Fields of Opportunities

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

October 8, 2015

Don P. Hudgell III, WPC Superintendent
Council Bluffs Public Works
18452 Applewood RD
Council Bluffs, IA 51503

SUBJECT: Council Bluffs Wastewater Treatment Facility Generators
AQ Facility #78-01-120
Pottawattamie County, Iowa

Dear Mr. Hudgell:

Thank you for your time and assistance during my visit to the Council Bluffs Wastewater Treatment Facility on August 26, 2015. The purpose of my visit was to determine the applicability of stack testing and air quality construction permits/exemptions to the generators at the plant. Since then, I consulted with Department of Natural Resources (DNR) Air Quality Bureau (AQB) personnel to determine applicability of the construction permit Small Unit Exemption (SUE) for the generators.

I learned that newer generators [subject only to New Source Performance Standards (NSPS)] can use the SUE. Older units need a construction permit rather than the SUE, including those subject to National Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ. So, it appears the natural gas generator (Emission Point G2 in the SUE document) needs a construction permit.

I recommend you contact the construction permit engineers toll-free at 877-247-4692 to get forms and/or information needed to determine construction permit applicability. In fact, I recommend you inquire about a construction permit determination for the boilers in the digester building, too.

Please contact me at 712-243-1934 if you have any questions.

Sincerely,

Holly Vandemark
Copy of Record

Holly Vandemark
Field Services & Compliance Bureau

HJV/AQ/CouncilBluffs082615.aq.WW Plant Generators.doc

CC Brian Hutchins, AQB, DNR, Windsor Heights, Iowa
Rachel Quill, AQB, DNR, Windsor Heights, Iowa
Sarah Piziali, AQB, DNR, Windsor Heights, Iowa
Facility AQ File, Pottawattamie County