

From: Levetzow, Kurt [DNR]

Hutchins, Brian [DNR]; Book, Kelli [DNR]; Sanfilippo, Joe [DNR]

Cc: Ostwinkle, Dennis [DNR]; Bermel, Reid [DNR]; Thielen, Dennis [DNR]

Subject: GPC, Muscatine

To:

A month or two back, I investigated a complaint against GPC in Muscatine regarding the visible emission cloud that is common (dare I say continuous) hanging over GPC. The emission point is their GEP stack, which is a common emission point for 6 coal fired boilers. As an outcome of my investigation, I requested they respond in writing to several questions I had. They did and we received that letter on 11-20-08.

Sent: Thu 12/4/2008 11:59 AM

In their letter, they talk about how they clean bottom ash out of the 6 boilers, and when they do, it stirs up dust and can cause spikes in opacity. They do this in every boiler every 2 hrs, one boiler at a time. They're claiming those "extra emissions" are exempt, since cleaning the bottom ash is needed to be done (which I agree) but they claim this is exempt since "the process is required to prevent the multiclones from plugging and thus is considered a control equipment cleaning procedure".

They indicate in their response that "during normal operations, the opacity levels in the GEP stack ranges from 25-35%". I'd have to think that any upset conditions, blowing soot, or the extra emissions from pulling bottom ash will elevate them over 40% opacity.

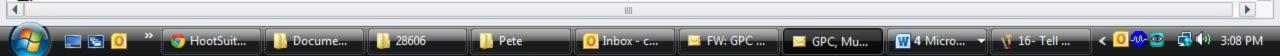
They also say they "understand blowing soot is an acceptable cleaning practice in boilers and not subject to excess emission reporting". Is that fact, or a myth that's just become accepted practice with operating coal fired boilers?

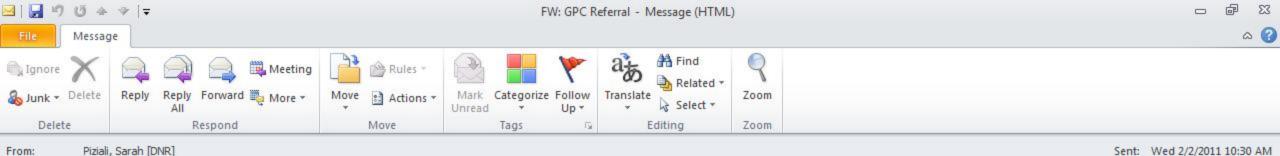
I think everyone would agree that multiclones are not the control of choice for properly cleaning particulate from a coal fired boiler....it may have been the best choice at one time, but the new boilers are using BagFilters. So do we just have sit back and wait for the new boiler MACT to come back out? GPC claims that they'll finish constructing and hooking up the new BF they built, but never completed after the Boiler MACT was vacated by EPA.......GPC also is claiming they'll be putting on a SC to control chlorine emissions too.....it would be nice if DNR/EPA could require them to finish hooking up the BF and do away with the multiclones now instead of years from now. In my conversations with GPC's environmental people, they agree that the new BF would more or less do away with the haze that can be see above GPC and half of Muscatine on any given day....but they're waiting for someone (new Boiler MACT) to require them to do it.

My question is this....since Muscatine is or will be non-attainment soon, and by seeing the haze over GPC and southern Muscatine, can we enter into agreement with them through a Consent Order to move forward sooner? I am sure they're NOT going to welcome that....but I'd think we're justified. I'd guess Mark Stone could show lots of instances where the GEP stack has failed stack testing.

Anyone have any thoughts or comments????

If anyone would like to see GPC's response, which has more detailed info about what I am talking about, I'd be happy to forward to you.





Phelps, Dave [DNR] Cc: Subject: FW: GPC Referral

This is the latest on the GPC PSD and MON violation referral.

From: Book, Kelli [DNR]

To:

Sent: Tuesday, February 01, 2011 1:24 PM

To: Thielen, Dennis [DNR]; Hutchins, Brian [DNR]; Piziali, Sarah [DNR]; Zayudis, Peter [DNR]

Subject: GPC Referral

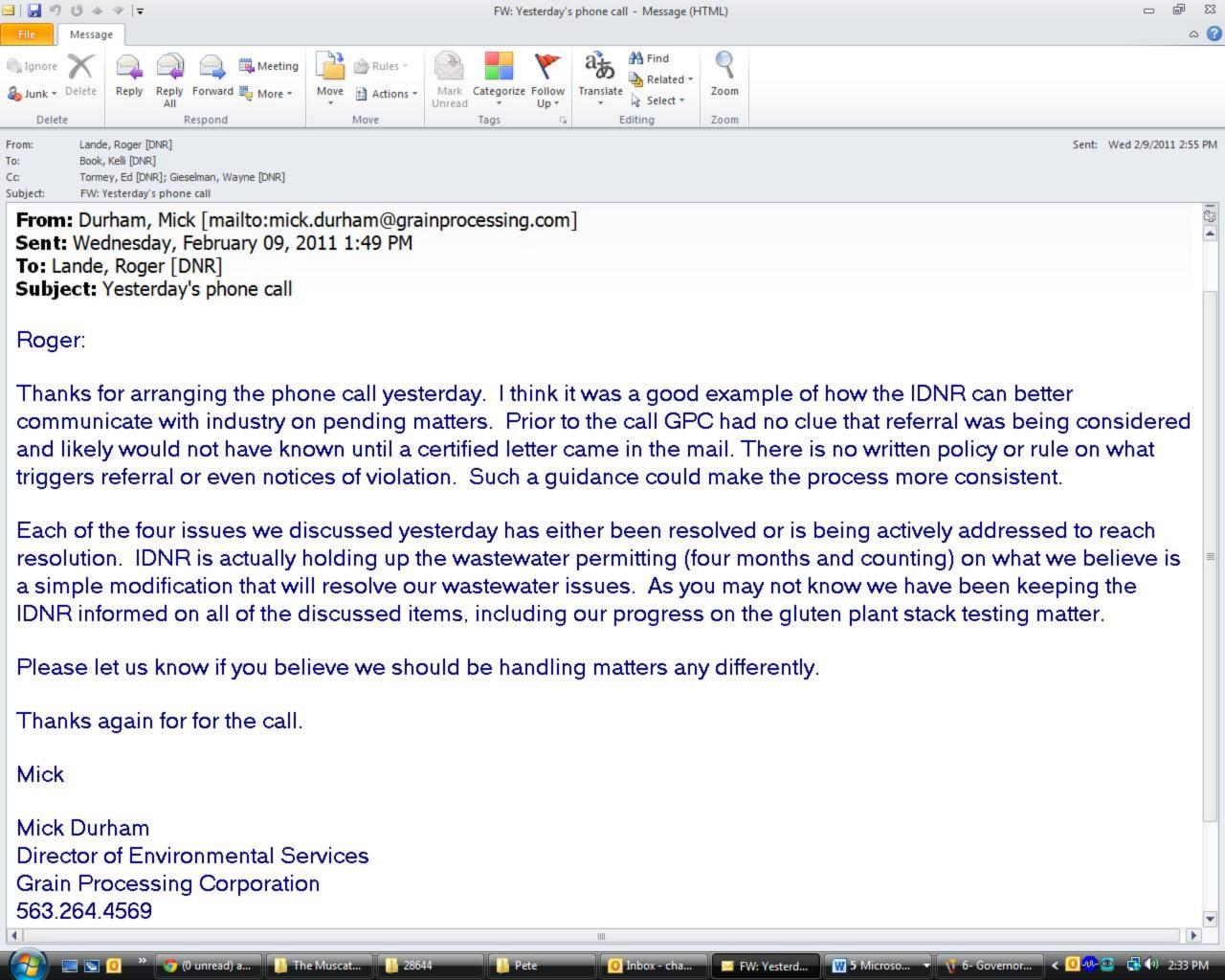
Okay we are back on a holding pattern with the GPC referral. The Director has requested Ed and I along with him have a conference call next week with GPC to discuss the air and water violations. I am not sure what this means, I think the referral is still on but the Director wants GPC to be well aware of why the referral is being requested. Was there a referral memo prepared for Joe - if so, could I have a copy of that? If at all possible I would like for the five of us to discuss the violations prior to meeting with the Director. Once I get a meeting time with the Director I will schedule us something.

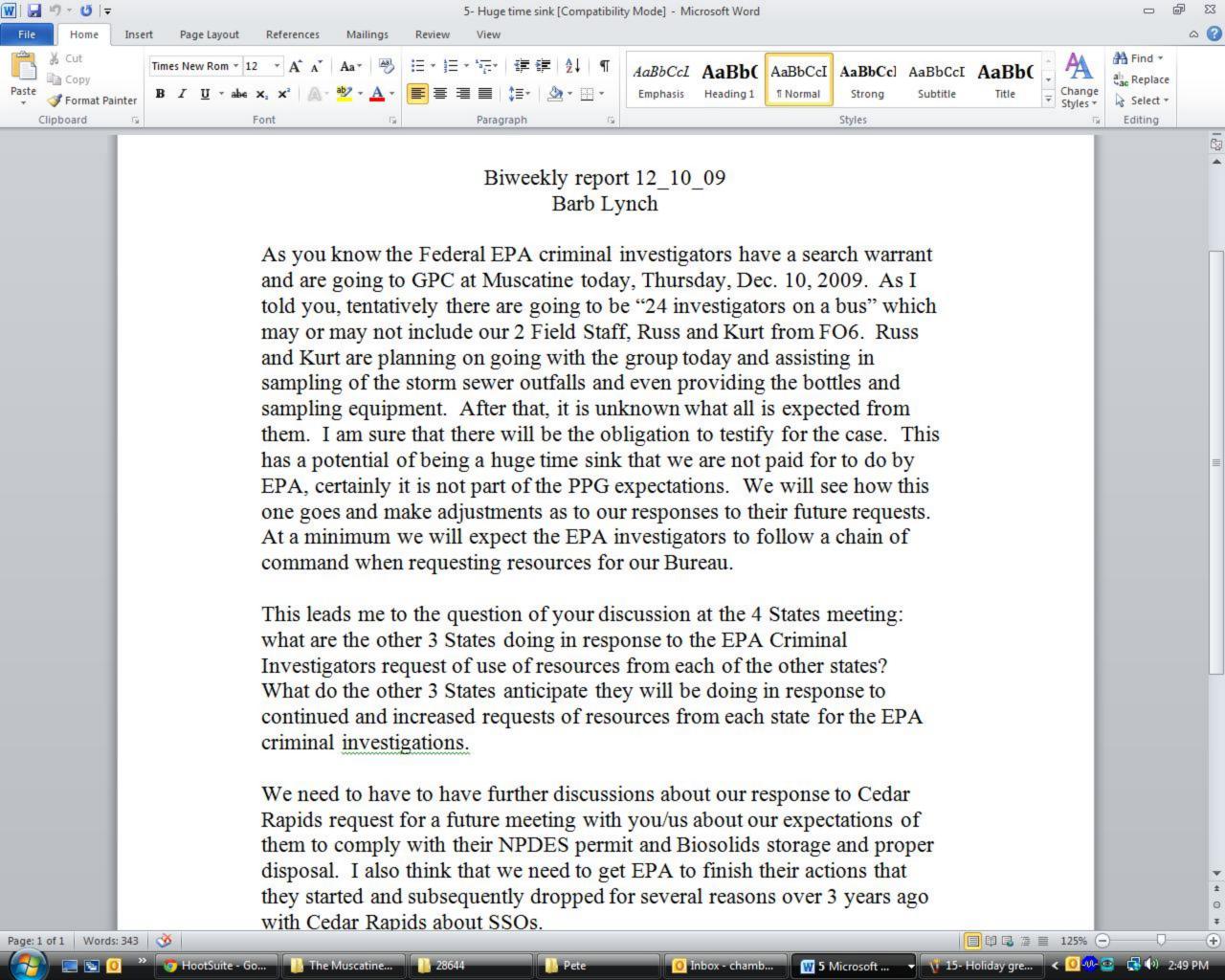
Brian - by the way Tom's asbestos referral is back on hold as well. The Director now wants more information on that as well. I will hopefully be able to talk to the Director about it after the GPC meeting.

I think both referrals will go through, just may take a little more talking with the Director. It does likely mean both referrals will be at the May meeting.

Thanks - Kelli









From: Hutchins, Brian <Brian.Hutchins@dnr.state.ia.us>

To: DSHERID@ag.state.ia.us

Cc:

Subject: Fwd: GPC Compliance Options

GPC prefers to take the approach that reduces emissions and modernizes an aged portion of our plant. However, with a significant increase in the cost, to take this approach a justification must be made to our ownership to spend the additional money. One piece of the puzzle that can help justify spending the extra money is if GPC could incrementally increase production prior to completing our full compliance with the consent decree.

Sent: Mon 4/9/2007 5:09 PM

PM10 PTE modeling of the current plant configuration results in High Second High (H2H) concentrations approaching 4000 µg/m3. While this is a very high number, most high concentrations are due to low stacks close to the fence line and therefore high concentrations are pretty localized near the facility. Our first step would be to repermit many emission points to lower their PTE's closer to their actual emissions. This would drop the H2H by about 50% to around 2000 µg/m3. The second step would be to make roughly half of the plant modernizations and raise some stacks. This step would again reduce the H2H by roughly another 50% to around 1000 µg/m3. This step would also make significant reductions in actual PM, PM10, PM2.5, and VOC's. This is the point at which GPC wishes to increase the plant grind limit from 170,000 bu/day to around 190,000 bu/day. The changes proposed here and the increased grind would not trigger PSD permitting for PM10 and therefore would not require PM10 PTE modeling. At this point the IDNR could, but does not have to, require a model of actual PM10 emissions. Since this step (i.e. project) would be making a large improvement in the PTE model, which GPC would be willing to provide, GPC requests a model of actual PM10 emissions not be required. The final step in the consent decree compliance would be to complete the modernization work and raise additional stacks as necessary.

As you can see GPC is looking at a substantial additional expenditure to take the approach of modernization and emission reductions. If the extra expenditure can not be justified we will be forced to simply raise stacks. Please feel free to call me to discuss this further.

Thank You,

John D. Sparks
Director, Environmental Services
Grain Processing Corp.
563-264-4568



## Memo

To: Dave Phelps

From: George Welch

Date: May 11,2009

Re:

Muscatine Power and Water

Later Thursday (May 7, 2009) EPA Region 7 staff met with us here at the DNR AQ offices. One of the issues was the status of the apparent PSD violations associated with Muscatine Power's (MPW) modifications to supply steam to Grain Processing (GPC) which allowed GPC to discontinue routine use of their natural gas boilers.

Whatever emission reductions GPC had as a result of this project are dwarfed by MPW's emission increases.

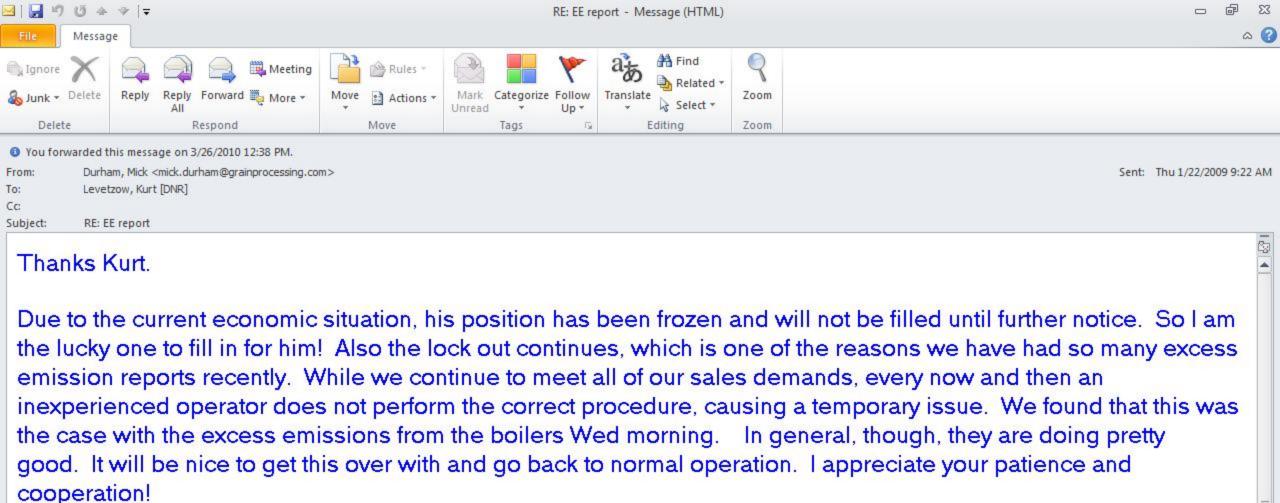
Thinking about the MPW/GPC project, I feel that any effort to assign the entire project to either source would be a distraction. Rather we should focus on resolving the ongoing PSD violation and the substantial environmental insult that resulted from the project.

MPW modified their Boiler 8. They built a new (smaller) turbine and build dedicated steam and return water lines to GPC to allow then to send substantial quantities of steam to GPC. This triggered PSD for MPW's Boiler 8.

EPA Region 5's 2001 letter to Minnesota regarding a similar Rochester Utility's project clearly supports this conclusion. Resolution of the subsequent environmental group's appeal through the Environmental Appeals Board affirmed this conclusion.

We need to resolve this ongoing PSD violation.





I'll send out the written report to you today.

Mick

Mick Durham Grain Processing Corporation

From: Levetzow, Kurt [DNR] [mailto:Kurt.Levetzow@dnr.iowa.gov]

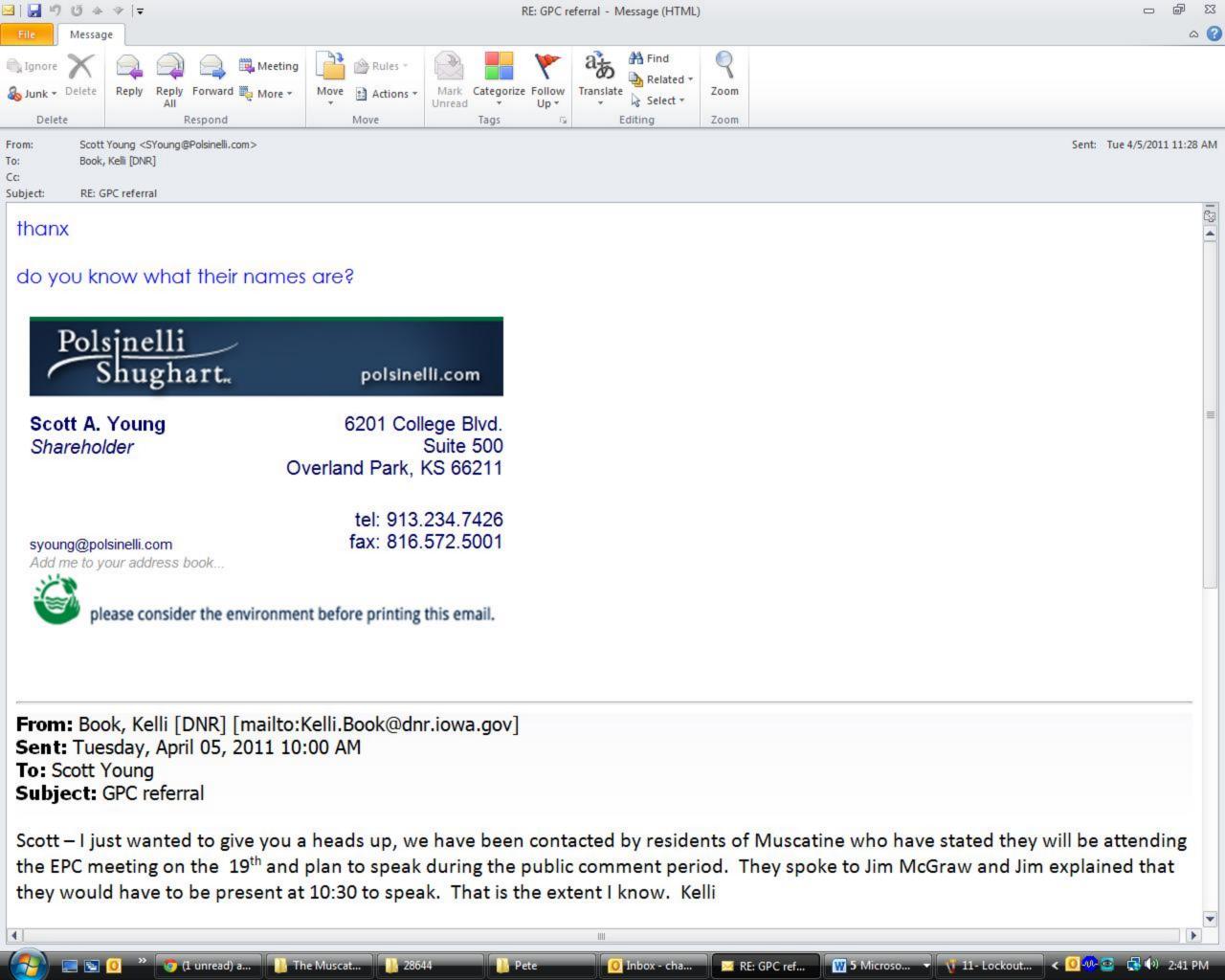
Sent: Wednesday, January 21, 2009 10:44 PM

To: Durham, Mick Subject: EE report

Mick,

I received your verbal EE report tonight. I'll get it written up. Just submit the written report with any info you didn't have at the time of







Fitzsimmons, Catharine [DNR]

Gieselman, Wayne [DNR]

RE: Letter for Director's Signature Subject:

Let me take a stab at this. We are trying to up the ante on encouraging GPC to get moving on a more realistic plan for reductions. The current plan does get some reductions, but not enough to reliably assure attainment, nor to do so quickly to reduce the public health impact quickly. We have been working with the environmental manager and have seen little effort to "move the needle" since they submitted their original plans.

品

Sent: Tue 7/13/2010 3:56 PM

So, I thought that a director's level letter to the president of GPC might help us get more action. We are currently anticipating that EPA will propose the "SIP call" in September - requiring us to modify the control strategies in the Muscatine area. The SIP call wouldn't become final until November or December. The SIP call will give us 12-18 months (depending on comments on the proposal) to get everything wrapped up in permits or orders. We hope that the letter will encourage GPC to rework their control strategy sooner than later since we have had so many exceedances in Muscatine this year (12). If we don't ask, we won't get what we need, and since we are still in a "voluntary" situation, I thought we might as well ask before we have to order.

## Catharine

From: Gieselman, Wayne [DNR]

Sent: Monday, July 12, 2010 11:38 AM

To: McGraw, Jim [DNR]; Fitzsimmons, Catharine [DNR] Cc: Krausman, Tammie [DNR]; Nissen, Lisa [DNR]

Subject: FW: Letter for Director's Signature

Importance: High

Jim, What is our purpose here and is this strong enough to accomplish it? Do we need to do this through an administrative order? Has legal been consulted on this?

Just random questions, but it looks like we want them to move faster than they have proposed. Given their history, will this accomplish our purpose?

