyone else?

[Marnie Stein - DNR] 19:09:57  
Okay, and just because you didn't raise your hand now doesn't mean that you...

[Marnie Stein - DNR] 19:10:02  
Neil? Okay.

[Marnie Stein - DNR] 19:10:03  
can't decide to give a comment later.

[Marnie Stein - DNR] 19:10:06  
Okay.

[Marnie Stein - DNR] 19:10:11  
Okay, now if you could lower your hands, that would be great.

[Marnie Stein - DNR] 19:10:24  
Perfect.

[Marnie Stein - DNR] 19:10:28

Wendy, if you could do the next slide?

[Marnie Stein - DNR] 19:10:35

Okay, so now I'm going to turn this over to Zane, and Zane's gonna give us some basic information on Title V operating permits.

[Zane Peters (Iowa DNR)] 19:10:43

All right, thank you, Marnie. Uh, so hello everyone, my name is Zane, like we said earlier, and I'm going to take these next few minutes to go over some basic information about Title V permits.

[Zane Peters (Iowa DNR)] 19:10:53

And the state of Iowa's permitting process.

[Zane Peters (Iowa DNR)] 19:10:57

So the Title V permits themselves were created as part of the Federal Clean Air Act amendments that were promulgated in 1990.

[Zane Peters (Iowa DNR)] 19:11:04

The original act was signed in 1969 by President Johnson.

[Zane Peters (Iowa DNR)] 19:11:09

And the 1990 amendments were major legislation that strengthened pollution control.

[Zane Peters (Iowa DNR)] 19:11:16

The requirements for a Title V operating permit are codified in Title V of the Clean Air Act.

[Zane Peters (Iowa DNR)] 19:11:22

Uh, specifically found in 40 CFR70.

[Zane Peters (Iowa DNR)] 19:11:26

These requirements state that a major source is required to obtain a Title V operating permit

[Zane Peters (Iowa DNR)] 19:11:32

through their... and this is to quote,

[Zane Peters (Iowa DNR)] 19:11:34

of the CFR through their comprehensive state air quality permitting systems consistent

[Zane Peters (Iowa DNR)] 19:11:40

with the requirements of Title V of the Clean Air Act.

[Zane Peters (Iowa DNR)] 19:11:44

A major source under the Part 70 definitions section

[Zane Peters (Iowa DNR)] 19:11:49

of the Clean Air Act is... is a source that has the potential or actual emissions

[Zane Peters (Iowa DNR)] 19:11:55

which are at or above the major source threshold for any air pollutant subject to regulation.

[Zane Peters (Iowa DNR)] 19:12:00  
The major source thresholds are as follows.

[Zane Peters (Iowa DNR)] 19:12:04  
So, 100 tons per year or more of any air pollutant subject to regulation, or...

[Zane Peters (Iowa DNR)] 19:12:09  
10 tons per year or more of any individual hazardous air pollutant.

[Zane Peters (Iowa DNR)] 19:12:14  
Or, 25 tons per year or more of any combination of hazardous air pollutants.

[Zane Peters (Iowa DNR)] 19:12:20  
If a source meets one or more of these criteria,

[Zane Peters (Iowa DNR)] 19:12:23  
They are considered a major source, and have the legal obligation to obtain a Title V operating permit.

[Zane Peters (Iowa DNR)] 19:12:30  
A Title V permit is a legally enforceable document designed to improve compliance by clarifying what facilities must do to control air pollution. Next slide.

[Zane Peters (Iowa DNR)] 19:12:44  
So, the state of Iowa has a two-step permitting process for sources of air pollution,

[Zane Peters (Iowa DNR)] 19:12:49  
So let's take a few minutes to kind of go through and explain that. So, the first step

[Zane Peters (Iowa DNR)] 19:12:54  
is construction permitting.

[Zane Peters (Iowa DNR)] 19:12:57  
The Iowa Administrative Code says, end quote,

[Zane Peters (Iowa DNR)] 19:12:59  
No person shall instruct, install, reconstruct, or alter any equipment, control equipment,

[Zane Peters (Iowa DNR)] 19:13:06  
or anaerobic Lagoon, unless a permit is first obtained

[Zane Peters (Iowa DNR)] 19:13:10  
or the equipment qualifies for an exemption.

[Zane Peters (Iowa DNR)] 19:13:13

So these construction permits are issued

[Zane Peters (Iowa DNR)] 19:13:16

For individual emission points,

[Zane Peters (Iowa DNR)] 19:13:19

Mission units and control equipment.

[Zane Peters (Iowa DNR)] 19:13:21

Construction permits do not expire and are transferable to the new owner of the equipment.

[Zane Peters (Iowa DNR)] 19:13:26

So at this point in the process, this is where emission limits and operating limitations are set.

[Zane Peters (Iowa DNR)] 19:13:32

Local-scale dispersion modeling may or may not be required at this time.

[Zane Peters (Iowa DNR)] 19:13:37

So, if the source is a major source, a Title V operating permit is required.

[Zane Peters (Iowa DNR)] 19:13:43

This is where we get to step two. In a Title V operating permit, all air regulations for a facility are compiled into a single document.

[Zane Peters (Iowa DNR)] 19:13:52

This process groups together all individual construction permits, as well as federal, state, and local requirements.

[Zane Peters (Iowa DNR)] 19:13:59

As part of this process, in the interest of keeping quality, up-to-date permits, each Title V permit is required to go through a full renewal every 5 years. Next slide, please.

[Zane Peters (Iowa DNR)] 19:14:12

So let's take a few minutes to talk about the different steps in Iowa's Title V permitting process, so...

[Zane Peters (Iowa DNR)] 19:14:18

First step is the facility submits a permit application.

[Zane Peters (Iowa DNR)] 19:14:21

This is done through our electronic system, Iowa Easy Air.

[Zane Peters (Iowa DNR)] 19:14:26

Step two, the DNR reviews this application that's come in, and either deems it complete,

[Zane Peters (Iowa DNR)] 19:14:31

or deems it incomplete and requires corrections and or additional information.

[Zane Peters (Iowa DNR)] 19:14:38

In step 3, once the application is deemed complete, it is put in the queue to be assigned to a permit rider.

[Zane Peters (Iowa DNR)] 19:14:44

And Step 4, the permit writer takes this project and reviews the application, drafts the permit,

[Zane Peters (Iowa DNR)] 19:14:50

and sends it to our senior staff,

[Zane Peters (Iowa DNR)] 19:14:52

for review.

[Zane Peters (Iowa DNR)] 19:14:55

And in step 5, the proposed draft permit is placed on public notice for 30 days.

[Zane Peters (Iowa DNR)] 19:15:02

Next slide. Thank you, and so...

[Zane Peters (Iowa DNR)] 19:15:06

during this time, uh, step 6 happens, EPA Region 7 staff are given a concurrent

[Zane Peters (Iowa DNR)] 19:15:12

45-day review period where they get all the draft documents, the same stuff that was put on public notice.

[Zane Peters (Iowa DNR)] 19:15:17

So this happens at the same time as step 5.

[Zane Peters (Iowa DNR)] 19:15:21

So in Step 7, any comments received during the public comment period or public hearing are addressed and responded to.

[Zane Peters (Iowa DNR)] 19:15:28

If comments are received, EPA is given another 45-day review period, and there's going to be more on that later.

[Zane Peters (Iowa DNR)] 19:15:36

So instead, DNR makes a final decision to either issue the permit or deny the application.

[Zane Peters (Iowa DNR)] 19:15:43

And then step 9 is when a final permit is issued,

[Zane Peters (Iowa DNR)] 19:15:46

with a duration of 5 years. And at this point, then the process starts over again.

[Zane Peters (Iowa DNR)] 19:15:52

So, and then just kind of an extra step 10, the facility is required to submit a Title V modification application

[Zane Peters (Iowa DNR)] 19:15:59

For certain changes at the facility, such as adding new or modifying the existing equipment.

[Zane Peters (Iowa DNR)] 19:16:05

So that's really just to look at our Title V and permitting process, and at this time, I'll turn it back over to Marnie.

[Zane Peters (Iowa DNR)] 19:16:16

You're muted, Marnie

[Marnie Stein - DNR] 19:16:18

Thank you, Zane. I wanted to go through the history of this facility with you and their Title V permits. So...

[Marnie Stein - DNR] 19:16:24

As Zane mentioned, um,

[Marnie Stein - DNR] 19:16:27

The Title V, um...

[Marnie Stein - DNR] 19:16:30

permit program came through the 1990 amendments to the Clean Air Act.

[Marnie Stein - DNR] 19:16:35

Our application

[Marnie Stein - DNR] 19:16:36

Title V program application.

[Marnie Stein - DNR] 19:16:39

was approved fully by EPA in 1995.

[Marnie Stein - DNR] 19:16:43

And we issued our first Title V permit in 1997.

[Marnie Stein - DNR] 19:16:46

So, for this facility, their first

[Marnie Stein - DNR] 19:16:48

Title V permit was issued to the Dexter Company.

[Marnie Stein - DNR] 19:16:52

in December of 1999.

[Marnie Stein - DNR] 19:16:54

The renewal... first renewal was issued to the Dexter Foundry in 2008.

[Marnie Stein - DNR] 19:17:00

Renewal 2 to Fairfield Castings in 2015.

[Marnie Stein - DNR] 19:17:04

Renewal 3 to Faircast in 2020.

[Marnie Stein - DNR] 19:17:07  
Faircast then shut down in April of 2024.

[Marnie Stein - DNR] 19:17:12  
HiCast Foundry purchased the Foundry in August of 2024.

[Marnie Stein - DNR] 19:17:16  
Their renewal application was submitted in September of 2024, and they started production back up in 11...

[Marnie Stein - DNR] 19:17:24  
in... pardon me... November of 2024, and have been operating since that date.

[Marnie Stein - DNR] 19:17:29  
So,

[Marnie Stein - DNR] 19:17:31  
Title V permits are issued for a period of 5 years, and you may notice that there's more than 5 years in between those issuance dates.

[Marnie Stein - DNR] 19:17:39  
So, the Title V...

[Marnie Stein - DNR] 19:17:41  
Um, program in the Clean Air Act, and the Iowa Administrative Code allow the facility to continue operating under their existing Title V permit

[Marnie Stein - DNR] 19:17:49  
Even if it... the 5 years have expired,

[Marnie Stein - DNR] 19:17:52  
until EPA... until DNR issues the renewal permit.

[Marnie Stein - DNR] 19:17:56  
As long as the facility has submitted a complete application. So Highcast Foundry is operating

[Marnie Stein - DNR] 19:18:02  
under the permit that was issued.

[Marnie Stein - DNR] 19:18:05  
to Faircast in 2020, because HiCast has submitted a complete application.

[Marnie Stein - DNR] 19:18:12  
Next slide.

[Marnie Stein - DNR] 19:18:14  
So, uh, so I wanted to provide you with some updates of the facility that have happened since the permit was put on public notice.

[Marnie Stein - DNR] 19:18:21  
So, first of all, the cupola.

[Marnie Stein - DNR] 19:18:23

So, HiCast has not been operating the cupola, and has decided they do not want to operate it in the future.

[Marnie Stein - DNR] 19:18:29

They've hired a third party,

[Marnie Stein - DNR] 19:18:31

vendor to begin dismantling the cupola.

[Marnie Stein - DNR] 19:18:34

On December 18th, ICAST voluntarily requested that the construction permit

[Marnie Stein - DNR] 19:18:39

For the cupola, be rescinded.

[Marnie Stein - DNR] 19:18:41

We were sending that construction permit on December 23rd.

[Marnie Stein - DNR] 19:18:45

This means the cupola cannot be operated.

[Marnie Stein - DNR] 19:18:48

Because there's no longer a permit for it.

[Marnie Stein - DNR] 19:18:51

Therefore, we will remove the cupola from the Title V permit.

[Marnie Stein - DNR] 19:18:56

The historical cupola Construction Permitting documents and compliant documents are still publicly available.

[Marnie Stein - DNR] 19:19:01

on our website.

[Marnie Stein - DNR] 19:19:04

The second update is for the induction furnaces, so there are two induction furnaces that are used to melt metal.

[Marnie Stein - DNR] 19:19:10

That go through one emission point.

[Marnie Stein - DNR] 19:19:12

So, we are always continuously checking the compliance status of our Title V facilities.

[Marnie Stein - DNR] 19:19:17

And we, on January 5th,

[Marnie Stein - DNR] 19:19:20

issued a notice of violation to HICAST for delinquent stack testing.

[Marnie Stein - DNR] 19:19:25

We're requiring them to schedule a stack test by May

[Marnie Stein - DNR] 19:19:29  
March 1st, excuse me,

[Marnie Stein - DNR] 19:19:31  
For particulate matter and total metal haps.

[Marnie Stein - DNR] 19:19:34  
on the induction furnace step.

[Marnie Stein - DNR] 19:19:37  
That requirement will also be added to any Title V permit.

[Marnie Stein - DNR] 19:19:41  
Next slide.

[Marnie Stein - DNR] 19:19:47  
Okay, now I'm going to turn it over to Jeremy.

[Jeremy Arndt IDNR] 19:19:47  
Okay.

[Jeremy Arndt IDNR] 19:19:50  
Thank you, Marnie. Um, I just want to, uh, share some information with you about what the actual Title V

[Jeremy Arndt IDNR] 19:19:58  
permitting program does.

[Jeremy Arndt IDNR] 19:20:00  
A Title V permit incorporates all applicable air requirements for a facility

[Jeremy Arndt IDNR] 19:20:06  
into a single document.

[Jeremy Arndt IDNR] 19:20:08  
The purpose of this is to give the facility, regulators,

[Jeremy Arndt IDNR] 19:20:12  
and the public a one-stop shop for all of the facility's responsibilities.

[Jeremy Arndt IDNR] 19:20:18  
These applicable requirements include state and federal emission limits,

[Jeremy Arndt IDNR] 19:20:23  
Operational limits and associated monitoring and record keeping for each

[Jeremy Arndt IDNR] 19:20:28  
source of air emissions at a facility.

[Jeremy Arndt IDNR] 19:20:32

Where current monitoring and record-keeping requirements are inadequate for verifying ongoing compliance with emission or operating limits,

[Jeremy Arndt IDNR] 19:20:41

The Title V permit is required to impose these.

[Jeremy Arndt IDNR] 19:20:46

The permit also evaluates each piece of equipment to impose periodic monitoring, ensuring ongoing compliance with applicable emission limits.

[Jeremy Arndt IDNR] 19:20:55

This monitoring can take shape in a couple of forms.

[Jeremy Arndt IDNR] 19:20:59

stack testing, or operation and maintenance plans.

[Jeremy Arndt IDNR] 19:21:02

We call them O&M plants for short.

[Jeremy Arndt IDNR] 19:21:06

Stack testing is the direct measurement of emissions from a source,

[Jeremy Arndt IDNR] 19:21:09

to determine its compliance with applicable emission limits.

[Jeremy Arndt IDNR] 19:21:15

O&M plans require monitoring of various indicators to verify proper operation and maintenance.

[Jeremy Arndt IDNR] 19:21:21

of air pollution control devices.

[Jeremy Arndt IDNR] 19:21:23

to maximize their ability to reduce air emissions.

[Jeremy Arndt IDNR] 19:21:28

Next slide.

[Jeremy Arndt IDNR] 19:21:31

The facility is required.

[Jeremy Arndt IDNR] 19:21:33

to submit two different reports during the year.

[Jeremy Arndt IDNR] 19:21:37

to certify compliance with the applicable requirements spelled out in the Title V permit.

[Jeremy Arndt IDNR] 19:21:43

There's also a requirement

[Jeremy Arndt IDNR] 19:21:46

For the facility to report annual actual emissions from each source,

[Jeremy Arndt IDNR] 19:21:51  
and pay fees based on those emissions totals.

[Jeremy Arndt IDNR] 19:21:55  
Title V facilities are also inspected by our local field office at least once every two years.

[Jeremy Arndt IDNR] 19:22:03  
Um, and you can see there's a website there that is for admissions data that you can, uh,

[Jeremy Arndt IDNR] 19:22:09  
That you can view at any time.

[Jeremy Arndt IDNR] 19:22:12  
Uh, next slide.

[Jeremy Arndt IDNR] 19:22:15  
Now that we've talked about what the program does...

[Jeremy Arndt IDNR] 19:22:18  
I want to talk about what...

[Jeremy Arndt IDNR] 19:22:21  
limitations there are within the program.

[Jeremy Arndt IDNR] 19:22:24  
A Title V permit does not impose new applicable requirements on the applicant in the form of emission limits.

[Jeremy Arndt IDNR] 19:22:35  
It does not implement

[Jeremy Arndt IDNR] 19:22:36  
Ambient air monitoring requirements?

[Jeremy Arndt IDNR] 19:22:39  
Local scale dispersion modeling.

[Jeremy Arndt IDNR] 19:22:42  
or require continuous emissions monitoring that is not imposed elsewhere.

[Jeremy Arndt IDNR] 19:22:47  
DNR does not have the authority to set new HAP standards.

[Jeremy Arndt IDNR] 19:22:52  
or apply requirements from a federal program that the facility is not otherwise subject to.

[Jeremy Arndt IDNR] 19:22:59  
by state statute, DNR cannot be more stringent than EPA requirements.

[Jeremy Arndt IDNR] 19:23:07  
Thank you. I'll pass it back to Marnie.

[Marnie Stein - DNR] 19:23:17  
Then, oh my gosh.

[Marnie Stein - DNR] 19:23:19  
It's been a long day. Um...

[Marnie Stein - DNR] 19:23:21  
We are going to start an informal question and answer period. So, if you would like to ask a question,

[Marnie Stein - DNR] 19:23:27  
pleas, um, raise your hand to do that, click on the heart...

[Marnie Stein - DNR] 19:23:33  
react button at the bottom.

[Marnie Stein - DNR] 19:23:35  
And then we will unmute you and call on you. Now, please remember, this is just informal questions.

[Marnie Stein - DNR] 19:23:42  
This is not... does not count as a formal public comment.

[Marnie Stein - DNR] 19:23:46  
Um, we will do that later after, um...

[Marnie Stein - DNR] 19:23:51  
the Q&A period, um, I'm trying to watch the clock to make sure that enough

[Marnie Stein - DNR] 19:23:56  
we haven't leave enough time for comments, so...

[Marnie Stein - DNR] 19:24:00  
Um, Wendy, if you want to call the first person.

[Wendy Walker (Iowa DNR)] 19:24:03  
I clicked on ask to unmute for Steve.

[Steve Boggs] 19:24:11  
Okay. Yep.

[Wendy Walker (Iowa DNR)] 19:24:12  
Steve Bug. Oh, good, good.

[Steve Boggs] 19:24:14  
So, um, I have a whole bunch of questions now. Is there a 2-hour limit? Are you limiting by the number of questions I ask? Do I have to...

[Steve Boggs] 19:24:21  
Frame these carefully so I don't go over my limit, or is it a time thing?

[Marnie Stein - DNR] 19:24:25

Um, so...

[Marnie Stein - DNR] 19:24:28  
We have...

[Marnie Stein - DNR] 19:24:30  
we're gonna limit the Q&A, so it's 724 now.

[Steve Boggs] 19:24:34  
Yeah, I get that. I'm just wondering about my time. Do you... is there a specific time that I'm allowed, or a number of questions, or how does this work?

[Marnie Stein - DNR] 19:24:39  
If you could keep it under 5 minutes, that would be great.

[Steve Boggs] 19:24:42  
Okay. Okay.

[Marnie Stein - DNR] 19:24:43  
So other folks can answer their questions?

[Steve Boggs] 19:24:45  
Okay. So, um...

[Steve Boggs] 19:24:49  
I'm not an expert on this, but my understanding is there is...

[Steve Boggs] 19:24:53  
Um, um...

[Steve Boggs] 19:24:55  
equipment that can... scrubbers that can remove gaseous material, and filters

[Steve Boggs] 19:25:01  
course and find that can take...

[Steve Boggs] 19:25:03  
Particulate matter out. Now, I'm wondering what level of removal are you for this particular plant on their particular stacks?

[Steve Boggs] 19:25:12  
I'm sure their state-of-the-art equipment that can take almost all of it out, if you required it, but I assume you don't.

[Marnie Stein - DNR] 19:25:19  
Um, so I will start off, and then I'll let Jeremy...

[Marnie Stein - DNR] 19:25:23  
pop in on this question. So, um...

[Marnie Stein - DNR] 19:25:30  
the major source of pollutants at this facility is particulate matter.

[Steve Boggs] 19:25:34  
Right.

[Marnie Stein - DNR] 19:25:34  
And the best way to control particulate matter is with bag houses, and so many of the emission points in the permit are required to have bag houses.

[Marnie Stein - DNR] 19:25:42  
Um, Wendy, if you could switch over and show that permit.

[Marnie Stein - DNR] 19:25:48  
I'll show you an actual example from the permit.

[Marnie Stein - DNR] 19:25:52  
And I can't see...

[Marnie Stein - DNR] 19:25:55  
Let's see...

[Marnie Stein - DNR] 19:26:00  
Okay, so can you see that, sir?

[Steve Boggs] 19:26:04  
Mm-hmm.

[Marnie Stein - DNR] 19:26:05  
Okay, so this particular emission point...

[Marnie Stein - DNR] 19:26:09  
I'm gonna switch over...

[Marnie Stein - DNR] 19:26:11  
So I can see it, too.

[Marnie Stein - DNR] 19:26:14  
Sorry, 50...

[Marnie Stein - DNR] 19:26:16  
Okay, so this is, um, an admission point. There are the manual shakeout of metal castings, the, um...

[Marnie Stein - DNR] 19:26:26  
sand return and sand bins all go through this emission point.

[Marnie Stein - DNR] 19:26:30  
And we have required a bag house on this.

[Marnie Stein - DNR] 19:26:33  
Um, it has...

[Marnie Stein - DNR] 19:26:36  
um, limits for opacity, which is, um...

[Marnie Stein - DNR] 19:26:39  
visible emissions, particulate matter,

[Zane Peters (Iowa DNR)] 19:26:43  
But if you could scroll down a little bit.

[Marnie Stein - DNR] 19:26:44  
Let...

[Marnie Stein - DNR] 19:26:45  
Yeah, lead, um...

[Marnie Stein - DNR] 19:26:48  
several different halves, single halves, and total halves.

[Marnie Stein - DNR] 19:26:51  
Um, and then if you scroll down some more, Wendy, it has very specific operating limits.

[Marnie Stein - DNR] 19:26:58  
of, um...

[Marnie Stein - DNR] 19:27:00  
keep going.

[Marnie Stein - DNR] 19:27:05  
Of how they have to demonstrate compliance, um...

[Marnie Stein - DNR] 19:27:08  
What records they have to keep regarding HAPS, etc., etc., how to calculate emissions.

[Marnie Stein - DNR] 19:27:13  
Um,

[Marnie Stein - DNR] 19:27:15  
And then, um, we are requiring a stack test, but also, what I wanted to show you is it's got a compliance assurance monitoring plan required. That's on page 62, Wendy.

[Marnie Stein - DNR] 19:27:28  
Keep going.

[Marnie Stein - DNR] 19:27:31  
Okay. Keep going. Okay, next page.

[Wendy Walker (Iowa DNR)] 19:27:37  
This one? Okay.

[Marnie Stein - DNR] 19:27:38  
Yes, there you go. Okay, so I will have Jeremy explain, um, kind of...

[Marnie Stein - DNR] 19:27:44

what we're requiring for this bag house.

[Marnie Stein - DNR] 19:27:47  
Um...

[Jeremy Arndt IDNR] 19:27:51  
Yeah, so, um, there's not really a, um, a specific

[Jeremy Arndt IDNR] 19:27:58  
control efficiency that is set forth in any

[Jeremy Arndt IDNR] 19:28:03  
permit, um, that the facility has to

[Jeremy Arndt IDNR] 19:28:06  
meet. What does compliance assurance monitoring plan does is it requires  
the facility to

[Jeremy Arndt IDNR] 19:28:14  
monitor multiple, it looks like, in this case, multiple

[Jeremy Arndt IDNR] 19:28:19  
indicators that show that that bag house is working as it is designed to  
work?

[Jeremy Arndt IDNR] 19:28:25  
And, um, as it is...

[Jeremy Arndt IDNR] 19:28:29  
will, like I mentioned in my part, um, to make sure that it is

[Jeremy Arndt IDNR] 19:28:33  
it is most efficiently removing pollutants from

[Jeremy Arndt IDNR] 19:28:36  
the exhaust stream as possible.

[Jeremy Arndt IDNR] 19:28:39  
So, this, uh, CAM plan requires daily

[Jeremy Arndt IDNR] 19:28:43  
monitoring of indicators.

[Jeremy Arndt IDNR] 19:28:44  
And then there are other requirements of if they were to fall outside of  
those

[Jeremy Arndt IDNR] 19:28:50  
those indicator ranges, what has to happen exactly in order to

[Jeremy Arndt IDNR] 19:28:59  
return it back to its...

[Jeremy Arndt IDNR] 19:29:02

operation, um, its maximum operation.

[Marnie Stein - DNR] 19:29:05  
Wendy, could you go down to 64?

[Marnie Stein - DNR] 19:29:13  
Perfect, if you could stop there.

[Jeremy Arndt IDNR] 19:29:13  
So, yeah, this one requires them to, um, look at

[Jeremy Arndt IDNR] 19:29:18  
visible emissions, as well as what their differential pressure ranges are.

[Jeremy Arndt IDNR] 19:29:23  
Um, so those are the two main indicators for bag houses on exactly... that show that they are

[Jeremy Arndt IDNR] 19:29:32  
doing what they're supposed to be doing and operating correctly.

[Marnie Stein - DNR] 19:29:37  
And I'll just add, Wendy, if you could go back up to 58.

[Marnie Stein - DNR] 19:29:40  
So...

[Marnie Stein - DNR] 19:29:42  
Um, when Jeremy says that we don't require a specific

[Marnie Stein - DNR] 19:29:48  
control efficiency,

[Marnie Stein - DNR] 19:29:49  
However, if you can show the particulate matter and the PM10 limits...

[Marnie Stein - DNR] 19:29:54  
At the time that that construction permit was

[Marnie Stein - DNR] 19:29:57  
issued, um, the engineer evaluated what kind of control efficiency and control equipment was required.

[Marnie Stein - DNR] 19:30:04  
to meet those particulate matter limits.

[Marnie Stein - DNR] 19:30:07  
So if that bag house is not operating properly and is not maintained,

[Marnie Stein - DNR] 19:30:12  
then they won't be able to meet

[Marnie Stein - DNR] 19:30:13

those, um, emission limits.

[Marnie Stein - DNR] 19:30:16  
And we verify that with stack testing.

[Steve Boggs] 19:30:20  
And it's stack testing is something that you're requiring of them, what, weekly, daily?

[Steve Boggs] 19:30:26  
Annually? What are you doing? I mean...

[Marnie Stein - DNR] 19:30:26  
No. So, for this one, it would be once every 5 years.

[Steve Boggs] 19:30:31  
Once every 5 years, you check to see if it's doing the job.

[Marnie Stein - DNR] 19:30:35  
Yes.

[Steve Boggs] 19:30:36  
Wow. Okay, that seems monstrously inadequate to me.

[Steve Boggs] 19:30:40  
that, um... and also, it seems... my recollection is I'm only going on my recollection of

[Steve Boggs] 19:30:47  
of some figures I saw earlier, but does it sound right to you that...

[Steve Boggs] 19:30:51  
Uh, emissions of 2.5...

[Steve Boggs] 19:30:53  
PM, um...

[Steve Boggs] 19:30:56  
is about 174 tons a year.

[Steve Boggs] 19:31:00  
Within this permit?

[Marnie Stein - DNR] 19:31:02  
So, the clarification on that is...

[Marnie Stein - DNR] 19:31:05  
The numbers that are in the public notice,

[Marnie Stein - DNR] 19:31:08  
are the maximum amounts that the facility is able and permitted to emit.

[Steve Boggs] 19:31:13

Right. Yeah. That's what I'm questioning. So the answer is yes. They can put out 174 tons of 2.5 PM

[Marnie Stein - DNR] 19:31:14  
Last year... yeah, yes.

[Marnie Stein - DNR] 19:31:16  
for potentials.

[Steve Boggs] 19:31:20  
And be in concurrence with your requirements.

[Marnie Stein - DNR] 19:31:25  
Yes.

[Steve Boggs] 19:31:26  
Wow.

[Steve Boggs] 19:31:28  
Um, are there state-of-the-art equipment that's... that can take out more than... more than this bag that they've

[Steve Boggs] 19:31:34  
that this equipment that they've got on this particular high-cast foundry?

[Marnie Stein - DNR] 19:31:43  
Um...

[Jeremy Arndt IDNR] 19:31:44  
Bag houses are the...

[Jeremy Arndt IDNR] 19:31:46  
um, are the piece of control equipment for handling

[Jeremy Arndt IDNR] 19:31:51  
exhaust streams, such as this, for handling particulate matter.

[Steve Boggs] 19:31:54  
Okay, so this is it.

[Jeremy Arndt IDNR] 19:31:56  
This is... this is what's there.

[Steve Boggs] 19:31:56  
So this is as good as it can get.

[Steve Boggs] 19:31:58  
Uh, that in 2026, the best you can do is limit...

[Steve Boggs] 19:32:04  
The PM2.5 to 174 tons a year.

[Steve Boggs] 19:32:09

Is that right?

[Jeremy Arndt IDNR] 19:32:13  
right now, based on the requirements that are in the construction permits  
and in the Title V permit, that is what the potential to emit is.

[Marnie Stein - DNR] 19:32:22  
Yes.

[Steve Boggs] 19:32:22  
Okay, and the monitoring that you require is...

[Steve Boggs] 19:32:26  
not even quarterly or semi-annually, it's...

[Steve Boggs] 19:32:30  
Less than that.

[Steve Boggs] 19:32:33  
Correct, Marnie? That's what you said.

[Marnie Stein - DNR] 19:32:33  
What do you mean by... so monitoring also includes record keeping and  
reporting.

[Marnie Stein - DNR] 19:32:39  
Are you referring to what...

[Steve Boggs] 19:32:40  
Okay, so I don't know all the details of this. Are there monitors inside  
the stacks that continuously monitor these emissions, or are they on the  
property, on the perimeter of the property, and they check them  
regularly? Or how does it monitored?

[Steve Boggs] 19:32:52  
I don't know.

[Marnie Stein - DNR] 19:32:52  
So, um, there are not...

[Marnie Stein - DNR] 19:32:54  
Zane, correct me if I'm wrong,

[Marnie Stein - DNR] 19:32:57  
continuous emission monitors on stacks only measure gaseous pollutants,  
not particulate matter.

[Steve Boggs] 19:33:01  
Okay. Okay.

[Zane Peters (Iowa DNR)] 19:33:02  
That's correct.

[Steve Boggs] 19:33:03

So...

[Marnie Stein - DNR] 19:33:03  
So, no, there is not a continuous emissions monitor.

[Steve Boggs] 19:33:06  
And are there monitors on their property that take air samples and keep track of what they're doing to the environment?

[Marnie Stein - DNR] 19:33:15  
No, there are not.

[Steve Boggs] 19:33:16  
Okay.

[Steve Boggs] 19:33:20  
It was quite an education for me, um...

[Steve Boggs] 19:33:25  
So, now that we've already had a violation, and... and...

[Steve Boggs] 19:33:30  
some indication of their intentions. Do you plan to keep a close eye on them, or how much supervision, actually, does the DNR actually do?

[Marnie Stein - DNR] 19:33:41  
So, for supervision, so, like Jeremy mentioned, all Title V facilities are inspected on-site once every

[Marnie Stein - DNR] 19:33:48  
two years, at a minimum.

[Marnie Stein - DNR] 19:33:50  
Since there is a notice of violation, we will be following up with them. They have to schedule that stack test with the DNR and someone from the DNR will likely be at that test.

[Marnie Stein - DNR] 19:34:01  
To observe it. Um, and then...

[Steve Boggs] 19:34:02  
So you go one time, they do a test and show that it seems to be okay now.

[Steve Boggs] 19:34:07  
And you take their word for it that they're going to monitor according to...

[Steve Boggs] 19:34:12  
the permit going forward, having violated it already once.

[Marnie Stein - DNR] 19:34:19  
Yes.

[Steve Boggs] 19:34:21

Well. Okay, I guess that's it for me.

[Marnie Stein - DNR] 19:34:24  
Okay. Thank you, sir.

[Wendy Walker (Iowa DNR)] 19:34:28  
Okay, next I have Richard Beale.

[Wendy Walker (Iowa DNR)] 19:34:33  
You can try to unmute.

[RICHARD BEALL] 19:34:37  
Uh, Chairman, your last slide, you mentioned that there could not be, um,

[RICHARD BEALL] 19:34:42  
federal...

[RICHARD BEALL] 19:34:45  
Air monitoring, ambient air monitoring done.

[RICHARD BEALL] 19:34:48  
Um, is there any, uh,

[RICHARD BEALL] 19:34:51  
control on... on monitoring ambient air?

[RICHARD BEALL] 19:34:55  
Community, anything...

[RICHARD BEALL] 19:34:58  
that's, uh, DNR-related?

[RICHARD BEALL] 19:35:00  
To that? That it could be included in the permitting process?

[Marnie Stein - DNR] 19:35:04  
So, you directed that question to Jeremy, but if I could pop in. So, what we mean by ambient air network?

[Marnie Stein - DNR] 19:35:11  
So we have a network of ambient air monitors across the state of Iowa.

[Marnie Stein - DNR] 19:35:16  
Um, every year, and that is outside of the Title V program. Every year, the DNR posts a network plan of where we have those monitors.

[Marnie Stein - DNR] 19:35:25  
Where we plan to put additional monies.

[Marnie Stein - DNR] 19:35:28  
Um, and those help sh...

[Marnie Stein - DNR] 19:35:31

measure error in real time to show that Iowa is in compliance with all the national ambient air quality standards.

[Marnie Stein - DNR] 19:35:37

There is not one of those monitors in Fairfield.

[Marnie Stein - DNR] 19:35:40

Um, we do have a map of all those monitors on our website.

[Wendy Walker (Iowa DNR)] 19:35:47

Marnie, do you want me to pull that up?

[Marnie Stein - DNR] 19:35:49

Um...

[Marnie Stein - DNR] 19:35:51

Sure.

[Wendy Walker (Iowa DNR)] 19:35:52

Okay, I'm gonna stop sharing a second.

[RICHARD BEALL] 19:35:56

I mean, it would seem like it would be... it can kind of woefully inadequate to have it in some other place when there's

[RICHARD BEALL] 19:36:03

This iron foundry is right in...

[RICHARD BEALL] 19:36:05

almost a direct middle of Fairfield.

[RICHARD BEALL] 19:36:08

a small town. And it would seem like there would be higher concentrations of emissions closer

[RICHARD BEALL] 19:36:13

to the, you know, in a kind of radius of that.

[RICHARD BEALL] 19:36:16

particular plan, especially downwind.

[RICHARD BEALL] 19:36:19

Which is the direction of our school.

[RICHARD BEALL] 19:36:22

So, I was just wondering about, you know, can there...

[RICHARD BEALL] 19:36:25

more air monitoring be...

[RICHARD BEALL] 19:36:27

a part of this permitting process, given the location of this, it's in the center of a town.

[Marnie Stein - DNR] 19:36:32  
So, um...

[Marnie Stein - DNR] 19:36:35  
an actual, real-time ambient air monitor.

[Marnie Stein - DNR] 19:36:40  
that is not a requirement that we can implement through the Title V  
program.

[Marnie Stein - DNR] 19:36:45  
Every year when DNR publishes its ambient air network monitoring plan,

[Marnie Stein - DNR] 19:36:50  
They also opened that up to public comment, and you would be able to  
comment during that time period that you'd like to see one in Fairfield.

[RICHARD BEALL] 19:36:57  
Okay. Um, I'll be making some comments later, and so I think that's it,  
but uh...

[Marnie Stein - DNR] 19:37:02  
Okay.

[RICHARD BEALL] 19:37:04  
Thank you.

[Marnie Stein - DNR] 19:37:04  
Thank you.

[Marnie Stein - DNR] 19:37:06  
Did you want to see the map, or we can, um, email you the map?

[Wendy Walker (Iowa DNR)] 19:37:07  
Okay.

[RICHARD BEALL] 19:37:10  
I think it would be helpful for us to see what the...

[Marnie Stein - DNR] 19:37:13  
Okay.

[Wendy Walker (Iowa DNR)] 19:37:14  
Okay.

[RICHARD BEALL] 19:37:14  
the radiuses of these...

[Wendy Walker (Iowa DNR)] 19:37:16  
Okay, so bear with me.

[Wendy Walker (Iowa DNR)] 19:37:19  
If I'm not muted, good. So this is, um, I think a nice way to look at it.  
It lists the city, and then the site that it's by.

[Wendy Walker (Iowa DNR)] 19:37:29  
Um...

[Wendy Walker (Iowa DNR)] 19:37:31  
And we do have one in Lake Sagima, that was the one in mind, and I will see...

[Wendy Walker (Iowa DNR)] 19:37:37  
I only look at this once a year, so my apologies. I'm gonna go through this. It is a large document.

[Wendy Walker (Iowa DNR)] 19:37:45  
I know.

[RICHARD BEALL] 19:37:46  
So the closest are Kiyosaka and Iowa City, so they're 30 and 60 miles away from us.

[Marnie Stein - DNR] 19:37:46  
Yeah, eh.

[Marnie Stein - DNR] 19:37:51  
Yes, and sir, I'm not, um, trying to avoid the question. I'm not a meteorologist.

[Wendy Walker (Iowa DNR)] 19:37:55  
Mm-hmm.

[Marnie Stein - DNR] 19:37:57  
Um, our staff that work on the monitoring network, many of them are meteorologists, and there's very specific, um, siding criteria of how they decide.

[Marnie Stein - DNR] 19:38:05  
where to put those. And that information would be on the website. I could have them follow up with you.

[Wendy Walker (Iowa DNR)] 19:38:07  
Mm-hmm.

[Marnie Stein - DNR] 19:38:11  
But nobody from the... none of the four of us in Title V, um,

[Marnie Stein - DNR] 19:38:17  
are monitor... ambient monitoring and meteorologist experts, but I'd be happy to follow up with you.

[Wendy Walker (Iowa DNR)] 19:38:19  
Okay.

[Wendy Walker (Iowa DNR)] 19:38:22  
So...

[RICHARD BEALL] 19:38:22

Yeah, I'd appreciate it. I mean, there's not even one shown in Iowa City in this map.

[Marnie Stein - DNR] 19:38:26

So that's ozone. So...

[Wendy Walker (Iowa DNR)] 19:38:26

Um, so... so this is for ozone, so I'm gonna keep going, um...

[Wendy Walker (Iowa DNR)] 19:38:31

And I apologize, I only look at this once a year.

[Wendy Walker (Iowa DNR)] 19:38:35

So...

[RICHARD BEALL] 19:38:39

Well, we don't have to take a lot of time with it. I want to make sure the comments are...

[Marnie Stein - DNR] 19:38:42

So, I'm gonna write down your name, Richard Beale.

[Wendy Walker (Iowa DNR)] 19:38:45

Okay, Iowa... so...

[Marnie Stein - DNR] 19:38:46

monitoring. Yeah.

[Wendy Walker (Iowa DNR)] 19:38:47

These are... so this one is the Iowa Ambient Air Monitoring Network maps. So this is by pollutant. Oh, this is manual, um, this is manual PM2.5, so there is one in Iowa City and Lake Segima.

[Wendy Walker (Iowa DNR)] 19:39:00

That's kind of our in-state transport site.

[Wendy Walker (Iowa DNR)] 19:39:03

Um, this is a different type of PM monitor.

[Wendy Walker (Iowa DNR)] 19:39:08

You have the prior one was...

[Marnie Stein - DNR] 19:39:09

Yeah.

[Wendy Walker (Iowa DNR)] 19:39:11

PM2.5 in a manual capture. This is a continuous.

[Wendy Walker (Iowa DNR)] 19:39:15

PM2.5.

[Wendy Walker (Iowa DNR)] 19:39:18

And... mhm.

[Marnie Stein - DNR] 19:39:18  
So, Wendy, um..

[Marnie Stein - DNR] 19:39:22  
I don't want to cut you off, but, um..

[Marnie Stein - DNR] 19:39:24  
we can follow up with that and provide the website to anyone that would like it.

[Wendy Walker (Iowa DNR)] 19:39:25  
Okay.

[Wendy Walker (Iowa DNR)] 19:39:28  
Okay.

[Marnie Stein - DNR] 19:39:30  
Um, and hook you up, Mr. Beal, with, um, a monitoring expert.

[Marnie Stein - DNR] 19:39:37  
Does that... is that, um, all you had, Mr. Beal?

[Steve Boggs] 19:39:44  
He's muted.

[Zane Peters (Iowa DNR)] 19:39:45  
Yeah, he's muted.

[Wendy Walker (Iowa DNR)] 19:39:46  
Oh, let me unmute you again.

[Wendy Walker (Iowa DNR)] 19:40:00  
Okay, ask to unmute, so you should be able to... okay.

[RICHARD BEALL] 19:40:02  
Yeah, it's all right for now, with lots of more questions, but I'll have comments as well.

[Marnie Stein - DNR] 19:40:04  
Okay.

[Marnie Stein - DNR] 19:40:07  
Okay, thank you. Okay, Wendy, if you could call the next person?

[RICHARD BEALL] 19:40:08  
Thank you.

[Wendy Walker (Iowa DNR)] 19:40:11  
Okay, the next person in the list is..

[Wendy Walker (Iowa DNR)] 19:40:15  
And it... Neil Carmen?

[NEIL CARMAN] 19:40:24

Uh, you explain what it would mean if the high-cast foundry, um,

[NEIL CARMAN] 19:40:29

was reclassified, instead of being a minor hazardous air pollutant source below 25...

[NEIL CARMAN] 19:40:35

5 tons per year. If it was found to be actually a major source

[NEIL CARMAN] 19:40:40

of 25 tons per year or more, 50,000 pounds, because in the application, they come in at 24.83 tons per year, which is less than 1%.

[NEIL CARMAN] 19:40:51

of being a major hazardous air pollutant source. What it would mean

[NEIL CARMAN] 19:40:56

for the high-cast air pollution controls on hazards...

[NEIL CARMAN] 19:41:00

air pollutants, if it was a major source.

[Marnie Stein - DNR] 19:41:03

So, um, I bel...

[Marnie Stein - DNR] 19:41:06

I believe the prime... am I still muted?

[Steve Boggs] 19:41:09

No, you're...

[Marnie Stein - DNR] 19:41:09

Oh, okay. The primary difference is, um,

[Marnie Stein - DNR] 19:41:13

Jeremy can help me out here, is PICAST is currently

[Marnie Stein - DNR] 19:41:17

subject to, um, the minor source niche app.

[Marnie Stein - DNR] 19:41:23

5Z...

[Marnie Stein - DNR] 19:41:24

5Z. If that...

[Jeremy Arndt IDNR] 19:41:24

5Z, you know.

[Marnie Stein - DNR] 19:41:26

um, potential to mit would be higher, would be 25 tons or higher.

[Marnie Stein - DNR] 19:41:31

They will be subject to a different niche app for major sources, which is 5E.

[Marnie Stein - DNR] 19:41:36  
Um, and so they may be different

[Marnie Stein - DNR] 19:41:39  
Subject to more stringent federal requirements if they were 5E.

[Marnie Stein - DNR] 19:41:44  
Um, I believe one of those is that 5E does require a bag house leak detection system.

[NEIL CARMAN] 19:41:55  
Okay, thank you.

[Marnie Stein - DNR] 19:41:56  
You're welcome.

[NEIL CARMAN] 19:41:58  
That's... that's my only question.

[NEIL CARMAN] 19:42:00  
Question.

[Wendy Walker (Iowa DNR)] 19:42:03  
Okay, s...

[Marnie Stein - DNR] 19:42:04  
Hey, Wendy, if you could call in the next person?

[Wendy Walker (Iowa DNR)] 19:42:05  
Henry Allstrom?

[Wendy Walker (Iowa DNR)] 19:42:08  
I said that correctly?

[Wendy Walker (Iowa DNR)] 19:42:16  
You should be able to unmute yourself.

[Henry Ahlstrom] 19:42:19  
Thank you, yeah, you got my name right.

[Henry Ahlstrom] 19:42:23  
Um, I have two questions for you, and they are related. First of all, I don't understand

[Henry Ahlstrom] 19:42:28  
all of what is said right now about monitoring this is a field that is quite new to me, so please bear with me.

[Henry Ahlstrom] 19:42:35  
may be good questions for some of us who don't understand all of it. The first question is, so,

[Henry Ahlstrom] 19:42:40

Does the company itself get to do their own monitoring, and it's up to them to accurately report their data to DNR?

[Marnie Stein - DNR] 19:42:50

So, um, the company, when they stack test,

[Marnie Stein - DNR] 19:42:54

they have to schedule that stack test with DNR. That's get...

[Marnie Stein - DNR] 19:42:57

stack test, maybe.

[Marnie Stein - DNR] 19:42:59

Highly likely observed by DNR stack testing staff.

[Marnie Stein - DNR] 19:43:03

We review the reports and results from that. So, they'll hire a third-party stack testing company.

[Marnie Stein - DNR] 19:43:10

We review those results.

[Marnie Stein - DNR] 19:43:13

Um, and then we calculate whether that stack test showed compliance with the emission limit or not.

[Marnie Stein - DNR] 19:43:20

We also, um, the record keeping they're required to do, um, so a lot of the admission points they have to keep track of.

[Marnie Stein - DNR] 19:43:27

Um, daily or monthly hazardous air pollution.

[Marnie Stein - DNR] 19:43:31

Those records, um, we will inspect those. The field office will do that.

[Marnie Stein - DNR] 19:43:36

They submit an annual, uh, compliance certification.

[Marnie Stein - DNR] 19:43:40

And two monitoring reports every year, and those are signed and certified under penalty of law.

[Marnie Stein - DNR] 19:43:48

Um, by the company, as well as their annual emissions inventory report.

[Henry Ahlstrom] 19:43:54

So when you... I live quite close to this place, so when you say maybe observed by DNR, it makes me nervous.

[Henry Ahlstrom] 19:44:01

So, what does that mean?

[Marnie Stein - DNR] 19:44:04  
So, so there is always a stack testing company there.

[Marnie Stein - DNR] 19:44:07  
Um, we don't...

[Marnie Stein - DNR] 19:44:11  
Um, I think Mark might be on here, but we don't always have...

[Marnie Stein - DNR] 19:44:15  
Um, the staff available to be at every test.

[Henry Ahlstrom] 19:44:19  
Okay. And my other question for you is, does the public have access to the data?

[Marnie Stein - DNR] 19:44:25  
Yes. So, all of...

[Marnie Stein - DNR] 19:44:29  
The air quality documents for this facility.

[Marnie Stein - DNR] 19:44:32  
And the past facilities are available on our website.

[Marnie Stein - DNR] 19:44:36  
And you can search them, um, at no cost.

[Marnie Stein - DNR] 19:44:39  
It's called, um, Document Search Open Text.

[Marnie Stein - DNR] 19:44:43  
So, there is one difference. So, compliance...

[Marnie Stein - DNR] 19:44:47  
stack testing and construction permitting records.

[Marnie Stein - DNR] 19:44:50  
Um, the retention schedule that... for that is 101 years.

[Marnie Stein - DNR] 19:44:55  
For Title V, the retention schedule is 15 years. So, um, but those data is all publicly available. And I'd be happy to...

[Marnie Stein - DNR] 19:45:02  
Um, send you instructions on how to do that.

[Henry Ahlstrom] 19:45:05  
Thank you, and I would love that.

[Henry Ahlstrom] 19:45:08  
Thanks.

[Marnie Stein - DNR] 19:45:10

And we can actually... we can send those instructions to all the registrants tonight.

[Wendy Walker (Iowa DNR)] 19:45:19

Okay.

[Marnie Stein - DNR] 19:45:21

Okay, did I get that right?

[Mark Fields] 19:45:21

mine. If you would...

[Mark Fields] 19:45:24

Yes, we will plan on attending the staff test. Things do occur, like weather, etc.

[Mark Fields] 19:45:31

that we may not be able to make it, but the plan is to observe the stack test.

[Henry Ahlstrom] 19:45:36

And would the public know whether or not they were observed by DNR, ultimately?

[Henry Ahlstrom] 19:45:41

Or we wouldn't know whether or not it was... you say you would plan to, and sorry if I'm a little picky about this, but I live nearby.

[Henry Ahlstrom] 19:45:50

Would the public be able to know whether or not it was actually observed, each of those tests?

[Mark Fields] 19:45:56

Normally, the stack test report would...

[Mark Fields] 19:45:59

indicate if the DNR was on site to observe the test, so it would be in the public record when the stacked test

[Henry Ahlstrom] 19:46:05

Thank you. Thank you so much, Mark.

[Mark Fields] 19:46:08

You're welcome.

[Marnie Stein - DNR] 19:46:13

Thank you, Mark. I'm glad you're here.

[Marnie Stein - DNR] 19:46:17

So Mark supervises our stack testing section.

[Marnie Stein - DNR] 19:46:22

for Dana.

[Wendy Walker (Iowa DNR)] 19:46:24  
Marnie, we only have one raised hand left, that's Patrick Basold.

[Marnie Stein - DNR] 19:46:28  
Okay? Oh, just got another one.

[Wendy Walker (Iowa DNR)] 19:46:29  
Oh, we got another one. Yep.

[Wendy Walker (Iowa DNR)] 19:46:35  
Ugh.

[Wendy Walker (Iowa DNR)] 19:46:40  
I'm gonna try it one more time. Okay.

[Wendy Walker (Iowa DNR)] 19:46:43  
should be able to speak now.

[Patrick Bosold] 19:46:44  
Okay, am I hearable?

[Marnie Stein - DNR] 19:46:46  
Yep.

[Wendy Walker (Iowa DNR)] 19:46:46  
Yes.

[Patrick Bosold] 19:46:47  
All right, uh, following up a little bit on the discussion we just had,  
uh, one of the slides

[Patrick Bosold] 19:46:54  
did list a website URL.

[Patrick Bosold] 19:46:58  
where results of monitoring could be viewed.

[Patrick Bosold] 19:47:04  
Um, I think it would be a good thing to send that link around.

[Marnie Stein - DNR] 19:47:09  
Sure.

[Patrick Bosold] 19:47:09  
to anybody who came to the meeting.

[Patrick Bosold] 19:47:12  
Uh, and how close to real time, if you click on that link and you go to  
that particular...

[Patrick Bosold] 19:47:18  
page on DNR's website, how close to real time is that data?

[Marnie Stein - DNR] 19:47:22  
So, um, the link that was in the presentation, that is for...

[Marnie Stein - DNR] 19:47:29  
annual actual emissions.

[Marnie Stein - DNR] 19:47:32  
So, Title V facilities report those actual emissions to us for the previous year.

[Marnie Stein - DNR] 19:47:39  
That report's due March 31st.

[Marnie Stein - DNR] 19:47:41  
They're up on that website by...

[Marnie Stein - DNR] 19:47:44  
July 1st.

[Patrick Bosold] 19:47:46  
Okay? Well, uh,

[Patrick Bosold] 19:47:50  
The line of reasoning I'm following here is,

[Patrick Bosold] 19:47:53  
I live about a third of a mile away from the facility. I step up... I step out the door.

[Patrick Bosold] 19:47:58  
next month, and I've got this acrid odor,

[Patrick Bosold] 19:48:01  
that many of us living that close to this facility

[Patrick Bosold] 19:48:04  
have detected many times in the course of its operations by previous operators.

[Patrick Bosold] 19:48:11  
Nothing noticed since ICAST took over.

[Patrick Bosold] 19:48:14  
But you can't just trust your nose and your palate on this sort of thing. So, the question I had was,

[Patrick Bosold] 19:48:19  
If you have whatever monitoring is being done,

[Patrick Bosold] 19:48:23  
How close to real time is the data that we can get off of the DNR's website?

[Marnie Stein - DNR] 19:48:32

So, for...

[Marnie Stein - DNR] 19:48:34  
annual emissions reports, like I said, they report that once a year.  
Stack testing, um, when those reports come in,

[Marnie Stein - DNR] 19:48:42  
It's usually...

[Marnie Stein - DNR] 19:48:45  
You could... you could request it immediately, it doesn't get uploaded to  
the website for possibly...

[Marnie Stein - DNR] 19:48:51  
two months. The reason for that is those... if those reports come in on  
paper,

[Marnie Stein - DNR] 19:48:56  
We are required to send that to the prison in Mitchellville to have the  
paper scanned, to have it uploaded to the website.

[Marnie Stein - DNR] 19:49:04  
So, there is a lag in that, but you could request, through an open  
records request, those go through me, too.

[Marnie Stein - DNR] 19:49:10  
Um, to get it sooner than when it's actually put on the website.

[Patrick Bosold] 19:49:15  
Okay? Because they... I mean, you know, the question I... I mean...

[Marnie Stein - DNR] 19:49:18  
We...

[Patrick Bosold] 19:49:21  
in a perfect or at least better world,

[Patrick Bosold] 19:49:25  
If somebody in this area

[Patrick Bosold] 19:49:29  
detected, you know, odor or something that seems suspicious.

[Patrick Bosold] 19:49:32  
It'd be nice if there's someplace where they could go,

[Patrick Bosold] 19:49:35  
Take a look at what monitoring equipment

[Patrick Bosold] 19:49:38  
is on-site, and be able to see for...

[Patrick Bosold] 19:49:42  
that period of time, let's say it was...

[Patrick Bosold] 19:49:45  
Same day. So, was I... was I detecting something?

[Patrick Bosold] 19:49:50  
That was coming out of that facility.

[Patrick Bosold] 19:49:53  
Getting this stuff uploaded 2 months or a year and a half later..

[Patrick Bosold] 19:49:58  
I mean, thank you very much. It's good to have the data.

[Patrick Bosold] 19:50:01  
But it would be much more helpful

[Patrick Bosold] 19:50:05  
If something closer to...

[Patrick Bosold] 19:50:07  
real time was available to us. Am I hearing that that simply can't be done?

[Patrick Bosold] 19:50:12  
Or what are the DNRs and the sensors' capabilities?

[Marnie Stein - DNR] 19:50:18  
So...

[Marnie Stein - DNR] 19:50:21  
First of all, this would be perfect. I would highly encourage you to give this as a public comment when we get to the public comment period.

[Patrick Bosold] 19:50:27  
Okay.

[Marnie Stein - DNR] 19:50:28  
Or to email it in as a comment.

[Patrick Bosold] 19:50:30  
Okay.

[Marnie Stein - DNR] 19:50:30  
So, HICAST does not have any continuous emission monitors, so they're required to report their emissions

[Marnie Stein - DNR] 19:50:37  
annually.

[Marnie Stein - DNR] 19:50:39  
Um, so we have annual omissions. We don't have necessarily daily emissions.

[Marnie Stein - DNR] 19:50:46

Um, they do keep daily record keeping on... for several sources on their HAP emissions of that day.

[Marnie Stein - DNR] 19:50:53

Or that could be monthly. Um, but that would have to be requested.

[Marnie Stein - DNR] 19:50:58

So we just don't have the capability to have real-time data from them at this point.

[Marnie Stein - DNR] 19:51:02

Um, as far as odor...

[Marnie Stein - DNR] 19:51:06

Um...

[Marnie Stein - DNR] 19:51:07

I totally understand, um...

[Marnie Stein - DNR] 19:51:10

your concerns with odor,

[Marnie Stein - DNR] 19:51:11

Um, actually, the Cleaner Act doesn't regulate odor.

[Marnie Stein - DNR] 19:51:16

So, that would be, um...

[Marnie Stein - DNR] 19:51:19

regulated locally, I'm not sure if Fairfield has odor ordinances.

[Marnie Stein - DNR] 19:51:24

Um, I know in Des Moines, we have odor ordinances, but that would be at the local level.

[Patrick Bosold] 19:51:30

Right, listen, I'll let it go at that. I will make a... I will make a formal comment. I have already, actually, uh, in writing.

[Patrick Bosold] 19:51:37

But I'll make it again here if time permits, but...

[Patrick Bosold] 19:51:42

Uh, when I say odor,

[Patrick Bosold] 19:51:43

I mean, I under... I... I acknowledge that that is not a scientific term.

[Patrick Bosold] 19:51:50

What I would like to be able to do...

[Patrick Bosold] 19:51:53

is if I'm detecting an odor,

[Patrick Bosold] 19:51:56  
Let me go take a look at what's coming out of that plant.

[Patrick Bosold] 19:51:59  
and see if anything's out of compliance.

[Marnie Stein - DNR] 19:52:02  
Right.

[Patrick Bosold] 19:52:02  
I mean, maybe what I'm detecting is particulate matter, maybe what I'm protecting

[Patrick Bosold] 19:52:06  
I'm detecting is... is outgassing that's above the limits, those kinds of things.

[Marnie Stein - DNR] 19:52:12  
So what I would encourage you to do, and we have a slide on this later, is

[Marnie Stein - DNR] 19:52:16  
Um, when there's a problem,

[Marnie Stein - DNR] 19:52:18  
call the field office in Washington.

[Marnie Stein - DNR] 19:52:21  
And then they... and file a complaint.

[Marnie Stein - DNR] 19:52:24  
And then they can send someone out to look.

[Patrick Bosold] 19:52:27  
Okay. Uh, thank you very much.

[Marnie Stein - DNR] 19:52:30  
You're welcome.

[Wendy Walker (Iowa DNR)] 19:52:32  
Okay, next we have Carol Simmons.

[Carole Simmons] 19:52:39  
Hello, can you hear me okay?

[Marnie Stein - DNR] 19:52:41  
Yeah.

[Carole Simmons] 19:52:42  
Okay, um, my concern from first hearing about this

[Carole Simmons] 19:52:47  
And it suggests a number of...

[Carole Simmons] 19:52:49  
people that live very close to this..

[Carole Simmons] 19:52:53  
foundry, and I finally took the time today to sit with Google Maps,

[Carole Simmons] 19:52:57  
and actually count out the houses, and..

[Carole Simmons] 19:52:59  
Within one quarter mile radius, there are

[Carole Simmons] 19:53:04  
approximately 150 homes, so perhaps 300 people.

[Carole Simmons] 19:53:09  
Um, and uh..

[Carole Simmons] 19:53:11  
you know, I understand you're not under any obligation to..

[Carole Simmons] 19:53:16  
notify them of this..

[Carole Simmons] 19:53:18  
issue, but it seems like they might need, you know, appreciate knowing.

[Carole Simmons] 19:53:25  
that they're... they may have..

[Carole Simmons] 19:53:27  
health risks as a result of living there.

[Carole Simmons] 19:53:30  
Um, I had 3 questions related to this, though. Uh, one is,

[Carole Simmons] 19:53:34  
As far as air dispersion models that might show..

[Carole Simmons] 19:53:39  
in general, where particulate matter or hazardous particles would go, um,

[Carole Simmons] 19:53:47  
would fall, would settle on the ground.

[Carole Simmons] 19:53:49  
I understand you're not required to do that. It would.. you would be if it  
were a new foundry, I believe.

[Carole Simmons] 19:53:56  
But because it's already in service, that's not a requirement, but is it  
possible to have that done?

[Carole Simmons] 19:54:02

Um, just because we have so many people living close by, I think it might be of use. That's one question.

[Marnie Stein - DNR] 19:54:10  
Okay, uh, so, um...

[Marnie Stein - DNR] 19:54:14  
I understand, um...

[Marnie Stein - DNR] 19:54:17  
how that could be valuable to you. Um...

[Marnie Stein - DNR] 19:54:21  
And, you know, we really do empathize with, um, the folks that are living in Fairfield, near the facility.

[Marnie Stein - DNR] 19:54:28  
We do not have a mechanism to require that through this permit.

[Marnie Stein - DNR] 19:54:33  
So, um...

[Marnie Stein - DNR] 19:54:35  
We just don't have the authority to require that.

[Carole Simmons] 19:54:38  
But as a... you're at... I mean, are you able to, um...

[Carole Simmons] 19:54:43  
offer that service even if it's not part of the permitting process? Because I see there is an error.

[Carole Simmons] 19:54:49  
modeling...

[Carole Simmons] 19:54:51  
team or office within the DNR, they would be able to do that, right?

[Marnie Stein - DNR] 19:54:57  
as a service, um...

[Marnie Stein - DNR] 19:54:59  
to the public? Is that your question?

[Carole Simmons] 19:55:02  
Right, right, I guess, yes.

[Marnie Stein - DNR] 19:55:05  
No.

[Marnie Stein - DNR] 19:55:08  
We don't provide that service to the public. Um, you could hire...

[Carole Simmons] 19:55:10

Okay.

[Marnie Stein - DNR] 19:55:13  
a company or a consulting firm to do dispersion modeling?

[Carole Simmons] 19:55:16  
Okay. Okay, and then, um...

[Carole Simmons] 19:55:20  
Secondly, there... I know that in some communities, there have been, um,

[Carole Simmons] 19:55:25  
groups who've organized informal off-site

[Carole Simmons] 19:55:30  
Ambient air monitoring,

[Carole Simmons] 19:55:32  
with these inexpensive PM2.5 monitors. If we were to do something like that here, would it carry any weight? Would it be of any value? Would it be able to trigger any further...

[Carole Simmons] 19:55:45  
Um, monitoring here.

[Marnie Stein - DNR] 19:55:48  
So you're talking about purple air monitors?

[Carole Simmons] 19:55:50  
Yes, yes.

[Marnie Stein - DNR] 19:55:52  
Um...

[Marnie Stein - DNR] 19:55:55  
If you were to put in purple air monitors, we'd be happy to look at that data.

[Marnie Stein - DNR] 19:55:59  
Um, that would not be... that would be...

[Marnie Stein - DNR] 19:56:05  
not within the Title V program and wouldn't affect the Title V permit.

[Marnie Stein - DNR] 19:56:09  
But if you had that data, we'd be happy to look at it as a department.

[Carole Simmons] 19:56:13  
Okay. And then, thirdly, I just want to ask, because

[Carole Simmons] 19:56:19  
these, um, emissions have been, uh,

[Carole Simmons] 19:56:23

emitted over the past hundred and whatever number of years, 120 years or something.

[Carole Simmons] 19:56:29  
I've heard people say that they suspect that the area around..

[Carole Simmons] 19:56:34  
the neighboring areas are heavily contaminated with residue.

[Carole Simmons] 19:56:38  
After that many years, is there a different branch of the DNR that would be concerned with that aspect?

[Marnie Stein - DNR] 19:56:47  
So we do have, um, a land quality and contaminated sites program.

[Marnie Stein - DNR] 19:56:54  
that I could refer you to.

[Marnie Stein - DNR] 19:56:55  
I believe that we do not have, um..

[Marnie Stein - DNR] 19:57:02  
contaminated sites program delegated to us from EPA, and so that would be under EPA Region 7's purview.

[Marnie Stein - DNR] 19:57:08  
But we can look into that and get back to you.

[Carole Simmons] 19:57:12  
Okay, thank you. That's all.

[Marnie Stein - DNR] 19:57:14  
Okay, thanks. And then, um..

[Marnie Stein - DNR] 19:57:17  
Wendy, Margaret Dwyer has her hand up. Um, I believe.. I'm gonna cut this off and have Mark be the last question, so we can get to the public comments, because I want to make sure everybody has time for the public comments.

[Margaret Dwyer] 19:57:30  
Okay, thank you.

[Marnie Stein - DNR] 19:57:30  
So..

[Margaret Dwyer] 19:57:32  
Um, I have 3 short questions. The first..

[Margaret Dwyer] 19:57:34  
It was very helpful that you provided the history.

[Margaret Dwyer] 19:57:37

of this facility, the recent history of this facility, so thank you for that.

[Margaret Dwyer] 19:57:41

Um, is there a violation history for this facility that's available to the public?

[Marnie Stein - DNR] 19:57:46

Yes, so that is up on our website, and I... when I send out the instructions of how to find things, I'll be happy to send

[Marnie Stein - DNR] 19:57:54

the search criteria for that.

[Margaret Dwyer] 19:57:56

Thank you. Um, and my second question is, you mentioned that the air monitoring...

[Margaret Dwyer] 19:58:01

is done every 2 years, I think you said, and that when... when it's...

[Margaret Dwyer] 19:58:07

And every two years, the public has an opportunity to make comments about that.

[Margaret Dwyer] 19:58:10

Could you provide information about when that might come up again?

[Marnie Stein - DNR] 19:58:14

Yes.

[Marnie Stein - DNR] 19:58:16

I believe...

[Marnie Stein - DNR] 19:58:20

Um, yeah, let me look on the website. I know it's a specific time of the year, but I can't... off the top of my...

[Wendy Walker (Iowa DNR)] 19:58:26

You talk of the monitoring network?

[Marnie Stein - DNR] 19:58:28

Yeah.

[Wendy Walker (Iowa DNR)] 19:58:28

It's... it's always the June... May-June, July, so they put it out for a 30-day public comment either at the end of May, beginning of June, and they try to get it in

[Wendy Walker (Iowa DNR)] 19:58:38

by July to EPA.

[Margaret Dwyer] 19:58:40

And is there a way that we can...

[Marnie Stein - DNR] 19:58:41  
Yeah, are you, um...

[Margaret Dwyer] 19:58:42  
be notified about?

[Marnie Stein - DNR] 19:58:43  
Are you signed up for our air quality listserv?

[Margaret Dwyer] 19:58:47  
I don't believe I am.

[Marnie Stein - DNR] 19:58:48  
Okay, we will also include instructions how to sign up for that. So, there's a notice that goes out on that.

[Wendy Walker (Iowa DNR)] 19:58:51  
Yeah.

[Margaret Dwyer] 19:58:52  
Thank you.

[Wendy Walker (Iowa DNR)] 19:58:54  
Yeah.

[Margaret Dwyer] 19:58:55  
Thank you very much. And just for, for, um... will the transcript of this call...

[Margaret Dwyer] 19:59:01  
be shared with the people on the call, or we need to request it.

[Marnie Stein - DNR] 19:59:06  
Um, it sounds to me like you just did request it, so...

[Margaret Dwyer] 19:59:08  
Okay, that would be great.

[Wendy Walker (Iowa DNR)] 19:59:09  
Um, I... I wanna...

[Marnie Stein - DNR] 19:59:09  
We can share that.

[Wendy Walker (Iowa DNR)] 19:59:11  
I want to caution you on, um, the transcript. It uses AI, and

[Wendy Walker (Iowa DNR)] 19:59:16  
It does a really good job, but I was on one earlier today where someone said,

[Wendy Walker (Iowa DNR)] 19:59:22

Um, one name, and it came up as another, so you have to take it with a little bit of grace.

[Margaret Dwyer] 19:59:28  
We all understand the limitations of AI. Thank you.

[Margaret Dwyer] 19:59:31  
Um, and then my final question is, um,

[Margaret Dwyer] 19:59:33  
Would you also send to the people on this call the appropriate address for submitting complaints? I personally have it, but probably not everybody does.

[Marnie Stein - DNR] 19:59:41  
Sure. Sure.

[Margaret Dwyer] 19:59:43  
So, thank you.

[Marnie Stein - DNR] 19:59:45  
Thank you.

[Marnie Stein - DNR] 19:59:49  
And we do have a slide, so after we do the formal comment period, we do have a slide on that for the next steps.

[Wendy Walker (Iowa DNR)] 19:59:56  
Marnie, do you want me to go back to the slides?

[Marnie Stein - DNR] 19:59:59  
Um, I believe the next slide is just, yes, for the formal comment. Oh, we got one quick question here.

[Wendy Walker (Iowa DNR)] 20:00:06  
Okay, ask to unmute.

[Marnie Stein - DNR] 20:00:10  
And then I really need to cut it off.

[Steve Boggs] 20:00:11  
Yeah. Okay.

[Steve Boggs] 20:00:13  
That's one short question, um...

[Steve Boggs] 20:00:16  
It was... it was mentioned at some point between major and minor polluters at 25 tons, and this

[Steve Boggs] 20:00:21  
plant is 24.83.

[Steve Boggs] 20:00:24

Can you tell me, um, how that calculation is arrived at, and by whom?

[Marnie Stein - DNR] 20:00:30  
So that... that's very detailed, but...

[Marnie Stein - DNR] 20:00:34  
That calculation is based on...

[Marnie Stein - DNR] 20:00:37  
Jeremy, help me out here. The potential amid

[Marnie Stein - DNR] 20:00:40  
from the emission limits within their construction permits, limit them  
down to 24.83.

[Jeremy Arndt IDNR] 20:00:48  
Yes, there are specific... there's a specific facility, or not facility-  
wide, but over the major, um,

[Jeremy Arndt IDNR] 20:00:56  
contributors of HAPS.

[Jeremy Arndt IDNR] 20:00:58  
There's a limit on those pieces of equipment, and then, um, any other  
ancillary small HAP sources then lead up to that 28, uh, 24