



### FORM MD: NON-PSD MODELING DETERMINATION FORM

Please see instructions on page three (3) of this form.

Company Name: \_\_\_\_\_

SECTION 1: PROJECT EMISSIONS						
1. Pollutant	2. Total Net Change in Emissions from Project			3. Significant Emission Rate (SER)	4. Check box if net change is ≥ corresponding SER (Modeling is required)	
	2a. Total Increase	2b. Total Decrease	2c. Net Change			
PM <sub>10</sub>	_____ lb/hr	- _____ lb/hr	= _____ lb/hr	3.42 lb/hr	<input type="checkbox"/>	
PM <sub>2.5</sub>	_____ lb/hr	- _____ lb/hr	= _____ lb/hr	2.28 lb/hr	<input type="checkbox"/>	
NO <sub>x</sub> Non-intermittent sources only:	_____ lb/hr	- _____ lb/hr	= _____ lb/hr	9.13 lb/hr	<input type="checkbox"/>	
NO <sub>x</sub> All sources combined:	_____ ton/yr	- _____ ton/yr	= _____ ton/yr	40 ton/yr		
SO <sub>2</sub>	_____ lb/hr	- _____ lb/hr	= _____ lb/hr	9.13 lb/hr	<input type="checkbox"/>	
CO	_____ lb/hr	- _____ lb/hr	= _____ lb/hr	22.8 lb/hr	<input type="checkbox"/>	

SECTION 2: AVAILABILITY OF AIR RESOURCES							
Only complete this section for pollutants with a net change (2c) greater than zero. Skip this section if the project is for a new facility or a portable plant.							
5. Pollutant	6. Averaging Period	7. Air Resources Currently Being Used (Visit <a href="http://www.iowadnr.gov/AAR">http://www.iowadnr.gov/AAR</a> if unknown)			8. Modeling Determination Threshold (MDT) (NAAQS – SIL)	9. Check if total is ≥ corresponding MDT (Modeling is required)	
		7a. Modeled Concentration (µg/m <sup>3</sup> )	7b. Current Background (µg/m <sup>3</sup> )	7c. Total (µg/m <sup>3</sup> )			
PM <sub>10</sub>	24-hour	_____	+ _____	= _____	145	<input type="checkbox"/>	
PM <sub>2.5</sub>	24-hour	_____	+ _____	= _____	33.8	<input type="checkbox"/>	
	Annual	_____	+ _____	= _____	11.7		
NO <sub>2</sub>	1-hour*	_____	+ _____	= _____	180.5	<input type="checkbox"/>	
	Annual	_____	+ _____	= _____	99		
SO <sub>2</sub>	1-hour*	_____	+ _____	= _____	188.1	<input type="checkbox"/>	
	3-hour	_____	+ _____	= _____	1,275		
	24-hour	_____	+ _____	= _____	360		
	Annual	_____	+ _____	= _____	79		
CO	1-hour	_____	+ _____	= _____	38,000	<input type="checkbox"/>	
	8-hour	_____	+ _____	= _____	9,500		

\*Leave the 1-hour NO<sub>2</sub> and 1-hour SO<sub>2</sub> lines blank if this project consists of only intermittent sources as defined in Item 1 of the instructions.

## SECTION 3: MODELING DETERMINATION

<b>10. Check Box if Modeling Is Required in Either Sections 1 or 2 (Modeling is required for these pollutants)</b>	<b>11. Who Will Conduct the Modeling Analysis?</b>  All applicants have the option to prepare and submit a complete dispersion modeling analysis per DNR's "Air Dispersion Modeling Guidelines for Non-PSD, Pre-Construction Permit Applications" and the "Dispersion Modeling Checklist for Non-PSD Projects." If modeling will be submitted to Linn County, a significant impact analysis should be conducted for each pollutant requiring modeling. This analysis should include only the current project. If the project will cause predicted concentrations that exceed any Significant Impact Level (SIL), a comprehensive modeling analysis should be conducted for the applicable pollutant(s). The comprehensive analysis must demonstrate that the project will not cause or contribute to any predicted exceedances of the NAAQS. Refer to the <a href="#">Modeling Guidelines</a> for additional details. Submitted modeling analyses will be reviewed by Linn County for accuracy and completeness.  Alternatively, Linn County will conduct the initial modeling analysis if the applicant requests it. Linn County may request that the applicant conduct a revised modeling analysis if the initial analysis indicates that extensive project design changes will be necessary in order to meet the NAAQS. When this occurs Linn County will provide the applicant with a summary of the initial modeling analysis along with all associated modeling files.  For major sources (defined in 567 IAC—22.100) that have previously been modeled, Linn County will conduct the initial modeling analysis if resources allow. Applicants with extensive changes to their facility may expedite the modeling review by submitting their own modeling analysis. For projects at major sources that have not previously been modeled, the applicant must prepare and submit the dispersion modeling analysis.  <input type="checkbox"/> <b>I will submit the modeling analysis for Linn County's review</b> <input type="checkbox"/> <b>I request that Linn County conducts the initial modeling analysis</b>
PM <sub>10</sub> <input type="checkbox"/>	
PM <sub>2.5</sub> <input type="checkbox"/>	
NO <sub>2</sub> <input type="checkbox"/>	
SO <sub>2</sub> <input type="checkbox"/>	
CO <input type="checkbox"/>	

## TIPS FOR WHEN MODELING IS NOT REQUIRED

Even if modeling is not required it is still important to consider the potential impact of the project on the air quality resources in the area. Future projects may trigger a comprehensive modeling analysis in which the sources in this project would need to be included. Designing the sources to comply with the National Ambient Air Quality Standards (NAAQS) now can help prevent modifications at a later date. The following tips will help minimize the impact on the air quality resources in your area:

- Use pollution controls to reduce overall emissions.
- Build stacks with vertical, unobstructed-type discharges. Hinged stacks, hexagonal stacks, and stack-in-a-stack style rain guards are considered unobstructed-type discharges.
- Locate stacks as far as possible from the facility's property boundary.
- Build stacks as tall as possible.

Some applicants may find it beneficial to perform a modeling analysis even if they are not required to submit it with the permit application. Doing so will help ensure that the chosen design complies with the NAAQS. In addition, having an up-to-date comprehensive model on file can help applicants plan for, and thus expedite, future projects. Modeling analyses that are conducted outside the scope of the requirements listed in this form do not need to be submitted to the Department, and should not be used to complete the Availability of Air Resources section of this form.

## Instructions for Form MD: Non-PSD Modeling Determination Form

- This form will help determine whether an air dispersion modeling analysis will be required for non-PSD construction permit projects (including non-PSD projects at PSD-major facilities). This procedure is used for both newly installed construction permit projects and for modifications to previous projects.
- **Some unique circumstances not addressed by Form MD may trigger a modeling review.** These include, but are not limited to:
  - Projects located at facilities associated with non-attainment or maintenance areas for the pollutant(s) in question;
  - New facilities locating in an already industrialized area where a majority of the air quality resource is already being utilized;
  - New sources with lead emissions, or increases in lead emissions from existing sources;
  - Relaxation of permit limits or requirements originally established to protect the NAAQS;
  - Changes to source location, stack design or facility layout; or
  - Direct ozone emissions.
- Linn County will review each project to determine the need for modeling outside the scope of Form MD. For assistance determining if additional modeling may be required for your project contact Linn County at 319-892-6000 and ask to speak to a member of the Air Quality Division.

**Understanding Form MD Information: Each number provides an explanation for the corresponding field on the form.**

**Company Name:** This is useful if application pages become separated.

### Section 1 - Project Emissions:

1. **Pollutants:** the pollutants to be evaluated for potential modeling, including:
  - PM<sub>10</sub>** Particulate matter with an aerodynamic diameter of ten microns or less, as measured by an EPA-approved reference method
  - PM<sub>2.5</sub>** Particulate matter with an aerodynamic diameter of 2.5 microns or less, as measured by an EPA-approved reference method
  - NO<sub>2</sub>** Nitrogen dioxide, a subset of NO<sub>x</sub> or all oxides of nitrogen  
Fill in the emissions for "intermittent sources" and "all sources combined." Per the [Modeling Guidelines](#), "**intermittent sources**" are those that operate randomly, and for 500 hr/yr or less. A source is still considered intermittent if test/maintenance is not random as long as it occurs between 9 a.m. and 4 p.m. "**All sources combined**" are all sources included in this application.
  - SO<sub>2</sub>** Sulfur dioxide
  - CO** Carbon monoxide
2. **Total Net Change in Emissions for the Project:** Determine the total net change in emissions due to this project. You may exclude emission units exempt from permitting (LCCO Sec.10-58(k)). To calculate the net change:
  - 2a. **Determine the Total Increase in Emission Levels from Project**  
Add together the following for each pollutant:
    - i) For equipment **proposed to be installed** as a part of this application or for **existing equipment that should already have had a construction permit** and is being permitted as a part of this application the increase in emissions is:
      - The requested emission limit or maximum calculated emission rate. These numbers can be found on Form EC, **plus**,
    - ii) For equipment that **already has a permit** and is being modified as a part of this application or for **equipment that did not previously need a permit** (e.g. previously used a permit exemption or was not required to be permitted) and is being permitted as a part of this application, the increase in emissions is determined from one of the three options below:
      - If requesting an increase in the permitted emission limit, use the difference between the current permitted emission limit and the new requested emission limit. The requested emission limit can be found on the Form EU or Form EC. The previously permitted emission limit can be found in the existing construction permit.

- If the equipment currently has a permit and was previously modeled at the permitted emission limit and no change is requested to the limit as a part of the application, the applicant may assume zero increase in emissions for that equipment. The applicant can determine if the equipment was previously modeled and the emission rate at which it was modeled by reviewing the "Emission Limits" section of the existing construction permit.
- If none of the above apply, use the difference in the best estimate of emissions at the maximum rated capacity of the equipment both **before** the change and **after** the change requested in the application. These numbers may be found on Form EC. If not calculated on the Form EC in this manner, they may need to be calculated separately for this form.

## 2b. Determine Total Emissions Decreases from the Project

Some projects may not have decreases or you may not want to quantify the decreases, in which case please put "zero" in this column. You may skip this section if the increases calculated do not exceed the Significant Emission Rate (SER – see #3 for definition). Decreases to permitted emission limits without actual emissions reductions cannot be counted as decreases in this section.

**Add together** the following for each pollutant:

- For equipment which is being **removed** as a part of this application the decrease in emissions is:
  - The permitted emission limit from the equipment being removed if previously modeled at the permitted emission limit. These numbers can be found in your existing construction permit, or
  - The best estimate of emissions at the maximum rated capacity of the equipment if not previously modeled, or if no permitted emission limit exists. These numbers most likely will need to be calculated separately for this form, **plus**,
- For existing equipment that is being **modified to decrease emissions** as a part of this application:
  - The difference in the best estimate of emissions at the maximum rated capacity of the equipment both **before** the change and **after** the change requested in the application. These numbers may be found on Form EC. If not calculated on the Form EC in this manner, they may need to be calculated separately for this form.

2c. **Net Change:** Subtract the emission rates in Column 2b from the emission rates in Column 2a to get the net change for each pollutant.

- Significant Emission Rate (SER):** A quantity of emissions more likely to cause concentrations that threaten the NAAQS. If the project's emission rate for any pollutant is greater than or equal to the SER, modeling is required for that pollutant.
- Check Box if net change is  $\geq$  corresponding SER:** If the box is checked, it means the NAAQS is more likely to be exceeded by the project, and modeling is required. For NO<sub>x</sub>, check the box if either the pounds per hour (lb/hr) or tons per year (ton/yr) net change is greater than or equal to the corresponding SER.

## Section 2 - Availability of Air Resources:

Only calculate the Availability of Air Resources for pollutants with a net change (2c) in Section 1 (Project Emissions) that is **greater** than zero. Pollutants without a net increase in emissions should be left blank. Unique situations requiring a modeling analysis in the absence of an emission increase will be reviewed on a case-by-case basis. Section 2 should be left blank if the project is for a new facility or a portable plant. Due to the nature of these types of facilities, it is necessary for the DNR to determine the availability of air resources when the application is processed.

- Pollutants:** The pollutants to be evaluated for potential modeling. See Item 1 above for definitions.
- Averaging Period:** The period of time over which the average concentration of a pollutant is calculated. The averaging period(s) for given pollutants are set by EPA when NAAQS are developed, and range from 1-hour (acute) to annual (chronic).
- Air Resource Currently Being Used:**  
For each pollutant with a net change greater than zero in the **Project Emissions** section, it is important to calculate the air resource currently used in your project's geographic area to determine if the NAAQS are threatened. If this application is for a new facility you may skip questions 7 – 9.

**7a. Determine Modeled Concentration (excluding background):**

Fill in the modeled concentration from the most recent comprehensive modeling analysis for each pollutant and averaging period listed. The most recent Availability of Air Resources (AAR) Summary for your facility may be used for this purpose. To request a copy of the AAR Summary visit <http://www.iowadnr.gov/AAR>. If previous comprehensive modeling does not exist for an individual pollutant or averaging period leave it blank.

**7b. Determine Current Background Concentration:**

The background includes naturally-occurring and human-produced pollutants that exist in the absence of the industrial emissions being evaluated as part of this project. The background concentration will change over time and must be reevaluated whenever an analysis is conducted. It is important to use current background concentrations when completing this form. The most current default background concentrations can be found on the DNR's [background concentration webpage](#). These default values can be used on this form without justification. Alternatively, applicants can propose non-default background concentrations. If using a non-default background concentration, attach justification for the chosen value(s) to this form. The Linn County Air Quality Division will review non-default background concentrations used on this form (major sources will be subject to the current hourly rate for dispersion modeling for this review). In some cases a time-varying background will be used in a modeling analysis. Time-varying background concentrations are those that fluctuate based on the time of year or time of day. These time-varying background concentrations are included in the modeled concentration and cannot be updated without reevaluating the modeling analysis. If a time-varying background was included in the modeled concentration (7a), leave the background concentration blank.

**7c. Determine Total:**

Add together the modeled concentration (7a) and the current background concentration (7b) to determine the total concentration prior to the project.

8. **Modeling Determination Threshold (MDT):** The MDT is equal to the NAAQS minus one Significant Impact Level (SIL). This is the threshold at which the NAAQS is considered to be threatened. A modeling analysis must be conducted to ensure the project will either result in a concentration less than the SIL, or that comprehensive modeling of the entire area will result in concentrations less than the NAAQS.
9. **Check if any total is  $\geq$  corresponding MDT.** Check the box for each pollutant with at least one total greater than or equal to the corresponding MDT.

**Section 3 - Modeling Determination:**

10. **Check Box If Modeling Is Required in Either Sections 1 or 2:** Check the box for each pollutant for which modeling is required in either Section 1 (Project Emissions) **or** Section 2 (Availability of Air Resources) of this form. A modeling analysis is required for each checked pollutant.
11. **Who Will Conduct the Modeling Analysis?:** If any pollutants require a modeling analysis (10), check the box in this section indicating if you will be submitting the analysis or are requesting that Linn County conduct it. This section also provides clarification on next steps for how modeling can be facilitated. If you have any questions about modeling, contact the Linn County Air Quality Division at 319-892-6000.