



STATE OF IOWA

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

DEPARTMENT OF NATURAL RESOURCES
PATRICIA L. BODDY, INTERIM DIRECTOR

November 12, 2010

Henniges Automotive
Attn: Joe Lehrter
3200 Main Street
Keokuk, IA 52632

RE: Complaint #11/10-01
Title V: #04-TV-015-MO01
Facility No: #56-01-008
State ID: #310475939

Dear Mr. Lehrter:

This letter is a follow up to the complaint investigation on November 8, 2010 at ~1030 regarding a visibly hazy smoke from numerous stacks, and a strong odor of rubber or hot brakes being emitted from this facility. On the day of the visit, the wind direction was 12 mph (SSW) with a clear sky. I met with Shawn McAfee, Plant Manager, and you regarding the complaint.

As you indicated during the visit, your title V and construction permits do not require Henniges to conduct routine monitoring of opacity. However, the permits do require the facility to investigate and make corrections to an emission unit when there is an exceedance of the indicator opacity.

A file review noted that per your letter of June 14, 2010, there were exceedances of the indicator opacities on Lines 5A, 10, & 13. The indicator opacities for Line 5A was reported to be 20%, and for Lines 10 & 13 it was 25%.

To support your readings, Trinity Consultants was hired to conduct Method 9 Tests. Per the copy of the report you provided, the six minute averages for lines 3, 5A, & 13 did not exceed 20%. However, line 10 had one six minute average at 25.4% with two others between 20-25%. The report also notes that the Lines #3, #5A & #13 presented no exceedance of the 25% indicator opacity in the facility's operating permit. As for line #10, the 25% indicator opacity was exceeded during one six minute period with an average 23.6% over 3 runs.

A review of the permits indicates that in January & April 2009 several permits were modified. Per the permits, the indicator opacity for the following emission points (EP) are as follows:

1. Line 5A - EP 1501 - #03-235-S1: 20%
2. Line 5A - EP 1502 - #03-236-S2: 20%
3. Line 10 - EP 1001 - #03-597-S2: 25%
4. Line 10 - EP 1002 - #03-598-S3: 20%
5. Line 13 - EP 1301 - #03-613-S1: 20%
6. Line 13 - EP 1302 - #03-614-S2: 20%
7. Line 3 - EP 303 - #92-A-056-S1: 25%

In summary, the correspondence of June 14, 2010 and the Method 9 conducted on September 20, 2010 indicates that Henniges Automotive is operating near or at the indicator opacities, and exceeding them periodically.

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As a reminder, the permit conditions require the owner/operator to investigate the emission(s) unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after corrections are made, the IDNR may require additional proof to demonstrate compliance (e.g., stack testing).

To ensure compliance with the rules and conditions of the permits, Henniges Automotive needs to:

1. Consider installing control units such as a scrubber to reduce or control emissions.
2. Review the permits to ensure the correct indicator opacity for each emission point/stack is known.
3. Report all exceedances of the indicator opacity as required by the permit

Be advised that if complaints persist, the department may determine that stack testing is required.

Your cooperation and assistance during this visit was appreciated. If you have any questions or would like further explanation of any part of this letter, please contact me at 319-653-2135.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Mark Heiderscheit
Environmental Specialist

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Picture File Name: NA

xc: ☒ IDNR AQ Bureau
☒ Complainant
☒ Facility AQ File