IOWA DEPARTMENT OF NATURAL RESOURCES
CONSENT ORDER

IN THE MATTER OF:	ADMINISTRATIVE CONSENT ORDER NO. 89-AQ-04
Interstate Power Company	

I. SUMMARY

This consent order, which is entered into by Interstate Power Company (hereinafter "Interstate") and the Department of Natural Resources (hereinafter the "Department"), pertains to the reduction of emissions of sulfur dioxide (SO_2) from boilers #1 and #2 at the Clinton, Iowa generating station.

II. JURISDICTION

This order is issued pursuant to Iowa Code section 455B.134(9) which authorizes the Director to issue any order necessary to prevent, abate or control air pollution.

III. STATEMENT OF FACTS

1. Interstate owns and operates an electric power generating station in Clinton, Iowa. This station contains two coal fired boilers.

2. Coal fired boiler #1 was installed in 1947 and was modified in 1974 to include an electrostatic precipitator as pollution control (Permit No. 74-A-117). This boiler unit includes a stack which is 210 feet tall.

3. Coal fired boiler #2 was installed in 1967 and was modified to include, as pollution control, a replacement electrostatic precipitator in 1978 (Permit No. 78-A-157). This boiler unit includes a 245 foot tall stack.

4. The Clinton County area, in which the Interstate generating station is located, is a designated attainment area for the criteria air contaminant sulfur dioxide.

5. The coal fired boilers #1 and #2 and associated pollution control constitute existing solid fuel-burning units located in Clinton County and are subject to the SO_2 emission limit specified in 567--23.3(3)"a"(1) (IAC) (6 lbs/million BTU).

6. The Department has determined that at current emission rates the SO_2 emissions from boilers #1 and #2 will not assure the attainment and maintenance of the SO_2 ambient air quality standard in the area of the station.

7. The Department, therefore, modifies the permits issued to Interstate, specifically, permits No. 74-A-117 and 78-A-157, to reduce the SO_2 emission limits for boilers #1 and #2 which are incorporated herein in their entirety.

IV. CONCLUSIONS OF LAW

1. The Clinton area, in which Interstate is located, has been designated an attainment area for SO_2.

2. The boilers #1 and #2 operated by Interstate are "air contaminant sources" as defined by Iowa Code section 455B.131(2) and "stationary sources" as defined by rule 567--20.2 (455B) Iowa Administrative Code (IAC).

3. Pursuant to rule 567--28.1 (IAC) (455B), the state of Iowa ambient air quality standards are the National Primary and Secondary Ambient Air Quality Standards (NAAQS), 40 CFR Part 50 as amended through July 1, 1987.

4. An exceedance of the primary or secondary NAAQS for SO_2 constitutes "air pollution" as defined by Iowa Code section 455B.131(3).

5. In accordance with Iowa Code section 455B.134(9), the Director shall issue orders consistent with the rules to cause the abatement or control of air pollution.

6. The Director has considered the facts and circumstances bearing upon the reasonableness of Interstate's SO_2 emissions including the character and degree of injury to, or interference with, the protection of health and the physical property of the public and the practicability of reducing or limiting its SO_2 emissions.

7. Based upon these facts and circumstances, the Director has determined and Interstate agrees that the reduction of these SO_2 emissions to a level at which the SO_2 NAAQS will not be exceeded is practicable.

V. ORDER

THEREFORE, the Department ORDERS and Interestate AGREES to do the following:

1. Beginning May 1, 1990, Interstate shall burn only natural gas in Unit #1. From the effective date of this Consent Order to the date natural gas is required to be burned Interstate shall operate Unit #1 on coal only when Unit #2 is not operating.

2. Interstate shall install continuous emission monitoring equipment for sulfur dioxide on Unit #2 which complies with 40 CFR, Part 60, Appendix B, Specifications 2 and 3. The installation shall be completed by June 1, 1990 and a certification report shall be submitted to the Department by July 15, 1990.

3. Interstate shall report by July 1, 1990, its determination of whether gas conditioning to maintain precipitator efficiency is necessary in Unit #2. This report shall include data to support a determination of whether or not gas conditioning is necessary.

4. If it is determined that gas conditioning is not necessary in Unit #2, compliance with permit emission limit of 4.3 pounds per million Btu of heat input shall be achieved no later than July 1, 1990.

5. If it is determined that gas conditioning is necessary in Unit #2, compliance with permit emission limit of 4.3 pounds per million Btu of heat input shall be achieved no later than February 1, 1991.

6. Interstate shall comply with permits 74-A-117-S and 78-A-157-S, which are attached to this Order and are incorporated herein as a part of this Order.

WAIVER OF APPEAL RIGHTS

This order is entered into knowingly and with the consent of Interstate. For this reason, Interstate waives its right to appeal this order.

NONCOMPLIANCE

This order is binding upon Interstate and is enforceable as an order of the Department in accordance with Iowa Code section 455B.146. Failure to comply may result in the imposition of administrative penalties or referral to the Attorney General to obtain injunctive relief and civil penalties.

Any questions regarding this consent order may be directed to:

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Henry A. Wallace Building
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Des Moines, Iowa 50319-0034
515/281-6243

Larry J. Wilson — 2/21/90

LARRY J. WILSON, DIRECTOR
DEPARTMENT OF NATURAL RESOURCES

DATE

E. D. Frederick — 2/13/90

for INTERSTATE POWER COMPANY

DATE

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