



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

April 10, 1993

Dr. Myles Stenshoel, Director  
Air Quality Section  
Iowa Department of Natural Resources  
Henry A. Wallace Building  
Des Moines, Iowa 50319

Re: Iowa State AQ Permit No. 93-A-540  
Iowa Lumber Company (ILCO)

Dear Dr. Stenshoel:

We have determined that Iowa State AQ Permit No. 93-A-540 issued on March 21, 1993, to the Iowa Lumber Company (ILCO), is consistent with the Iowa State Implementation Plan previously approved by the EPA. The EPA is now requiring, however, that all state air quality permits include the following condition:

*Performance Tests.* Not later than January 15 of each calendar year, the permittee shall obtain and submit to the State permitting agency stack test results setting forth three representative sample measurements for each pollutant for which emissions have been limited in the permit. The results must be obtained, reported, and certified by an independent engineering laboratory suitable to the State permitting agency in a form substantially similar to the attached Form AQ-9.

You must, therefore, amend the ILCO permit to conform to the new EPA policy.

Please feel free to contact me if you have any questions that I can address.

Sincerely,

**Jan Brown**

Jan Brown, P.E.  
Environmental Engineer  
Office of State Air Programs

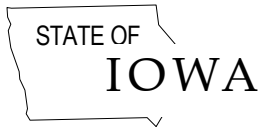
Enclosure

**U.S. EPA  
FORM AQ-9**

[Identification of Independent Laboratory]

Name of Facility and Description of Test					
Sample #	Date	Time	Pollutant #1	Pollutant #2	Pollutant #3
1					
2					
3					
Average:					

[Certification by Laboratory Personnel]



TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
PHILLIP R. QUANBECK, DIRECTOR

April 15, 1993

**CERTIFIED**

Mr. Daniel W. Platt  
Plant Manager  
Iowa Lumber Company  
3000 Harrison Drive  
Clinton, Iowa 52732

Subject: Permit No. 93-A-540

Dear Mr. Platt:

In accordance with the enclosed April 10, 1993, letter from Ms. Jan Brown, of the United States Environmental Protection Agency, ILCO must comply with the following additional permit condition at its new Clinton, Iowa, waferboard facility, commencing on January 15, 1994:

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**14. Performance Tests**

Not later than January 15 of each calendar year, the permittee shall obtain and submit to the DNR stack test results setting forth three representative sample measurements for each pollutant for which emissions have been limited in the permit. The results must be obtained, reported, and certified by an independent engineering laboratory suitable to the DNR in a form substantially similar to EPA Form AQ-9.

Please let me know if you have any questions about this new permit condition.

Sincerely,

*Leila Forcier*

Leila Forcier, P.E.  
Environmental Engineer

Enclosure

cc: IDNR Field Office #6

# Iowa Lumber Company

3000 Harrison Drive  
Clinton, Iowa 52732  
(319)-244-1600



April 25, 1993

Ms. Leila Forcier  
Air Quality Section  
Iowa Department of Natural Resources  
Henry A. Wallace Building  
900 East Grand  
Des Moines, Iowa 50319

Subject: Permit No. 93-A-540

Dear Ms. Forcier:

The Iowa Lumber Company (ILCO) takes issue with your letter of April 15, 1993, purporting to impose a new "condition" at its Clinton, Iowa, waferboard facility. We do not believe that "Condition 14" is necessary to ensure our compliance with ILCO's air quality permit, the provisions of the state implementation plan, or other applicable law. The conditions of Permit 93-A-540, as originally issued to us on March 21, 1993, are adequate to ensure that our facility maintains the required air quality standards. We know of no other air quality permit issued by the State of Iowa imposing annual stack testing obligations on stationary source emission facilities.

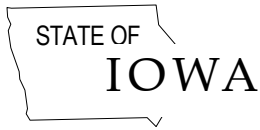
Thank you.

Very truly yours,

*Daniel W. Platt*

Daniel W. Platt  
Plant Manager

DWP:rmn



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TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
PHILLIP R. QUANBECK, DIRECTOR

May 5, 1993

Mr. Daniel W. Platt  
Plant Manager  
Iowa Lumber Company  
3000 Harrison Drive  
Clinton, Iowa 52732

Subject: Permit No. 93-A-540

Dear Mr. Platt:

In response to your letter of April 25, 1993, you are correct in your belief that no other air quality permit issued by the State of Iowa imposes annual stack testing obligations on stationary source emission facilities. This obligation is imposed not by the Iowa Department of Natural Resources (IDNR), but by the United States Environmental Protection Agency (EPA). New permit Condition 14, requiring performance monitoring and the submission of annual reports, involves forms required by the EPA as a condition of continuing federal approval of the Iowa state implementation plan. Thus, the Condition 14 requirement is, in essence, a federal demand that the IDNR is merely implementing.

While we expect your facility to submit Form AQ-9 annually, to comply with *Condition 4* of Permit No. 93-A-540, as issued on March 21, 1993, we do not intend to enforce this requirement as a matter of Iowa state law. You may wish to pursue your concerns with Ms. Jan Brown of the EPA. Enforcement will come from the EPA on this issue, in any event.

Sincerely,

*Leila Forcier*

Leila Forcier, P.E.  
Environmental Engineer

cc: IDNR Field Office #6

