August 24, 2022

ATTN ANDY MURDOCK
PB LEINER USA
PO BOX 2807
DAVENPORT IA 52809
Attn: FACILITY CONTACT

Notice of Violation: Excess Emission Oral Reporting, 567 IAC 24.1(2)
Excess Emission Written Reporting, 567 IAC 24.1(3)
Fugitive Dust - Paragraph 567 IAC 23.3(2)"c"
Stack Modification - 567 IAC 22.1(1)

RE: Air Compliance Evaluation / Complaint Investigation
Facility No. 82-01-064
Title V Permit No. N/A
Complaint ID: 31014

Dear Mr. Murdock:

On July 20, 2022 this office received a complaint via the United States Environmental Protection Agency regarding the PB Leiner USA facility located at 7001 N. Brady Street in Davenport, Iowa. The complaint alleged that waste emissions from the facility was landing on nearby vehicles. The waste emitted was said to range from tissue product, gel dust and by-product from the chemical cleaning equipment. The complaint alleged that the material is ruining paint jobs on vehicles.

In response to the complaint I was out to the facility on July 22, 2022 to investigate the complaint and also conducted a full air quality compliance evaluation at that time. The purpose of this compliance evaluation was to determine the current compliance status of the facility with respect to the rules and regulations governing air pollution in the state of Iowa as well as to investigate the complaint. The scope of this evaluation included a walkthrough inspection of the emission sources, control devices, and any applicable operational and maintenance records. During the course of the compliance evaluation, I toured the facility with you. I also made observations of the facility from nearby properties as part of the investigation.

Further visits done as part of the complaint investigation included visits to the facility and/or surrounding properties on July 28, August 2, and August 9, 2022.

The completed compliance evaluation report is included with this letter. Based on the observations made during the compliance evaluation, and information obtained from facility personnel, the facility had known of emission issues but kept operating the emission units involved while attempting to get cartridges for the affected baghouses. The facility had known of issues with the baghouses

associated with EP-3 and EP-5 since May of 2022 but kept operating those emission units while attempting to get replacement cartridges for those baghouses.

While I did not notice direct visible emissions from the stacks on the day of my visit there was material (gelatin, etc.) observed on the roof in several areas on the roof of the facility. This included areas around the EP-5 emission point, and the area around the EP-3 emission point. Areas where materials were observed on the roof of the facility are included in the attached pictures and illustrated in the attached aerial photograph.

There was no tissue loadout being done on the date of my visit so I was unable to make observations of this emission point when the source is operating. However, a subsequent visit to observed the tissue loadout on August 9, 2022 revealed that the control equipment for this emission point was not functioning properly. The permit for this emission point states that any exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The operator at that time indicated that they seem to have several issues with the baghouse for the tissue loadout tripping a fuse. During the initial visit on 7/22/2022 you indicated there were slatted curtains along the east and west sides of the tissue loadout bay but there were no curtains present and, according to the operator, they have not been present for about 6 months to a year.

You indicated to me that the replacement cartridges for the baghouses associated with the EP-3 and EP-5 emission points were received the week of my visit and were scheduled to be installed over Wednesday (7/27/22) and Thursday (7/28/2022) of the following week. Operating the emission sources without properly functioning emission control units is a violation of the air quality construction permits. These cartridges were changed out according to the schedule that you indicated.

Subrule 567 IAC 24.2(1) specifies that equipment and control equipment must be maintained and operated in a manner consistent with good practice for minimizing emissions and that any cause of excess emissions must be remedied expeditiously.

Finally, please be advised, incidents causing excess emissions, must be reported the regional field office, which in this case have not occurred. The following two rule citations explain the requirements for reporting excess emissions.

Subrule 567 IAC 24.1(2) requires the oral reporting of incidents of excess emission to the appropriate regional office of the DNR within 8 hours of the incident or at the start of the first working day following the onset of the incident.

Subrule 567 IAC 24.1(3) requires a written report of each incident of excess emission to be submitted to the appropriate regional office of the DNR within 7 days of the incident. The specific information to be included in the written report is contained in paragraphs 567 IAC 24.1(3)"a" through 567 IAC 24.1(3)"g". Notify this office in writing by as soon as the bag house repairs occur and how you intend to comply with the aforementioned requirements of general equipment maintenance and reporting of excess emissions.

As a reminder, Paragraph 567 IAC 23.3(2)"c" states, in part, that no person shall allow, cause, or permit material to be handled, transported or stored… with the exception of farming operations or dust generated by ordinary travel on unpaved roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance (See attached rules).

The facility must develop an operations and maintenance plan for all control units to prevent similar occurrences from happening in the future. The plan may include having full sets of replacement cartridges on hand at all times for all baghouses or having a pre-set preventative maintenance plan that includes replacing all cartridges in the baghouses on a pre-set schedule. You indicated during my visit that the facility was considering having all cartridges in the baghouses changed on a 3- to 5-year schedule. Furthermore, if there are issues with emissions control equipment in the future then the source should not be operated until the issue is resolved and the associated control unit is functioning properly. The facility will also need to clean the gelatin / emissions debris off the roof so that any emissions issues can be better identified in the future as well as to prevent this material on the roof from blowing down onto vehicles.

Please notify this office as soon as possible, but no later than September 30, when the following items have been addressed:

1. The repairs to the dust collector for the tissue loadout (EP-23) are complete.
2. The cleaning of the roof has been completed so that the facility can better know if there are excess emissions and be better able to identify the source.
3. The facility has developed a comprehensive operations and maintenance plan for all of the control units.

Your cooperation and assistance in investigating the complaint and in completing this compliance evaluation was appreciated. If you have any questions or would like further explanation of any part of this letter or report, please contact me at 319-653-2135 or Jon.Ryk@dnr.iowa.gov.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Jon Ryk
Environmental Specialist

JPR: N:\Environmental Services\Field Services\ESD06-Wash-Fo6\JRYK\AQ\2022\PB Leiner 82-01-064 - Complaint 31014\PB LEINER AQ CE cover 2022.doc

Encl. 1) Site Photographs 2) Aerial Photo of Facility 3) Air Quality Compliance Evaluation

Pictures: PB Leiner - Davenport 7-22-22 (1)-(18)

xc: AQB - DNR, Des Moines (w/ all encl)
FO6 AQ File - PB LEINER USA, DAVENPORT, IA (w/all encl)

Site Photographs

View area of roof near EP-5 showing gelatin debris on the roof

View area of roof near EP-5 showing gelatin debris on the roof.

View looking east along the north edge of the roof over the Boiler Room.

View looking northeast from the roof over the Boiler Rooms at the roof over the office area showing gelatin material on the top of the office roof.

View looking northwest at area of roof around EP-12 showing gelatin material along the west edge of the roof.

View looking west at roof drain inlet in the northwest corner of the roof near EP-12.

Site Photographs

View looking south from EP-12 (left stack) along the west edge of the roofline by EP-12. EP-18 and EP-19 can be seen in the background (from left to right, respectively).

View looking north-northwest at materials on the roof near EP-6 - Old Scrubber Stack (upper right).

View looking north at the tissue loadout (EP-23) from the south.

View looking up at the telescoping chute at the tissue loadout (EP-23).

View of small pile of tissue debris located directly below the chute at the tissue loadout (EP-23).

View looking south at the facility from the adjacent Super 8 facility to the north.

Aerial Photo of Facility

N

Areas with accumulations of material included the area near EP-5 and the west edge of that roofline; The area near EP-12 and the west edge of that roofline; the north edge of the roofline that has the boiler stacks (EP-1 and EP-2); The northern portion of part of the roofline for the office area; the northwest corner of the roofline to the north of the EP-3 stack; and the area of the roof near the EP-6 stack (Old Scrubber DAF Room). These areas are shown in the photos as well as the aerial photo of the facility following the photos.

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL SERVICES DIVISION
AIR QUALITY COMPLIANCE EVALUATION
FIELD OFFICE # 6

FACILITY # 82-01-064 **OPERATING PERMIT # N/A**

Company Name: PB LEINER USA

Company Address: P.O. BOX 2807, DAVENPORT, IA 52809-2807

Plant Address: 7001 NORTH BRADY STREET, DAVENPORT, IA 52809

Process and/or Product Type: MANUFACTURE GELATIN

Facility Classification: ☐ Title V ☒ SM 80 ☐ Minor

Deficiencies Noted During Inspection: Yes ☒ No ☐ (If yes, list deficiencies below)

Federally Reportable Violation (FRV) and High Priority Violation (HPV) – For consistency purposes, FRV and HPV determinations, will be made by Iowa DNR Air Quality Bureau staff.

SUMMARY OF DEFICIENCIES

EP	EP Description	Permit	Type of Deficiency	Specific Code Citation
3	Product Grind – N&S Blending	95-A-253-S1	Facility had known of excess emissions from unit but kept operating.	567 IAC 24.1 (2&3), 567 IAC 24.2(1)
5	Mixed Lot Packaging	95-A-255-S1	Facility had known of excess emissions from unit but kept operating.	567 IAC 24.1 (2&3), 567 IAC 24.2(1)
15	Mixed Lot Transfer	95-A-259	Stack height discrepancy.	567 IAC 22.1(1)
23	Tissue Loadout	03-A-1159	Operating with control equipment not functioning properly.	567 IAC 24.2(1)

VISIT NUMBER: 1

Inspection Type Complaint Initiated AQ CE
Inspection Date July 22, 2022
Time Arrive 0900
Wind Speed & Direction 6-7 mph SSW
Weather Conditions Sunny, Clear
Inspection Status (FCE or PCE) FCE
Time Depart ~1200

(FCE = Full Compliance Evaluation PCE = Partial Compliance Evaluation)

Persons Contacted: Andy Murdock, EHS **Phone:** 563-386-8040
Jordon Young, Production Manager

Inspector's Signature: _____ **Date:** 8/29/2022
Jon Ryk, Environmental Specialist

Reviewed by: _____ **Date:** 08/24/2022
Ryan Stouder, Environmental Specialist Senior

IOWA DEPARTMENT OF NATURAL RESOURCES - ENVIRONMENTAL SERVICES DIVISION - AIR QUALITY COMPLIANCE EVALUATION

Company Name: PB LEINER USA Facility: 82-01-064 Operating Permit: N/A AQ2

EP # 1	Source Description & Location 2	Stack Character 3	Permit Number 4	Cntl Code 5	Actual Operating Condition (Process Input Rate) 6	CNTL EQP OP? 7	OP Sched 8	Record Keeping OK? 9	Opacity 10	Compliance Status 11	Comments 12
EP-1	BOILERS 1, 2, 3, 4 (Cleaver Brooks)	56' St. Ht. 48" dia. VU	95-A-261-S4	N	Operating	N/A	24/7	Y	0%	3	Boilers 2, 5, 3 & 4 operating
Limits: Fired on Distillate Oil and Nat Gas Only. Distillate Oil Max Sulfur ≤ 0.05% By Weight, Max Oil Usage ≤ 1,722,222 Gallons / 12 Rolling Months. **10% Indicator OPACITY**											
EP-1A	ECONOMIZER / HEAT EXCHANGER FOR EP-1 (CLEAVER BROOKS BOILERS 1-4)	60' St. Ht. 24" dia. VU	05-A-921-S2	N	Operating	N/A	24/7	Y	0%	3	Boilers 2, 5, 3 & 4 operating
Limits: Distillate Oil and Natural Gas Only; Distillate Oil Max Sulfur ≤ 0.05% By Weight; Max Oil Usage ≤ 1,722,222 Gallons / 12 Rolling Months. **10% Indicator OPACITY**											
EP-2	BOILER #5 (Cleaver Brooks DH-52) L.H. Boiler (EU-2)	56' St. Ht. 36" dia. VU	95-A-021-S3	N	Operating	N/A	24/7	Y	0%	3	
Limits: Natural Gas Or #2 Fuel Oil; Fuel Oil Sulfur Content ≤ 0.05% by Weight; Max Oil Usage ≤ 430,556 Gallons / 12 Rolling Months. **Records:** Monthly Amount of Fuel Combusted; 12-Month Rolling Total of Fuel Oil Combusted; Records of Sulfur Content of Fuel Oil; Excess Emissions Records. **20% OPACITY**											
EP-3	PRODUCT GRIND - N & S BLENDING (EU-3)	48' St. Ht. 24" dia. VU	95-A-253-S1	BF (CE-1)	Operating	Y	24/7	Y	0%	1	Cartridges in BF scheduled to be changed Next Thurs (7/28/22)
EP-4	FINE GRIND - 2 PRATER MILLS (EU-4)	46' St. Ht. 28" dia. VU	95-A-254-S1	BF (CE-2)	Operating	Y	24/7	Y	0%	3	Cartridges changed out in 2020
EP-5	MIXED LOT PACKAGING (EU-5)	34' St. Ht. 16" dia. VU	95-A-255-S1	BF (CE-3)	Operating	y	24/7	Y	0%	1	Cartridges in BF scheduled to be changed Next Wed (7/27/22)
Limits: Maintain per Mfg. Specs. **Records:** Maintenance Log. **0% Indicator OPACITY (NVE)**											
EP 8	HYDROCHLORIC ACID STORAGE TANK	19' St. Ht. 6" dia.	96-A-511	WSC	Not Operating	N	As Needed	N/A	0%	3	EP only operates when loading
EP-12	BARREL FILLING + REGRINDING	50' St. Ht. 16" dia.	95-A-256	BF (CE-6)	Operating	Y	24/7	Y	0%	3	Cartridges in BF changed fall 2021
Records: Maintenance Log.											

Compliance Status		Control Equipment Code			
0- Unknown	5- On ERP Schedule	BF- Bag Filter	MC- Multiclone	SC- Scrubber	WW- Waterwall
1- Not in Compliance	6- Not on ERP Schedule	EP- Electrostatic Precip.	CR- Cone Roof	VS- Venturi Scrubber	DF- Dry Filter
2- In Compliance- Test	9- In Compliance (Closed)	CY- Cyclone	FX- Fixed Roof	PBS- Packed Bed Scrubber	O- Other
3- In Compliance - Insp.		A- Afterburner	IFR- Internal Floating Roof	PCS- Packed Column Scrubber	N- No control

EP #	Source Description & Location	Stack Character	Permit Number	Cntl Code	Actual Operating Condition (Process Input Rate)	CNTL EQP OP?	OP Sched	Record Keeping OK?	Opacity	Compliance Status	Comments
1	2	3	4	5	6	7	8	9	10	11	12
EP-13	MIXED LOT BLENDING	35' St. Ht. 3" dia.	95-A-257	BF (CE-8)	Not Operating	N	As Needed	Y	0%	3	
Records: Maintenance Log.											
EP-14	CENTRAL VACUUM SYSTEM (EU-14)	35' St. Ht. 3" dia. VU	95-A-258-S1	BF (CE-9)	Not Operating	N	As Needed	Y	0%	3	
Records: Maintenance Log.	**10% Indicator OPACITY**										
EP-6	OLD SCRUBBER: DAF ROOM, CAUSTIC VESSEL, ACID VESSELS, OTHER TANKS	50' St. Ht. 36" dia. VU	06-A-298-S1 (CAP)	WSC	Operating	Y	24/7	Y	0%	3	
EP-7	NEW SCRUBBER SYSTEM: DAF ROOM, ~34 VESSELS,	50' St. Ht. 36" dia. VU	06-A-299-S4 (CAP)	WSC	Operating	Y	24/7	Y	0%	3	
Limits: Operate and Maintain per Manufacturer's Specifications; ΔP New Scrubber btwn 0.5 and 5" of Water; pH New Scrubber btwn 7 and 10.2; Maintain Record of Chemicals Used as Additives to the Scrubber Liquor (ID of Chem; SDS; Amount in Gallons) **0% Indicator OPACITY (NVE)**											
EP-15	MIXED LOT TRANSFER	20' St. Ht. 3" dia. VU	95-A-259	BF (CE-10)	Not Operating	N	As Needed	Y	0%	1	Stack height observed to be ~35'
Records: Maintenance Log.											
EP-21	TISSUE DRYER (Rotary AeroGlide Model R1-60-20)	58' St. Ht. 16" dia. VU	95-A-260-S2	CY	Operating	Y	24/7	N/A	0%	3	
0% Indicator OPACITY (NVE)											
EP-23	TISSUE LOADOUT (EU 23)	23' St. Ht. 6" dia. HOR	03-A-1159	BF	Not Operating (7/22/22) / (Operating on 8/9/22)	N / Y	As Needed	N/A	0% / 5-10%	1	Operates approximately 2 days each week. Control Equipment not functioning properly (8/9/22)
10% Indicator OPACITY											
EP 22	SULFURIC ACID (H_2SO_4) STORAGE TANK	3' St. Ht. 1" dia.	96-A-512	N	Operating	N/A	As Needed	N/A	0%	3	
EP-24	DE MIXING TANKS (EUs 24a & 24b)	42' ST HT, 12" dia. VU	05-A-131	WSC (CE-24)	Operating	Y	24/7	N/A	0%	3	
25% Indicator OPACITY											

Compliance Status

0- Unknown
1- Not in Compliance
2- In Compliance- Test
3- In Compliance - Insp.
5- On ERP Schedule
6- Not on ERP Schedule
9- In Compliance (Closed)

Control Equipment Code

BF- Bag Filter
EP- Electrostatic Precip.
CY- Cyclone
A- Afterburner
MC- Multiclone
CR- Cone Roof
FX- Fixed Roof
IFR- Internal Floating Roof
SC- Scrubber
VS- Venturi Scrubber
PBS- Packed Bed Scrubber
PCS- Packed Column Scrubber
WW- Waterwall
DF- Dry Filter
O- Other
N- No control

EP #	Source Description & Location	Stack Character	Permit Number	Cntl Code	Actual Operating Condition (Process Input Rate)	CNTL EQP OP?	OP Sched	Record Keeping OK?	Opacity	Compliance Status	Comments
1	2	3	4	5	6	7	8	9	10	11	12
EP-16	P&S INDIRECT STEAM HEATED DRYER #1, ZONES 1-6 (EU-16)	62' St. Ht. 36" dia. VU	DUAL STACK 06-A-300-S1	N	Operating	N/A	24/7	N/A	0%	3	
EP-17	P&S INDIRECT STEAM HEATED DRYER #1, ZONES 7-10 (EU-17)	54' St. Ht. 36" dia. VU	06-A-301	N	Operating	N/A	24/7	N/A	0%	3	
EP-18	P&S INDIRECT STEAM HEATED DRYER #2, ZONES 1-6 (EU-18)	62' St. Ht. 36" dia. VU	DUAL STACK 06-A-302-S1	N	Operating	N/A	24/7	N/A	0%	3	
EP-19	P&S INDIRECT STEAM HEATED DRYER #2, ZONES 7-10 (EU-19)	54' St. Ht. 36" dia. VU	06-A-303	N	Operating	N/A	24/7	N/A	0%	3	
0% Indicator OPACITY (NVE)											
EP-25A	COOLING TOWER #1	21' St. Ht. 132" dia. VU	13-A-185	*ME	Operating	Y	24/7	Y	0%	3	*Mist Eliminator
EP-25B	COOLING TOWER #1	21' St. Ht. 132" dia. VU	13-A-186	*ME	Operating	Y	24/7	Y	0%	3	*Mist Eliminator
Limits: Maintain Cooling Tower According to Manufacturer's Specifications; Shall Not Use Additives that Contain Chromium Compounds. **Records:** Records of Inspections/Maintenance; SDS for Additives Used in Cooling Tower. 40 CFR 63 Subpart Q – Industrial Process Cooling Towers – However, These Cooling Towers Do Not Utilize Water Treatment Chemicals That Contain Chromium, Therefore, They Are Not Subject to This Subpart. **10% Indicator OPACITY**											
EP-26	PLANT EMERGENCY GENERATOR #1 (480 bhp) (EU-26)	9' St. Ht. 4" dia. VU	18-A-675	N	Not Operating	N/A	As Needed	Y	0%	3	
Limits: Diesel Fuel ONLY; Max Sulfur Content 0.0015% by weight (15ppm); Min Cetane Index of 40 or Maximum Aromatic Content of 35% by Volume; Operating Hours ≤ 500 / 12-Month Rolling Period; Operating Hours ≤ 100 Hours/Year for Maintenance Checks & Readiness Testing; Operating Hours ≤ 50 Hours/Year for Non-Emergency Situations; Cannot be Used for Peak Shaving or Non-Emergency Demand Response or to Generate Income for the Facility. Non-Resettable Hour Meter. **Records:** Monthly: Hours for Maintenance Checks & Readiness Testing; Hours for Non-Emergency; Total Hours Operated; Rolling 12-Month Total of Hours Operated. Annually: Hours for Maintenance Checks & Readiness Testing; Hours for Non-Emergency; Total Hours Operated for Maintenance Checks, Readiness Testing, and Allowed Non-Emergency Operations. **10% Indicator OPACITY**											

Compliance Status		Control Equipment Code			
0- Unknown	5- On ERP Schedule	BF- Bag Filter	MC- Multiclone	SC- Scrubber	WW- Waterwall
1- Not in Compliance	6- Not on ERP Schedule	EP- Electrostatic Precip.	CR- Cone Roof	VS- Venturi Scrubber	DF- Dry Filter
2- In Compliance- Test	9- In Compliance (Closed)	CY- Cyclone	FX- Fixed Roof	PBS- Packed Bed Scrubber	O- Other
3- In Compliance - Insp.		A- Afterburner	IFR- Internal Floating Roof	PCS- Packed Column Scrubber	N- No control

AIR QUALITY COMPLIANCE EVALUATION
COMMENTS

Company Name: PB LEINER USA
Facility Number: 82-01-064 Operating Permit Number: N/A
Evaluation Date: July 22, 2022

GENERAL INFORMATION:

The purpose of this compliance evaluation was to determine the current compliance status of the PB Leiner USA facility located at 7001 North Brady Street in Davenport, Iowa with respect to the rules and regulations governing air pollution in the state of Iowa. The compliance evaluation was complaint initiated due to a complaint forwarded to the Iowa Department of Natural Resources by the United States Environmental Protection Agency (EPA). The EPA Complaint mentioned that employees have been complaining for months about waste landing on vehicles in the parking lot. The complaint stated that sometimes the waste appears to be the tissue product and that sometimes it appears to be the gel dust and other times it appears to be byproduct from the chemical cleaning equipment. The scope of this evaluation was weighted towards possible emission sources that could be causing the depositions on the vehicles but also included a walkthrough inspection of the emission sources, control devices, and any applicable operational and maintenance records.

RECORDKEEPING:

A recordkeeping review was done to ensure that the facility was keeping adequate records to comply with permit requirements. The PB Leiner USA was able to produce records for their boilers and cooling towers and the emergency generator and their preventative maintenance plans (PMs) for their baghouses. In addition, they were able to produce maintenance records for the baghouses. However, many of the maintenance records for the baghouses did not indicate the respective emission point ID number. While that is not necessarily a violation, having a way to correlate the maintenance records to the specific emission points greatly assists when following up on issues with emissions at specific emission points. Review of the maintenance orders also indicated that the company knew of gel leaking on the roof in the area of EP-3 and EP-12.

STACK CHARACTERISTICS:

During the course of the evaluation, permitted stack characteristics were compared to what actually exists at the facility. For the most part, the emission points observed appeared to be in compliance with the stack height, diameter and discharge style. However, the stack for emission point EP 15 was observed to be approximately 35 feet above ground surface. The construction permit for this emission point (95-A-259) indicated a stack height of 20 feet above ground surface. Because the stack is higher greater than 125% of the permitted value, it appears that a permit modification is necessary.

LABELING EMISSION POINTS:

None of the stacks around the facility appeared to be labeled with some sort of identifier (emission point number or equipment name). Although this does not constitute a violation, labeling the emission points greatly assists proper identification during air quality compliance evaluations. Therefore, PB Leiner USA is encouraged to label the emission points with an identifier for easy recognition during inspections.

APPLICABLE IOWA ADMINISTRATIVE CODE RULE CITATIONS:

Subrule 567 Iowa Administrative Code (IAC) 22.1(1) prohibits the construction, installation or alteration of any equipment or control equipment on or after September 23, 1970, without first obtaining a construction permit or conditional permit from the DNR.

Be advised that all emission sources that are constructed, installed, modified, reconstructed, or altered on or after September 23, 1970, must have a construction permit from the DNR unless otherwise specifically exempted by DNR rules. For emission sources that vent only volatile organic compounds, the permit applicability date is April 22, 1987.

Subrule 567 IAC 22.3(3) states that a permit may be issued subject to conditions which shall be specified in writing. Such conditions may include but are not limited to emission limits, operating conditions, fuel specifications, compliance testing, continuous monitoring, and excess emission reporting.

Subrule 567 IAC 24.2(1) specifies that equipment and control equipment must be operated and maintained in a manner consistent with good practice for minimizing emissions and that any cause of excess emissions must be remedied expeditiously.

Inspector Initials: JPR

JPR: N:\Environmental Services\Field Services\ESD06-Wash-Fo6\JRYK\AQ\2022\PB Leiner 82-01-064 - Complaint 31014\PB LEINER AQ3.doc

Picture Filenames: NA