Iowa Department of Natural Resources
Administrative Consent Order

In the Matter of:
New Heaven Chemicals Iowa, LLC

Administrative Consent Order
No. 2019-AQ-36

To: New Heaven Chemicals Iowa, LLC
Paul Katzenberger
Plant Manager
1585 380th Street
Manly, Iowa 50456

New Heaven Chemicals Iowa, LLC
Chuck Becker, Attorney
Belin Law Firm
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309-3989

I. Summary

This administrative consent order is entered into between the Iowa Department of Natural Resources (DNR) and New Heaven Chemicals Iowa, LLC (NHC) for the purpose of resolving air quality violations. In the interest of avoiding litigation, the parties have agreed to the provisions below.

Any questions regarding this administrative consent order should be directed to:

Relating to technical requirements:
Julie Duke
Iowa Department of Natural Resources
Wallace State Office Building
502 East Ninth Street
Des Moines, Iowa 50319-0034
Phone: 515-725-9565.

Relating to legal requirements:
Anne Preziosi, Attorney for the DNR
Iowa Department of Natural Resources
Wallace State Office Building
502 East Ninth Street
Des Moines, Iowa 50319-0034
Phone: 515-725-9551

Payment of penalty to:
Director of the Iowa DNR
Wallace State Office Building
502 East Ninth Street
Des Moines, Iowa 50319-0034
II. JURISDICTION

This administrative consent order is issued pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1), which authorize the Director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II (air quality), and the rules promulgated or permits issued pursuant to that part; and Iowa Code section 455D.109 and 507 Iowa Administrative Code (IAC) chapter 10, which authorize the Director to assess administrative penalties.

NHC neither admits nor denies the statements or assertions made in the Statement of Facts or Conclusions of Law.

III. STATEMENT OF FACTS

1. New Heaven Chemicals Iowa, LLC, (NHC) is a supplier of sodium methyleate, also known as sodium methoxide (SMO). SMO is a catalyst used in the production of biodiesel. The NHC facility in Iowa is located at 1585 380th Street, north of Manly, Iowa. The facility began its operations on August 30, 2016. Some of the sources of emissions to the outside atmosphere at this facility are mixing tanks, reaction columns, storage tanks, product loadout and wastewater treatment. The facility has the capability to produce 20,000 metric tons per year of SMO. NHC currently operates three SMO production systems at its Manly, Iowa, facility. NHC plans to increase its SMO production by installing a fourth SMO production system.

2. NHC has been a major source for purposes of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) contained in 40 CFR 63 Subparts F, G, and H since its initial start-up date of August 30, 2016. Administrative Consent Order No. 2019-AQ-17 was signed by the Director of DNR on February 21, 2019. Among other things, New Heaven was ordered to:

comply with 40 CFR 63 Subparts F, G, and H by no later than ninety days from the issuance date of Project No. 17-410, air quality construction permits if no control installation is necessary for compliance, or comply with 40 CFR 63 Subparts F, G, and H by no later than 210 days from the issuance date of Project No. 17-410 permits if control installation is necessary for compliance.

3. NHC also was ordered to:

submit a written compliance plan detailing how the facility will comply with Subparts F, G, and H within 60 days of the issuance of Project No. 17-410 permits. The administrative consent order stated that the
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compliance plan should include proposed compliance plan options
and a schedule for implementing each option.

4. On February 25, 2019, DNR issued the construction permits included
in Construction Permit Project No. 17-410. Therefore, according to the requirements
of Administrative Consent Order No. 2019-AQ-17, NHC should have come into
compliance with the provisions of 40 CFR 63 Subparts F, G, and H by May 26,
2019, if no control installation is necessary for compliance, or by September 23,
2019, if control installation is necessary for compliance. NHC did not meet either
of these deadlines. To date, NHC is not in compliance with 40 CFR 63 Subparts
F, G, and H.

5. The compliance plan required by the administrative consent order
should have been submitted to DNR by no later than April 26, 2019, detailing how
the facility would comply with 40 CFR Part 63 Subparts F, G, and H.

6. On July 15, 2019, DNR issued a Notice of Violation letter to NHC for
failure to provide the required compliance plan. The compliance plan was received
on August 16, 2019. The compliance plan, amended by DNR and NHC, is
attached to this administrative consent order as Attachment A.

7. The purpose of this administrative consent order is to make the
compliance plan enforceable.

IV. CONCLUSIONS OF LAW

1. Iowa Code section 455B.133 provides that the Environmental
Protection Commission (Commission) shall establish rules governing the quality of
air and emission standards. The Commission has adopted 567 IAC chapters 20-
35 relating to air quality.

2. 567 IAC chapter 23 requires compliance with the National Emission
Standards for Hazardous Air Pollutants found in 40 Code of Federal Regulations
(CFR) 63, Subpart F, Subpart G, and Subpart H, and adopted by reference by
DNR. 567 IAC 23.1(4) states that the federal standards of hazardous air pollutants
for source categories, 40 Code of Federal Regulations Part 63, as amended or
corrected through September 14, 2016, are adopted by reference, except for those
provisions which cannot be delegated to the states. NHC is required to comply
with the following NESHAPs:
   a. 40 CFR Part 63.100, Subpart F – Synthetic Organic Chemical
      Manufacturing Industry;
   b. 40 CFR 63.110, Subpart G – Synthetic Organic Chemical
      Manufacturing Industry for Process Vents, Storage Vessels, transfer
      Operations, and Wastewater; and
As stated above, NHC has been a major source for purposes of the above-listed NESHAPS since its initial start-up date of August 30, 2016.

V. ORDER

THEREFORE, DNR orders and NHC agrees to the following:

1. NHC shall comply with compliance plan attached to this administrative consent order as Attachment A by the dates included in the compliance plan; and

2. NHC shall provide DNR with written quarterly updates describing the steps NHC has taken to work towards compliance in accordance with the compliance plan attached as Attachment A. NHC shall state whether Attachment A deadlines have been met. If Attachment deadlines have not been met, then NHC shall state why the deadlines were not met and what alternative plan is proposed. NHC shall submit quarterly reports beginning December 1, 2019, and continuing by no later than March 1, June 1, September 1, and December 1, until such time as DNR agrees that NHC has achieved compliance with 40 CFR Part 63.100, Subparts F, G, and H.

3. If NHC sells or transfers the facility subject to this Administrative Consent Order, then NHC shall advise the proposed purchaser or successor-in-interest in writing of the existence of this Administrative Consent Order, including Attachment A; Administrative Consent Order No. 2019-AQ-07; all Air Quality Title V permits, amendments, and applications for this facility; and all Air Quality Construction Permits for this facility, to the proposed purchaser or successor-in-interest. In the event NHC sells or otherwise assigns any of its right, title, or interest in this facility prior to fulfilling all requirements of the Administrative Consent Order, including Attachment A, and the requirements of Administrative Consent Order No. 2019-AQ-07, the conveyance shall not release NHC from any obligation imposed by this Administrative Consent Order, including Attachment A, and the requirements of Administrative Consent Order No. 2019-AQ-07, unless the party to whom the right, title, or interest has been transferred agrees in writing to fulfill the obligations of this Administrative Consent Order, including Attachment A, and the requirements of Administrative Consent Order No. 2019-AQ-07, and if the party to whom the right, title, or interest has been transferred so agrees, NHC is hereby released of all liability and obligations hereunder.
VI. PENALTY

No penalty is assessed by this administrative consent order.

VII. RESERVATION OF RIGHTS

This administrative consent order is entered into between the Iowa Department of Natural Resources (DNR) and NHC for the sole purpose of creating a compliance plan for NHC to achieve compliance with 40 CFR Subparts F, G, and H.

DNR reserves the right to bring enforcement action to assess monetary penalties for the alleged violations addressed in this administrative consent order or to pursue referral to the Attorney General, to obtain injunctive relief and penalties or fines, pursuant to Iowa Code section 455B.146 or 455B.146A. Further, nothing in this administrative consent order restricts or limits the administrative or judicial enforcement remedies available to the DNR or the State of Iowa for the violations referred to in this administrative consent order or any other violations that may have occurred at the NHC facility in Manly, Iowa.

Additionally, DNR reserves the right to bring enforcement action or to pursue referral to the Attorney General, to obtain injunctive relief and penalties or fines, pursuant to Iowa Code section 455B.146 and 455B.146A, for alleged violations not addressed in this administrative consent order that may have occurred at the NHC facility in Manly, Iowa.

VIII. WAIVER OF APPEAL RIGHTS

This administrative consent order is entered into knowingly and with the consent of NHC. For that reason, NHC waives its right to appeal this administrative consent order or any part thereof.

Kayla Lyon, Director
Iowa Department of Natural Resources

New Heaven Chemicals Iowa, LLC

DNR Field Office 2; Anne Preziosi; VII.B.2

Dated this 3rd day of December, 2019.

Dated this 25th day of November, 2019.
Attachment A

Compliance Plan and Regulatory Analysis

New Heaven Chemicals
Manly, Iowa
Plant ID# 98-02-006

NESHAPs

In accordance with Administrative Consent Order No. 2019-AQ-07 Item V.2, the following compliance plan details how NHC will comply with 40 CFR 63 (NESHAP) Subparts F, G, and H. This plan includes compliance plan options and a schedule for implementing each option.

1. General NESHAP Requirements (Subparts A and F)

   NHC is subject to the more generalized NESHAP requirements found in Subpart A and Subpart F. In order to return to compliance with these subparts, NHC must develop a written startup, shutdown, and malfunction plan [Subpart A, §63.6(e)(3)]. The plan must detail procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction. It must also establish a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with NESHAP Subparts F, G, and H. Furthermore, as dictated by Subpart F, the startup, shutdown, and malfunction plan must also include maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair [(§83.105(b) and (d)]. NHC shall complete this plan by November 3, 2020, so that startup and shutdown procedures can be followed when commissioning new control equipment that is proposed below.


   NHC constructed and currently operates three separate Sodium Methoxide (SMO) distillation columns. Each of the distillation columns is equipped with a vent to the atmosphere that meets the definition of "process vent" contained within NESHAP Subpart G. The three operational process vents are identified in SMO Production Construction Permit project 17-410, issued by the Iowa Department of Natural Resources (IDNR) on February 25, 2019, as EP-003 (IDNR Construction Permit 14-A-434-S2), EP-018 (IDNR Construction Permit 14-A-695-S1), and EP-019 (IDNR Construction Permit 14-A-696-S1).

   EP-003, EP-018, and EP-019 are classified as Group 2 Process Vents under NESHAP Subpart G. Per 40 CFR §63.111 of Subpart G, a Group 1 process vent is a process vent for which the vent stream flow rate is greater than or equal to 0.005 standard cubic meter per minute, the total organic HAP concentration is greater than or equal to 60 parts per million by volume, and the total resource effectiveness index value is less than or equal to 1.0. Process vents that do not meet all three of these criteria are considered Group 2 process vents.

   NHC conducted flow testing for process vents EP-003, EP-018, and EP-019 on April 10 through April 12, 2018. This testing showed that the flow rate for each of the process vents was below 3.065 standard cubic meter per minute. Therefore, EP-003, EP-019, and EP-019 are considered Group 2 process vents. Under NESHAP Subpart G, no additional control equipment is needed to comply with the NESHAP standard for the existing process vents.


IDNR Construction permit 17-A-240 for SMO Production authorized the construction and operation of a fourth SMO distillation column and process vent. The permit identifies the process vent as EP-022. NHC has not commenced construction of this fourth production line.

The fourth distillation column is designed to be identical to EP-003, EP-018, and EP-019. NHC believes that, based on the design, EP-022 will also qualify as a Group 2 Process Vent under NESHAP Subpart G. This will be verified through testing methods prescribed in the NESHAP.

NHC shall meet the following schedule for NESHAP compliance for EP-022:

<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Notification – Submit application for approval to construct</td>
<td>Completed</td>
<td>63.151(b)(2)(i)</td>
</tr>
<tr>
<td>Submit Notification of Startup to IDNR</td>
<td>Within 15 Days After Startup of EP-022</td>
<td>63.9(b)(4)(v)</td>
</tr>
<tr>
<td>Confirm EP-022 is a Group 2 Process Vent using the procedures in 63.115(a), (b), and (e) of Subpart G</td>
<td>Within 60 days after achieving maximum production rate and no later than 90 days after startup of EP-022</td>
<td>63.113(f); Condition 5.B.i(k) CP 17-410 for SMO Production</td>
</tr>
<tr>
<td>Submit a Notification of Compliance Status that contains results of Group 1/Group 2 determination for EP-022</td>
<td>Within 150 days of initial startup</td>
<td>63.117(c); 63.152(b);</td>
</tr>
</tbody>
</table>

NHC has until August 24, 2020 to begin construction of EP-022 under IDNR Construction Permit 17-A-240 for SMO Collection Tanks 1A, 2A, and 3A. NHC will provide notification to IDNR if construction of EP-022 cannot be started by August 24, 2020. NHC understands that a new construction permit application will need to be submitted to IDNR if construction of EP-022 cannot be started prior to August 24, 2020.

4. **Storage Vessels**

NHC constructed and currently operates seven storage vessels, as defined in NESHAP Subpart F. Methanol and SMO storage tanks are identified as follows in Construction Permit Project 17-41C:

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Equipment Description</th>
<th>IDNR Construction Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-004</td>
<td>Methanol Storage Tank #1</td>
<td>14-A-435-S1</td>
</tr>
<tr>
<td>EP-005</td>
<td>Methanol Storage Tank #2</td>
<td>14-A-436-S1</td>
</tr>
</tbody>
</table>
Each of the storage vessels listed above are considered Group 1 Storage Vessels under NESHAP Subpart G. As such, NHC will need to install various pieces of equipment to achieve compliance with the NESHAP Standards. As allowed under §63.119(a)(1), NHC has chosen to install a closed vent system and control device for NESHAP compliance. Specifically, NHC will install an enclosed vapor combustion unit (VCU) that will be used to control breathing and working loss vapors from the methanol and SMO storage vessels. As required by §63.119(e)(1), the VCU will reduce inlet emissions of total organic HAPs by 95 percent or greater.

If needed, NHC will submit a supplemental Title V application with approved VCU drawings after October 7, 2019, but no later than December 7, 2019.

NHC shall meet the following schedule for NESHAP compliance for storage vessels subject to NESHAP Subpart G:

<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finalize purchase order and authorize work to begin on storage vessel VCU</td>
<td>August 23, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Receive storage vessel VCU design drawings for review</td>
<td>September 23, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Approve storage vessel VCU design drawings</td>
<td>October 7, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Construction Permit application submitted to IDNR for approval to construct storage vessel VCU system.</td>
<td>Emailed on October 15, 2019 Hard copy sent on October 25, 2019</td>
<td>567 IAC Chapter 22.1(1)</td>
</tr>
<tr>
<td>Submit Initial Notification of NESHAP Subpart G to IDNR</td>
<td>Hard copy sent on October 25, 2019</td>
<td>63.151(b)(l)</td>
</tr>
<tr>
<td>Storage vessel VCU fabrication complete and ready for shipment</td>
<td>June 15, 2020</td>
<td>N/A</td>
</tr>
<tr>
<td>Field assembly, erection, and start-up of storage vessel VCU</td>
<td>October 15, 2020</td>
<td>N/A</td>
</tr>
<tr>
<td>Submit NESHAP Subpart G Notification of Compliance Status Report</td>
<td>January 4, 2021 or no later than 150 calendar days after the compliance dates specified in 63.100 of</td>
<td>63.152(b)</td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>subpart F of this part, whichever first occurs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Begin submittals of required periodic reports and achieve full compliance with NESHAP Subpart G</td>
<td>September 3, 2021, or no later than 8 months after the date the Notification of Compliance Status is due, whichever first occurs</td>
<td>63.152(c)(1)</td>
</tr>
</tbody>
</table>

5. **Transfer Operations (EU-F015)**

NHC operates one transfer rack, a SMO loadout unit. The truck SMO product loadout unit is identified as EU-F015 in IDNR Construction Permit 14-A-444-S2, issued on February 25, 2019.

EU-F015 is considered a Group 1 transfer rack under NEHAP Subpart G. Therefore, NHC will need to install various pieces of equipment to comply with the NESHAP Standards. NHC has elected to control organic HAP emissions from SMO loadout through the use of a vapor collection system and VCU. Like with the storage vessels, NHC will install and operate an enclosed VCU that will be used to control organic HAP vapors displaced during the loading of SMO to trucks. This will be a separate VCU system from the VCU that will be used to control organic HAP vapors from storage vessels.

As required under 63.126(b)(1), the VCU will be designed to reduce emissions of total organic HAPs by 99 percent or to an exit concentration of 20 parts per million (ppm) by volume, whichever is less stringent.

NHC shall meet the following schedule for NESHAP compliance for the transfer rack that is subject to NESHAP Subpart G:

<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finalize purchase order and authorize work to begin on SMO loadout VCU</td>
<td>August 23, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Receive SMO loadout VCU design drawings for review</td>
<td>September 23, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Approve SMO Storage VCU design drawings</td>
<td>October 7, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Construction Permit application submitted to IDNR for approval to construct SMO loadout VCU system</td>
<td>Emailed on October 15, 2019 Hard copy sent on October 26, 2019</td>
<td>667 IAC Chapter 22.1(1)</td>
</tr>
<tr>
<td>Submit Initial Notification of NESHAP Subpart G to IDNR</td>
<td>Hard copy sent on October 26, 2019</td>
<td>63.151(b)(i)</td>
</tr>
<tr>
<td>SMO Loadout VCU fabrication complete and ready for shipment</td>
<td>June 16, 2020</td>
<td>N/A</td>
</tr>
</tbody>
</table>
6. **Process Wastewater Operations**


IDNR designated the process wastewater at NHC as a Group 1 Wastewater Stream, as defined in NESHAP Subpart G, based upon wastewater sampling that was conducted on October 14, 2017, December 4, 2017, and May 24, 2018. The average methanol concentration of these sampling events was greater than the 10,000 parts per million (ppm) threshold for Group 1 wastewater streams established in the NESHAP.

Given the above, NHC took inlet and outlet samples of process wastewater in late July of 2019. Results from this sampling showed that inlet concentrations of methanol to the WWTP were approximately 21,000 ppm. Therefore, NHC will handle wastewater as a Group 1 Wastewater Stream.

NHC will comply with the NESHAP by installing fixed roofs on wastewater tanks and routing aeration tank vapors to either the storage vessel VCU or the SMO loadout VCU. NHC also does not intend to discharge wastewater, but will instead truck the wastewater to nearby WWTPs in the area.

NHC shall meet the following schedule for achieving NESHAP compliance for the Group 1 Wastewater Stream:

<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Begin including notices with wastewater shipments to facilities off-site stating that the wastewater contains organic HAP and are to be treated in accordance with NESHAP Subpart G</td>
<td>January 1, 2020</td>
<td>63.132(g)(1)(ii)</td>
</tr>
<tr>
<td>Construction Permit application submitted to IDNR to authorize construction of fixed roofs routing of wastewater organic HAP vapors to VCU</td>
<td>Emailed on October 15, 2019</td>
<td>N/A</td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Install fixed roofs on wastewater tanks</td>
<td>Hard copy sent on October 25, 2019</td>
<td>63.133(a)(2)(i)</td>
</tr>
<tr>
<td>Route aeration tank wastewater vapors to either storage vessel VCU or SMO loadout VCU</td>
<td>October 15, 2020</td>
<td>63.133(a)(2)(i)</td>
</tr>
<tr>
<td>Submit NESHAP Subpart G Notification of Compliance Status Report</td>
<td>January 4, 2021, or within 150 calendar days after the compliance dates specified in §63.100 of subpart F of this part, whichever first occurs</td>
<td>63.152(b)</td>
</tr>
<tr>
<td>Begin submittals of required periodic reports and achieve full compliance with NESHAP Subpart G</td>
<td>September 3, 2021, or no later than 8 months after the date the Notification of Compliance Status is due, whichever first occurs</td>
<td>63.152(c)(1)</td>
</tr>
</tbody>
</table>

7. **Equipment Leaks**

Pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottom receivers, instrumentation systems, and control devices or closed vent systems required by NESHAP Subpart H that are in service for 300 hours or more per year are subject to equipment leak requirements found in NESHAP Subpart H. NHC operates multiple types of this equipment, collectively referred to as EU-F017: VOC/HAP Emissions from Equipment Leaks, in IDNR Construction Permit 17-A-732.

Due to aging equipment and to enhance NESHAP Subpart H compliance, NHC intends to install at the plant three replacement blowers and approximately 13 replacement pumps that do not require a seal. Following installation of the blowers and pumps, NHC will inventory all equipment subject to the equipment leak provisions in Subpart H, and develop and implement a formal Leak Detection and Repair (LDAR) program.

NHC shall meet the following schedule for achieving NESHAP Subpart H compliance for equipment leaks:

<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receive test replacement pump from manufacturer</td>
<td>August 19, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Complete installation of test replacement pump</td>
<td>August 26, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Receive test replacement blower #1 at NHC</td>
<td>September 6, 2019</td>
<td>N/A</td>
</tr>
</tbody>
</table>

11
<table>
<thead>
<tr>
<th>Task</th>
<th>Task to be Completed By</th>
<th>Regulatory Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete installation of test replacement blower #1</td>
<td>September 13, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Complete field testing of test replacement pump and issue purchase orders for four (4) additional pumps</td>
<td>September 23, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Complete field testing of test replacement blower #1 and issue purchase orders for replacement blowers #2 and #3</td>
<td>October 11, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Receive the four pumps ordered September 2019</td>
<td>October 21, 2019</td>
<td>N/A</td>
</tr>
<tr>
<td>Submit Initial Notification of NESHAP Subpart H to IDNR</td>
<td>Hard copy sent on October 25, 2019</td>
<td>63.182(a)(1)</td>
</tr>
<tr>
<td>Fabrication of replacement blowers #2 and #3 completed</td>
<td>June 8, 2020</td>
<td>N/A</td>
</tr>
<tr>
<td>Receive replacement blowers #2 and #3 at NHC</td>
<td>August 24, 2020</td>
<td>N/A</td>
</tr>
<tr>
<td>Install replacement blowers #2 and #3</td>
<td>October 15, 2020</td>
<td>N/A</td>
</tr>
<tr>
<td>Inventory all LDAR components and implement LDAR program</td>
<td>January 4, 2021</td>
<td>N/A</td>
</tr>
<tr>
<td>Submit NESHAP Subpart H Notification of Compliance Status Report</td>
<td>January 4, 2021</td>
<td>63.182(c)</td>
</tr>
<tr>
<td>Begin submittals of required periodic reports and achieve full compliance with NESHAP Subpart G and H</td>
<td>September 3, 2021</td>
<td>63.152(c)(1)</td>
</tr>
</tbody>
</table>