Attachment 1. GPC’s New and Modified Air Construction Permits
Air Quality Construction Permits
Collection of Air Permits

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Mick Durham
Director of Environmental Services
563.264.4569
mick.durham@grainprocessing.com
1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Ron Zitzow
Senior Vice President
1600 Oregon Street
Muscatine, IA 52761

Project/Process Description
Maltrin #3 Spray Dryer

Maximum Design Capacity: 3.13 tons of maltrin per hour, dry solid basis

Maximum Natural Gas Firing Rate: 18 MMBtu per hour (Natural gas fuel only)

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Project Number: 16-344

Project Description: Remove requirement to modify control equipment and update to CAP

Date: 02/21/17

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the Department of Natural Resources
# List of Emission Units, Control Equipment, Emission Points, and Permits

<table>
<thead>
<tr>
<th>EP#</th>
<th>EU#</th>
<th>Emission Unit Description</th>
<th>CE#</th>
<th>Control Equipment Description</th>
<th>Permit #</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>132.1</td>
<td>EU3111.0, EU3111.1</td>
<td>Maltrin #3 Spray Dryer with Product Recovery Cyclones,</td>
<td>CE3111-1</td>
<td>Venturi Scrubber</td>
<td>80-A-149-S6</td>
<td>Yes</td>
</tr>
<tr>
<td>132.2</td>
<td></td>
<td>Cyclones, Maltrin #3 Spray Dryer Direct-Fired Burner</td>
<td>CE3111-2</td>
<td>Venturi Scrubber</td>
<td>80-A-150-S6</td>
<td>Yes</td>
</tr>
</tbody>
</table>

## PERMIT CONDITIONS

1. **Emission Limits**

   The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits”.

   A. The following combined emission limits shall not be exceeded for the following emission points:

<table>
<thead>
<tr>
<th>EPs</th>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP131.1, EP132.2</td>
<td>Sulfur Dioxide (SO(_2))</td>
<td>0.011(^{3,4})</td>
<td>NA</td>
<td>NA</td>
<td>RACT, 23.3(3)&quot;e&quot;</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. The SO\(_2\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
B. The following emission limits shall not be exceeded per emission point:

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>132.1,</td>
<td>Particulate Matter (PM) – State</td>
<td>2.40(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>132.2</td>
<td>Particulate Matter (PM) – State</td>
<td>NA</td>
<td>NA</td>
<td>0.03 gr/scf</td>
<td>567 IAC 31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td></td>
<td>2.40(^4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td></td>
<td>0.90(^5)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>40%(^6,7)</td>
<td>23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>500 ppm(_v)</td>
<td>567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Requested limits restrict potential PM emissions.
4. The limit for PM\(_{10}\) emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
5. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

2. Compliance Demonstration(s)

**Compliance Demonstration Table**

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP131.1, EP132.2</td>
<td>PM – State</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years(^1)</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td></td>
<td>PM(_{10})^2</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years(^1)</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>PM(_{2.5})^2,3</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years(^1)</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td></td>
<td>SO(_2)</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
</tbody>
</table>

1. Performance testing for PM, PM\(_{10}\), and PM\(_{2.5}\) shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the PM, PM\(_{10}\), and PM\(_{2.5}\) emission limits in condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM\(_{10}\), and PM\(_{2.5}\).
2. It is acceptable to test for PM and to assume that all PM emissions are PM\(_{10}\) emissions.
3. If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due to high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM\(_{2.5}\) limit as specified in condition 1 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM\(_{2.5}\) fraction shall be determined by conducting internal particle sizing of the dried maltodextrin product (immediately following the dryer) to determine the PM\(_{2.5}\) fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM\(_{2.5}\).
2. Compliance Demonstration(s) (continued)

For each Emission Point listed in the “Compliance Demonstration Table”, initial stack test was completed on 08/02/16. Additional stack testing is required within 3 calendar years from the initial stack test.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission points shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>EP ID</th>
<th>Stack Height, Feet</th>
<th>Discharge Style</th>
<th>Stack Opening, inches</th>
<th>Stack Temperature, °F</th>
<th>Exhaust Flowrate, SCFM</th>
</tr>
</thead>
<tbody>
<tr>
<td>132.1</td>
<td>150</td>
<td>Vertical Unobstructed</td>
<td>42 inch Diameter</td>
<td>125</td>
<td>23,000</td>
</tr>
<tr>
<td>132.2</td>
<td>150</td>
<td>Vertical Unobstructed</td>
<td>42 inch Diameter</td>
<td>125</td>
<td>24,950</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
4. Federal Standards
   
   A. New Source Performance Standards (NSPS):
      
      This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.
   
   B. National Emission Standards for Hazardous Air Pollutants (NESHAP):
      
      This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
   
   5. Operating Requirements and Associated Recordkeeping
      
      Unless specified by a federal regulation, all records as required by these permits shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:
      
     A. Within 90-days after permit issuance, the owner or operator shall install, calibrate and operate equipment to monitor differential pressure drop across Venturi Scrubber (CE3111-1) and Venturi Scrubber (CE3111-2) as specified in conditions 5C and 5E.
        
        i. The owner or operator shall maintain a record of installation date and operation commencement date of equipment to monitor differential pressure drop across Venturi Scrubber (CE3111-1) and Venturi Scrubber (CE3111-2).
     
     B. The total flowrate of the Venturi Scrubber (CE3111-1) liquor shall be maintained at or above 148 gallons per minute.
        
        i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to Venturi Scrubber (CE3111-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
        
        ii. The owner or operator shall collect and record the total liquor flow rate to Venturi Scrubber (CE3111-1), in gallons per minute, at least once per day. If the liquor flow rate to Venturi Scrubber (CE3111-1) falls below the value specified in Condition 5A, the owner or operator shall investigate Venturi Scrubber (CE3111-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE3111-1) is not in operation.
     
     C. The differential pressure drop across the Venturi Scrubber (CE3111-1) shall be maintained between 6 and 17 inches of water column.
        
        i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across the Impingement Venturi Scrubber (CE3111-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
        
        ii. The owner or operator shall collect and record the pressure drop across Venturi Scrubber (CE3111-1), in inches of water, at least once per day. If the pressure drop across Venturi Scrubber (CE3111-1) falls outside the range specified in Condition 5 B., the owner or operator shall investigate Venturi Scrubber (CE3111-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Venturi Scrubber (CE3111-1) is not in operation.
5. Operating Requirements and Associated Recordkeeping (continued)

D. The total flowrate of the Venturi Scrubber (CE3111-2) liquor shall be maintained at or above 154 gallons per minute.
   iii. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to Venturi Scrubber (CE3111-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   iv. The owner or operator shall collect and record the total liquor flow rate to Venturi Scrubber (CE3111-2), in gallons per minute, at least once per day. If the liquor flow rate to Venturi Scrubber (CE3111-2) falls below the value specified in Condition 5C, the owner or operator shall investigate Venturi Scrubber (CE3111-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE3111-2) is not in operation.

E. The differential pressure drop across the Venturi Scrubber (CE3111-2) shall be maintained between 6 and 17 inches of water column.
   iii. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across the Impingement Venturi Scrubber (CE3111-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   iv. The owner or operator shall collect and record the pressure drop across Venturi Scrubber (CE3111-2), in inches of water, at least once per day. If the pressure drop across Venturi Scrubber (CE3111-2) falls outside the range specified in Condition 5D, the owner or operator shall investigate Venturi Scrubber (CE3111-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Venturi Scrubber (CE3111-2) is not in operation.

F. The owner or operator shall develop an operating and maintenance plan for Venturi Scrubber (CE3111-1) and Venturi Scrubber (CE3111-2), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Venturi Scrubber (CE3111-1) and the monitoring devices.
   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Venturi Scrubber (CE3111-2) and the monitoring devices.

G. The owner or operator shall maintain Product Recovery Cyclones in manner to ensure proper operation.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Product Recovery Cyclones.

6. Continuous Emission Monitoring

Continuous emission monitoring is not required by these permits at this time.
7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permit(s) are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

The permit or amendment shall become void if any one of the following conditions occurs:
(1) the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within a time period specified elsewhere in the permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) The permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.
10. Construction (continued)

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See Permit Condition 12.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition (See Permit Condition 12.B.2).

12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits.”

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.
B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under each permit in this “Collection of Air Permits” shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding any permit in this “Collection of Air Permits” shall be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Location</th>
<th>Address</th>
<th>Telephone</th>
<th>Fax</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Bureau</td>
<td>Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DNR Field Office 6</td>
<td>1023 West Madison, Washington, IA 52353 Telephone: (319) 653-2135 Fax: (319) 653-2856</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
### 14. Permit History

<table>
<thead>
<tr>
<th>Project No.</th>
<th>Permit No.</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>80-210</td>
<td>80-A-149</td>
<td>Original Permit</td>
<td>09/24/80</td>
</tr>
<tr>
<td></td>
<td>80-A-150</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>---------------</td>
<td>Amended PM LAER Limit based on compliance testing</td>
<td>02/14/84</td>
</tr>
<tr>
<td>01-467</td>
<td>80-A-149-S2</td>
<td>Increased airflow through the dryer by about 10% (as-built)</td>
<td>10/15/02</td>
</tr>
<tr>
<td></td>
<td>80-A-150-S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>03-072</td>
<td>80-A-149-S3</td>
<td>Amended PM &amp; PM$_{10}$ allowables</td>
<td>02/07/02</td>
</tr>
<tr>
<td></td>
<td>80-A-150-S3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>03-113</td>
<td>80-A-149-S4</td>
<td>Amended PM$_{10}$ allowable</td>
<td>06/24/03</td>
</tr>
<tr>
<td></td>
<td>80-A-150-S4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15-050</td>
<td>80-A-149-S5</td>
<td>Increase Stack Height, Modify Scrubber, Decrease PM$<em>{10}$ Emission Limit and Add PM$</em>{2.5}$ and SO$_2$ Emission Limits.</td>
<td>12/10/15</td>
</tr>
<tr>
<td></td>
<td>80-A-150-S5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

END OF PERMIT
Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham Mgr., Environmental Services

Responsible Party: Ron Zitzow Senior Vice President

(563) 264-4569 Mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA, 52761

Project/Process Description

Maltrin #4 Spray Dryer

Maximum Design Capacity: 5.55 tons of maltrin per hour, dry solids basis

Maximum Natural Gas Firing Rate: 28.8 MMBtu per hour (Natural gas fuel only)

Equipment Location: 1600 Oregon Street
Muscatine, IA, 52761

Project Number: 19-307

Project Description: Modify operating limit range for wet scrubbers CE3110-1 and CE3110-2

Date: May 19, 2020

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the Department of Natural Resources
<table>
<thead>
<tr>
<th>EP#</th>
<th>Emission Unit Description</th>
<th>Control Equipment Description</th>
<th>Permit #</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>135.0</td>
<td>Maltrin #4 Spray Dryer with Product Recovery Cyclones (EU3110.0) and</td>
<td>Packed Bed Scrubber (CE3110-1)</td>
<td>85-A-031-S5</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>136.0</td>
<td>Maltrin #4 Spray Dryer Direct Fired Low-NOx Line Burner (EU3110.1)</td>
<td>Packed Bed Scrubber (CE3110-2)</td>
<td>85-A-032-S5</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Product Transfer Baghouse (CE3110-3)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits”.

A. The following combined emission limits shall not be exceeded for the following emission points:

<table>
<thead>
<tr>
<th>EPs</th>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP135.0, EP136.0</td>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.017³,⁴</td>
<td>NA</td>
<td>NA</td>
<td>RACT, 567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
</tbody>
</table>

1 The emission limit is expressed as the average of three (3) runs.
2 The emission limit is based on a twelve (12) month rolling total.
3 The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
4 Combined emission limit for EP135.0 and EP136.0.

B. The following emission limits shall not be exceeded per emission point:

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>135.0</td>
<td>Particulate Matter (PM) – State</td>
<td>2.12³</td>
<td>NA</td>
<td>0.1 gr/scf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td></td>
<td>Particulate Matter (PM) – State</td>
<td>NA</td>
<td>NA</td>
<td>0.03 gr/scf</td>
<td>567 IAC 31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td></td>
<td>PM₂₅</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td></td>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%³,⁴,⁵</td>
<td>567 IAC 23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td></td>
<td>Sulfur Dioxide (SO₂)</td>
<td>NA</td>
<td>NA</td>
<td>500 ppmv</td>
<td>567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
<tr>
<td></td>
<td>Nitrogen Oxides (NOₓ)</td>
<td>NA</td>
<td>NA</td>
<td>0.04 lb/MMBTU³,⁴,⁵,⁶</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>4.7 ppmv,₆³⁷</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Carbon Monoxide (CO)</td>
<td>NA</td>
<td>NA</td>
<td>0.074 lb/MMBTU³,⁴,⁵,⁶</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Particulate Matter (PM) – State</td>
<td>3.26³</td>
<td>NA</td>
<td>0.1 gr/scf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td></td>
<td>Particulate Matter (PM) – State</td>
<td>NA</td>
<td>NA</td>
<td>0.03 gr/scf</td>
<td>567 IAC 31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td></td>
<td>PM₂₅</td>
<td>1.0³,⁴,⁵</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td></td>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%³,⁴,⁵,⁶,⁷</td>
<td>567 IAC 23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td></td>
<td>Sulfur Dioxide (SO₂)</td>
<td>NA</td>
<td>NA</td>
<td>500 ppmv</td>
<td>567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
<tr>
<td></td>
<td>Nitrogen Oxides (NOₓ)</td>
<td>NA</td>
<td>NA</td>
<td>0.04 lb/MMBTU³,⁴,⁵,⁶</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>4.7 ppmv,₆³⁷</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>Carbon Monoxide (CO)</td>
<td>NA</td>
<td>NA</td>
<td>0.074 lb/MMBTU³,⁴,⁵,⁶</td>
<td>NA</td>
</tr>
</tbody>
</table>

1 The emission limit is expressed as the average of three (3) runs.
2 The emission limit is a twelve (12) month rolling total.
3 Limit restricts potential PM, PM₁₀, PM₂₅, CO, NOₓ and VOC emission below PSD significance levels and Project 15-113 was considered a minor modification for the purposes of PSD.
4 The emission limit used in facility wide PM₁₀ dispersion modeling analysis that indicates predicted attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS).
5 The limit for PM₂₅ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM₂₅ published in the Federal Register (76 FR 9706) on February 22, 2011.
6 The emission limit is a six (6) minute average.
7 An exceedance of the indicator opacity of “No visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8 The limit for NOₓ, CO and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].
2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>EP135.0</td>
<td>PM – State</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>EP136.0</td>
<td>PM$_{10}$</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>PM$_{2.5}$</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td></td>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td></td>
<td>NO$_x$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 7E</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 60, Appendix A, Method 18</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 10</td>
</tr>
</tbody>
</table>

1 Performance testing for PM, PM$_{10}$, and PM$_{2.5}$ shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the PM, PM$_{10}$, and PM$_{2.5}$ emission limits in condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM$_{10}$, and PM$_{2.5}$. Because the last performance test was conducted on April 2, 2019, the next test required by these permits shall be conducted no later than April 2, 2022.

2 It is acceptable to test for PM and to assume that all PM emissions are PM$_{10}$ emissions.

3 If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due to high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM$_{2.5}$ limit as specified in condition 1 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM$_{2.5}$ fraction shall be determined by conducting internal particle sizing of the dried maltodextrin product (immediately following the dryer) to determine the PM$_{2.5}$ fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM$_{2.5}$.

For each Emission Point listed in the “Compliance Demonstration Table,” if an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of the permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.
Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. **Emission Point Characteristics**

This emission points shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>EP ID</th>
<th>Stack Height, Feet</th>
<th>Discharge Style</th>
<th>Stack Opening, inches</th>
<th>Stack Temperature, °F</th>
<th>Exhaust Flowrate, SCFM</th>
</tr>
</thead>
<tbody>
<tr>
<td>135.0</td>
<td>144 Feet</td>
<td>Vertical Unobstructed</td>
<td>42 inches</td>
<td>125°F</td>
<td>25,272 scfm</td>
</tr>
<tr>
<td>136.0</td>
<td>144 Feet</td>
<td>Vertical Unobstructed</td>
<td>42 inches</td>
<td>125°F</td>
<td>26,942 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. **Federal Standards**

   A. **New Source Performance Standards (NSPS):**

      This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

      **NOTE:** The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

   B. **National Emission Standards for Hazardous Air Pollutants (NESHAP):**

      These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

      **NOTE:** The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.
5. Operating Requirements and Associated Recordkeeping

Unless specified by a federal regulation, all records as required by these permits shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

A. The total flow rate for Packed Bed Scrubber (CE3110-1) liquor shall be maintained at or above 500 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Packed Bed Scrubber (CE3110-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the total liquor flow rate to Packed Bed Scrubber (CE3110-1), in gallons per minute, at least once per day. If the liquor flow rate to the Packed Bed Scrubber (CE3110-1) falls below the value specified in Condition 5A, the owner or operator shall investigate the Packed Bed Scrubbers (CE3110-1) and make corrections to the scrubber. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Packed Bed Scrubber (CE3110-1) is not in operation.

B. The total flow rate for Packed Bed Scrubber (CE3110-2) liquor shall be maintained at or above 500 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Packed Bed Scrubber (CE3110-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the total liquor flow rate to the Packed Bed Scrubber (CE3110-2), in gallons per minute, at least once per day. If the liquor flow rate to the Packed Bed Scrubber (CE3110-2) falls below the value specified in Condition 5B, the owner or operator shall investigate the Packed Bed Scrubber (CE3110-2) and make corrections to the scrubber. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Packed Bed Scrubber (CE3110-2) is not in operation.

C. The differential pressure drop across each Packed Bed Scrubber (CE3110-1 and CE3110-2) shall be maintained between 0.3 and 5 inches of water column as a 1-hour block average.
   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across each Packed Bed Scrubber (CE3110-1 and CE3110-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across each Packed Bed Scrubber (CE3110-1 and CE3110-2), in inches of water, on a continuous basis. The owner or operator shall calculate and record the 1-hour block average of the differential pressure drop across each Packed Bed Scrubber in inches water column. If the 1-hour block average pressure drop across either Packed Bed Scrubbers (CE3110-1 and CE3110-2) falls outside the range specified in Condition 5C, the owner or operator shall investigate the Packed Bed Scrubber(s) (CE3110-1 and CE3110-2) and make corrections to the scrubber(s). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Packed Bed Scrubbers (CE3110-1 and CE3110-2) are not in operation.

D. The owner or operator shall develop an operating and maintenance plan for each Packed Bed Scrubber (CE3110-1 and CE3110-2), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Packed Bed Scrubber (CE3110-1) and the monitoring devices.
   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Packed Bed Scrubber (CE3110-2) and the monitoring devices.
5. Operating Requirements and Associated Recordkeeping (continued)

E. The differential pressure drop across the Baghouse (CE3110-3) shall be maintained between 1 and 6 inches of water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across the Baghouse (CE3110-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across the Baghouse (CE3110-3), in inches of water, at least once per day. If the pressure drop across the Baghouse (CE3110-3) falls outside the range specified in Condition 5E, the owner or operator shall investigate the Baghouse (CE3110-3) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Baghouse (CE3110-3) is not in operation.

F. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE3110-3), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE3110-3).

G. The owner or operator shall maintain the Product Recovery Cyclones in a manner to ensure proper operation.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Product Recovery Cyclones.

H. The owner or operator shall tune the Low-NOx Line Burner (EU3110.1) on an annual basis to maintain good combustion. The annual burner tune-up activity shall include at a minimum:
   - Inspect the burner—Clean and replace any components, as necessary
   - Inspect the flame pattern and flame dimensions—Adjust the burner as necessary to optimize the flame pattern and dimensions. The adjustment should be consistent with manufacturer’s specifications, if available.
   - Inspect the air-to-fuel ratio control system—Ensure the control system is calibrated and functioning properly, if such a system is installed.
   - Optimize emissions of carbon dioxide—Optimize emissions consistent with the manufacturer’s specifications, if available, and with any nitrogen oxide requirement to which unit may be subject.
   - Verify that emissions (carbon dioxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

I. The owner or operator shall maintain record on annual basis of the following:
   - The completion date of Low-NOx Line Burner (EU3110.1) tuning as specified in condition 5H,
   - Low-NOx Line Burner (EU3110.1) emissions (carbon dioxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

J. The owner or operator shall develop an operating and maintenance plan for the Low-NOx Line Burner (EU3110.1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Low-NOx Line Burner (EU3110.1).

6. Continuous Emission Monitoring

Continuous emission monitoring is not required by these permits at this time.
7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permit(s) are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)*f*).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

The permit or amendment shall become void if any one of the following conditions occurs:

1. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within a time period specified elsewhere in the permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend the permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. The permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.
C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions
Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See Permit Condition 12.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition (See Permit Condition 12.B.2).

12. Notification, Reporting, and Recordkeeping
These requirements shall apply to each permit included in this “Collection of Air Permits.”

A. The owner or operator shall furnish the Department the following written notifications:
1. Per 567 IAC 22.3(3)“b”:
   a. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   b. The actual date of startup, postmarked within fifteen (15) days following the start of operation.
2. Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   a. At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   b. At least seven (7) days before equipment relocation.
3. Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
4. Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.
B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under each permit in this “Collection of Air Permits” shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding any permit in this “Collection of Air Permits” shall be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E. 9th St.</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (515) 725-9501</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td>Fax: (319) 653-2856</td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
14. Permit History

<table>
<thead>
<tr>
<th>Project No.</th>
<th>Permit No.</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>85-030</td>
<td>85-A-031</td>
<td>Original Permit</td>
<td>03/26/85</td>
</tr>
<tr>
<td></td>
<td>85-A-032</td>
<td></td>
<td></td>
</tr>
<tr>
<td>09-281</td>
<td>85-A-031-S1</td>
<td>Increase Stack Height and Modify PM/PM_{10} Emission Limits</td>
<td>07/16/09</td>
</tr>
<tr>
<td></td>
<td>85-A-032-S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15-050</td>
<td>85-A-031-S2</td>
<td>Increase Stack Height, Add PM_{2.5}, SO_{2} and VOC Emission Limits.</td>
<td>12/10/15</td>
</tr>
<tr>
<td></td>
<td>85-A-032-S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15-113</td>
<td>85-A-031-S3</td>
<td>Low-NOx Burner Installation, Decrease Stack Height</td>
<td>06/06/16</td>
</tr>
<tr>
<td></td>
<td>85-A-032-S3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16-344</td>
<td>85-A-031-S4</td>
<td>Remove requirement to increase stack height to 154 feet and update to CAP</td>
<td>02/21/17</td>
</tr>
<tr>
<td></td>
<td>85-A-032-S4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19-307</td>
<td>85-A-031-S5</td>
<td>Modify operating limit range for wet scrubbers CE3110-1 and CE3110-2</td>
<td>05/19/20</td>
</tr>
<tr>
<td></td>
<td>85-A-032-S5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 91-A-068-S3

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 174.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1245.0</td>
<td>GP2, #4 Gluten Pre-Mill Cooling System</td>
<td>6.13 tons of dried gluten per hour</td>
<td>GP2, Product Baghouse (CE1245-1)</td>
</tr>
<tr>
<td>1246.0</td>
<td>GP2, #4 Gluten Mill</td>
<td>6.13 tons of dried gluten per hour</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-198</td>
<td>Increase Maximum Capacity</td>
<td>None</td>
<td>11/04/19</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources

CPFP|7001004|110419|17198|91A068S3
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.41^3</td>
<td>NA</td>
<td>0.1 gr/dscf(^3)</td>
<td>PSD Synthetic Minor, 23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.41^3,4</td>
<td>NA</td>
<td>NA</td>
<td>PSD Synthetic Minor</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.150^5</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%^6,7</td>
<td>23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_{2}))</td>
<td>0.37^8</td>
<td>NA</td>
<td>10.0 ppm(_{e,d})^1,9</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>15.0 ppm(_{e,d})^1,9</td>
<td>PSD Synthetic Minor</td>
</tr>
</tbody>
</table>

---

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limits established to avoid PSD applicability and keep Project 90-257 minor PSD. Project 90-257 netted out of review for PM and PM\(_{10}\) using credits obtained from the shutdown of several streets in December of 1990. Any future projects that reevaluate the netting for this time period will require the facility to submit a model examining the equivalency of the increased stack emissions to be credited to road closure emissions.
4. The emission limit used in facility wide PM\(_{10}\) dispersion modeling analysis that indicates predicted attainment of the PM\(_{10}\) National Ambient Air Quality Standards (NAAQS).
5. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO\(_{2}\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_{2}\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9. The limit for SO\(_{2}\) and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].
2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 &lt;br&gt;40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or &lt;br&gt;40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.
3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>82 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>18 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>115 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>8295 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

   This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

   This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The pressure drop across GP2, Product Baghouse (CE1245-1) shall be maintained between 0.1 to 10 inches of water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the GP2, Product Baghouse (CE1245-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across the GP2, Product Baghouse (CE1245-1), in inches of water, once per calendar day. If the pressure drop across the GP2, Product Baghouse (CE1245-1) falls outside the range specified in Condition 5A, the owner or operator shall investigate the Impingent Wet Scrubber (CE1244-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP2, Product Baghouse (CE1245-1) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

B. The owner or operator shall develop an operating and maintenance plan for GP2, Product Baghouse (CE1245-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP2, Product Baghouse (CE1245-1).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).
10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.
   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically
   changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a
   permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged
   permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is
       not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is
       not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is
       not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment
   and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s)
   and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission
       point permitted herein; or
   (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation
of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing
emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment,
which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour
period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa
Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an
expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified
in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office
within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition
12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports
within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
       initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
    one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
       area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
    thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the
     contact person, and the owner of the equipment both before and after the ownership change; and the
     construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
    in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
    monitor [567 IAC 25.1(7)]. The notification shall include:
   • The time; the place; the name of the person who will conduct the tests; and other information as required by
     the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the
results or performance evaluation results to be a valid demonstration of compliance with the applicable rules
or permit conditions. Upon written request, the Department may allow a notification period of less than thirty
(30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
    (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
    electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
    submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
    upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
    Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
    systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
    of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
    successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other
    regulations provide for other notification requirements. In that case, the more stringent reporting requirement
    shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be
available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution
regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording
unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
12. Notification, Reporting, and Recordkeeping (Continued)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E 9th Street</td>
<td>Washington, IA  52353</td>
</tr>
<tr>
<td>Des Moines, IA  50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>91-A-068</td>
<td>90-257</td>
<td>Permit Source</td>
<td>04/05/91</td>
<td>Yes</td>
</tr>
<tr>
<td>91-A-068-S1</td>
<td>05-697</td>
<td>Replace Baghouse</td>
<td>12/22/05</td>
<td>No</td>
</tr>
<tr>
<td>91-A-068-S2</td>
<td>15-050</td>
<td>Modify PM, PM\textsubscript{10} Emission Limits; add PM\textsubscript{2.5}, SO\textsubscript{2} and VOC Emission Limits</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 92-A-383-S3

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director, Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President

(563) 264-4569
Mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP179.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1258.0</td>
<td>Gluten Surge Bin, Feed Loading Surge Bin, GP2 #1 Feed Truck Loadout</td>
<td>100 tons of feed per hour</td>
<td>Pulse Jet Baghouse – West Hood Baghouse (CE1258-1)</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number | Project Description | Stack Testing | Issuance Date  |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>16-036</td>
<td>Correct Maximum Capacity; modify flow rate based on testing</td>
<td>No</td>
<td>10/11/16</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.50³</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0.50³,⁴</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>0.15⁵</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%⁶,⁷</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.25⁸</td>
<td>NA</td>
<td>5.0 ppmv,d¹,⁹</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>3.0 ppmv,d¹,⁹</td>
<td>NA</td>
</tr>
</tbody>
</table>

¹ The emission limit is expressed as the average of three (3) runs.
² The emission limit is based on a twelve (12) month rolling total.
³ Limit maintains Project 92-120 as minor project for the purposes of PSD review.
⁴ The limit for PM₁₀ emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
⁵ The limit for PM₂.₅ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM₂.₅ published in the Federal Register (76 FR 9706) on February 22, 2011.
⁶ The emission limit is based on a six (6) minute average.
⁷ An exceedance of the indicator opacity of “No visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
⁸ The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
⁹ The limits for SO₂ and VOC emissions are required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].

2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO₂</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the time applicable period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.
2. Compliance Demonstration(s) (Continued)

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>75 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>30 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>Ambient</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>21,670 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The differential pressure drop across the Pulse Jet Baghouse (CE1258-1) shall be maintained between 0.1 and 6 inches water column.

B. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Pulse Jet Baghouse (CE1258-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

C. The owner or operator shall collect and record the pressure drop across the Pulse Jet Baghouse (CE1258-1), in inches of water, on a daily basis. If the pressure drop across the Pulse Jet Baghouse (CE1258-1) falls outside the range specified in Condition 5 A., the owner or operator shall investigate the Pulse Jet Baghouse (CE1258-1) and make corrections to the Pulse Jet Baghouse (CE1258-1). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Pulse Jet Baghouse (CE1258-1) is not in operation.

D. The owner or operator shall develop an operating and maintenance plan for the Pulse Jet Baghouse (CE1258-1) including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.

E. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Pulse Jet Baghouse (CE1258-1).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.
Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:
It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:
1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.
An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
       (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
       (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
       (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (b) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
   (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
       • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
   (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:
13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

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<th>Project No.</th>
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<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>92-A-383</td>
<td>92-120</td>
<td>Original Permit</td>
<td>06/19/92</td>
<td>Yes</td>
</tr>
<tr>
<td>92-A-383-S1</td>
<td>06-162</td>
<td>Change Air Flow Rate due to Stack Test of August 2005 (formerly Animal Feed Mix Production)</td>
<td>06/20/06</td>
<td>No</td>
</tr>
<tr>
<td>92-A-383-S2</td>
<td>15-051</td>
<td>Stack Height Increase, Establish PM$_{2.5}$ &amp; SO$_2$ limit</td>
<td>07/06/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 92-A-385-S2

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director, Environmental Services

(563) 264-4569
Mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President

Permitted Equipment

Emission Point ID: EP180.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1259.0</td>
<td>Gluten Surge Bin, Feed Loading Surge Bin, GP2 #2 Feed Truck Loadout</td>
<td>100 tons of feed per hour</td>
<td>Pulse Jet Baghouse – East Hood Baghouse (CE1259-1)</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16-036</td>
<td>Correct Maximum Capacity; modify flowrate based on testing</td>
<td>No</td>
<td>10/11/16</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
## PERMIT CONDITIONS

### 1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.50$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.50$^3,4$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.150$^5$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^6,7$</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>0.25$^8$</td>
<td>NA</td>
<td>5.0 ppmv,d$^{1,9}$</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>3.0 ppmv,d$^{1,9}$</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. Limit maintains Project 92-120 as minor project for the purposes of PSD review.
4. The limit for PM$_{10}$ emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
5. The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is based on a six (6) minute average.
7. An exceedance of the indicator opacity of “No visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO$_2$ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9. The limits for SO$_2$ and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].

### 2. Compliance Demonstration(s)

**Compliance Demonstration Table**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the time applicable period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.
2. Compliance Demonstration(s) (Continued)

If any additional stack testing beyond an initial test (i.e., quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>75 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>30 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>Ambient</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>21,670 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.
B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The differential pressure drop across the Pulse Jet Baghouse (CE1259-1) shall be maintained between 0.1 and 6 inches water column.

B. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Pulse Jet Baghouse (CE1259-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

C. The owner or operator shall collect and record the pressure drop across the Pulse Jet Baghouse (CE1259-1), in inches of water, on a daily basis. If the pressure drop across the Pulse Jet Baghouse (CE1259-1) falls outside the range specified in Condition 5 A., the owner or operator shall investigate the Pulse Jet Baghouse (CE1259-1) and make corrections to the Pulse Jet Baghouse (CE1259-1). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Pulse Jet Baghouse (CE1259-1) is not in operation.

D. The owner or operator shall develop an operating and maintenance plan for the Pulse Jet Baghouse (CE1259-1) including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.

E. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Pulse Jet Baghouse (CE1259-1).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.
8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.
11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
       (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
       (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
       (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (b) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
   (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
       • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.
       If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>7900 Hickman Road, Suite 1</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Windsor Heights, IA 50324</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>92-A-385</td>
<td>92-120</td>
<td>Original Permit</td>
<td>06/19/92</td>
<td>Yes</td>
</tr>
<tr>
<td>92-A-385-S1</td>
<td>15-051</td>
<td>Stack Height Increase, Establish PM$_{2.5}$ &amp; SO$_2$ limit</td>
<td>07/06/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
**Plant Number:** 70-01-004  

**Company:** Grain Processing Corporation

<table>
<thead>
<tr>
<th><strong>Contact Person:</strong></th>
<th><strong>Responsible Party:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Mick Durham</td>
<td>Ron Zitzow</td>
</tr>
<tr>
<td>Director of Environmental Services</td>
<td>Senior Vice President</td>
</tr>
</tbody>
</table>

563.264.4569  
mick.durham@grainprocessing.com  

1600 Oregon Street  
Muscatine, IA  52761

<table>
<thead>
<tr>
<th><strong>Project/Process Description</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Maltrin #6 Spray Dryer</td>
</tr>
</tbody>
</table>

**Maximum Design Capacity:** 9.84 tons of maltrin per hour, dry solids basis  

**Maximum Natural Gas Firing Rate:** 44 MMBtu per hour (Natural gas fuel only)  

<table>
<thead>
<tr>
<th><strong>Equipment Location:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1600 Oregon Street</td>
<td></td>
</tr>
<tr>
<td>Muscatine, IA  52761</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Project Number:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>21-058</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Project Description:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Install New Low Emissions Burner System</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Date:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>05/13/21</td>
<td></td>
</tr>
</tbody>
</table>

The permits in this document are issued in accordance with 567 Iowa Administrative Code Chapter 22, and are issued subject to the terms and conditions contained in this document. Issuance of the permits in this document shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law. If any permit contained in this document is modified, superseded, expires, or for any other reason changes or ceases to exist, the status of that permit shall not affect the validity or enforceability of any other permit contained in this document.

Under the Direction of the Director of the Department of Natural Resources

---
## List of Emission Units, Control Equipment, Emission Points, and Permits

<table>
<thead>
<tr>
<th>EP#</th>
<th>Emission Unit Description</th>
<th>Control Equipment Description</th>
<th>Permit #</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>186.0</td>
<td>Maltrin #6 Spray Dryer with Product Recovery Cyclones (EU3116.0) and Packed Bed Scrubber (CE3116-1)</td>
<td>94-A-055-S3</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>187.0</td>
<td>Maltrin #6 Spray Dryer Low-NOx Direct-Fired Burner (EU3116.1) Packed Bed Scrubber (CE3116-2) Product Transfer Baghouse (CE3116-3)</td>
<td>94-A-061-S3</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in any permit contained in this “Collection of Air Permits”.

A. The following combined emission limits shall not be exceeded for the following emission points:

<table>
<thead>
<tr>
<th>EPs</th>
<th>Pollutant</th>
<th>lb/hr&lt;sup&gt;1&lt;/sup&gt;</th>
<th>tons/yr&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP186.0, EP187.0</td>
<td>Sulfur Dioxide (SO&lt;sub&gt;2&lt;/sub&gt;)</td>
<td>0.027&lt;sup&gt;3,4&lt;/sup&gt;</td>
<td>NA</td>
<td>NA</td>
<td>RACT</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. The SO<sub>2</sub> limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO<sub>2</sub> primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

B. The following emission limits shall not be exceeded per emission point:

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>lb/hr&lt;sup&gt;1&lt;/sup&gt;</th>
<th>tons/yr&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>186.0, 187.0</td>
<td>Particulate Matter (PM) – State</td>
<td>1.76&lt;sup&gt;3&lt;/sup&gt;</td>
<td>NA</td>
<td>0.1 gr/dscf&lt;sup&gt;1&lt;/sup&gt;</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td></td>
<td>1.76&lt;sup&gt;1,4&lt;/sup&gt;</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td></td>
<td>0.663&lt;sup&gt;5&lt;/sup&gt;</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>40%&lt;sup&gt;6,7&lt;/sup&gt;</td>
<td>23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO&lt;sub&gt;2&lt;/sub&gt;)</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>500 ppm&lt;sub&gt;1&lt;/sub&gt;</td>
<td>567 IAC 23.3(3)“e”</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO&lt;sub&gt;x&lt;/sub&gt;)</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>0.04 lbs/MMBtu&lt;sup&gt;1,8&lt;/sup&gt;</td>
<td>NA</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>9.2 ppm&lt;sub&gt;6&lt;/sub&gt;</td>
<td>NA</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>0.074 lbs/MMBtu&lt;sup&gt;1,8&lt;/sup&gt;</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Requested emission limits maintain project 93-200 below PSD significant rates for PM and PM<sub>10</sub>. Project 93-200 netted out of review for PM and PM<sub>10</sub> using credits obtained from the paving of two roads at the facility in November of 1992. Any future projects that reevaluate the netting for this time period will require the facility to submit a model examining the equivalency of the increased stack emissions to the credited road closure emissions.
4. The emission limit used in facility wide PM<sub>10</sub> dispersion modeling analysis that indicates predicted attainment of the PM<sub>10</sub> National Ambient Air Quality Standards (NAAQS).
5. The limit for PM<sub>2.5</sub> emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM<sub>2.5</sub> published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of “No visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The limit for NO<sub>x</sub>, CO and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].
2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>EP</th>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP186.0</td>
<td>PM – State</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years¹</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>EP187.0</td>
<td>PM₁₀²</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years¹</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>PM₂₅²,³</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years¹</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td></td>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td></td>
<td>SO₂</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td></td>
<td>NOₓ</td>
<td>Performance Testing</td>
<td>One-time</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 7E</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>Performance Testing</td>
<td>One-time</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>Performance Testing</td>
<td>One-time</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 10</td>
</tr>
</tbody>
</table>

¹ Performance testing for PM, PM₁₀, and PM₂₅ shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the PM, PM₁₀, and PM₂₅ emission limits in condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM₁₀, and PM₂₅.

² It is acceptable to test for PM and to assume that all PM emissions are PM₁₀ emissions.

³ If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due to high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM₂₅ limit as specified in condition 1 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM₂₅ fraction shall be determined by conducting internal particle sizing of the dried maltodextrin product (immediately following the dryer) to determine the PM₂₅ fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM₂₅.

For each Emission Point listed in the “Compliance Demonstration Table”, if an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of Low-NOx Burner (EU3116.1).

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.
2. **Compliance Demonstration(s) (continued)**

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. **Emission Point Characteristics**

This emission points shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>EP ID</th>
<th>Stack Height, Feet</th>
<th>Discharge Style</th>
<th>Stack Opening, inches</th>
<th>Stack Temperature, °F</th>
<th>Exhaust Flowrate, SCFM</th>
</tr>
</thead>
<tbody>
<tr>
<td>186.0</td>
<td>137</td>
<td>Vertical Unobstructed</td>
<td>72 inch Diameter</td>
<td>117</td>
<td>49,267</td>
</tr>
<tr>
<td>187.0</td>
<td>137</td>
<td>Vertical Unobstructed</td>
<td>72 inch Diameter</td>
<td>117</td>
<td>49,267</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. **Federal Standards**

   A. **New Source Performance Standards (NSPS):**

   This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

   B. **National Emission Standards for Hazardous Air Pollutants (NESHAP):**

   This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements and Associated Recordkeeping

Unless specified by a federal regulation, all records as required by these permits shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:

**Control Equipment- Scrubbers**

A. The total flowrate for Packed Bed Scrubber (CE3116-1) liquor shall be maintained at or above 1141 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to Packed Bed Scrubber (CE3116-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the total liquor flow rate to each Packed Bed Scrubber (CE3116-1), in gallons per minute, at least once per day. If the liquor flow rate to either Packed Bed Scrubber (CE3116-1) falls below the value specified in Condition 5A, the owner or operator shall investigate Packed Bed Scrubber (CE3116-1) and make corrections to the scrubber. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Packed Bed Scrubber (CE3116-1) are not in operation.

B. The total flowrate for Packed Bed Scrubber (CE3116-2) liquor shall be maintained at or above 1169 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to each Packed Bed Scrubber (CE3116-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the total liquor flow rate to Packed Bed Scrubber (CE3116-2), in gallons per minute, at least once per day. If the liquor flow rate to Packed Bed Scrubber (CE3116-2) falls below the value specified in Condition 5B, the owner or operator shall investigate Packed Bed Scrubber (CE3116-2) and make corrections to the scrubber. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Packed Bed Scrubber (CE3116-2) are not in operation.

C. The differential pressure drop across each Packed Bed Scrubber (CE3116-1 and CE3116-2) shall be maintained between 1 and 8 inches of water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across each Packed Bed Scrubber (CE3116-1 and CE3116-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across each Packed Bed Scrubber (CE3116-1 and CE3116-2), in inches of water, at least once per day. If the pressure drop across either Packed Bed Scrubbers (CE3116-1 and CE3116-2) falls outside the range specified in Condition 5C., the owner or operator shall investigate Packed Bed Scrubbers (CE3116-1 and CE3116-2) and make corrections to the scrubbers. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Packed Bed Scrubbers (CE3116-1 and CE3116-2) are not in operation.
5. Operating Requirements and Associated Recordkeeping (continued)

D. The owner or operator shall develop an operating and maintenance plan for each Packed Bed Scrubber (CE3116-1 and CE3116-2), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Packed Bed Scrubber (CE3116-1) and the monitoring devices.
   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Packed Bed Scrubber (CE3116-2) and the monitoring devices.

Control Equipment-Baghouse

E. The differential pressure drop across Baghouse (CE3116-3) shall be maintained between 0.25 and 6 inches of water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE3116-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE3116-3), in inches of water, at least once per day. If the pressure drop across Baghouse (CE3116-3) falls outside the range specified in Condition 5E, the owner or operator shall investigate Baghouse (CE3116-3) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE3116-3) are not in operation.

F. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE3116-3), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE3116-3).

Low-NOx Burner (EU3116.1)

G. The owner or operator shall tune Low-NOx Burner (EU3116.1) on an annual basis to maintain good combustion. The annual burner tune-up activity shall include at a minimum:
   • Inspect the burner-Clean and replace any components, as necessary
   • Inspect the flame pattern and flame dimensions-Adjust the burner as necessary to optimize the flame pattern and dimensions. The adjustment should be consistent with manufacturer’s specifications, if available.
   • Inspect the air-to fuel ratio control system-Ensure the control system is calibrated and functioning properly, if such a system is installed.
   • Optimize emissions of carbon monoxide - Optimize emissions consistent with the manufacturer’s specifications, if available, and with any nitrogen oxide requirement to which unit may be subject.
   • Verify that emissions (carbon monoxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

H. The owner or operator shall maintain record on annual basis of the following:
   • The completion date of burner (EU3116.1) tuning as specified in condition 5G,
   • Burner (EU3116.1) emissions (carbon monoxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

I. The owner or operator shall develop an operating and maintenance plan for the Low-NOx Burner (EU3116.1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of burner (EU3116.1).
5. Operating Requirements and Associated Recordkeeping (continued)

Other Requirements

J. The owner or operator shall maintain Product Recovery Cyclones in manner to ensure proper operation.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Product Recovery Cyclones.

Project Completion

K. The owner or operator shall install and commence operation of Low-NOx Burner (EU3116.1) by December 31, 2022.
   i. The owner or operator shall maintain a record of installation date and operation commencement date of Low-NOx Burner (EU3116.1).

6. Continuous Emission Monitoring

Continuous emission monitoring is not required by these permits at this time.

7. Department Review

These permits are issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. These permits are issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause the affected permit or permits to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

These permits are for the construction and operation of specific emission unit(s), control equipment, and emission point(s) as described in these permits and in the applications for these permits. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in these permits conform to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter any of the emission unit(s), or emission point(s), or the associated control equipment without the required amended permit(s).

Any owner or operator of the specified emission unit(s), emission point(s), or associated control equipment, including any person who becomes an owner or operator subsequent to the issuance date of the affected permit(s), is responsible for assuring that the installation, operation, and maintenance of the equipment listed in the permit(s) is in compliance with the provisions of the permit(s) and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, these permit(s) are not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3.(3)“f”).
10. Construction

A. General Requirements:
It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

The permit or amendment shall become void if any one of the following conditions occurs:
1. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. the construction or implementation of the proposed project, as it affects each emission point permitted herein, is not completed within a time period specified elsewhere in the permit.

B. Changes to Plans and Specifications:
The owner or operator shall amend the permit or amendment prior to startup of the equipment if:
1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. The permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See Permit Condition 12.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition (See Permit Condition 12.B.2).
12. Notification, Reporting, and Recordkeeping

These requirements shall apply to each permit included in this “Collection of Air Permits.”

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
       (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
           initiation of construction, installation, or alteration.
       (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
       one location to another, the Department shall be notified:
       (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
           area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (b) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
       thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the
         contact person, and the owner of the equipment both before and after the ownership change; and the
         construction permit number(s) of the equipment changing ownership.
   (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
       in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
       monitor [567 IAC 25.1(7)]. The notification shall include:
       • The time; the place; the name of the person who will conduct the tests; and other information as required by
         the Department.
       If the owner or operator does not provide timely notice to the Department, the Department shall not consider the
       test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules
       or permit conditions. Upon written request, the Department may allow a notification period of less than thirty
       (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
       (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
       electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
       submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
       upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
       Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
       systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
       of the calendar quarter, on forms provided by the Director.
   (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
       successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other
       regulations provide for other notification requirements. In that case, the more stringent reporting requirement
       shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under each permit in this
   “Collection of Air Permits” shall be available at the plant during normal business hours for inspection and copying by
   federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2)
   years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
12. Notification, Reporting, and Recordkeeping (continued)

D. Information regarding any permit in this “Collection of Air Permits” shall be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>7900 Hickman Road, Suite 1</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Windsor Heights, IA 50324</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td>Fax: (519) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Project No.</th>
<th>Permit No.</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>93-200</td>
<td>94-A-055</td>
<td>Original Permit</td>
<td>01/26/94</td>
</tr>
<tr>
<td></td>
<td>94-A-061</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15-050</td>
<td>94-A-055-S1</td>
<td>Increase Stack Height, Modify PM Emission Limit and Add PM2.5, SO2 and VOC Emission Limits.</td>
<td>12/10/15</td>
</tr>
<tr>
<td></td>
<td>94-A-061-S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16-344</td>
<td>94-A-055-S2</td>
<td>Remove requirement to increase stack height to 147 feet and update to CAP</td>
<td>02/21/17</td>
</tr>
<tr>
<td></td>
<td>94-A-061-S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21-058</td>
<td>94-A-055-S3</td>
<td>Install New Low Emissions Burner System</td>
<td>05/13/21</td>
</tr>
<tr>
<td></td>
<td>94-A-061-S3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 02-A-781-S3

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP190A (also known as 190.1)

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1256.0</td>
<td>GP2 Gluten Loadout Pneumatic Transport System</td>
<td>32 tons of gluten per hour</td>
<td>Pulse Jet Baghouse (CE1256-1)-East Gluten Receiver Baghouse</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-340</td>
<td>Amend VOC Limit</td>
<td>None</td>
<td>02/08/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP190A shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.11$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf$^6$</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.11$^3,4$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.021$^5$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^6,7$</td>
<td>23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>0.125$^8$</td>
<td>NA</td>
<td>5.0 ppm$^1,9$</td>
<td>NA</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>14.8 ppm$^1,9$</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit maintains Projects 92-120 and 01-169 as minor projects for the purposes of PSD review.
4. The limit for PM$_{10}$ emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
5. The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO$_2$ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9. The limits for SO$_2$ and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].

2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>None</td>
<td>NA</td>
<td>3 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1. Performance testing may be conducted for total particulate matter to demonstrate compliance with PM$_{10}$ limit as specified in permit condition 10.
2. If method 40 CFR 51, Appendix M, 201A cannot be performed due to stack blockage then the owner operator shall add a temporary stack extension to perform method 40 CFR 51, Appendix M, 201A. The temporary stack extension shall conform to 40 CFR Part 60, Appendix A, Method 1.
2. Compliance Demonstration(s) (continued)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e., quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>77 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Downward Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>12 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>80 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>2850 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
4. Federal Standards

A. **New Source Performance Standards (NSPS):**

   This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. **National Emission Standards for Hazardous Air Pollutants (NESHAP):**

   This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

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5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The differential pressure drop across Baghouse (CE1256-1) shall be maintained between 0.3 and 6 inches of water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Baghouse (CE1256-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across Baghouse (CE1256-1), in inches of water, continuously. If the pressure drop across Baghouse (CE1256-1) falls outside the range specified in Condition 5A, the owner or operator shall investigate Baghouse (CE1256-1) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Baghouse (CE1256-1) are not in operation.

B. The owner or operator shall develop an operating and maintenance plan for the Baghouse (CE1256-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE1256-1).

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Continuous emission monitoring is not required by this permit at this time.

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7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.
8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
   (2) This current amendment becomes void.
11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
       (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
       (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
       (b) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (c) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
   (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
       • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
12. Notification, Reporting, and Recordkeeping (Continued)

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Location</th>
<th>Address</th>
<th>Telephone</th>
<th>Fax:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Bureau</td>
<td>Iowa Department of Natural Resources</td>
<td>7900 Hickman Road, Suite 1</td>
<td>(515) 725-9549</td>
</tr>
<tr>
<td></td>
<td>Windsor Heights, IA 50324</td>
<td></td>
<td>(515) 725-9502</td>
</tr>
<tr>
<td>DNR Field Office 6</td>
<td></td>
<td>1023 West Madison</td>
<td>(319) 653-2856</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Washington, IA 52353</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Telephone: (319) 653-2135</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

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<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>02-A-781</td>
<td>01-169</td>
<td>&quot;As-built&quot; Permit</td>
<td>10/17/02</td>
<td>Yes</td>
</tr>
<tr>
<td>02-A-781-S1</td>
<td>11-297</td>
<td>Add PM$_{10}$ NAAQS Emission Limit and Modify Stack Characteristics</td>
<td>05/17/02</td>
<td>No</td>
</tr>
<tr>
<td>02-A-781-S2</td>
<td>15-051</td>
<td>Establish PM$_{2.5}$ &amp; SO$_2$ limit</td>
<td>07/06/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 02-A-782-S3

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham  
Director of Environmental Services

Responsible Party: Ron Zitzow  
Senior Vice President

563.264.4569  
mick.durham@grainprocessing.com

1600 Oregon Street  
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP190B (also known as 190.2)

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1257.0</td>
<td>GP2 Gluten Truck Loadout Bin</td>
<td>32 tons of gluten per hour</td>
<td>Bin Vent Filter (CE1257-1)-East Gluten Receiver Bin Vent Dust Collector</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street  
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-340</td>
<td>Amend VOC Limit</td>
<td>None</td>
<td>02/08/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP190B shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.009(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf(^5)</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.009(^3,4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.002(^5)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%(^6,7)</td>
<td>23.3(2)(&quot;d&quot;)</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>0.005(^8)</td>
<td>NA</td>
<td>5.0 ppm(e,d)(^{1,9})</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>14.8 ppm(e,d)(^{1,9})</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit maintains Projects 92-120 and 01-169 as minor projects for the purposes of PSD review.
4. The limit for PM\(_{10}\) emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
5. The limit for PM\(_{2.5}\) emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
6. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
7. The limit for SO\(_2\) emissions is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
8. The limits for SO\(_2\) and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].

2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO(_2)</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>
2. Compliance Demonstration(s) (continued)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>77 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Horizontal Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>6 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>70 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>100 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall conduct visible emissions observation on emission point (EP190B) once per calendar day.
   i. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions. If the owner or operator observes visible emissions from EP190B, the owner or operator shall investigate the emission unit or control equipment and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that this emission unit is not in operation.

B. The owner or operator shall develop an operating and maintenance plan for the Bin Vent Filter (CE1257-1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Bin Vent Filter (CE1257-1).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.
8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
   (2) This current amendment becomes void.
11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
12. Notification, Reporting, and Recordkeeping (Continued)

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Address</th>
<th>Telephone</th>
<th>Fax</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Bureau</td>
<td>(515) 725-9549</td>
<td>(515) 725-9502</td>
</tr>
<tr>
<td>Iowa Department of Natural Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7900 Hickman Road, Suite 1 Windsor Heights, IA 50324</td>
<td>Telephone: (515) 725-9549</td>
<td>Fax: (515) 725-9502</td>
</tr>
<tr>
<td>DNR Field Office 6</td>
<td>(319) 653-2135</td>
<td>(319) 653-2856</td>
</tr>
<tr>
<td>1023 West Madison Washington, IA 52353</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>02-A-782</td>
<td>01-169</td>
<td>“As-built” Permit</td>
<td>10/17/02</td>
<td>Yes</td>
</tr>
<tr>
<td>02-A-782-S1</td>
<td>11-297</td>
<td>Add PM$_{10}$ NAAQS Emission Limit and Modify Stack Characteristics</td>
<td>05/17/02</td>
<td>No</td>
</tr>
<tr>
<td>02-A-782-S2</td>
<td>15-051</td>
<td>Establish PM$_{2.5}$ &amp; SO$_2$ limit</td>
<td>07/06/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 10-A-563-S2

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

Responsible Party: Ron Zitzow
Senior VP of Operations

(563) 264-4569
Mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP196.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1263.0</td>
<td>DH4 and DH5 Rotary Dryers’ Product Receiver Cyclone</td>
<td>52.8 tons of dry feed per hour</td>
<td>DHWHSE Bypass Baghouse (CE1263-2)</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16-485</td>
<td>Modify PM$_{2.5}$ emission rate, temperature, exhaust flow rate; correct max. capacity</td>
<td>No</td>
<td>07/25/17</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.61(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.61(^3,4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.175(^5,6)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40(^%)(^7)</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>0.42(^8)</td>
<td>NA</td>
<td>500 ppm(_v),</td>
<td>RACT and 567 IAC 23.3(3)”e”</td>
</tr>
</tbody>
</table>

\(^1\) The emission limit is expressed as the average of three (3) runs.

\(^2\) The emission limit is based on a twelve (12) month rolling total.

\(^3\) Requested emission limits maintain projects 10-713 and 10-555 below PSD significance rates for PM, PM10, PM2.5, and SO2.

\(^4\) The limit for PM\(_{10}\) emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].

\(^5\) The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.

\(^6\) The emission limit is a six (6) minute average.

\(^7\) An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

\(^8\) The SO\(_2\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, M 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, M 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO(_2)</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
</tbody>
</table>

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.
2. Compliance Demonstration(s) (Continued)

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>82.67 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, unobstructed</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>22 inches</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>113°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>11,672 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.
B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emissions unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The Bypass Baghouse’s (CE1263-2) differential pressure drop shall be maintained between 0.3 and 6 inches water column.

B. The owner or operator shall properly operate and maintain equipment to continuously monitor the differential pressure drop across the Bypass Baghouse (CE1263-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

C. The owner or operator shall collect and record the pressure drop across the Bypass Baghouse (CE1263-2), in inches of water, continuously. If the pressure drop across the Bypass Baghouse (CE1263-2) falls outside the range specified in Condition 5 A., the owner or operator shall investigate the Bypass Baghouse (CE1263-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Bypass Baghouse (CE1263-2) is not in operation.

D. The owner or operator shall develop an operating and maintenance plan for the Bypass Baghouse (CE1263-2), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.

E. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Bypass Baghouse (CE1263-2).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.
8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“F”).

10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
   (2) This current amendment becomes void.
11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>7900 Hickman Road, Suite 1</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Windsor Heights, IA 50324</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-A-563</td>
<td>10-555</td>
<td>Original Permit</td>
<td>12/10/10</td>
<td>No</td>
</tr>
<tr>
<td>10-A-563-S1</td>
<td>15-050</td>
<td>Add PM2.5 and SO2 emission limits</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 15-A-200-S1

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
   Director of Environmental Services

(563) 264-4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
   Senior Vice President

Permitted Equipment

Emission Point ID: EP200N

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>See</td>
<td>North Steep House – see Condition 3</td>
<td>Process Design</td>
<td>Spray Chamber</td>
</tr>
<tr>
<td>Condition</td>
<td></td>
<td>Capacity of 75,000</td>
<td>Scrubber (CE2810-1)</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>bushels corn per day;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>See Condition 3</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
   Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-028</td>
<td>Add Additional Emission Units to Scrubber; Add PM, PM$<em>{10}$, PM$</em>{2.5}$ emission limits; Modify Stack Characteristics</td>
<td>Yes</td>
<td>04/12/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.23(^{3})</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.23(^{3})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.23(^{3,4})</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%(^5,6)</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_{2}))</td>
<td>2.80(^7)</td>
<td>NA</td>
<td>500 ppmv</td>
<td>RACT, 567 IAC 23.3(3)”e”</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>2.10(^3)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

\(^1\) The emission limit is expressed as the average of three (3) runs.
\(^2\) The emission limit is based on a twelve (12) month rolling total.
\(^3\) Limits restrict potential to emit below PSD significance levels, and Project 17-028 is considered a minor modification for the purposes of PSD.
\(^4\) The emission limit used in facility wide PM\(_{2.5}\) dispersion modeling analysis that indicates predicted attainment of the PM\(_{2.5}\) National Ambient Air Quality Standards (NAAQS).
\(^5\) The emission limit is based on a six (6) minute average.
\(^6\) An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
\(^7\) The SO\(_{2}\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_{2}\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Test</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>Performance Test(^1)</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>Performance Test(^1)</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO(_{2})</td>
<td>Performance Test</td>
<td>Once Every 3</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Calendar Years(^3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>Performance Test</td>
<td>One Time</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

\(^1\) It is acceptable to test for PM and to assume that all PM emissions are PM\(_{10}\) and PM\(_{2.5}\) emissions.

\(^2\) After the initial performance test, performance testing for SO\(_{2}\) shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the SO\(_{2}\) emission limit in Condition 1, the owner or operator may request to modify the performance testing frequency for SO\(_{2}\).

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall verify compliance with the emission limitations contained in Permit Condition 1 within one hundred and eighty (180) days after installation of the Spray Chamber Scrubber (CE2810-1) is completed.
2. Compliance Demonstration(s) (Continued)

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, unobstructed</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>46 inches</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>125°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>19,405 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU2810.0 – EU2833.0</td>
<td>Corn Wet Mill Steep Tanks 1-24</td>
<td>3050 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2834.0 – EU2839.0</td>
<td>Corn Wet Mill Steep Tanks 25-30</td>
<td>4550 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2895.1</td>
<td>#1 and #2 Wet Mill Grind Bins</td>
<td>40 tons corn per hour (each bin)</td>
</tr>
<tr>
<td>EU2896.1</td>
<td>#6 Wet Mill Grind Bin</td>
<td>40 tons corn per hour</td>
</tr>
<tr>
<td>EU2895.11, EU2895.12</td>
<td>Set 1 – Grind Tank #1 and Tank #2</td>
<td>40 tons corn per hour (each tank)</td>
</tr>
<tr>
<td>EU2895.21, EU2895.22</td>
<td>Set 2 – Grind Tank #1 and Tank #2</td>
<td>40 tons corn per hour (each tank)</td>
</tr>
<tr>
<td>EU2895.61, EU2895.62</td>
<td>Set 6 – Grind Tank #1 and Tank #2</td>
<td>40 tons corn per hour (each tank)</td>
</tr>
<tr>
<td>EU ID</td>
<td>Description</td>
<td>Maximum Rated Capacity</td>
</tr>
<tr>
<td>------------------</td>
<td>--------------------------------------------------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>EU2899.1, EU2899.3, EU2899.4</td>
<td>Wet Mill Germ Presses #1&amp;#2, #3, #4</td>
<td>100 tons wet corn per hour (each press)</td>
</tr>
<tr>
<td>EU2899.5</td>
<td>Wet Mill Germ Press #5</td>
<td>138 tons wet corn per hour</td>
</tr>
<tr>
<td>EU2896.1</td>
<td>Small Reels Tank</td>
<td>100 tons corn per hour</td>
</tr>
<tr>
<td>EU2896.2</td>
<td>120 Degree Tank</td>
<td>100 tons corn per hour</td>
</tr>
<tr>
<td>EU2896.3</td>
<td>Big Reels Tank</td>
<td>100 tons corn per hour</td>
</tr>
<tr>
<td>EU2896.4</td>
<td>60 Degree Tank</td>
<td>100 tons corn per hour</td>
</tr>
<tr>
<td>EU2896.5</td>
<td>Steepwater Tank</td>
<td>360,000 gallon storage capacity</td>
</tr>
<tr>
<td>EU2801.1</td>
<td>West Double Runner Tanks</td>
<td>100 tons corn per hour</td>
</tr>
<tr>
<td>EU2898.1</td>
<td>North Wet Corn Drag Vent Fan</td>
<td>75,000 bushels per day</td>
</tr>
<tr>
<td>EU2898.4</td>
<td>Wet Germ Hopper Vent Fan</td>
<td>100 tons corn per hour</td>
</tr>
</tbody>
</table>

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The Spray Chamber Scrubber (CE2810-1) shall be installed by December 31, 2017 to control SO₂ emissions from the emission units covered by this construction permit.

   i. The owner or operator shall maintain a record of the completion date for the installation of the Spray Chamber Scrubber (CE2810-1).

B. Sodium bisulfite (NaHSO₃) shall be used as a steeping additive for the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0). Prior to using any other steeping additive as a substitute for sodium bisulfite in the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0), the owner or operator shall apply for, and obtain, a modification to this construction permit.

C. The concentration of sodium bisulfite in the solution added to the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0) shall not exceed 42% by weight.

   i. The owner or operator shall maintain a record of a Safety Data Sheet or other supplier information that shows the weight percent of sodium bisulfite in the liquid solution added to the steeping tanks.
D. The amount of sodium bisulfite added on a wet basis to the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0) shall not exceed 0.40 pounds per bushel of corn on a monthly basis.
   
   i. The owner or operator shall maintain the following daily records for the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0):
      a. The total amount of sodium bisulfite added on a wet basis to the tanks, in pounds; and
      b. The total amount of corn loaded into the tanks, in bushels.
   
   ii. For the Corn Wet Milling Steeping Tanks 1-62 (EU2810.0 – EU2871.0), the owner or operator shall calculate and record for each calendar month the amount of sodium bisulfite added on a wet basis per bushel of corn (pounds NAHSO₃ per bushel).

E. All emission units specified in Condition 3 of this permit shall be enclosed so that SO₂ emissions are captured and vented to the control system. At a minimum, the enclosure shall meet Conditions E.i. through E.iii. for the emission units covered by this permit.

   i. Each emission unit is enclosed at all times during its operation except for process inspections and testing.
   
   ii. Access lids or hatches shall be maintained in good condition and shall completely cover equipment openings. The lids and hatches shall be closed except for periods of process inspections and testing.
   
   iii. The capture system shall be maintained under negative pressure at all times; i.e. the direction of air flow through any opening shall be into the capture system at all times.

F. The owner or operator shall develop and implement an operating and monitoring plan to ensure SO₂ emissions are captured and vented to the control system at all times during operation. The owner or operator may update the facility’s existing operating and monitoring plan to satisfy this requirement. The plan shall include, at a minimum, the following:

   i. Operators Training Plan: A plan that includes training of operators on the proper function of the equipment’s enclosure system and on how to identify and correct deficiencies.
   
   ii. Periodic Inspection Plan: A plan for periodic inspections of the equipment, enclosures and capture system to ensure proper operation. The inspection may be done by portable sampling equipment or by other methods developed by the owner or operator. The plan shall include all records related to periodic inspection such as date, inspection method, and results.
   
   iii. Corrective Action Plan: A plan that details corrective action(s) that shall be made to the equipment, enclosure, or capture system if the system is not properly capturing SO₂ emissions. The plan shall include all records related to any corrective actions taken.

G. The total flowrate of the Spray Chamber Scrubber (CE2810-1) liquor shall be maintained at or above 1000 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE2810-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   
   ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE2810-1), in gallons per minute. If the liquor flow rate to the Spray Chamber Scrubber (CE2810-1) falls below the value specified in Condition 5G, the owner or operator shall investigate the Spray Chamber Scrubber (CE2810-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2810-1) is not in operation.
H. The pH range of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-1) shall be maintained between 5 and 8.
   i. The owner or operator shall properly operate and maintain equipment to monitor the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-1) continuously. If the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-1) falls outside the range specified in Condition 5H, the owner or operator shall investigate the Spray Chamber Scrubber (CE2810-1) and make corrections to them. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2810-1) are not in operation.

I. The owner or operator shall develop an operating and maintenance plan for the Spray Chamber Scrubber (CE2810-1) including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   a. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Spray Chamber Scrubber (CE2810-1).

J. No later than sixty (60) days after Wet Mill Bins #1, #2, #3, #4, #5, #6 (EU2895.1, EU2895.2, EU2895.3, EU2895.4, EU2895.5, EU2985.6) are connected to Spray Chamber Scrubber (CE2810-1) and Spray Chamber Scrubber (CE2810-2), the owner or operator shall submit a letter to the Department requesting that air construction permit 15-A-209 (EP279.0) be rescinded.

K. No later than sixty (60) days after the Wet Mill Steepwater Tank is connected to Spray Chamber Scrubber (CE2810-1), the owner or operator shall submit a letter to the Department requesting that air construction permit 15-A-202 (EP264.0) be rescinded.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.
Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(f))

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.
An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

1. Per 567 IAC 22.3(3)“b”:
   a. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   b. The actual date of startup, postmarked within fifteen (15) days following the start of operation.

2. Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   a. At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   b. At least seven (7) days before equipment relocation.

3. Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

4. Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

   If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E. 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-200</td>
<td>16-028</td>
<td>Wet Mill Steep Tanks (EU2810.0 – EU2839.0)</td>
<td>03/25/16</td>
<td>Yes</td>
</tr>
<tr>
<td>15-A-209</td>
<td>15-050</td>
<td>Permit Units to limit SO2 emissions; add scrubber</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
<tr>
<td>15-A-202</td>
<td>15-050</td>
<td>Steep Water Tank (EU2896.0)</td>
<td>12/10/15</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Permit Unit to limit SO2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 15-A-201-S1

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

(563) 264-4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP200S

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>See</td>
<td>South Steep House - see Condition 3</td>
<td>Process Design</td>
<td>Spray Chamber</td>
</tr>
<tr>
<td>Condition 3</td>
<td></td>
<td>Capacity of 101,000</td>
<td>Scrubber (CE2810-2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>bushels corn per day;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>See Condition 3</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-028</td>
<td>Add Additional Emission Units to Scrubber; Add PM, PM_{10}, PM_{2.5} emission limits; Modify Stack Characteristics</td>
<td>Yes</td>
<td>04/12/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.22(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.22(^3)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.22(^3,4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%(^5,6)</td>
<td>567 IAC 23.3(2)(^{d})</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>3.17(^7)</td>
<td>NA</td>
<td>500 ppm(_e)</td>
<td>RACT, 567 IAC 23.3(3)(^{e})</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>2.20(^3)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

\(^1\) The emission limit is expressed as the average of three (3) runs.
\(^2\) The emission limit is based on a twelve (12) month rolling total.
\(^3\) Limits restrict potential to emit below PSD significance levels, and Project 17-028 is considered a minor modification for the purposes of PSD.
\(^4\) The emission limit used in facility wide PM\(_{2.5}\) dispersion modeling analysis that indicates predicted attainment of the PM\(_{2.5}\) National Ambient Air Quality Standards (NAAQS).
\(^5\) The emission limit is based on a six (6) minute average.
\(^6\) An exceedance of the indicator opacity of “no visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
\(^7\) The SO\(_2\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Test</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>Performance Test(^1)</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>Performance Test(^1)</td>
<td>One Time</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO(_2)</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years(^2)</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>Performance Test</td>
<td>One Time</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

\(^1\) It is acceptable to test for PM and to assume that all PM emissions are PM\(_{10}\) and PM\(_{2.5}\) emissions.
\(^2\) After the initial performance test, performance testing for SO\(_2\) shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the SO\(_2\) emission limit in Condition 1, the owner or operator may request to modify the performance testing frequency for SO\(_2\).

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall verify compliance with the emission limitations contained in Permit Condition 1 within one hundred and eighty (180) days after installation of the Spray Chamber Scrubber (CE2810-2) is completed.
2. Compliance Demonstration(s) (Continued)

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, unobstructed</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>46 inches</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>125°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>18,120 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU2840.0 – EU2851.0</td>
<td>Corn Wet Mill Steep Tanks 31-42</td>
<td>4550 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2852.0 – EU2859.0</td>
<td>Corn Wet Mill Steep Tanks 43-50</td>
<td>6700 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2860.0 – EU2867.0</td>
<td>Corn Wet Mill Steep Tanks 51-58</td>
<td>4550 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2868.0 – EU2871.0</td>
<td>Corn Wet Mill Steep Tanks 59-62</td>
<td>6700 Bushels corn (each tank)</td>
</tr>
<tr>
<td>EU2895.3</td>
<td>#3 Wet Mill Grind Bin</td>
<td>40 tons corn per hour</td>
</tr>
<tr>
<td>EU2895.4</td>
<td>#4 Wet Mill Grind Bin</td>
<td>40 tons corn per hour</td>
</tr>
<tr>
<td>EU2895.5</td>
<td>#5 Wet Mill Grind Bin</td>
<td>40 tons corn per hour</td>
</tr>
</tbody>
</table>
### 4. Federal Standards

**A. New Source Performance Standards (NSPS):**

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

**B. National Emission Standards for Hazardous Air Pollutants (NESHAP):**

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

### 5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

**A. The Spray Chamber Scrubber (CE2810-2) shall be installed by January 31, 2018 to control SO$_2$ emissions from the emission units covered by this construction permit.**

   **i.** The owner or operator shall maintain a record of the completion date for the installation of the Spray Chamber Scrubber (CE2810-2).

**B. Sodium bisulfite (NaHSO$_3$) shall be used as a steeping additive for the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0). Prior to using any other steeping additive as a substitute for sodium bisulfite in the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0), the owner or operator shall apply for, and obtain, a modification to this construction permit.**

**C. The concentration of sodium bisulfite in the solution added to the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0) shall not exceed 42% by weight.**

   **i.** The owner or operator shall maintain a record of a Safety Data Sheet or other supplier information that shows the weight percent of sodium bisulfite in the liquid solution added to the steeping tanks.

**D. The amount of sodium bisulfite added on a wet basis to the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0) shall not exceed 0.40 pounds per bushel of corn on a monthly basis.**

   **i.** The owner or operator shall maintain the following daily records for the Corn Wet Mill Steeping Tanks 1-62 (EU2810.0 – EU2871.0):

      a. The total amount of sodium bisulfite added on a wet basis to the tanks, in pounds; and

      b. The total amount of corn loaded into the tanks, in bushels.

   **ii.** For the Corn Wet Milling Steeping Tanks 1-62 (EU2810.0 – EU2871.0), the owner or operator shall calculate for each calendar month the amount of sodium bisulfite added on a wet basis per bushel of corn (pounds NAHSO$_3$ per bushel).
E. All emission units specified in Condition 3 of this permit shall be enclosed so that SO₂ emissions are captured and vented to the control system. At a minimum, the enclosure shall meet Conditions E.i. through E.iii. for the emission units covered by this permit.

   i. Each emission unit is completely enclosed at all times during its operation except for process inspections and testing.

   ii. Access lids or hatches shall be maintained in good condition and shall completely cover equipment openings. The lids and hatches shall be closed except for periods of process inspections and testing.

   iii. The capture system shall be maintained under negative pressure at all times; i.e. the direction of air flow through any opening shall be into the capture system at all times.

F. The owner or operator shall develop and implement an operating and monitoring plan to ensure SO₂ emissions are captured and vented to the control system at times during operation. The owner or operator may update the facility’s existing operating and monitoring plan to satisfy this requirement. The plan shall include, at a minimum, the following:

   i. Operators Training Plan: A plan that includes training of operators on the proper function of the equipment’s enclosure system and on how to identify and correct deficiencies.

   ii. Periodic Inspection Plan: A plan for periodic inspections of the equipment, enclosures and capture system to ensure proper operation. The inspection may be done by portable sampling equipment or by other methods developed by the owner or operator. The plan shall include all records related to periodic inspection such as date, inspection method, and results.

   iii. Corrective Action Plan: A plan that details corrective action(s) that shall be made to the equipment, enclosure or capture system if the system is not operating properly capturing SO₂ emissions. The plan shall include all records related to any corrective actions taken.

G. The total flowrate of the Spray Chamber Scrubber (CE2810-2) liquor shall be maintained at or above 1000 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE2810-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE2810-2), in gallons per minute. If the liquor flow rate to the Spray Chamber Scrubber (CE2810-1) falls below the value specified in Condition 5G, the owner or operator shall investigate the Spray Chamber Scrubber (CE2810-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2810-2) is not in operation.

H. The pH range of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-2) shall be maintained between 5 and 8.

   i. The owner or operator shall properly operate and maintain equipment to monitor the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-2) continuously. If the pH of the scrubbing liquor in the Spray Chamber Scrubber (CE2810-2) falls outside the range specified in Condition 5H, the owner or operator shall investigate the Spray Chamber Scrubber (CE2810-2) and make corrections to them. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2810-2) are not in operation.
I. The owner or operator shall develop an operating and maintenance plan for the Spray Chamber Scrubber (CE2810-2) including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Spray Chamber Scrubber (CE2810-2).

J. No later than sixty (60) days after Wet Mill Bins #1, #2, #3, #4, #5, #6 (EU2895.1, EU2895.2, EU2895.3, EU2895.4, EU2895.5, EU2985.6) are connected to Spray Chamber Scrubber (CE2810-1) and Spray Chamber Scrubber (CE2810-2), the owner or operator shall submit a letter to the Department requesting that air construction permit 15-A-209 (EP279.0) be rescinded.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).
10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
   (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
      (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
(b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3) “f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
   (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E. 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>
13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-200</td>
<td>16-028</td>
<td>Wet Mill Steep Tanks (EU2840.0 – EU2871.0)</td>
<td>03/25/16</td>
<td>Yes</td>
</tr>
<tr>
<td>15-A-209</td>
<td>15-050</td>
<td>Wet Mill Bins (EU2895.1 – EU2895.6)</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 17-A-298

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director Environmental Services
(563) 264-4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP296.0 (North)

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>2801.0</td>
<td>#1 Wet Germ Transfer System with Product Recovery Cyclone (CE2801-1)</td>
<td>6.65 tons/hr dry germ</td>
<td>See Condition 3</td>
</tr>
<tr>
<td>2802.0</td>
<td>#1 Germ Dryer (North Top) with Product Recovery Cyclone (CE2802-1)</td>
<td>6.65 tons/hr dry germ</td>
<td></td>
</tr>
<tr>
<td>2802.1</td>
<td>#2 Germ Dryer (North Bottom) with Product Recovery Cyclone (CE2802-1)</td>
<td>13.3 tons/hr dry germ</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-028</td>
<td>Combine EP14.0 and EP15.0; Install New Scrubber</td>
<td>Yes</td>
<td>04/12/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.96$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.96$^4$</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.60$^{4,5}$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^6,7$</td>
<td>567 IAC 23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>3.8$^8$</td>
<td>NA</td>
<td>500 ppmv</td>
<td>RACT, 567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>9.69$^{9,10}$</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1 The emission limit is expressed as the average of three (3) runs.
2 The emission limit is based on a twelve (12) month rolling total.
3 The PM emission limit maintains emission limits established for EU2802.0 (Dryer #1) and EU2802.1 (Dryer #2) in projects 79-222 and 79-265 to keep projects minor for LAER.
4 The limits restrict potential to emit below PSD significance levels, and Project 17-028 is considered a minor modification for the purposes of PSD.
5 The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
6 The emission limit is based on a six (6) minute average.
7 An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8 The SO$_2$ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9 VOC emission limit established to maintain project 17-028 below significant net emissions increase for purposes of PSD review.
10 Requested emission limit maintains project 17-028 (#1 Germ Transfer, #1 Germ Dryer, #2 Germ Dryer (EU2801.0, EU2802.0, EU2802.1)) below PSD significance rate.

2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years$^1$</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>Performance Test$^2$</td>
<td>Once Every 3 Calendar Years$^1$</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Performance Test$^3$</td>
<td>Once Every 3 Calendar Years$^1$</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years$^1$</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1 After the initial performance test, performance testing for PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ emission limits in Condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM$_{10}$, PM$_{2.5}$, opacity, and SO$_2$.
2 It is acceptable to test for PM and to assume that all PM emissions are PM$_{10}$ emissions.
2. Compliance Demonstration(s) (Continued)

If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM$_{2.5}$ limit as specified in Condition 10 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM$_{2.5}$ fraction shall be determined by conducting internal particle sizing of the dried germ product (immediately following the dryer) to determine the PM$_{2.5}$ fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM$_{2.5}$.

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 by no later than one hundred and eighty (180) days after the issuance date of this permit. The previous performance test was conducted on November 30, 2017.

If any additional stack testing beyond an initial test (i.e., quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, unobstructed</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>42 inches</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>160°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>12,170 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
The following emission units and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1 Wet Germ Transfer System with Product Recovery Cyclone</td>
<td>Venturi Scrubber w/ Mist Eliminator</td>
</tr>
<tr>
<td>(EU 2801.0)</td>
<td>(CE2802-2)</td>
</tr>
<tr>
<td>#1 Germ Dryer (North Top) with Product Recovery Cyclone</td>
<td>Spray Chamber Scrubber (CE2802-3)</td>
</tr>
<tr>
<td>(EU 2802.0)</td>
<td></td>
</tr>
<tr>
<td>#2 Germ Dryer (North Bottom) with Product Recovery Cyclone</td>
<td></td>
</tr>
<tr>
<td>(EU 2802.1)</td>
<td></td>
</tr>
</tbody>
</table>

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The total flowrate of the Venturi Scrubber’s (CE2802-2) liquor shall be maintained at or above 130 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to Venturi Scrubber (CE2802-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Venturi Scrubber (CE2802-2), in gallons per minute. If the liquor flow rate to the Venturi Scrubber (CE2802-2) falls below the value specified in Condition 5A, the owner or operator shall investigate the Venturi Scrubber (CE28402-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2802-2) is not in operation.

B. The differential pressure drop across the Venturi Scrubber (CE2802-2) shall be maintained between 11 and 20 inches of water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Venturi Scrubber (CE2802-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall continuously collect and record the pressure drop across the Venturi Scrubber (CE2802-2), in inches of water column. If the pressure drop across the Venturi Scrubber (CE2802-2) falls outside the range specified in Condition 5B, the owner or operator shall investigate the Venturi Scrubber (CE2802-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2802-2) is not in operation.
C. The pH range of the scrubbing liquor in the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber shall be maintained between 5 and 8.
   i. The owner or operator shall properly operate and maintain equipment to monitor the pH of the scrubbing liquor in the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pH of the scrubbing liquor for the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3) continuously. If the pH of the scrubbing liquor in the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3) falls outside the range specified in Condition 5C., the owner or operator shall investigate the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3) and make corrections to them. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3) are not in operation.

D. The total flowrate of the Spray Chamber Scrubber (CE2802-3) liquor shall be maintained at or above 600 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE2802-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE2802-3), in gallons per minute. If the liquor flow rate to the Spray Chamber Scrubber (CE2802-3) falls below the value specified in Condition 5D, the owner or operator shall investigate the Spray Chamber Scrubber and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2802-3) is not in operation.

E. The owner or operator shall develop an operating and maintenance plan for the cyclones (CE2801-1 and CE2802-1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the cyclones (CE2801-1 and CE2802-1).

F. The owner or operator shall develop an operating and maintenance plan for the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3) including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Venturi Scrubber (CE2802-2) and the Spray Chamber Scrubber (CE2802-3).

G. No later than sixty (60) days after the issuance date of construction permit 17-A-298, the owner or operator shall submit a letter to the Department requesting that air construction permits 15-A-078 (EP14.0) and 79-A-194-S2 (EP15.0) be rescinded.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.
No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.
11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
(a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
(b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
(a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
(b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Address</th>
<th>Telephone</th>
<th>Fax</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Bureau</td>
<td>(515) 725-8200</td>
<td>(515) 725-9501</td>
</tr>
<tr>
<td>Iowa Department of Natural Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>502 E. 9th Street</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DNR Field Office 6</td>
<td>(319) 653-2135</td>
<td>(319) 653-2856</td>
</tr>
<tr>
<td>1023 West Madison</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington, IA 52353</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-078</td>
<td>15-050</td>
<td>#1 Wet Germ Transfer System (EU2801.0)</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
<tr>
<td>79-A-194</td>
<td>79-265</td>
<td>#1 and #2 Germ Dryers (EU2802.0, EU2802.1)</td>
<td>08/17/79</td>
<td>No</td>
</tr>
<tr>
<td>79-A-194-S1</td>
<td>95-266</td>
<td>Original Permit</td>
<td>09/18/95</td>
<td>No</td>
</tr>
<tr>
<td>79-A-194-S2</td>
<td>15-050</td>
<td>Add PM10 and PM2.5 Emission Limits; Add Scrubber; Modify SO2 Limit; Modify EU Description</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 17-A-299

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director Environmental Services
(563) 264-4569
mick.durham@grainprocessing.com
1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior VP of Operations

Permitted Equipment

Emission Point ID: EP297.0 (South)

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Process Design Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>2803.0</td>
<td>#2 Wet Germ Transfer System with Product Recovery Cyclone (CE2803-1)</td>
<td>6.65 tons/hr dry germ¹</td>
<td>See Condition 3</td>
</tr>
<tr>
<td>2804.0</td>
<td>#3 Germ Dryer (South Top) with Product Recovery Cyclone (CE2804-1)</td>
<td>6.65 tons/hr dry germ¹</td>
<td></td>
</tr>
<tr>
<td>2807.0</td>
<td>#4 Germ Dryer (South Bottom) with Product Recovery Cyclone (CE2807-1)</td>
<td>13.3 tons/hr dry germ</td>
<td></td>
</tr>
</tbody>
</table>

¹ Maximum rated capacity is 9.0 tons/hr, dry germ

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-028</td>
<td>Combine EP96.0, EP97.0, EP126.0; Install New Scrubber</td>
<td>Yes</td>
<td>04/12/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1a. Emission Limits – emission point EP297.0

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.58$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.58$^3$</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.48$^{3,4}$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^5,6$</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>2.05$^7$</td>
<td>NA</td>
<td>500 ppm$_v$</td>
<td>RACT, 567 IAC 23.3(3)”e”</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>10.4$^{5,9}$</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1 The emission limit is expressed as the average of three (3) runs.
2 The emission limit is based on a twelve (12) month rolling total.
3 Limits restrict potential to emit below PSD significance levels, and Project 17-028 is considered a minor modification for the purposes of PSD.
4 The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
5 The emission limit is based on a six (6) minute average.
6 An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
7 The SO$_2$ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
8 VOC emission limit established to maintain project 17-028 below significant net emissions increase for purposes of PSD review.
9 Requested emission limit maintains project 17-028 ( #2 Germ Transfer, #3 Germ Dryer, #4 Germ Dryer (EU2803.0, EU2804.0, EU2807.0)) below PSD significance rate.

1b. Lowest Achievable Emission Rate (LAER) Emission Limits – Germ Dryer #4

The following emission limit shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Additional Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) - State</td>
<td>0.42$^3$</td>
<td>NA</td>
<td>NA</td>
<td>567 IAC 31.20(1)”d”, LAER</td>
</tr>
</tbody>
</table>

1 The emission limit is expressed as the average of three (3) runs.
2 The emission limit is a twelve (12) month rolling total.
3 The PM emission limit maintains emission limits established for EU2807.0 (Dryer #4) in project 79-222 and 79-265 to keep the project minor for LAER.
2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State: EP297.0</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM – State: EU2807.0, Dryer 4</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>Performance Test</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1 Performance testing for PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ shall be conducted once every 3 calendar years. A performance test was conducted on November 29, 2017. Therefore, the next performance test is required to be conducted by no later than November 29, 2020. After completion of three consecutive performance tests that demonstrate compliance with the PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ emission limits in Condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM$_{10}$, PM$_{2.5}$, opacity, and SO$_2$.

2 It is acceptable to test for PM and to assume that all PM emissions are PM$_{10}$ emissions.

3 If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM$_{2.5}$ limit as specified in Condition 10 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM$_{2.5}$ fraction shall be determined by conducting internal particle sizing of the dried germ product (immediately following the dryer) to determine the PM$_{2.5}$ fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM$_{2.5}$.

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 by no later than November 29, 2020. The previous performance test was conducted on November 29, 2017.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.
2. Compliance Demonstration(s) (Continued)

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical, unobstructed</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>42 inches</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>160°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>13,800 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following emission units and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>#2 Wet Germ Transfer System with Product Recovery Cyclone (EU 2803.0)</td>
<td>Venturi Scrubber w/ Mist Eliminator (CE2804-2)</td>
</tr>
<tr>
<td>#3 Germ Dryer (South Top) with Product Recovery Cyclone (EU 2804.0)</td>
<td>Spray Chamber Scrubber (CE2804-3)</td>
</tr>
<tr>
<td>#4 Germ Dryer (South Bottom) with Product Recovery Cyclone (EU 2807.0)</td>
<td></td>
</tr>
</tbody>
</table>

4. Federal Standards

A. New Source Performance Standards (NSPS):

These emission units are not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

These emission units are not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The total flowrate of the Venturi Scrubber’s (CE2804-2) liquor shall be maintained at or above 130 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to Venturi Scrubber (CE2804-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Venturi Scrubber (CE2804-2), in gallons per minute. If the liquor flow rate to the Venturi Scrubber (CE2804-2) falls below the value specified in Condition 5A, the owner or operator shall investigate the Venturi Scrubber (CE2804-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2804-2) is not in operation.

B. The differential pressure drop across the Venturi Scrubber (CE2804-2) shall be maintained between 16 and 25 inches of water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Venturi Scrubber (CE2804-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall continuously collect and record the pressure drop across the Venturi Scrubber (CE2804-2), in inches of water column. If the pressure drop across the Venturi Scrubber (CE2804-2) falls outside the range specified in Condition 5B., the owner or operator shall investigate the Venturi Scrubber (CE2804-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2804-2) is not in operation.

C. The pH range of the scrubbing liquor in the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) shall be maintained between 5 and 8.
   i. The owner or operator shall properly operate and maintain equipment to monitor the pH of the scrubbing liquor in the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pH of the scrubbing liquor for the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) continuously. If the pH of the scrubbing liquor in the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) falls outside the range specified in Condition 5C., the owner or operator shall investigate the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) and make corrections to them. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) are not in operation.

D. The total flowrate of the Spray Chamber Scrubber (CE2804-3) liquor shall be maintained at or above 590 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE2804-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
ii. The owner or operator shall continuously collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE2804-3), in gallons per minute. If the liquor flow rate to the Spray Chamber Scrubber (CE2804-3) falls below the value specified in Condition 5D, the owner or operator shall investigate the Spray Chamber Scrubber (CE2804-3) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE2804-3) is not in operation.

E. The owner or operator shall develop an operating and maintenance plan for the cyclones (CE2803-1, CE2804-1, CE2807-1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the cyclones (CE2803-1, CE2804-1, and CE2807-1).

F. The owner or operator shall develop an operating and maintenance plan for the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3) including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Venturi Scrubber (CE2804-2) and the Spray Chamber Scrubber (CE2804-3).

G. No later than sixty (60) days after the issuance date of construction permit 17-A-299, the owner or operator shall submit a letter to the Department requesting that air construction permits 74-A-014-S1 (EP96.0), 74-A-015-S2 (EP97.0), and 79-A-195-S2 (EP126.0) be rescinded.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.
9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

1. Per 567 IAC 22.3(3)“b”:
   
   a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   
   b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

2. Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:

   a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.

   b) At least seven (7) days before equipment relocation.

3. Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:

   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

4. Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:

   • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

   If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E. 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>74-A-014</td>
<td>74-017</td>
<td>Original Permit</td>
<td>01/16/74</td>
<td>No</td>
</tr>
<tr>
<td>74-A-014-S1</td>
<td>15-050</td>
<td>Add PM_{10}, PM_{2.5} and SO\textsubscript{2} Emission Limits</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
<tr>
<td>74-A-015</td>
<td>74-018</td>
<td>Original Permit</td>
<td>01/16/74</td>
<td>No</td>
</tr>
<tr>
<td>74-A-015-S1</td>
<td>95-266</td>
<td>Add SO\textsubscript{2} Emission Limit</td>
<td>09/18/95</td>
<td>No</td>
</tr>
<tr>
<td>74-A-015-S2</td>
<td>15-050</td>
<td>Add PM_{10} and PM_{2.5} Emission Limits; Modify SO\textsubscript{2} Emission Limit; Add Scrubber; Re-identify EU</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
<tr>
<td>79-A-195</td>
<td>79-222</td>
<td>Original Permit</td>
<td>08/17/79</td>
<td>Yes</td>
</tr>
<tr>
<td>79-A-195-S1</td>
<td>95-266</td>
<td>Add SO\textsubscript{2} Emission Limit</td>
<td>09/18/95</td>
<td>No</td>
</tr>
<tr>
<td>79-A-195-S2</td>
<td>15-050</td>
<td>Add PM_{10} and PM_{2.5} Emission Limits; Add Wet Scrubber; Modify SO\textsubscript{2} Limit; Re-identify EU</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 15-A-213-S2

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA  52761

Permitted Equipment

Emission Point ID: EP 311.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1236.0</td>
<td>Dryer House 4, Rotary Dryer #5</td>
<td>4.25 tons of dried feed per hour</td>
<td></td>
</tr>
<tr>
<td>EU1238.0</td>
<td>Dryer House 4, Rotary Dryer #6</td>
<td>6.65 tons of dried feed per hour</td>
<td>See condition 3 for emission unit and control equipment list</td>
</tr>
<tr>
<td>EU1241.0</td>
<td>Dryer House 4, Rotary Dryer #7</td>
<td>6.65 tons of dried feed per hour</td>
<td></td>
</tr>
<tr>
<td>See condition 3</td>
<td>Dryer House 4 Building Aspiration System</td>
<td>17.55 tons of dried feed per hour</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA  52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20-197</td>
<td>Amend PM2.5 Rate, Exhaust Flow &amp; Temperature</td>
<td>Yes</td>
<td>12/22/20</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1a. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP311.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>5.7(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf(^4)</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>5.7(^3,4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>4.30(^5,10)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%(^6,7)</td>
<td>23.3(2)(^{d})</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>2.10(^8,9)</td>
<td>NA</td>
<td>90% Control Efficiency or 10 ppm(_{v,d})(^1,10,11)</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>98% Control Efficiency or 10 ppm(_{v,d})(^1,3,10,12)</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit restricts potential PM, PM\(_{10}\), PM\(_{2.5}\) and VOC emission below PSD significance levels and Projects 15-087/17-159 are considered a minor modification for the purposes of PSD.
4. The emission limit used in facility wide PM\(_{10}\) dispersion modeling analysis that indicates predicted attainment of the PM\(_{10}\) National Ambient Air Quality Standards (NAAQS).
5. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. Limit restricts potential SO\(_2\) emissions below NA-NSR significance level and Project 15-087/17-159 are considered a minor modification for the purposes of NA-NSR.
9. The SO\(_2\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
10. The limit for PM\(_{2.5}\), SO\(_2\) and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVC020979, Iowa District Court for Muscatine County (March 27, 2014)].
11. Limit requires 90 percent control efficiency across Spray Chamber Scrubber (CE1236-2) and Spray Chamber Scrubber (CE1282-1) or SO\(_2\) concentration of 10 ppm\(_{v,d}\) from the outlet of EP311.0. Compliance with limit shall be demonstrated by measuring the SO\(_2\) concentration of the inlet and outlet and flowrate of Spray Chamber Scrubber (CE1236-2) and Spray Chamber Scrubber (CE1282-1) to determine control efficiency of each scrubber or measuring the outlet SO\(_2\) concentration from EP311.0. Control efficiency is defined as\[\left(\frac{\text{inlet m}}{\text{outlet m}}\right) \times 100\].
12. Limit requires 98 percent control efficiency across Regenerative Thermal Oxidizer (CE1236-3) or VOC concentration of 10 ppm\(_{v,d}\) from the outlet of EP311.0. Compliance with limit shall be demonstrated by measuring the inlet and outlet VOC concentration and flowrate of Regenerative Thermal Oxidizer (CE1236-3) to determine control efficiency of Regenerative Thermal Oxidizer (CE1236-3) or measuring the outlet VOC concentration from EP311.0. Control efficiency is defined as\[\left(\frac{\text{inlet m}}{\text{outlet m}}\right) \times 100\].
### 1b. Other Emission Limits

The following emission limits for DH4 Feed Dryer #5 (EU1236.0) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>1.41(^3)</td>
<td>NA</td>
<td>NA</td>
<td>31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit established when the Muscatine Area was designated non-attainment for TSP (PM). Any relaxation in the Lowest Achievable Emission Rates (LAER) after the Muscatine Area is redesignated attainment for TSP (PM) is subject to review under the PSD regulations in effect at the time the relaxation occurs.

The following emission limits for DH4 Feed Dryer #6 (EU1238.0) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>NA</td>
<td>NA</td>
<td>0.1 gr/scf(^3)</td>
<td>31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit established when the Muscatine Area was designated non-attainment for TSP (PM). Any relaxation in the Lowest Achievable Emission Rates (LAER) after the Muscatine Area is redesignated attainment for TSP (PM) is subject to review under the PSD regulations in effect at the time the relaxation occurs.

The following emission limits for DH4 Feed Dryer #7 (EU1241.0) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>1.60(^3)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit restricts potential PM emissions below the PSD significance level and maintains Projects 90-082 as minor for the purposes of PSD.
2. Compliance Demonstration(s)

### Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years (^1)</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})(^2)</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years (^1)</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})(^3)</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years (^1)</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO(_2)</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years (^1)</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>Performance Testing</td>
<td>Once per Calendar Year (^4,5)</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

\(^1\) Performance testing for PM, PM\(_{10}\), PM\(_{2.5}\), and SO\(_2\) shall be conducted once every 3 calendar years. After the completion of three consecutive performance tests that demonstrate compliance with PM, PM\(_{10}\), PM\(_{2.5}\), and SO\(_2\) emission limits as specified in condition 1a, the owner or operator may request to modify the performance testing frequency for PM, PM\(_{10}\), PM\(_{2.5}\), and SO\(_2\). The next performance test for PM, PM\(_{10}\), PM\(_{2.5}\), and SO\(_2\) shall be completed by December 31, 2023.

\(^2\) Performance testing may be conducted for total particulate matter to demonstrate compliance with PM\(_{10}\) limit as specified in permit condition 1a.

\(^3\) If performance testing using methods specified in 40 CFR 51, Appendix M, 201A with 202 are not performed due high moisture content (stack saturation) then the owner or operator shall demonstrate compliance with PM\(_{2.5}\) limit as specified in permit condition 1a by conducting methods specified in 40 CFR 60, Appendix A, Method 5 and 40 CFR 51 Appendix M Method 202. Utilizing Method 5, the filterable PM\(_{2.5}\) fraction shall be determined by conducting internal particle sizing of the dried feed product (immediately following the feed dryers) to determine the PM\(_{2.5}\) fraction of the measured total filterable particulate. Utilizing Method 202, the measured condensable fraction shall be considered all PM\(_{2.5}\).

\(^4\) Performance testing for VOC shall be conducted once per calendar year. After the completion of two consecutive performance tests that demonstrate compliance with VOC emission limits as specified in condition 1a, the owner or operator may request to modify the performance testing frequency for VOC. The next performance test for VOC shall be completed by December 31, 2021.

\(^5\) As alternative, the owner or operator may elect to demonstrate RTO control efficiency using test method 40 CFR 60, Appendix A, Method 25A.

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.
2. Compliance Demonstration(s) (continued)

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>110 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>64 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>333 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>34,530 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
### 3. Emission Point Characteristics (continued)

The following emission unit and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>DH4 Rotary Dryer #5 (EU1236.0)</td>
<td>Expansion Chamber (CE1236-1)</td>
</tr>
<tr>
<td>DH4 Rotary Dryer #6 (EU1238.0)</td>
<td>Expansion Chamber (CE1238-1)</td>
</tr>
<tr>
<td>DH4 Rotary Dryer #7 (EU1241.0)</td>
<td>Expansion Chamber (CE1241-1)</td>
</tr>
<tr>
<td>Hulls Surry Tank Vent (EU1282.0)</td>
<td></td>
</tr>
<tr>
<td>East Thin Stillage Tank Vent (EU1285.0)</td>
<td></td>
</tr>
<tr>
<td>West Thin Stillage Tank (EU1285.1)</td>
<td></td>
</tr>
<tr>
<td>West C-400’s Thus Tank (EU1285.2)</td>
<td></td>
</tr>
<tr>
<td>East C-400’s Thrus Tank (Now Oil Tank) (EU1285.3)</td>
<td></td>
</tr>
<tr>
<td>R-2639-Emergency Syrup Tank (EU1285.4)</td>
<td></td>
</tr>
<tr>
<td>12-B Whole Stillage Tank Vent (EU1283.0)</td>
<td></td>
</tr>
<tr>
<td>MR2 Feed Tank (EU1284.1)</td>
<td></td>
</tr>
<tr>
<td>MR2 Condensate Tank Vent (EU1284.2)</td>
<td>Spray Chamber Scrubber (CE1282-1)</td>
</tr>
<tr>
<td>MR2 Non Condensibles Vent (EU1284.3)</td>
<td></td>
</tr>
<tr>
<td>#1 Alfa-Laval Decanter Centrifuge (EU1264.0)</td>
<td></td>
</tr>
<tr>
<td>ME-1204-R2662-#6 Sharples Decanter Centrifuge (EU1264.8)</td>
<td></td>
</tr>
<tr>
<td>ME-1204-R2663-#7 Sharples Decanter Centrifuge (EU1264.9)</td>
<td></td>
</tr>
<tr>
<td>DH4 Conveyors (EU1286.0): Spent Germ Conveyor, Dry Ingredients Conveyor, Dry Ingredients Drag, #3 &amp; #4</td>
<td>Regenerative Thermal Oxidizer (CE1236-3), Maximum Heat Input: 12.0 MMBtu/hr with Low NOx Burners</td>
</tr>
<tr>
<td>Sharples Discharge Screw Conveyors, #5</td>
<td></td>
</tr>
<tr>
<td>Rotary Product Conveyors #1 &amp; 2, #7 &amp; #8 C-400 Discharge Conveyors, #7 &amp; #8 C-400</td>
<td></td>
</tr>
<tr>
<td>Cross Conveyors, Combined Feed Collection Conveyor, Inclined Mixing Conveyor, #5, #6 &amp; #7 Rotaries Feed Conveyors, Overflow Drag #1, Rework Conveyors #1 &amp; #2, #5, Combined Rotaries Product Conveyors #1 &amp; #2, DH4 Mill Feed Draver Conveyor</td>
<td></td>
</tr>
</tbody>
</table>
4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

**DH4, Rotary Dryer #5 (EU 1236.0)**

A. The capacity of the DH4, Rotary Dryer #5 (EU 1236.0) is limited to 4.25 tons per hour of dry product.

B. The #5 Rotary Dryer Stub Feeder Conveyor speed shall not exceed 28.9 revolutions per minute (rpm) on a one (1) hour average which is 85% of the maximum conveyor speed of 34 rpm.

   i. The owner or operator shall properly operate and maintain equipment to continuously monitor the #5 Rotary Dryer Stub Feeder Conveyor motor speed. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and calculate the #5 Rotary Dryer Stub Feeder Conveyor speed, in revolutions per minute, continuously. This requirement shall not apply on the days that DH4, Rotary Dryer #5 is not in operation.

   iii. The owner or operator shall determine and track the hourly average #5 Rotary Dryer Stub Feeder Conveyor speed in revolutions per minute.

**Control Equipment-Scrubbers**

C. The Spray Chamber Scrubber (CE1236-2) total liquor flowrate shall be maintained at or above 55 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE1236-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE1236-2), in gallons per minute, continuously. If the total liquor flow rate to the Spray Chamber Scrubber (CE1236-2) falls below the value specified in Condition 5C, the owner or operator shall investigate the Spray Chamber Scrubber (CE1236-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE1236-2) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

D. The pH range of the scrubbing liquor in Spray Chamber Scrubber (CE1236-2) shall be maintained between 5 and 8.
   
i. The owner or operator shall properly operate and maintain equipment to monitor the scrubbing liquor pH to the Spray Chamber Scrubber (CE1236-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the scrubbing liquor pH in Spray Chamber Scrubber (CE1236-2), on a continuous basis. If the pH of the scrubbing liquor in Spray Chamber Scrubber (CE1236-2) falls outside the range specified in Condition 5D, the owner or operator shall investigate Spray Chamber Scrubber (CE1236-2) and make corrections to Spray Chamber Scrubber (CE1236-2). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Spray Chamber Scrubber (CE1236-2) is not in operation.

E. The Spray Chamber Scrubber (CE1282-1) total liquor flowrate shall be maintained at or above 165 gallons per minute.
   
i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Spray Chamber Scrubber (CE1282-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the total liquor flow rate to the Spray Chamber Scrubber (CE1282-1), in gallons per minute, continuously. If the total liquor flow rate to the Spray Chamber Scrubber (CE1282-1) falls below the value specified in Condition 5E, the owner or operator shall investigate the Spray Chamber Scrubber (CE1282-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE1282-1) is not in operation.

F. The pressure drop across Spray Chamber Scrubber (CE1282-1) shall be maintained between 0.1 to 5 inches of water column.
   
i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Spray Chamber Scrubber (CE1282-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across the Spray Chamber Scrubber (CE1282-1), in inches of water, continuously. If the pressure drop across the Spray Chamber Scrubber (CE1282-1) falls outside the range specified in Condition 5F, the owner or operator shall investigate the Spray Chamber Scrubber (CE1282-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Spray Chamber Scrubber (CE1282-1) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

G. The pH range of the scrubbing liquor in Spray Chamber Scrubber (CE1282-1) shall be maintained between 5 and 8.

   iii. The owner or operator shall properly operate and maintain equipment to monitor the scrubbing liquor pH to the Spray Chamber Scrubber (CE1282-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   iv. The owner or operator shall collect and record the scrubbing liquor pH in Spray Chamber Scrubber (CE1282-1), on a continuous basis. If the pH of the scrubbing liquor in Spray Chamber Scrubber (CE1282-1) falls outside the range specified in Condition 5G, the owner or operator shall investigate Spray Chamber Scrubber (CE1282-1) and make corrections to Spray Chamber Scrubber (CE1282-1). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Spray Chamber Scrubber (CE1282-1) is not in operation.

H. The owner or operator shall develop an operating and maintenance plan for Spray Chamber Scrubber (CE1236-2) and Spray Chamber Scrubber (CE1282-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Spray Chamber Scrubber (CE1236-2).

   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Spray Chamber Scrubber (CE1282-1).

Control Equipment-RTO

I. The owner or operator shall only bypass Regenerative Thermal Oxidizer (CE1236-3) for purposes of malfunction and/or maintenance for a maximum of 200 hours per twelve month rolling period.

   i. The owner or operator shall record the total hours and the cause of Regenerative Thermal Oxidizer (CE1236-3) bypass on a monthly basis. The owner or operator shall calculate and record the rolling 12-month totals.

J. The owner or operator shall maintain a Regenerative Thermal Oxidizer (CE1236-3) combustion chamber temperature to no less than 1600 degrees Fahrenheit based on a 3-hour block average.

   i. The owner or operator shall properly operate and maintain equipment to monitor the chamber temperature of Regenerative Thermal Oxidizer (CE1236-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the combustion chamber temperature of Regenerative Thermal Oxidizer (CE1236-3), in °F on a continuous basis. The owner or operator shall calculate and record the 3-hour block average of the combustion chamber temperature in °F. If the 3-hour block average combustion chamber temperature of Regenerative Thermal Oxidizer (CE1236-3) falls below the value specified in Condition 5I, the owner or operator shall investigate Regenerative Thermal Oxidizer (CE1236-3) and make corrections Regenerative Thermal Oxidizer (CE1236-3). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Regenerative Thermal Oxidizer (CE1236-3) is not in operation.

K. The owner or operator shall combust only natural gas or process off-gasses in Regenerative Thermal Oxidizer (CE1236-3).
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

L. The owner or operator shall develop an operating and maintenance plan for the Regenerative Thermal Oxidizer (CE1236-3), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Regenerative Thermal Oxidizer (CE1236-3).


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).
10. Construction

A. General Requirements:
It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:
(1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions
Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
       (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
           initiation of construction, installation, or alteration.
       (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
       one location to another, the Department shall be notified:
       (b) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
           area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (c) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
       thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the
         contact person, and the owner of the equipment both before and after the ownership change; and the
         construction permit number(s) of the equipment changing ownership.
   (4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
       in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
       monitor [567 IAC 25.1(7)]. The notification shall include:
       • The time; the place; the name of the person who will conduct the tests; and other information as required by
         the Department.
       If the owner or operator does not provide timely notice to the Department, the Department shall not consider the
       test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules
       or permit conditions. Upon written request, the Department may allow a notification period of less than thirty
       (30) days.

B. The owner or operator shall furnish the Department with the following reports:
   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
       (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
       electronic mail, in person or by telephone.
   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
       submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
       upset condition.
   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
       Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.
   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
       systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
       of the calendar quarter, on forms provided by the Director.
   (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
       successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other
       regulations provide for other notification requirements. In that case, the more stringent reporting requirement
       shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be
   available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution
   regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording
   unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
12. Notification, Reporting, and Recordkeeping (Continued)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

EP311.0 (Dryer House 4 Rotary Dryer #5, Rotary Dryer #6, Rotary Dryer #7 & Building Aspiration System)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-213-S1</td>
<td>17-159</td>
<td>Add DH4 Building Aspiration System, Amend PM2.5 Limit &amp; Parametric Monitoring</td>
<td>04/05/18</td>
<td>Yes</td>
</tr>
</tbody>
</table>
14. **Permit History** (continued)

Dryer House 4 Rotary Dryer #5 (EP127.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>09-A-707</td>
<td>09-317</td>
<td>Replace Rotary Dryer #5, previously permitted under 80-A-112</td>
<td>12/23/09</td>
<td>No</td>
</tr>
<tr>
<td>09-A-707-S1</td>
<td>10-501</td>
<td>Amended recordkeeping.</td>
<td>03/09/11</td>
<td>No</td>
</tr>
</tbody>
</table>

Dryer House 4 Rotary Dryer #6 (EP137.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>85-A-033</td>
<td>85-032</td>
<td>Original Permit</td>
<td>03/26/85</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Dryer House 4 Rotary Dryer #7 (EP164.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>90-A-264</td>
<td>90-082</td>
<td>Original Permit</td>
<td>08/30/90</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**END OF PERMIT**
Air Quality Construction Permit

Permit Number: 15-A-486-S1

Plant Number: 70-01-004

Company:

Contact Person: Mick Durham
Director of Environmental Services

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 314.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1281.5</td>
<td>GP2: No 5 Gluten Filter</td>
<td>0.86 tons of gluten cake per hour</td>
<td>None</td>
</tr>
<tr>
<td>1281.6</td>
<td>GP2: No. 6 Gluten Filter</td>
<td>0.86 tons of gluten cake per hour</td>
<td>None</td>
</tr>
<tr>
<td>1281.7</td>
<td>GP2: No.7 Gluten Filter</td>
<td>0.86 tons of gluten cake per hour</td>
<td>None</td>
</tr>
<tr>
<td>1281.8</td>
<td>GP2: No.8 Gluten Filter</td>
<td>0.86 tons of gluten cake per hour</td>
<td>None</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-198</td>
<td>Add New Gluten Filter No. 8</td>
<td>None</td>
<td>11/04/19</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr</th>
<th>tons/yr</th>
<th>Additional Limits</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.273,4</td>
<td>NA</td>
<td>500 ppm,1</td>
<td>RACT, 23.3(3)“e”</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
4. Limit restricts potential SO2 emissions below NA-NSR significance level and Project 17-198 is considered a minor modification for the purposes of NA-NSR.

2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Performance Testing</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>Performance Testing</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.
2. Compliance Demonstration(s) (Continued)

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>65 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Horizontal Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>24 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>81 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>5430 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. This permit does not establish operating, monitoring and recordkeeping requirements on these emission units at this time.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).
10. Construction

A. General Requirements:
It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:
(1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
       initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
    one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
       area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.
(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
    thirty (30) days of the occurrence. The notification shall include the following information:
    • The date of ownership change; the name, address, and telephone number of the responsible official, the
      contact person, and the owner of the equipment both before and after the ownership change; and the
      construction permit number(s) of the equipment changing ownership.
(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
    in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
    monitor [567 IAC 25.1(7)]. The notification shall include:
    • The time; the place; the name of the person who will conduct the tests; and other information as required by
      the Department.

B. The owner or operator shall furnish the Department with the following reports:
(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
    (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
    electronic mail, in person or by telephone.
(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
    submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
    upset condition.
(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
    Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
    systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
    of the calendar quarter, on forms provided by the Director.
(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
    successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other
    regulations provide for other notification requirements. In that case, the more stringent reporting requirement
    shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be
   available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution
   regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording
   unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of
   information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence
   (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications
   (Compliance Unit Supervisor and DNR Field Office). The addresses are:
12. Notification, Reporting, and Recordkeeping (continued)

Air Quality Bureau
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319
Telephone: (515) 725-8200
Fax: (515) 725-9501

DNR Field Office 6
1023 West Madison
Washington, IA 52353
Telephone: (319) 653-2135
Fax: (319) 653-2856

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-346</td>
<td>15-362</td>
<td>Permit Units to Limit SO2 Emissions</td>
<td>02/15/16</td>
<td>None</td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 15-A-326-S1

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services
563.264.4569
mick.durham@grainprocessing.com
1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President
1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 315.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Maximum Process Design Rate</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>2874.0</td>
<td>#5 Wet Mill Germ Dryer with Product Recovery Cyclone (CE2874-1)</td>
<td>10 tons of dried germ per hour</td>
<td>9.0 tons of dried germ per hour</td>
<td>Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2)</td>
</tr>
<tr>
<td>2894.0</td>
<td>#3 Germ Transfer and Receiver with Product Recovery Cyclone (CE2894-1)</td>
<td>28 tons of wet germ per hour</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>18-024</td>
<td>Amend Limits and Establish Operating Parameters</td>
<td>Yes</td>
<td>03/04/20</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources

[Signature]
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP315.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr</th>
<th>tons/yr</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>1.40³</td>
<td>NA</td>
<td>0.1 gr/dscf³</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>1.40⁴</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>0.50⁵</td>
<td>NA</td>
<td>90% Control Efficiency or 1 ppm,⁶,⁷</td>
<td>RACT</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%</td>
<td>23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.70⁶</td>
<td>NA</td>
<td>90% Control Efficiency or 10 ppm,⁸</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>130 ppm,⁹</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Requested limit maintains project 91-097 as minor project for PSD purposes.
4. The emission limit used in facility wide PM₁₀ dispersion modeling analysis that indicates predicted attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS).
5. The limit for PM₂.₅ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM₂.₅ published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9. The limit for SO₂ and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)] as amended on March 26, 2019.
10. Limit requires 90 percent control efficiency across Scrubbing System (CE2874-2) or SO₂ concentration of 10 ppm,⁹ from the outlet of EP315.0. Compliance with limit shall be demonstrated by measuring the inlet and outlet SO₂ concentration and flowrate of Scrubbing System (CE2874-2) to determine control efficiency of Scrubbing System (CE2874-2) or measuring the outlet SO₂ concentration from EP315.0. Control efficiency is defined as $\frac{\text{inlet mass rate} - \text{outlet mass rate}}{\text{inlet mass rate}} \times 100$.  


2. Compliance Demonstration(s)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}^2$</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}^3$</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>Performance Testing</td>
<td>Once Every 3 Calendar Years</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1 Performance testing for PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ shall be conducted once every 3 calendar years. After the completion of three consecutive performance tests that demonstrate compliance with PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$ emission limits as specified in condition 1, the owner or operator may request to modify the performance testing frequency for PM, PM$_{10}$, PM$_{2.5}$, and SO$_2$.

2 Performance testing may be conducted for total particulate matter to demonstrate compliance with PM$_{10}$ and PM$_{2.5}$ limits as specified in condition 1.

3 If performance testing using methods specified in 40 CFR Part 51, Appendix M, 201A with 202 are not performed due to high moisture content (stack saturation), the owner or operator shall demonstrate compliance with the PM$_{2.5}$ limit as specified in Condition 10 by using methods specified in 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202. Using Method 5, the filterable PM$_{2.5}$ fraction shall be determined by conducting internal particle sizing of the dried germ product (immediately following the dryer) to determine the PM$_{2.5}$ fraction of the measured total filterable particulate. The entire condensable fraction, measured by using Method 202, shall be considered PM$_{2.5}$.

4 The last performance test was conducted on 12/12/18. The next performance test shall be conducted by December 31, 2021.

If any additional stack testing beyond an initial test (i.e., quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.
2. Compliance Demonstration(s) (continued)

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>40 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>160 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>12,500 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

#5 Germ Dryer (EU2874.0)

A. The #5 Germ Dryer (EU2874.0) is limited to a maximum operating capacity of 9 tons of dried germ per hour.

i. The owner or operator shall maintain an interlock system on #5 Germ Dryer conveyors to ensure that #5 Germ Dryer cannot operate alone but must operate with either #1, #2, #3, or #4 Germ Dryers at all times.

ii. The owner or operator shall continuously monitor operation of each germ dryer to ensure that #5 Germ Dryer is operating in conjunction with either #1, #2, #3, or #4 Germ Dryers at all times.

iii. The owner or operator shall operate a variable speed drive on the germ feed screw conveyor to #5 Germ Dryer so that motor on #5 Germ Dryer does not operate no more than 54 Hertz.

iv. The owner or operator shall conduct daily inspections of #5 Germ Dryer and related equipment that includes conveyors and the germ feed screw conveyor variable speed drive.

v. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of #5 Germ Dryer and related equipment.

Control Equipment-Scrubber

B. The Venturi Scrubber (CE2874-2) total liquor flowrate shall be maintained at or above 138 gallons per minute.

i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Venturi Scrubber (CE2874-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the total liquor flow rate to the Venturi Scrubber (CE2874-2), in gallons per minute, continuously. If the total liquor flow rate to the Venturi Scrubber (CE2874-2) falls below the value specified in Condition 5B, the owner or operator shall investigate the Venturi Scrubber (CE2874-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2874-2) is not in operation.

C. The pressure drop across Venturi Scrubber (CE2874-2) shall be maintained between 10 to 14 inches of water column.

i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Venturi Scrubber (CE2874-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the pressure drop across the Venturi Scrubber (CE2874-2), in inches of water, continuously. If the pressure drop across the Venturi Scrubber (CE2874-2) falls outside the range specified in Condition 5C, the owner or operator shall investigate the Venturi Scrubber (CE2874-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Venturi Scrubber (CE2874-2) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

D. The 4-Stage Spray Tower Scrubber (CE2874-2) total liquor flowrate shall be maintained at or above 600 gallons per minute.
   
   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the 4-Stage Spray Tower Scrubber (CE2874-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the total liquor flow rate to the 4-Stage Spray Tower Scrubber (CE2874-2) in gallons per minute, continuously. If the total liquor flow rate to the 4-Stage Spray Tower Scrubber (CE2874-2) falls below the value specified in Condition 5D, the owner or operator shall investigate the 4-Stage Spray Tower Scrubber (CE2874-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the 4-Stage Spray Tower Scrubber (CE2874-2) is not in operation.

E. The pH range of the scrubbing liquor in Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2) shall be maintained between 5 and 8.

   i. The owner or operator shall properly operate and maintain equipment to monitor the scrubbing liquor pH to the Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the scrubbing liquor pH in Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2), on a continuous basis. If the pH of the scrubbing liquor in Scrubber (CE2874-2) falls outside the range specified in Condition 5E, the owner or operator shall investigate Scrubber (CE2874-2) and make corrections to Scrubber (CE2874-2). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Scrubber (CE2874-2) is not in operation.

F. The owner or operator shall develop an operating and maintenance plan for the Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Venturi Scrubber followed by 4-stage Spray Tower Scrubbing System (CE2874-2).

G. The owner or operator shall maintain Product Recovery Cyclone (CE2874-1) and Product Recovery Cyclone (CE2894-1) in manner to ensure proper operation.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Product Recovery Cyclone (CE2874-1).

   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Product Recovery Cyclone (CE2894-1).

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.
10. Construction (continued)

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail, or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.
(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
12. Notification, Reporting, and Recordkeeping (Continued)

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
- The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-326</td>
<td>15-050</td>
<td>Add PM$<em>{10}$, PM$</em>{2.5}$, and SO$_2$ &amp; VOC Emission Limits; Install Scrubber &amp; EP178.0 and EP194.0 into common stack</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

#5 Germ Dryer (EP178.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>91-A-176</td>
<td>91-097</td>
<td>Permit Issued</td>
<td>07/24/91</td>
<td>Yes</td>
</tr>
</tbody>
</table>

#3 Germ Transport and Receiver (EP194.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>02-A-783</td>
<td>01-517</td>
<td>As-built permit issued</td>
<td>10/11/02</td>
<td>Yes</td>
</tr>
<tr>
<td>02-A-783-S1</td>
<td>02-596</td>
<td>Corrected control equipment listed</td>
<td>10/28/02</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 19-A-515-S1

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 318.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1217.0-</td>
<td>GP1, #1 Gluten Flash Dryer</td>
<td>See condition 3</td>
<td>See condition 3 for emission unit and control equipment list</td>
</tr>
<tr>
<td>1217.3,</td>
<td>GP1, #2 Gluten Flash Dryer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1244.1,</td>
<td>GP2, #4 Gluten Flash Dryer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1244.2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20-197</td>
<td>Decrease PM2.5 Limit for EP318.0, Increase PM2.5 Limit on GP2, #4 Gluten Flash Dryer</td>
<td>Yes</td>
<td>12/22/20</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources

[Signature]

CPFP|7001004|122220|20197|19A515S1
PERMIT CONDITIONS

1a. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP318.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>11.30³</td>
<td>NA</td>
<td>0.1 gr/dscf⁴</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>11.30⁴</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM₂.⁵</td>
<td>5.0⁵</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%⁶,⁷</td>
<td>23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>5.45⁸</td>
<td>500 ppm₁</td>
<td>RACT,</td>
<td>23.3(3)“e”</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit requested by owner or operator in Project 17-198 to restrict potential emissions.
4. The emission limit used in facility wide PM₁₀ dispersion modeling analysis that indicates predicted attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS).
5. The limit for PM₂.⁵ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM₂.⁵ published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of 10% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

1b. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for GP1, #1 Gluten Flash Dryer (1217.0, 1217.1) and GP1, #2 Gluten Flash Dryer (1217.2, 1217.3) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>98% Control Efficiency or 10 ppmvₐ₁,³,⁴</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. The limit for VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].
4. Limit requires 98 percent control efficiency across GP1 Regenerative Thermal Oxidizer (CE1217-4) or VOC concentration of 10 ppmvₐ at the outlet of GP2 Regenerative Thermal Oxidizer (CE1244-2) or EP318.0. Compliance with limit shall be demonstrated by measuring the inlet and outlet VOC concentration and flowrate of GP1 Regenerative Thermal Oxidizer (CE1217-4) to determine control efficiency of GP1 Regenerative Thermal Oxidizer (CE1217-4) or measuring the VOC concentration at the outlet GP1 Regenerative Thermal Oxidizer (CE1217-4) or EP318.0. Control efficiency is defined as \[ \frac{\text{inlet m}}{\text{outlet m} - \text{inlet m}} \times 100. \]
### Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for GP2, #4 Gluten Flash Dryer (1244.0, 1244.1) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>5.31(^3,10)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>5.31(^3,10)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>4.45(^10)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>4.50(^5,11)</td>
<td>NA</td>
<td>90% Control Efficiency or 10 ppm(_{v,d})(^{1,4,6})</td>
<td>NA</td>
</tr>
<tr>
<td>Hydrogen Sulfide (H(_2)S)</td>
<td>1.64(^8)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>98% Control Efficiency or 10 ppm(_{v,d})(^{1,4,7,10})</td>
<td>NA</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO(_x))-Biogas</td>
<td>8.90(^9)</td>
<td>NA</td>
<td>0.09 lbs/MMBtu(^{1,4,12})</td>
<td>NA</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO(_x))-Natural Gas</td>
<td>NA</td>
<td>NA</td>
<td>0.14 lbs/MMBtu(^{1,4,12})</td>
<td>NA</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)-Biogas</td>
<td>8.90(^9)</td>
<td>NA</td>
<td>0.15 lbs/MMBtu(^{1,4,12})</td>
<td>NA</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)-Natural Gas</td>
<td>NA</td>
<td>NA</td>
<td>0.10 lbs/MMBtu(^{1,4,12})</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limits established to avoid PSD applicability and keep Project 90-257 minor PSD. Project 90-257 netted out of review for PM and PM\(_{10}\) using credits obtained from the shutdown of several streets in December of 1990. Any future projects that reevaluate the netting for this time period will require the facility to submit a model examining the equivalency of the increased stack emissions to be credited to road closure emissions.
4. The limit for VOC, SO\(_2\), NO\(_x\) and CO emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].
5. The limit is based on a H\(_2\)S concentration of 6200 ppm\(_i\) in the biogas and 91.2% control efficiency for SO\(_2\) from the wet scrubber. The limit also serves to limit SO\(_2\) emission to avoid PSD applicability and keep Project 08-211 minor for PSD.
6. Limit requires 90 percent control efficiency across GP2 Impingent Wet Scrubber (CE1244-1) or SO\(_2\) concentration of 10 ppm\(_{v,d}\) from the outlet of the GP2 Impingent Wet Scrubber (CE1244-1). Compliance with limit shall be demonstrated by measuring the SO\(_2\) concentration and flowrate of the inlet and outlet of GP2 Impingent Wet Scrubber (CE1244-1) to determine control efficiency of the scrubber or measuring the SO\(_2\) concentration at the outlet of the GP2 Impingent Wet Scrubber (CE1244-1).
7. Control efficiency is defined as \[\frac{\text{inlet m}}{\text{te}} \times \frac{\text{inlet m}}{\text{te}} \times 100\].
8. Limit requires 98 percent control efficiency across GP2 Regenerative Thermal Oxidizer (CE1244-2) or VOC concentration of 10 ppm\(_{v,d}\) at the outlet of GP2 Regenerative Thermal Oxidizer (CE1244-2) or EP318.0. Compliance with limit shall be demonstrated by measuring the inlet and outlet VOC concentration and flowrate of GP2 Regenerative Thermal Oxidizer (CE1244-2) to determine control efficiency of GP2 Regenerative Thermal Oxidizer (CE1244-2) or measuring the VOC concentration at the outlet GP2 Regenerative Thermal Oxidizer (CE1244-2) or EP318.0. Control efficiency is defined as \[\frac{\text{inlet m}}{\text{te}} \times \frac{\text{inlet m}}{\text{te}} \times 100\].
2. Compliance Demonstration(s)

Compliance Demonstration Table(s)

**EP318.0**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
</table>
| PM – State | Performance Testing¹ | Once Every 3 Calendar Years ³ | 1 hour | 40 CFR 60, Appendix A, Method 5  
40 CFR 51 Appendix M Method 202 |
| PM₁₀ | Performance Testing¹, ⁴ | Once Every 3 Calendar Years ³ | 1 hour | 40 CFR 51, Appendix M, 201A with 202 |
| PM₂₅ | Performance Testing¹, ⁵ | Once Every 3 Calendar Years ³ | 1 hour | 40 CFR 51, Appendix M, 201A with 202 |
| Opacity | None | NA | 1 hour | 40 CFR 60, Appendix A, Method 9 |
| SO₂ | Performance Testing¹, ² | Once Every 3 Calendar Years ³ | 1 hour | 40 CFR 60, Appendix A, Method 6C |

¹ Performance testing shall be conducted at worst case emission scenario, #1, #2, and #4 Gluten Flash Dryers are operating at the same time and combusting natural gas (except for SO₂ testing).
² SO₂ performance tests shall be conducted while GP2, #4 Gluten Flash Dryer is firing on biogas.
³ Performance testing for PM, PM₁₀, PM₂₅, and SO₂ shall be conducted once every 3 calendar years. After the completion of three consecutive performance tests that demonstrate compliance with PM, PM₁₀, PM₂₅, SO₂ emission limits as specified in condition 1a, the owner or operator may request to modify the performance testing frequency for PM, PM₁₀, PM₂₅, and SO₂. The next performance test for PM, PM₁₀, PM₂₅, and SO₂ shall be completed by December 31, 2022.
⁴ Performance testing may be conducted for total particulate matter to demonstrate compliance with PM₁₀ limit as specified in permit condition 1a.
⁵ If performance testing using methods specified in 40 CFR 51, Appendix M, 201A with 202 are not performed due high moisture content (stack saturation) then the owner or operator shall conduct internal particle sizing of the dried gluten product (immediately following the gluten dryers) to determine the PM₂₅ fraction of the measured total filterable particulate. Utilizing Method 202, the measured condensable fraction shall be considered all PM₂₅.

**GP1, #1 Gluten Flash Dryer (1217.0, 1217.1) #2 Gluten Flash Dryer (1217.2, 1217.3)**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
</table>
| VOC | Performance Testing¹ | Once Every 3 Calendar Years ² | 1 hour | 40 CFR 63, Appendix A, Method 320 or  
40 CFR 60, Appendix A, Method 18 |

¹ Performance testing shall be conducted as specified in condition 1b.
² Performance testing for VOC shall be conducted once every 3 calendar years. After the completion of three consecutive performance tests that demonstrate compliance VOC emission limits as specified in condition 1b, the owner or operator may request to modify the performance testing frequency for VOC. The next performance test for VOC shall be completed by December 31, 2022.
³ As alternative, the owner or operator may elect to demonstrate RTO control efficiency using test method 40 CFR 60, Appendix A, Method 25A.
2. Compliance Demonstration(s) (continued)

**GP2, #4 Gluten Flash Dryer (1244.0, 1244.1)**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State 1</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM(_{10})(^{1,3})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM(_{2.5})(^{1,4})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>SO(_{2})(^{5,6,7})</td>
<td>Performance Testing(^{5,6,7})</td>
<td>Once Every 3 Calendar Years (^{2})</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>Hydrogen Sulfide (H(_{2})S)(^{1,6})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 15</td>
</tr>
<tr>
<td>NO(_{x})-Biogas(^{9})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 7E</td>
</tr>
<tr>
<td>NO(_{x})-Natural gas(^{9})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 7E</td>
</tr>
<tr>
<td>CO-Biogas(^{9})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 10</td>
</tr>
<tr>
<td>CO-Natural Gas(^{9})</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 10</td>
</tr>
<tr>
<td>VOC(^{1,5,8})</td>
<td>Performance Testing(^{1,5,8})</td>
<td>Once Every 3 Calendar Years (^{2})</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1. Performance testing shall be conducted at the exhaust outlet of GP2 Regenerative Thermal Oxidizer (CE1244-2) or at outlet of EP318.0 while Gluten Flash Dryer #1 and #2 are not in operation.
2. Performance testing for SO\(_{2}\) and VOC shall be conducted once every 3 calendar years. After the completion of three consecutive performance tests that demonstrate compliance with SO\(_{2}\) and VOC emission limits as specified in condition 1c, the owner or operator may request to modify the performance testing frequency for SO\(_{2}\) and VOC. The next performance test for SO\(_{2}\) and VOC shall be completed by December 31, 2022.
3. Performance testing may be conducted for total particulate matter to demonstrate compliance with PM\(_{10}\) limit as specified in permit condition 1c.
4. If performance testing using methods specified in 40 CFR 51, Appendix M, 201A with 202 are not performed due to high moisture content (stack saturation) then the owner or operator shall demonstrate compliance with PM\(_{2.5}\) limit as specified in permit conditions 1a and 1c by conducting methods specified in 40 CFR 60, Appendix A, Method 5 and 40 CFR 51 Appendix M Method 202. Utilizing Method 5, the filterable PM\(_{2.5}\) fraction shall be determined by conducting internal particle sizing of the dried gluten product (immediately following the gluten dryers) to determine the PM\(_{2.5}\) fraction of the measured total filterable particulate. Utilizing Method 202, the measured condensable fraction shall be considered all PM 2.5.
5. Performance testing shall be conducted as specified in condition 1c or at outlet of EP318.0 while Gluten Flash Dryer #1 and #2 are not in operation.
6. SO\(_{2}\) and H\(_{2}\)S performance tests shall be conducted while GP2, #4 Gluten Flash Dryer is firing on biogas.
7. During the SO\(_{2}\) test, GPC shall collect a sample of the biogas being sent to the dryer during each stack test run. H\(_{2}\)S concentration shall be determined using a GC/FPD analysis. The H\(_{2}\)S concentrations determined during the SO\(_{2}\) testing shall be supplied with the test reports submitted for SO\(_{2}\). GPC may request different test methods in the testing protocol if alternative test methods or procedures are preferable.
8. As alternative, the owner or operator may elect to demonstrate RTO control efficiency using test method 40 CFR 60, Appendix A, Method 25A.
9. Performance testing shall be conducted at the exhaust outlet of GP2, #4 Gluten Flash Dryer or at the inlet to GP2 Regenerative Thermal Oxidizer (CE1244-2).

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.
2. Compliance Demonstration(s) (continued)

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

The following emission unit and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>GP1 #1 Gluten Flash Dryer (EU1217.0) w/ Product Recovery Cyclone</td>
<td>1.35 tons of dried gluten per hour</td>
<td>GP1 TurboTak Spray Chamber Scrubber W/ Cyclonic Separator (CE1217-3)</td>
</tr>
<tr>
<td>GP1 #1 Gluten Flash Dryer Direct Fired Burner (EU1217.1)</td>
<td>16 MMBtu per hour</td>
<td>GP1 Regenerative Thermal Oxidizer (CE1217-4), Maximum Heat Input: 16.5 MMBtu per hour with Low NOx Burners</td>
</tr>
<tr>
<td>GP1 #2 Gluten Flash Dryer (EU1217.2) w/Product Recovery Cyclone</td>
<td>1.35 tons of dried gluten per hour</td>
<td></td>
</tr>
<tr>
<td>GP1 #2 Gluten Flash Dryer Direct Fired Burner (EU1217.3)</td>
<td>16 MMBtu per hour</td>
<td></td>
</tr>
<tr>
<td>GP2 #4 Gluten Flash Dryer (EU1244.0) w/six Parallel Product Recovery Cyclones</td>
<td>6.13 tons of dried gluten per hour</td>
<td>GP2 Regenerative Thermal Oxidizer (CE1244-2), Maximum Heat Input: 16.5 MMBtu per hour with Low NOx Burners</td>
</tr>
<tr>
<td>GP2 Low-NOx Burner (EU1244.1)</td>
<td>36.0 MMBtu per hour (total); 28,000 SCFH (Biogas); 36,000 SCFH (Natural Gas)</td>
<td>GP2 Impingent Wet Scrubber (CE1244-1)</td>
</tr>
</tbody>
</table>
3. Emission Point Characteristics (continued)

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>180 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>78 inches Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>235 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>102,000 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

GP2, #4 Gluten Flash Dryer (EU 1244.0)

A. The #4 Gluten Flash Dyer shall only combust natural gas, natural gas mixed with biogas from on-site waste water treatment plant, and biogas from on-site wastewater treatment plant with combustion air.

Control Equipment- Scrubbers

B. The GP1 Turbotak Scrubber (CE1217-3) atomizing liquor flow rate shall be maintained at or above 80 gallons per minute.
   i. The owner or operator shall properly operate and maintain equipment to monitor the atomizing liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

ii. The owner or operator shall collect and record the atomizing liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3), in gallons per minute, continuously. If the atomizing liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3) falls below the value specified in Condition 5B, the owner or operator shall investigate the GP1 Turbotak Scrubber (CE1217-3) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the GP1 Turbotak Scrubber (CE1217-3) is not in operation.

C. The GP1 Turbotak Scrubber (CE1217-3) wash liquor flow rate shall be maintained at or above 650 gallons per minute.

i. The owner or operator shall properly operate and maintain equipment to monitor the wash liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the wash liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3), in gallons per minute, continuously. If the wash liquor flow rate to the GP1 Turbotak Scrubber (CE1217-3) falls below the value specified in Condition 5C, the owner or operator shall investigate the GP1 Turbotak Scrubber (CE1217-3) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the GP1 Turbotak Scrubber (CE1217-3) is not in operation.

D. The GP2 Impingent Wet Scrubber (CE1244-1) total liquor flowrate shall be maintained at or above 500 gallons per minute.

i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the GP2 Impingent Wet Scrubber (CE1244-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the total liquor flow rate to the GP2 Impingent Wet Scrubber (CE1244-1), in gallons per minute, continuously. If the total liquor flow rate to the GP2 Impingent Wet Scrubber (CE1244-1) falls below the value specified in Condition 5C, the owner or operator shall investigate the GP2 Impingent Wet Scrubber (CE1244-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the GP2 Impingent Wet Scrubber (CE1244-1) is not in operation.

E. The pressure drop across GP2 Impingent Wet Scrubber (CE1244-1) shall be maintained between 6 to 12 inches of water column.

i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the GP2 Impingent Wet Scrubber (CE1244-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the pressure drop across the GP2 Impingent Wet Scrubber (CE1244-1), in inches of water, continuously. If the pressure drop across the GP2 Impingent Wet Scrubber (CE1244-1) falls outside the range specified in Condition 5D, the owner or operator shall investigate the GP2 Impingent Wet Scrubber (CE1244-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP2 Impingent Wet Scrubber (CE1244-1) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

F. The pH range of the scrubbing liquor in GP1 Turbotak Scrubber (CE1217-3) shall be maintained between 5 and 8.
   i. The owner or operator shall properly operate and maintain equipment to monitor the scrubbing liquor pH to the GP1 Turbotak Scrubber (CE1217-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the scrubbing liquor pH in GP1 Turbotak Scrubber (CE1217-3), on a continuous basis. If the pH of the scrubbing liquor GP1 Turbotak Scrubber (CE1217-3) falls outside the range specified in Condition 5F, the owner or operator shall investigate GP1 Turbotak Scrubber (CE1217-3) and make corrections to GP1 Turbotak Scrubber (CE1217-3). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP1 Turbotak Scrubber (CE1217-3) is not in operation.

G. The pH range of the scrubbing liquor in GP2 Impingent Wet Scrubber (CE1244-1) shall be maintained between 5 and 8.
   i. The owner or operator shall properly operate and maintain equipment to monitor the scrubbing liquor pH to the GP2 Impingent Wet Scrubber (CE1244-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the scrubbing liquor pH in GP2 Impingent Wet Scrubber (CE1244-1), on a continuous basis. If the pH of the scrubbing liquor in GP2 Impingent Wet Scrubber (CE1244-1) falls outside the range specified in Condition 5E, the owner or operator shall investigate GP2 Impingent Wet Scrubber (CE1244-1) and make corrections to GP2 Impingent Wet Scrubber (CE1244-1). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP2 Impingent Wet Scrubber (CE1244-1) is not in operation.

H. The owner or operator shall develop an operating and maintenance plan for GP1 Turbotak Scrubber (CE1217-3) and GP2 Impingent Wet Scrubber (CE1244-1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP1 Turbotak Scrubber (CE1217-3).
   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP2 Impingent Wet Scrubber (CE1244-1).

Control Equipment- RTOs

I. The owner or operator shall only bypass GP2 Regenerative Thermal Oxidizer (CE1244-2) for purposes of start-up, malfunction and/or maintenance for a maximum of 200 hours per twelve month rolling period. GP2 Regenerative Thermal Oxidizer (CE1244-2) shall be in operation and at the operating temperature specified in condition 5J prior to processing any product (gluten).
   i. The owner or operator shall develop and implement an operating plan to ensure GP2 Regenerative Thermal Oxidizer (CE1244-2) is at the required operating temperature prior to processing any gluten in GP2 #4 Gluten Flash Dyer. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.
   ii. The owner or operator shall record the total hours and the cause of GP2 Regenerative Thermal Oxidizer (CE1244-2) bypass on a monthly basis. The owner or operator shall calculate and record the rolling 12-month totals.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

J. The owner or operator shall maintain a GP2 Regenerative Thermal Oxidizer (CE1244-2) combustion chamber temperature to no less than 1,600 degrees Fahrenheit based on a 3-hour block average.

i. The owner or operator shall properly operate and maintain equipment to monitor the chamber temperature of GP2 Regenerative Thermal Oxidizer (CE1244-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the combustion chamber temperature of GP2 Regenerative Thermal Oxidizer (CE1244-2), in °F on a continuous basis. The owner or operator shall calculate and record the 3-hour block average of the combustion chamber temperature in °F. If the 3-hour block average combustion chamber temperature of GP2 Regenerative Thermal Oxidizer (CE1244-2) falls below the value specified in Condition 5J, the owner or operator shall investigate GP2 Regenerative Thermal Oxidizer (CE1244-2) and make corrections GP2 Regenerative Thermal Oxidizer (CE1244-2). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP2 Regenerative Thermal Oxidizer (CE1244-2) is not in operation.

K. The owner or operator shall only bypass GP1 Regenerative Thermal Oxidizer (CE1217-4) for purposes of start-up, malfunction and/or maintenance for a maximum of 200 hours per twelve month rolling period. GP1 Regenerative Thermal Oxidizer (CE1217-4) shall be in operation and at the operating temperature specified in condition 5L prior to processing any product (gluten).

i. The owner or operator shall develop and implement an operating plan to ensure GP1 Regenerative Thermal Oxidizer (CE1217-4) is at the required operating temperature prior to processing any gluten in GP1 #1 and #2 Gluten Flash Dyers. The written plan and any documentation as required by the plan shall be maintained onsite and available for inspection.

ii. The owner or operator shall record the total hours and the cause of GP1 Regenerative Thermal Oxidizer (CE1217-4) bypass on a monthly basis. The owner or operator shall calculate and record the rolling 12-month totals.

L. The owner or operator shall maintain a GP1 Regenerative Thermal Oxidizer (CE1217-4) combustion chamber temperature to no less than 1,600 degrees Fahrenheit based on a 3-hour block average.

i. The owner or operator shall properly operate and maintain equipment to monitor the chamber temperature of GP1 Regenerative Thermal Oxidizer (CE1217-4). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the combustion chamber temperature of GP1 Regenerative Thermal Oxidizer (CE1217-4), in °F on a continuous basis. The owner or operator shall calculate and record the 3-hour block average of the combustion chamber temperature in °F. If the 3-hour block average combustion chamber temperature of GP1 Regenerative Thermal Oxidizer (CE1217-4) falls below the value specified in Condition 5L, the owner or operator shall investigate GP1 Regenerative Thermal Oxidizer (CE1217-4) and make corrections GP1 Regenerative Thermal Oxidizer (CE1217-4). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that GP1 Regenerative Thermal Oxidizer (CE1217-4) is not in operation.

M. The owner or operator shall combust only natural gas or process off-gasses in GP2 Regenerative Thermal Oxidizer (CE1244-2) and GP1 Regenerative Thermal Oxidizer (CE1217-4).
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

N. The owner or operator shall develop an operating and maintenance plan for GP2 Regenerative Thermal Oxidizer (CE1244-2) and GP1 Regenerative Thermal Oxidizer (CE1217-4), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP2 Regenerative Thermal Oxidizer (CE1244-2).

ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP1 Regenerative Thermal Oxidizer (CE1217-4).

Low-NOx Burner (EU1244.1)

O. The owner or operator shall tune Low-NOx Burner (EU1244.1) on an annual basis to maintain good combustion. The annual burner tune-up activity shall include at a minimum:

- Inspect the burner-Clean and replace any components, as necessary
- Inspect the flame pattern and flame dimensions-Adjust the burner as necessary to optimize the flame pattern and dimensions. The adjustment should be consistent with manufacturer’s specifications, if available.
- Inspect the air-to fuel ratio control system-Ensure the control system is calibrated and functioning properly, if such a system is installed.
- Optimize emissions of carbon dioxide- Optimize emissions consistent with the manufacturer’s specifications, if available, and with any nitrogen oxide requirement to which unit may be subject.
- Verify that emissions (carbon dioxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

P. The owner or operator shall maintain record on annual basis of the following:

- The completion date of Low-NOx Burner (EU1244.1) tuning as specified in condition 5O,
- Low-NOx Burner (EU1244.1) emissions (carbon dioxide and nitrogen oxide) and oxygen levels in the exhaust have been optimized consistent per manufactures specifications.

Q. The owner or operator shall develop an operating and maintenance plan for the Low-NOx Burner (EU1244.1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Low-NOx Burner (EU1244.1).

Other Requirements

R. The owner or operator shall maintain GP1 and GP2 Gluten Dryers Product Recovery Cyclones in manner to ensure proper operation.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the GP1 and GP2 Gluten Dryers Product Recovery Cyclones.


Continuous emission monitoring is not required by this permit at this time.
7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).
10. Construction

A. General Requirements:
   It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

   In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

   This permit or amendment shall become void if any one of the following conditions occurs:
   (1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
   (2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
   (3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
   (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
       initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
    one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
       area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
    thirty (30) days of the occurrence. The notification shall include the following information:
    - The date of ownership change; the name, address, and telephone number of the responsible official, the
      contact person, and the owner of the equipment both before and after the ownership change; and the
      construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
    in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
    monitor [567 IAC 25.1(7)]. The notification shall include:
    - The time; the place; the name of the person who will conduct the tests; and other information as required by
      the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider
the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules
or permit conditions. Upon written request, the Department may allow a notification period of less than thirty
(30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
    (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
    electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
    submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
    upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
    Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
    systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
    of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
    successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other
    regulations provide for other notification requirements. In that case, the more stringent reporting requirement
    shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be
available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution
regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording
unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of
information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence
(Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications
(Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

GP1: Gluten Flash Dryer #1, GP1: Gluten Flash Dryer #2 and GP2: Gluten Flash Dryer #4 (EP318.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>19-A-515</td>
<td>17-198</td>
<td>Add RTOs, Debottleneck GP2, #4 Gluten Flash Dryer</td>
<td>11/04/19</td>
<td>Yes</td>
</tr>
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GP1, #1 Gluten Flash Dryer w/ Direct Fired Burner, #2 Gluten Flash Dryer W/ Direct Fired Burner (EP43.1)

<table>
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<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
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<tbody>
<tr>
<td>75-A-087</td>
<td>75-087</td>
<td>Add Venturi and Packed Bed Scrubbers to Existing Dryers</td>
<td>05/06/75</td>
<td>Yes</td>
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<tr>
<td>75-A-087-S1</td>
<td>15-050</td>
<td>Modify Scrubbers; Add PM_{10}, PM_{2.5} and SO_{2} Emission Limits</td>
<td>12/10/15</td>
<td>Yes</td>
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<tr>
<td>75-A-087-S2</td>
<td>15-455</td>
<td>Install Turbotak Scrubber as Replacement Controls</td>
<td>05/17/16</td>
<td>Yes</td>
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GP2, #4 Gluten Flash Dryer w/ Gas Fired Heater (EP173.0)

<table>
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<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
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<tbody>
<tr>
<td>91-A-067</td>
<td>90-257</td>
<td>Original Permit</td>
<td>04/05/91</td>
<td>Yes</td>
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<tr>
<td>91-A-067-S1</td>
<td>06-346</td>
<td>Increase PM/PM_{10} Allowable Emissions</td>
<td>12/05/06</td>
<td>Yes</td>
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<tr>
<td>91-A-067-S2</td>
<td>08-211</td>
<td>Allow Use of Biogas as Fuel</td>
<td>03/12/09</td>
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<td>91-A-067-S3</td>
<td>18-448</td>
<td>Replacement of Low-NOx Burner</td>
<td>11/28/18</td>
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</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 18-A-136

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 319.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
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<tbody>
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<td>1282.0</td>
<td>Gluten Day Bin</td>
<td>350 tons of gluten per hour</td>
<td>Pulse Jet Baghouse (CE1282-1)</td>
</tr>
<tr>
<td>1275.0</td>
<td>Railcar Loading: Gluten</td>
<td>11.5 tons of gluten per hour (load-out rate)</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-404</td>
<td>New Gluten Day Bin, enclosure and aspiration of existing Gluten railcar loading (RAILCAR2) to Baghouse</td>
<td>Yes</td>
<td>05/30/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP319.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.30$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf$^7$</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.30$^3$</td>
<td>NA</td>
<td>NA</td>
<td>See note 3</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.30$^3,4$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>0.10$^5,6$</td>
<td>NA</td>
<td>500 ppm,$^1$</td>
<td>RACT, 567 IAC 23.3(3)$”e”$</td>
</tr>
<tr>
<td>VOC</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^7,8$</td>
<td>567 IAC 23.3(2)$”d”$</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. Limit maintains potential PM, PM$_{10}$, PM$_{2.5}$ emission below PSD significance levels and Project 17-404 is considered a minor modification for the purposes of PSD.
4. The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
5. Limit maintains potential SO$_2$ emissions below NA-NSR significance level and Project 17-404 is considered a minor modification for the purposes of NA-NSR.
6. The SO$_2$ limit is established to address the non attainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The non attainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
7. The emission limit is a six (6) minute average.
8. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

2. Compliance Demonstration(s)

Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Testing$^1$</td>
<td>One-Time$^1$</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>Performance Testing$^1$</td>
<td>One-Time$^1$</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Performance Testing$^2$</td>
<td>One-Time$^1$</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>Performance Testing</td>
<td>One-Time$^1$</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1. Performance testing may be conducted for total particulate matter to demonstrate compliance with PM$_{10}$ and PM$_{2.5}$ limits as specified in permit condition 1.
2. If method 40 CFR 51, Appendix M, 201A cannot be performed due to stack blockage then the owner operator shall add a temporary stack extension to perform method 40 CFR 51, Appendix M, 201A. The temporary stack extension shall conform to 40 CFR Part 60, Appendix A, Method 1.

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of gluten railcar aspiration system.
2. Compliance Demonstration(s) (continued)

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>90 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>14 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>92 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>5750 scfm</td>
</tr>
</tbody>
</table>

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
4. Federal Standards

A. These emission units are not subject to the New Source Performance Standards (NSPS) as there are no applicable subparts at this time.

B. These emission units are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) as there are no subparts for this source category.

The absence of the inclusion of any NSPS or NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS or NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall operate the Gluten Railcar Loading (EU1275.0) in manner to ensure that particulate emissions generated during Gluten Railcar Loading are captured and vented to Pulse Jet Baghouse (CE 1282-1)

   i. The owner or operator shall check for the presence of visible emissions from Gluten Railcar Loading area (EU1275.0) once per calendar day. The owner or operator shall record the date and time of the observation and the presence or absence of visible emissions during gluten railcar loading. If the owner or operator observes visible emissions during gluten railcar loading, the owner or operator shall investigate the emission unit, or the operations associated with the emission unit and make corrections to the associated operations or equipment. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Gluten Railcar Loading (EU1275.0) is not in operation.

B. The differential pressure drop across Pulse Jet Baghouse (CE1282-1) shall be maintained between 0.3 and 6 inches of water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Pulse Jet Baghouse (CE1282-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across Pulse Jet Baghouse (CE1282-1), in inches of water, at least once per day. If the pressure drop across Pulse Jet Baghouse (CE1282-1) falls outside the range specified in Condition 5C, the owner or operator shall investigate Pulse Jet Baghouse (CE1282-1) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Pulse Jet Baghouse (CE1282-1) are not in operation.

C. The owner or operator shall develop an operating and maintenance plan for the Pulse Jet Baghouse (CE1282-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Pulse Jet Baghouse (CE1282-1).

D. The owner or operator shall rescind air construction permit 16-A-037, Gluten Railcar Loading within 30-days after completion of the gluten railcar loading project.

Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3("f")).

10. Construction

A. General Requirements:

It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:
(1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.
10. Construction (continued)

B. Changes to Plans and Specifications:
   The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
   (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
   (2) This permit becomes void.

   Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment
   and control equipment and the specified operation thereof.

C. Amended Permits:
   The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s)
   and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
   (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission
       point permitted herein; or
   (2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation
of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing
emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment,
which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour
period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa
Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an
expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified
in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office
within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition
12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports
within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
   (1) Per 567 IAC 22.3(3)“b”:
      (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
          initiation of construction, installation, or alteration.
      (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
   (2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
       one location to another, the Department shall be notified:
       (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
           area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
       (b) At least seven (7) days before equipment relocation.
   (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
       thirty (30) days of the occurrence. The notification shall include the following information:
       • The date of ownership change; the name, address, and telephone number of the responsible official, the
         contact person, and the owner of the equipment both before and after the ownership change; and the
         construction permit number(s) of the equipment changing ownership.
12. **Notification, Reporting, and Recordkeeping** (Continued)

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
- The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>Wallace Office Building</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>502 E 9th St</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td></td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>

13. **Appeal Rights**

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
### 14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 03-A-471-S3

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP531.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Nameplate Capacity</th>
<th>Maximum Process Design Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>1260.0</td>
<td>Gluten Plant 1 Pneumatic Transport System</td>
<td>5.1 tons dried gluten per hour</td>
<td>2.7 tons dried gluten per hour</td>
<td>Pulse Jet Baghouse (CE1260-1)</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-404</td>
<td>Baghouse Replacement</td>
<td>Yes</td>
<td>05/30/18</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP531.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr¹</th>
<th>tons/yr²</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.42³,⁴</td>
<td>NA</td>
<td>0.1 gr/dscf⁵</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0.42⁵</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>0.122⁶</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>SO₂</td>
<td>0.10³,⁸</td>
<td>NA</td>
<td>500 ppm,¹</td>
<td>RACT, 567 IAC 23.3(3)&quot;e&quot;</td>
</tr>
<tr>
<td>VOC</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%⁹,¹⁰</td>
<td>567 IAC 23.3(2)&quot;d&quot;</td>
</tr>
</tbody>
</table>

¹. The emission limit is expressed as the average of three (3) runs.
². The emission limit is based on a twelve (12) month rolling total.
³. Emission rate requested to maintain Project 03-188 below PSD significance level.
⁴. Limit maintains potential PM, PM₁₀, PM₂₅ emission below PSD significance levels and Project 17-404 is considered a minor modification for the purposes of PSD.
⁵. The emission limit used in facility wide PM₁₀ dispersion modeling analysis that indicates predicted attainment of the PM₁₀ National Ambient Air Quality Standards (NAAQS).
⁶. The limit for PM₂₅ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM₂₅ published in the Federal Register (76 FR 9706) on February 22, 2011.
⁷. Limit maintains potential SO₂ emissions below NA-NSR significance level and Project 17-404 is considered a minor modification for the purposes of NA-NSR.
⁸. The SO₂ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO₂ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
⁹. The emission limit is a six (6) minute average.
¹⁰. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

2. Compliance Demonstration(s)

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<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
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</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Testing¹</td>
<td>One-Time¹</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Performance Testing¹</td>
<td>One-Time</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Performance Testing²</td>
<td>One-Time</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO₂</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

¹. Performance testing may be conducted for total particulate matter to demonstrate compliance with PM₁₀ limit as specified in permit condition 1.
². If method 40 CFR 51, Appendix M, 201A cannot be performed due to stack blockage then the owner operator shall add a temporary stack extension to perform method 40 CFR 51, Appendix M, 201A. The temporary stack extension shall conform to 40 CFR Part 60, Appendix A, Method 1.
2. Compliance Demonstration(s) (continued)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of Pulse Jet Baghouse (CE1260-1).

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>60 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>24 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>120 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>10,300 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.
4. Federal Standards

   A. These emission units are not subject to the New Source Performance Standards (NSPS) as there are no applicable subparts at this time.

   B. These emission units are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) as there are no subparts for this source category.

   The absence of the inclusion of any NSPS or NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS or NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

   Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

   A. The differential pressure drop across Pulse Jet Baghouse (CE1260-1) shall be maintained between 0.3 and 6 inches of water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor differential pressure drop across Pulse Jet Baghouse (CE1260-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across Pulse Jet Baghouse (CE1260-1), in inches of water, continuously. If the pressure drop across Pulse Jet Baghouse (CE1260-1) falls outside the range specified in Condition 5A, the owner or operator shall investigate Pulse Jet Baghouse (CE1260-1) and make corrections to the baghouse. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Pulse Jet Baghouse (CE1260-1) are not in operation.

   B. The owner or operator shall develop an operating and maintenance plan for the Pulse Jet Baghouse (CE1260-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of Pulse Jet Baghouse (CE1260-1).


   Continuous emission monitoring is not required by this permit at this time.

7. Department Review

   This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

   No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.
8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3))“f”).

10. Construction

A. General Requirements:

It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.
10. Construction (continued)

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment
and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s)
and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission
point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation
of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing
emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment,
which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour
period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa
Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an
expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified
in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office
within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition
12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports
within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
       initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
    one location to another, the Department shall be notified:
    (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
        area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
    (b) At least seven (7) days before equipment relocation.
(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
    thirty (30) days of the occurrence. The notification shall include the following information:
    • The date of ownership change; the name, address, and telephone number of the responsible official, the
      contact person, and the owner of the equipment both before and after the ownership change; and the
      construction permit number(s) of the equipment changing ownership.
12. Notification, Reporting, and Recordkeeping (Continued)

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:

- The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>Wallace Office Building</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>502 E 9th St</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td></td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>03-A-471</td>
<td>03-188</td>
<td>Original Permit</td>
<td>05/01/03</td>
<td>Yes</td>
</tr>
<tr>
<td>03-A-471-S1</td>
<td>15-051</td>
<td>Add PM$<em>{10}$, PM$</em>{2.5}$ and SO$_{2}$ emission limits, modify stack</td>
<td>07/06/15</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>characteristics</td>
<td></td>
<td></td>
</tr>
<tr>
<td>03-A-471-S2</td>
<td>16-036</td>
<td>Correct Maximum Capacity; modify flowrate &amp; exhaust temperature</td>
<td>10/11/16</td>
<td>None</td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 06-A-1261-S2

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
   Director of Environmental Services

Responsible Party: Ron Zitzow
   Senior Vice President

563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
   Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP 545.0

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>See condition 3</td>
<td>Seventeen Expellers for Spent Germ Hulls</td>
<td>See condition 3</td>
<td>Two Baghouses in parallel (CE2876-1, CE2882-1)</td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
   Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20-197</td>
<td>Decrease PM2.5 Emission Limit</td>
<td>None</td>
<td>12/22/20</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
1a. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP545.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>1.50(^3)</td>
<td>NA</td>
<td>0.1 gr/dscf(^3)</td>
<td>23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>1.50(^4)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.61(^5)</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40(^%)(^6,7)</td>
<td>23.3(2)&quot;d&quot;</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_{2}))</td>
<td>0.50(^8)</td>
<td>NA</td>
<td>10.0 ppm(_{v,d})(^1,9)</td>
<td>RACT</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>NA</td>
<td>NA</td>
<td>18.7 ppm(_{v,d})(^1,9)</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit requested by GPC to restrict potential emissions.
4. The emission limit used in facility wide PM\(_{10}\) dispersion modeling analysis that indicates predicted attainment of the PM\(_{10}\) National Ambient Air Quality Standards (NAAQS).
5. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
6. The emission limit is a six (6) minute average.
7. An exceedance of the indicator opacity of “No visible emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
8. The SO\(_{2}\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_{2}\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
9. The limit for SO\(_{2}\) and VOC emissions as required by the consent order, judgment, and decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV020979, Iowa District Court for Muscatine County (March 27, 2014)].

1b. Other Emission Limits

The following emission limits for Expellers #7 – 12, 14, 16, and 17 (EU 2882 – EU2887, EU2889, EU2892, EU2893) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr(^1)</th>
<th>tons/yr(^2)</th>
<th>Additional Limits</th>
<th>Reference (567 IAC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>NA</td>
<td>NA</td>
<td>0.078 gr/scf(^3)</td>
<td>31.20(1)&quot;d&quot;, LAER</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is a twelve (12) month rolling total.
3. Limit established when the Muscatine Area was designated non-attainment for TSP (PM). The emission units associated with the East Baghouse (CE 2882-1) are subject to a Lowest Achievable Emission Rate (LAER) limit of 0.078 gr/scf. As is listed in Permit Condition 3, those units are Expellers #7 – 12, 14, 16, and 17 (EUs 2882 – 2887, 2889, 2892 – 2893, respectively). The PM emissions from the exit of the East Baghouse are limited to 0.078 gr/scf.
2. Compliance Demonstration(s)

**Compliance Demonstration Table**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5 40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}^{1}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>None</td>
<td>NA</td>
<td>2 hours</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1 Performance testing may be conducted for total particulate matter to demonstrate compliance with PM$_{10}$ limit as specified in permit condition 1a.

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.
3. Emission Point Characteristics

The following emission unit and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Maximum Rated Capacity (tons/hr)</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>#7 Expeller (EU2882.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#8 Expeller (EU2883.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#9 Expeller (EU2884.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#10 Expeller (EU2885.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#11 Expeller (EU2886.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#12 Expeller (EU2887.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#14 Expeller (EU2889.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#16 Expeller (EU2892.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#17 Expeller (EU2893.0)</td>
<td>0.978</td>
<td></td>
</tr>
<tr>
<td>#1 Expeller (EU2876.0)</td>
<td>0.95</td>
<td>West Baghouse (CE 2876-1)</td>
</tr>
<tr>
<td>#2 Expeller (EU2877.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#3 Expeller (EU2878.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#4 Expeller (EU2879.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#5 Expeller (EU2880.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#6 Expeller (EU2881.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#13 Expeller (EU2888.0)</td>
<td>0.95</td>
<td></td>
</tr>
<tr>
<td>#15 Expeller (EU2889.0)</td>
<td>0.95</td>
<td></td>
</tr>
</tbody>
</table>

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>95 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>36 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>115°F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>20,769 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.
5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The differential pressure drop across the Baghouse (CE2876-1) shall be maintained between 0.1 and 4 inches water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Baghouse (CE2876-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across the Baghouse (CE2876-1), in inches of water, at least once per day. If the pressure drop across the Baghouse (CE2876-1) falls outside the range specified in Condition 5A., the owner or operator shall investigate the Baghouse (CE2876-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Baghouse (CE2876-1) is not in operation.

B. The differential pressure drop across the Baghouse (CE2882-1) shall be maintained between 0.1 and 4 inches water column.
   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Baghouse (CE2882-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.
   ii. The owner or operator shall collect and record the pressure drop across the Baghouse (CE2882-1), in inches of water, at least once per day. If the pressure drop across the Baghouse (CE2882-1) falls outside the range specified in Condition 5B., the owner or operator shall investigate the Baghouse (CE2882-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Baghouse (CE2882-1) is not in operation.

C. The owner or operator shall develop an operating and maintenance plan for Baghouse (CE2876-1) and Baghouse (CE2882-1), including a preventative maintenance schedule that is consistent with the manufacturer’s instructions for routine and long-term maintenance.
   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE2876-1).
   ii. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Baghouse (CE2882-1).


Continuous emission monitoring is not required by this permit at this time.
7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:
(1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.
10. Construction (continued)

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
1. Per 567 IAC 22.3(3)“b”:
   a. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   b. The actual date of startup, postmarked within fifteen (15) days following the start of operation.
2. Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   a. At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   b. At least seven (7) days before equipment relocation.
3. Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
4. Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.
12. Notification, Reporting, and Recordkeeping (Continued)

B. The owner or operator shall furnish the Department with the following reports:

(1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

(2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

(3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

(4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

(5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked no later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>502 E 9th Street</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
</tbody>
</table>

13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
## 14. Permit History

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>06-A-1261</td>
<td>06-610</td>
<td>Original Permit (replaced permits 76-A-091 &amp; 85-A-044-S1)</td>
<td>12/13/06</td>
<td>Yes</td>
</tr>
<tr>
<td>06-A-1261-S1</td>
<td>15-050</td>
<td>Modify PM, PM$<em>{10}$ emission limits, add PM$</em>{2.5}$, SO$_{2}$ and VOC emission limits</td>
<td>12/10/15</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Air Quality Construction Permit

Permit Number: 17-A-112

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Director of Environmental Services
563.264.4569
mick.durham@grainprocessing.com

1600 Oregon Street
Muscatine, IA 52761

Responsible Party: Ron Zitzow
Senior Vice President

1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP556.0

Emission Unit(s) and Control Equipment: Fermentation & Distillation
(See condition 3 for emission unit and control equipment list)

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16-385</td>
<td>Remove old columns, Add new columns, merge emission points, Add Scrubber, Add RTO</td>
<td>Yes</td>
<td>05/02/17</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources

[Signature]

CPFP[7001004/050217]16385/17A112
PERMIT CONDITIONS

1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits for EP556.0 shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr</th>
<th>tons/yr</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.110</td>
<td>NA</td>
<td>0.1 gr/dscf(^3)</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.110</td>
<td>NA</td>
<td>NA</td>
<td>PSD Synthetic Minor</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.110</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%(^8,,9)</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_2))</td>
<td>2.0</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO(_x))</td>
<td>3.0</td>
<td>NA</td>
<td>NA</td>
<td>PSD Synthetic Minor</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>1.6</td>
<td>NA</td>
<td>NA</td>
<td>PSD Synthetic Minor</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>6.0</td>
<td>NA</td>
<td>NA</td>
<td>PS D Synthetic Minor</td>
</tr>
<tr>
<td>(Single HAP)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>(Total HAP)</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. Emission limit maintains projects 06-168 and 07-094 PSD significance thresholds.
4. Limit restricts potential emissions below PSD significance level and Projects 16-149 and 16-385 are considered a minor modification for the purposes of PSD.
5. Emission limit used in facility wide 24-hr PM\(_{2.5}\) dispersion modeling analysis conducted in Project 16-385 that indicates predicted attainment of the PM\(_{2.5}\) National Ambient Air Quality Standards (NAAQS).
6. Limit restricts potential SO\(_2\) emissions below NA-NSR significance level and Projects 16-149 and 16-385 are considered a minor modification for the purposes of NA-NSR.
7. Emission limit used in facility wide 1-hr SO\(_2\) dispersion modeling analysis conducted in Project 16-385 that indicates predicted attainment of the SO\(_2\) National Ambient Air Quality Standards (NAAQS).
8. The emission limit is a six (6) minute average.
9. An exceedance of the indicator opacity of “No Visible Emissions” will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).
10. VOC emission limit established to maintain projects 16-149 and 16-385 below significant net emissions increase for purposes of PSD review.
11. Requested emission limit maintains projects 06-168 and 07-094 (Mash Fermenters Nos. 24-29 (EU6324.0-EU6329.0) below PSD significance rate.

The following emission limits for Mash Fermenters Nos. 24-33 with Primary Impinjet/Packed Bed Scrubber and Secondary Packed Bed Scrubber (formerly EP544.0) shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr</th>
<th>tons/yr</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(_{10})</td>
<td>0.49</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>0.185</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Sulfur Dioxide</td>
<td>0.258</td>
<td>NA</td>
<td>NA</td>
<td>RACT</td>
</tr>
</tbody>
</table>

1. The emission limit is expressed as the average of three (3) runs.
2. The emission limit is based on a twelve (12) month rolling total.
3. The limit for PM\(_{10}\) emissions is established to correspond to the emission rate used in the dispersion modeling required by the consent decree entered into between the State of Iowa and Grain Processing Corporation [Law No. CVCV016788, Iowa District Court in and for Muscatine County (July 17, 2006)].
4. The limit for PM\(_{2.5}\) emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM\(_{2.5}\) published in the Federal Register (76 FR 9706) on February 22, 2011.
5. The SO\(_2\) limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO\(_2\) primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).
## 2. Compliance Demonstration(s)

### Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>Performance Testing&lt;sup&gt;1&lt;/sup&gt;</td>
<td>Once every 3 calendar years&lt;sup&gt;3&lt;/sup&gt;</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>40 CFR 51 Appendix M Method 202</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>Performance Testing&lt;sup&gt;1,2&lt;/sup&gt;</td>
<td>Once every 3 calendar years&lt;sup&gt;3&lt;/sup&gt;</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt; - Mash Fermenters Nos. 24-33 with Primary Impinjet/Packed Bed Scrubber and Secondary Packed Bed Scrubber</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>Performance Testing&lt;sup&gt;1&lt;/sup&gt;</td>
<td>Once every 3 calendar years&lt;sup&gt;3&lt;/sup&gt;</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt; - Mash Fermenters Nos. 24-33 with Primary Impinjet/Packed Bed Scrubber and Secondary Packed Bed Scrubber</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>Performance Testing</td>
<td>One-Time</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt; - Mash Fermenters Nos. 24-33 with Primary Impinjet/Packed Bed Scrubber and Secondary Packed Bed Scrubber</td>
<td>NA</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>Performance Testing</td>
<td>One-Time</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 7E</td>
</tr>
<tr>
<td>CO</td>
<td>Performance Testing</td>
<td>One-Time</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 10</td>
</tr>
<tr>
<td>VOC-EP556.0</td>
<td>Performance Testing</td>
<td>Once every 3 calendar years&lt;sup&gt;3&lt;/sup&gt;</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
<tr>
<td>HAP</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18</td>
</tr>
</tbody>
</table>

1. Compliance testing shall be conducted when Mash Fermenters Nos. 24-33 are exhausting to the atmosphere through EP556.0 at the maximum exhaust flow rate.
2. Performance testing may be conducted for total particulate matter to demonstrate compliance with PM<sub>10</sub> and PM<sub>2.5</sub> limit as specified in permit condition 1.
3. After the initial performance test, performance testing shall be conducted once every 3 calendar years. After completion of three consecutive performance tests that demonstrate compliance with the emission limits in condition 1, the owner or operator may request to modify the performance testing frequency.
2. Compliance Demonstration(s) (continued)

If an initial stack test is specified in the “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of equipment specified in condition 3 (EP556.0).

If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,” the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)“a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.
3. Emission Point Characteristics

The following emission unit and control equipment are vented directly or indirectly through this emission point:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU6324.0 - EU6329.0</td>
<td>Mash Fermenters Nos. 24-29</td>
<td>200,000 gallons (storage), each 45,000 gallons of corn mash per hour, each</td>
<td>Primary Impinjet/Packed Bed Scrubber (CE6301-1)</td>
</tr>
<tr>
<td>EU6330.0 - EU6333.0</td>
<td>Mash Fermenters Nos. 30-33</td>
<td>800,000 gallons (storage), each 90,000 gallons of corn mash per hour, each</td>
<td>Secondary Packed Bed Scrubber (CE6301-2)</td>
</tr>
<tr>
<td>EU1072.0 - EU1074.0</td>
<td>Beer Wells A, B, D</td>
<td>96,000 gallons of beer per hour per beer well</td>
<td></td>
</tr>
<tr>
<td>EU1120.0</td>
<td>Beer Degasification Column #1</td>
<td>96,000 gallons of beer per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1082.0 - EU1083.0</td>
<td>Beer Columns #1 and #2</td>
<td>25,000 gallons of beer per hour per column (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1084.0</td>
<td>Beer Column #3</td>
<td>30,000 gallons of beer per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1085.0</td>
<td>Beer Column #4</td>
<td>45,000 gallons of beer per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1121.0</td>
<td>High Pressure Purification Column #1 (Extractive Distillation)</td>
<td>16,740 gallons of high wines per hour (feed rate)</td>
<td>Distillation Area Scrubber (CE1120-1)</td>
</tr>
<tr>
<td>EU1112.0</td>
<td>#6 Alcohol Column</td>
<td>2,500 gallons of proof ethanol per hour (feed rate)</td>
<td>Regenerative Thermal Oxidizer RTO (CE6301-3), Maximum Heat Input: 1.5 MMBtu per hour (natural gas fired only)</td>
</tr>
<tr>
<td>EU1114.0</td>
<td>#7 Alcohol Column</td>
<td>13,542 gallons of proof ethanol per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1122.0</td>
<td>Heads Concentration Column</td>
<td>5,000 gallons of alcohol per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1123.0</td>
<td>Fusil Oil Column</td>
<td>27,3000 gallons fusel alcohol per hour (feed rate)</td>
<td></td>
</tr>
<tr>
<td>EU1105.0 - EU1106.0</td>
<td>Low Proof Surge Tank #1, Low Proof Surge Tank #2</td>
<td>946 gallons low Proof Ethanol per hour (feed rate) per tank</td>
<td></td>
</tr>
<tr>
<td>EU1107.0</td>
<td>High Proof Surge Tank</td>
<td>7, 246 gallons high proof ethanol per hour</td>
<td></td>
</tr>
</tbody>
</table>
3. Emission Point Characteristics (continued)

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>110 Feet</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>Vertical Unobstructed Discharge</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>30 inch Diameter</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>250 °F</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>12,400 scfm</td>
</tr>
</tbody>
</table>

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

The following subparts apply to equipment that are in VOC service located at the: alcohol production operations at Grain Processing Corporation (Plant No. 70-01-004). As specified in 60.481a, equipment means each pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, and flange or other connector in VOC service and any devices or systems required by this subpart. As specified in 60.481a, in VOC service means that the piece of equipment contains or contacts a process fluid that is at least 10 percent VOC by weight. As specified in §60.480a(4), this subpart does not apply to equipment associated with beverage grade alcohol production only. In cases, when equipment used to produce non-beverage alcohol and equipment used to produce common alcohol feedstock for both beverage and non-beverage alcohol production, the following subparts applies

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Subpart</th>
<th>Title</th>
<th>Type</th>
<th>State Reference (567 IAC)</th>
<th>Federal Reference (40 CFR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment Leaks</td>
<td>VVa</td>
<td>Standards of Performance for EquipmentLeaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006</td>
<td>NA</td>
<td>23.1(2)&quot;nn&quot;</td>
<td>§60.480a-60.489a</td>
</tr>
</tbody>
</table>
4. Federal Standards (continued)

The owner or operator shall comply with all reporting and recordkeeping requirements as specified 40 CFR Part 60 Subparts A and VVa, specifically §60.486a and §60.487a.

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):
The following subpart apply to the alcohol production operations at Grain Processing Corporation (Plant No. 70-01-004). This subpart does not apply to operations, equipment and operating periods associated with beverage grade alcohol production only. In cases, when equipment used to produce non-beverage alcohol and equipment used to produce common alcohol feedstock for both beverage and non-beverage alcohol production such as Mash Fermenters Nos. 24-33 (EU6324.0-EU6333.0), the following subpart applies.

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Subpart</th>
<th>Title</th>
<th>Type</th>
<th>State Reference (567 IAC)</th>
<th>Federal Reference (40 CFR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fermentation &amp; Distillation</td>
<td>A</td>
<td>General Provisions</td>
<td>NA</td>
<td>23.1(4)</td>
<td>§63.2540 (Table 12)</td>
</tr>
<tr>
<td>Equipment Leaks</td>
<td>FFFF</td>
<td>Miscellaneous Organic Chemical Manufacturing</td>
<td>(1), (2)</td>
<td>23.1(4)&quot;cf&quot;</td>
<td>§63.2435 – §63.2550</td>
</tr>
</tbody>
</table>

(1) The Fermentation & Distillation equipment are considered a continuous operation in accordance with the definition in §63.2550. This equipment shall be considered new and reconstructed affected sources for purposes of this subpart.

(2) As specified in §63.2455(a), the owner or operator must meet each emission limit in Table 1 that applies to continuous process vents and must meet each applicable requirement §63.2455 (b) and§63.2455 (c).

(3) As specified in §63.2480(a), meet each requirement in Table 6 to this subpart that applies to equipment leaks as applicable.

The owner or operator shall comply with all reporting, notification, and recordkeeping requirements as specified 40 CFR Part 63 Subpart FFFF, specifically §63.2515, §63.2520, 63.2525.

The absence of the inclusion of any NSPS or NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS or NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

Control Equipment-Scrubbers

A. The total liquor flowrate of the Primary Packed Bed Scrubber (CE6301-1) shall be maintained at or above 6 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Primary Packed Bed Scrubber (CE6301-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the total liquor flow rate to the Primary Packed Bed Scrubber (CE6301-1), in gallons per minute, at least once per day. If the total liquor flow rate to the Primary Packed Bed Scrubber (CE6301-1) falls below the value specified in Condition 5A., the owner or operator shall investigate the Primary Packed Bed Scrubber (CE 6301-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Primary Packed Bed Scrubber (CE6301-1) is not in operation.
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

B. The owner or operator shall develop an operating and maintenance plan for the Primary Packed Bed Scrubber (CE6301-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Primary Packed Bed Scrubber (CE6301-1).

C. The total liquor flowrate of the Secondary Packed Bed Scrubber (CE6301-2) shall be maintained at or above 10 gallons per minute.

i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Secondary Packed Bed Scrubber (CE6301-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the total liquor flow rate to the Secondary Packed Bed Scrubber (CE6301-2), in gallons per minute, continuously. If the total liquor flow rate to the Secondary Packed Bed Scrubber (CE6301-2) falls below the value specified in Condition 5 C., the owner or operator shall investigate the Secondary Packed Bed Scrubber (CE6301-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Secondary Packed Bed Scrubber (CE6301-2) is not in operation.

D. The differential pressure drop across the Secondary Packed Bed Scrubber (CE6301-2) shall be maintained between 1 and 21 inches water column.

i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Secondary Packed Bed Scrubber (CE6301-2). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

ii. The owner or operator shall collect and record the pressure drop across the Secondary Packed Bed Scrubber (CE6301-2), in inches of water, continuously. If the pressure drop across the Secondary Packed Bed Scrubber (CE6301-2) falls outside the range specified in Condition 5 D., the owner or operator shall investigate the Secondary Packed Bed Scrubber (CE6301-2) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Secondary Packed Bed Scrubber (CE6301-2) is not in operation.

E. The owner or operator shall develop an operating and maintenance plan for the Secondary Packed Bed Scrubber (CE6301-2), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Packed Bed Scrubber (CE 6301-2).
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

F. The total liquor flowrate of Distillation Packed Bed Scrubber (CE1120-1) shall be maintained at or above 14.5 gallons per minute.

   i. The owner or operator shall properly operate and maintain equipment to monitor the total liquor flow rate to the Distillation Packed Bed Scrubber (CE1120-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the total liquor flow rate to the Distillation Packed Bed Scrubber (CE1120-1), in gallons per minute, continuously. If the total liquor flow rate to the Distillation Packed Bed Scrubber (CE1120-1) falls below the value specified in Condition 5F., the owner or operator shall investigate the Secondary Packed Bed Scrubber (CE1120-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Secondary Packed Bed Scrubber (CE1120-1) is not in operation.

G. The differential pressure drop across the Distillation Packed Bed Scrubber (CE1120-1) shall be maintained between 1 and 6 inches water column.

   i. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Distillation Packed Bed Scrubber (CE1120-1). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the pressure drop across the Distillation Packed Bed Scrubber (CE1120-1), in inches of water, continuously. If the pressure drop across the Distillation Packed Bed Scrubber (CE1120-1) falls outside the range specified in Condition 5G., the owner or operator shall investigate the Distillation Packed Bed Scrubber (CE1120-1) and make corrections to it. The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that the Distillation Packed Bed Scrubber (CE1120-1) is not in operation.

H. The owner or operator shall develop an operating and maintenance plan for the Distillation Packed Bed Scrubber (CE1120-1), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Distillation Packed Bed Scrubber (CE1120-1).
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

**Control Equipment-RTO**

I. The owner or operator shall maintain a Regenerative Thermal Oxidizer (CE6301-3) combustion chamber temperature to no less than 1600 degrees Fahrenheit based on a 3-hour block average.

   i. The owner or operator shall properly operate and maintain equipment to monitor the chamber temperature of Regenerative Thermal Oxidizer (CE6301-3). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

   ii. The owner or operator shall collect and record the combustion chamber temperature of Regenerative Thermal Oxidizer (CE6301-3), in °F on a continuous basis. The owner or operator shall calculate and record the 3-hour block average of the combustion chamber temperature in °F. If the 3-hour block average combustion chamber temperature of Regenerative Thermal Oxidizer (CE6301-3) falls below the value specified in Condition 5I, the owner or operator shall investigate Regenerative Thermal Oxidizer (CE6301-3) and make corrections Regenerative Thermal Oxidizer (CE6301-3). The owner or operator shall maintain a record of all corrective actions taken. This requirement shall not apply on the days that Regenerative Thermal Oxidizer (CE6301-3) is not in operation.

J. The owner or operator shall combust only natural gas or process off-gasses in Regenerative Thermal Oxidizer (CE6301-3).

K. The owner or operator shall develop an operating and maintenance plan for the Regenerative Thermal Oxidizer (CE6301-3), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

   i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Regenerative Thermal Oxidizer (CE6301-3).

**Project Completion**

L. The owner or operator shall permanently cease operation and decommission the equipment specified in Table 1 within 30 days upon the startup date of equipment specified in condition 3.

   i. The owner or operator shall maintain a record of the date that the equipment specified in Table 1 of have permanently ceased operation and have been decommissioned.

### Table 1: Decomisioned Equipment List

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>EU ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mash Fermenters Nos. 1-23</td>
<td>EU6301.0 – EU6323.0</td>
</tr>
<tr>
<td>Alcohol Columns Nos. 1-4</td>
<td>EU1086.0 -EU1089.0</td>
</tr>
<tr>
<td>Extractive Distillation Column Nos. 3-4</td>
<td>EU191.0 –EU1092.0</td>
</tr>
<tr>
<td>Stripper Column</td>
<td>EU1093.0</td>
</tr>
</tbody>
</table>
5. Operating Requirements with Associated Monitoring and Recordkeeping (continued)

k. The owner or operator shall vent all equipment to the control equipment specified in condition 3 at all times when the equipment is exhausting to the atmosphere. This condition is not applicable when the equipment is not in operation.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.
10. Construction (continued)

This permit or amendment shall become void if any one of the following conditions occurs:
(1) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
(2) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
(3) The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:
The owner or operator shall amend this permit or amendment prior to startup of the equipment if:
(1) Any changes are made to the final plans and specifications submitted for the proposed project; or
(2) This permit becomes void.

Changes to the final plans and specifications shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:
The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:
(1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
(2) This current amendment becomes void.

11. Excess Emissions
Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].

12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:
(1) Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
(2) Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
   (b) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (c) At least seven (7) days before equipment relocation.
12. Notification, Reporting, and Recordkeeping (continued)

(3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
   • The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.

(4) Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
   • The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

   If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

   (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.

   (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.

   (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 14 in accordance to the schedule set forth in 567 IAC 24.1.

   (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.

   (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

<table>
<thead>
<tr>
<th>Air Quality Bureau</th>
<th>DNR Field Office 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td>1023 West Madison</td>
</tr>
<tr>
<td>7900 Hickman Road, Suite 1</td>
<td>Washington, IA 52353</td>
</tr>
<tr>
<td>Windsor Heights, IA 50324</td>
<td>Telephone: (319) 653-2135</td>
</tr>
<tr>
<td>Telephone: (515) 725-9549</td>
<td>Fax: (319) 653-2856</td>
</tr>
<tr>
<td>Fax: (515) 725-9502</td>
<td></td>
</tr>
</tbody>
</table>
13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

Mash Fermenters Nos. 24-33 with Primary Impinjet/Packed Bed Scrubber and Secondary Packed Bed Scrubber (EP544.0)

<table>
<thead>
<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>05-A-926</td>
<td>05-645</td>
<td>Original Permit.</td>
<td>12/02/2005</td>
<td>No</td>
</tr>
<tr>
<td>05-A-926-S1</td>
<td>06-168</td>
<td>Correct Permit, Emissions Increase.</td>
<td>07/24/2006</td>
<td>Yes</td>
</tr>
<tr>
<td>05-A-926-S2</td>
<td>07-094</td>
<td>Modify VOC and PM Emission Limits.</td>
<td>06/14/2007</td>
<td>No</td>
</tr>
<tr>
<td>05-A-926-S3</td>
<td>08-069</td>
<td>Increase Stack Height.</td>
<td>02/20/2008</td>
<td>No</td>
</tr>
<tr>
<td>05-A-926-S4</td>
<td>15-362</td>
<td>Add PM10, PM2.5, and SO2 emission limits</td>
<td>02/15/16</td>
<td>Yes</td>
</tr>
<tr>
<td>05-A-926-S5</td>
<td>16-149</td>
<td>Install 4 New Continuous Fermentation Vessels, Remove Existing Vessels 1-23</td>
<td>09/19/16</td>
<td>Yes</td>
</tr>
</tbody>
</table>

END OF PERMIT
Permit Number: 15-A-199-S1

Plant Number: 70-01-004

Company: Grain Processing Corporation

Contact Person: Mick Durham
Manager of Environmental Services

Responsible Party: Ron Zitzow
Senior Vice President, Operations

(563) 264-4569
Mick.durham@grainprocessing.com
1600 Oregon Street
Muscatine, IA 52761

Permitted Equipment

Emission Point ID: EP WETFEED

Emission Unit(s) and Control Equipment:

<table>
<thead>
<tr>
<th>EU ID</th>
<th>Description</th>
<th>Maximum Rated Capacity</th>
<th>Control Equipment Description and ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1276.0</td>
<td>Wet Feed Pad and Loadout to Truck</td>
<td>1500 tons of wet feed per day</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Storage pile size of 10,500 ft²</td>
<td></td>
</tr>
</tbody>
</table>

Equipment Location: 1600 Oregon Street
Muscatine, IA 52761

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

<table>
<thead>
<tr>
<th>Project Number</th>
<th>Project Description</th>
<th>Stack Testing</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>20-259</td>
<td>Modify Operating Limit on Annual Throughput</td>
<td>No</td>
<td>01/11/21</td>
</tr>
</tbody>
</table>

Under the Direction of the Director of the Department of Natural Resources
1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>lb/hr$^1$</th>
<th>tons/yr$^2$</th>
<th>Other Limits</th>
<th>Reference/Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM) – State</td>
<td>0.17$^3$</td>
<td>NA</td>
<td>0.1 gr/dscf</td>
<td>567 IAC 23.4(7)</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.068$^{3,4}$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.038$^5$</td>
<td>NA</td>
<td>NA</td>
<td>NAAQS</td>
</tr>
<tr>
<td>Opacity</td>
<td>NA</td>
<td>NA</td>
<td>40%$^6$</td>
<td>567 IAC 23.3(2)“d”</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>0.15$^7$</td>
<td>NA</td>
<td>500 ppm$_v$</td>
<td>RACT and 567 IAC 23.3(3)“e”</td>
</tr>
</tbody>
</table>

$^1$ The emission limit is expressed as the average of three (3) runs.
$^2$ The emission limit is based on a twelve (12) month rolling total.
$^3$ The limits for PM and PM$_{10}$ emissions are established to limit the unit’s potential to emit.
$^4$ The emission limit used in facility wide PM$_{10}$ dispersion modeling analysis that indicates predicted attainment of the PM$_{10}$ National Ambient Air Quality Standards (NAAQS).
$^5$ The limit for PM$_{2.5}$ emissions is established to address the “Finding of Substantial Inadequacy of Implementation Plan; Call for Iowa SIP Revision” for PM$_{2.5}$ published in the Federal Register (76 FR 9706) on February 22, 2011.
$^6$ The emission limit is a six (6) minute average.
$^7$ The SO$_2$ limit is established to address the nonattainment designation for a portion of Muscatine County published in the Federal Register (78 FR 47191) on August 5, 2013. The nonattainment designation is for the 1-hour SO$_2$ primary national ambient air quality standard promulgated by EPA in 2010 (75 FR 35519, June 22, 2010).

2. Compliance Demonstration(s)

### Compliance Demonstration Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Compliance Methodology</th>
<th>Frequency</th>
<th>Test Run Time</th>
<th>Test Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM – State</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 5, 40 CFR 51, Appendix M Method 202</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 51, Appendix M, 201A with 202</td>
</tr>
<tr>
<td>Opacity</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 9</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>None</td>
<td>NA</td>
<td>1 hour</td>
<td>40 CFR 60, Appendix A, Method 6C</td>
</tr>
</tbody>
</table>

**If an initial stack test is specified in the “Compliance Demonstration Table,”** the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

**If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in “Compliance Demonstration Table,”** the owner or the owner’s authorized agent shall demonstrate compliance with the emission limitations contained in Condition 1 as specified in the “Compliance Demonstration Table.” See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.
2. Compliance Demonstration(s) (Continued)

If stack testing is required, the owner or the owner’s authorized agent shall use the test method and run time listed in the “Compliance Demonstration Table” unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)”a”, at the Department’s request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner’s intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack Height (feet from the ground)</td>
<td>*</td>
</tr>
<tr>
<td>Discharge Style</td>
<td>*</td>
</tr>
<tr>
<td>Stack Outlet Dimensions (inches)</td>
<td>*</td>
</tr>
<tr>
<td>Exhaust Temperature (°F)</td>
<td>*</td>
</tr>
<tr>
<td>Exhaust Flowrate (scfm)</td>
<td>*</td>
</tr>
</tbody>
</table>

*There is no stack on this emission unit.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

4. Federal Standards

A. New Source Performance Standards (NSPS):

This emission unit is not subject to any NSPS subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.
B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This emission unit is not subject to any NESHAP subparts at this time as there are no applicable subparts for its source category.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

5. Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The moisture content of the wet feed handled and loaded out shall not be less than 10%. The owner or operator shall maintain records on any analysis done on the moisture content of the wet feed.

B. The amount of wet feed loaded out shall not exceed 100,000 tons in any rolling 12-month period.
   i. The owner or operator shall maintain the following monthly records for the Wet Feed Loadout (EU1276.0):
      a. The amount of wet feed loaded out, in tons; and
      b. The rolling 12-month total of the amount of wet feed loaded out, in tons.


Continuous emission monitoring is not required by this permit at this time.

7. Department Review

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant’s representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

8. Owner and Operator Responsibility

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.
9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

10. Construction

A. General Requirements:

It is the owner’s responsibility to ensure that construction conforms to the final plans and specifications as submitted. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

1. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
2. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
3. The construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

1. Any changes are made to the final plans and specifications submitted for the proposed project; or
2. This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

1. The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
2. This current amendment becomes void.

11. Excess Emissions

Per 567 IAC 24.1(1), excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one (1) six-minute period per one (1) hour period.

An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shut down within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported by telephone, electronic mail or in person to the appropriate field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident [See Permit Condition 12.B.(1)]. A written report of an incident of excess emissions shall be submitted as a follow-up to all required initial reports within seven (7) days of the onset of the upset condition [See Permit Condition 12.B.(2)].
12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

1. Per 567 IAC 22.3(3)“b”:
   (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following
       initiation of construction, installation, or alteration.
   (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.

2. Per 567 IAC 22.3(3)“f,” when portable equipment for which a permit has been issued is to be transferred from
   one location to another, the Department shall be notified:
   (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment
       area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
   (b) At least seven (7) days before equipment relocation.

3. Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within
   thirty (30) days of the occurrence. The notification shall include the following information:
   - The date of ownership change; the name, address, and telephone number of the responsible official, the
     contact person, and the owner of the equipment both before and after the ownership change; and the
     construction permit number(s) of the equipment changing ownership.

4. Unless specified per a federal regulation, the owner or the owner’s authorized agent shall notify the Department
   in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission
   monitor [567 IAC 25.1(7)]. The notification shall include:
   - The time; the place; the name of the person who will conduct the tests; and other information as required by
     the Department.

   If the owner or operator does not provide timely notice to the Department, the Department shall not consider the
   test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules
   or permit conditions. Upon written request, the Department may allow a notification period of less than thirty
   (30) days.

B. The owner or operator shall furnish the Department with the following reports:

1. Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight
   (8) hours or at the start of the first working day following the onset of the incident. The report may be made by
   electronic mail, in person or by telephone.

2. Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be
   submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the
   upset condition.

3. Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit
   Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.

4. Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or
   systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end
   of the calendar quarter, on forms provided by the Director.

5. Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether
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   regulations provide for other notification requirements. In that case, the more stringent reporting requirement
   shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be
   available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution
   regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording
   unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)
D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

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<tbody>
<tr>
<td>Iowa Department of Natural Resources</td>
<td></td>
</tr>
<tr>
<td>6 E. 9th St.</td>
<td></td>
</tr>
<tr>
<td>Des Moines, IA 50319</td>
<td></td>
</tr>
<tr>
<td>Telephone: (515) 725-8200</td>
<td></td>
</tr>
<tr>
<td>Fax: (515) 725-9501</td>
<td></td>
</tr>
<tr>
<td>Washington, IA 52353-1623</td>
<td></td>
</tr>
<tr>
<td>Telephone: (319) 653-2135</td>
<td></td>
</tr>
<tr>
<td>Fax: (319) 653-2856</td>
<td></td>
</tr>
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All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

14. Permit History

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<tr>
<th>Permit No.</th>
<th>Project No.</th>
<th>Description</th>
<th>Date</th>
<th>Stack Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-A-199</td>
<td>15-050</td>
<td>Permit Source</td>
<td>12/10/15</td>
<td>No</td>
</tr>
</tbody>
</table>

END OF PERMIT