



IOWA DEPARTMENT OF NATURAL RESOURCES

Air Quality News

Environmental Services

Air Toxics Update: Vegetable Oil Production

EPA recently updated several federal regulations for hazardous air pollutants (also known as HAP or air toxics). EPA's actions address the Risk and Technology Review (RTR) required under the U.S. Clean Air Act.

This is the third in a series of articles covering EPA's updates to air toxics regulations (also known as National Emission Standards for Hazardous Air Pollutants or NESHAP). Find background on the NESHAP RTR requirements and a general overview of the recent changes in the [Air Toxics Update](#). In the following weeks, Iowa DNR will address changes to specific regulations affecting Iowa businesses.

Updates to the [NESHAP for Vegetable Oil Production](#)

On March 18, 2020, EPA published final [NESHAP RTR amendments](#) for solvent extraction for vegetable oil production. This industry includes facilities that produce crude vegetable oil and meal products by removing oil from oilseeds through direct contact with an organic solvent. This NESHAP restricts plant-wide emissions of the HAP, n-hexane, from each affected facility. DNR estimates that 17 Iowa facilities are currently subject to this NESHAP.

The updated NESHAP (published in [40 Code of Federal Regulations Part 63 Subpart GGGG](#)) includes, but is not limited to, the following changes:

- **Startup, Shutdown, and Malfunction (SSM):** EPA clarified that the emission standards apply at all times, including during periods of startup, shutdown and malfunction, except for periods of initial startup for new or significantly modified sources. For these sources, EPA established specific work practice standards that apply during the initial startup period. EPA did not set separate standards for periods of malfunction, but did provide for new and significantly modified sources to meet the new work practice standards allowed for an initial start-up period during a malfunction period. EPA also made revisions to the deviation reporting requirements for certain malfunction events.
- **Electronic Reporting:** Owners and operators are required to submit electronic copies of performance test reports and performance evaluation reports and semiannual reports through the EPA's Central Data Exchange, using the Compliance and Emissions Data Reporting Interface. **Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.

Affected sources that commenced construction before April 12, 2001, have until September 15, 2020, to comply with the amendments. Affected sources that started up on or after April 12, 2001, but before March 18, 2020, must comply with all requirements upon startup, except that the compliance date for the new SSM and Electronic Reporting is September 15, 2020. Affected sources that commence construction or reconstruction after March 18, 2020, must comply with all requirements upon start up.

Implementation in Iowa

DNR plans to begin rulemaking to incorporate the updated standards—which will give DNR authority to administer the rules. In the interim, EPA will implement the NESHAP RTR changes. DNR is available to answer questions about the new amendments and will work with EPA Region 7 to assist facilities.

DNR staff will review the changes and contact facilities which we know are impacted and have substantively different requirements in their permits from the updated NESHAP. However, an affected facility should carefully review the updated NESHAP to be aware of any new requirements and compliance dates. An affected facility must still comply with the NESHAP RTR requirements even if the requirements are not included in an Iowa air permit.

In the upcoming weeks, please keep an eye on your inbox for **Air Toxics** updates on other individual source categories.

If you have technical questions about the NESHAP changes, please contact Michael Hermsen (email: michael.hermsen@dnr.iowa.gov; phone: 515-725-9577). For general questions, please contact Christine Paulson (email: christine.paulson@dnr.iowa.gov; phone: 515-725-9510).

A note on Iowa DNR and COVID-19

The Iowa Department of Natural Resources is working with state and local officials to reduce the spread of COVID-19 and has transitioned employees to work remotely. DNR offices are closed to the public during this time and only available by appointment.

In another effort to further reduce the spread of COVID-19, the DNR is encouraging the use of the online services for submitting applications, payments and other daily tasks and interaction with DNR staff.

- [Full list of DNR's online services](#)
- [Up-to-date information on DNR services, facilities and events impacted by COVID-19](#)
- [Technical information for regulated businesses in regards to COVID-19](#)

We thank you for your patience and flexibility during this time. If you need to contact DNR staff you can reach them by email or phone or by calling 515-725-8200

DNR's Air Quality News listserve is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email. If you have difficulty, please contact DNR's Wendy Walker at 515-725-9570.