



**LINN COUNTY PUBLIC HEALTH**  
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 CEDAR RAPIDS, IOWA 52401  
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**Pramod Dwivedi, DrPH, MS** | Health Director

LinnCountyIowa.gov



May 21, 2025

Brian Mullins  
 Plant Manager  
 ADM Corn Processing  
 1350 Waconia Avenue SW  
 Cedar Rapids, IA 52404

Dear Mr. Mullins:

This letter transmits the issuance of a final Title V operating permit for the following facility:

**Table 1 - Facility Information**

EQ No.	Plant No.	Facility Name	City	Operating Permit No.
92-9065	57-01-080	ADM Corn Processing	Cedar Rapids	08-TV-004R2

Based on the information submitted in your application, the DNR has made the following determinations:

1. Comments were received from the facility during the public comment period and observations were made by the Department on the contents of the permit that might require further review and documentation. These comments and observations and the responses are enclosed in the Responsiveness Summary.
2. The effective date of this permit is May 21, 2026.
3. The facility is subject to the following New Source Performance Standard(s): 40 CFR 60 Subpart Dc, Kb, Y, DD, VV, IIII, and KKKK.
4. The facility is subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAPs): 40 CFR 61 Subpart M and 40 CFR 63 Subparts Q, UU, FFFF, YYYY, ZZZZ, and DDDDD.
5. The facility is a major source with regards to Title V operating permit regulations.
6. The term for this permit is five years.
7. The issuance of this permit does not preclude the DNR from pursuing enforcement action regarding any violation.

You are encouraged to review the permit thoroughly with your staff, in particular the monitoring and recordkeeping requirements within the permit. Also, please be aware that Title V compliance/monitoring reports will be due March 31 and September 30 of each year (see General Condition items G4 and G5). Forms and instructions for completing these reports are available on Iowa DNR's website at [www.iowacleanair.com](http://www.iowacleanair.com).

I appreciate the cooperation and effort your staff provided in developing this permit. If you have any questions regarding the permit, please contact me at (319) 892-6011 or [Jason.Keener@linncountyiowa.gov](mailto:Jason.Keener@linncountyiowa.gov).

Sincerely,





Jason Keener  
Air Permitting Engineer

c: Angeline Chung, Vantage (w/ Enc. via e-mail)  
Shane Dodge, Field Office 1 (w/ Enc. via e-mail)  
David Peter, EPA Region VII (w/ Enc. via e-mail)

Enclosure(s): Final Title V Operating Permit #: 08-TV-004R2  
Permit Writer Notes  
Spreadsheet  
Responsiveness Summary

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility:** ADM Corn Processing  
**Facility Location:** 1350 Waconia Avenue SW  
Cedar Rapids, IA 52404

**Air Quality Operating Permit Number:** 08-TV-004R2

**Expiration Date:** May 20, 2031

**Permit Renewal Application Deadline:** November 20, 2030

**EIQ Number:** 92-9062

**Facility File Number:** 57-01-080

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**Responsible Official**

**Name:** Brian Mullins  
**Title:** Plant Manager  
**Mailing Address:** 1350 Waconia Ave. SW., Cedar Rapids, Iowa 52404  
**Phone #:** 319-398-0721

**Permit Contact Person for the Facility**

**Name:** Angeline Chung  
**Title:** Environmental Manager  
**Mailing Address:** 1350 Waconia Ave. SW, Cedar Rapids, Iowa 52404  
**Phone #:** 319-398-0632

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 24, and is issued subject to the terms and conditions contained in this permit. This facility and Bio Springer North America Corporation (Plant No. 57-01-226), LeSaffre Blending Plant (Plant No. 57-01-226), Red Star Yeast Company, LLC (Plant No. 57-01-226), and Vantage Corn Processors (Plant No. 57-01-246) are considered one stationary source. Four Title V Permits have been issued for the five facilities. This permit is for ADM Corn Processing. Other permits have been issued for Bio Springer (Permit No. 12-TV-005R2), LeSaffre and Red Star (Permit No. 10-TV-006R2), and Vantage Corn Processors (Permit No. 08-TV-007R2).

**For the Director of the Department of Natural Resources**

*Corey McCoid*

05/21/2026

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Corey McCoid, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

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acfm	actual cubic feet per minute	LCPH	Linn County Public Health
ATI	authorization to install	LCCO	Linn County Code of Ordinances
BHP	brake horse power	Mcf/hr	thousand cubic feet per hour
bph	bushels per hour	MMcf/hr	million cubic feet per hour
bpy	bushels per year	MVAC	motor vehicle air conditioner
Btu	British thermal units	NAICS	North American Industry Classification System
CFR	Code of Federal Regulation		
CI	compression ignition	NSPS	new source performance standard
CE	control equipment	ppm <sub>v</sub>	parts per million by volume
cfh	cubic feet per hour	PTO	permit to operate
cfm	cubic feet per minute	lb/hr	pounds per hour
°F	degrees Fahrenheit	lb/MMBtu	pounds per million British thermal units
DOC	diesel oxidation catalyst		
dscfm	dry standard cubic feet per minute	SI	spark ignition
EIQ	emissions inventory questionnaire	scfm	standard cubic feet per minute
EP	emission point	SIC	Standard Industrial Classification
EU	emission unit	tph	tons per hour
GPH	gallons per hour	tpy	tons per year
gpm	gallons per minute	USEPA	United States Environmental Protection Agency
gr./dscf	grains per dry standard cubic foot		
H	horizontal	V	vertical, unobstructed
IAC	Iowa Administrative Code		
IDNR	Iowa Department of Natural Resources		

## Pollutants

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PM	particulate matter
PM <sub>10</sub>	particulate matter ten microns or less in diameter
PM <sub>2.5</sub>	particulate matter two point five microns and less in diameter
SO <sub>2</sub>	sulfur dioxide
NO <sub>x</sub>	nitrogen oxides
VOC	volatile organic compound
CO	carbon monoxide
HAP	hazardous air pollutant
SHAP	single hazardous air pollutant
THAP	total hazardous air pollutant

## I. Facility Description and Equipment List

Facility Name: ADM Corn Processing

Permit Number: 08-TV-004R2

Facility Description: Corn Wet Milling Plant (SIC 2046)

**Table 1 – Elevator Equipment List**

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
008	010A	60% Gluten Meal Cooler 1	--	7651 / 7420
	010B	60% Gluten Meal Cooler 2		
	023	Cracked Corn Receiving		
	040	Germ to Storage Conveying		
	048	Gluten Hammermills		
	049	Gluten to Storage Conveying		
	086A	Gluten Truck Loadout		
	086B	Gluten Rail Loadout		
061	061	Steel Corn Silo #1	--	6210 / 6051
062	062	Steel Corn Silo #2	--	6211 / 6052
063	063	Steel Corn Silo #3	--	6212 / 6053
064	064	Steel Corn Silo #4	--	6213 / 6054
180	180	Bulk Weight Scale	--	8206 / --
	180B	Steel Tank Leg		
	180C	Silo to Steeps 1 West Belt Conveyor		
	180D	Silo to Steeps 2 East Belt Conveyor		
	180E	Steep House Corn Hopper		
	181	Rail Dump		
	181B	200 Leg		
181	180	Bulk Weigh Scale	--	8207 / --
	180B	Steel Tank Leg		
	180C	Silo to Steeps 1 West Belt Conveyor		
	180D	Silo to Steeps 2 East Belt Conveyor		
	180E	Steep House Corn Hopper		
	181	Rail Dump		
	181B	200 Leg		
	182F	West Reclaim Leg Bucket Elevator		
	182G	14 & 15 Reclaim Conveyor		
	182H	South to North Reclaim Conveyor		
	182I	West to East Reclaim Conveyor		
182	182A	Corn Truck Unload Pit 1 (North)	--	8208 / --
	182B	Corn Truck Unload Pit 2 (South)		
	182C	Truck Pit 1 Conveyor (North)		
	182D	Truck Pit 2 Conveyor (South)		
	182E	West Reclaim Leg Feed Conveyor		
	182F	West Reclaim Leg Bucket Elevator		
	182G	14 & 15 Reclaim Conveyor		
	182H	South to North Reclaim Conveyor		
	182I	West to East Reclaim Conveyor		
183	180B	Steel Tank Leg	--	8210 / --
	183A	Corn Cleaner Feed Tank		

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
183	183B	Corn Cleaner 1 Feed Screw (East)	--	8210 / --
	183C	Corn Cleaner 2 Feed Screw (Center)		
	183D	Corn Cleaner 3 Feed Screw (West)		
	183E	Corn Cleaner 1 – 6 Rolls (East)		
	183F	Corn Cleaner 2 – 6 Rolls (Center)		
	183G	Corn Cleaner 3 – 6 Rolls (West)		
	183H	Clean Corn Discharge Conveyor 1		
	183I	Clean Corn Discharge Conveyor 2		
	183J	Clean Corn Leg		
	183K	Cracked Corn Discharge Conveyor 1		
	183L	Cracked Corn Discharge Conveyor 2		
	183M	Corn Overs Drag		
	183N	Cracked Corn Fill Leg		
	183O	Cracked Corn Tank 1 (East)		
	183P	Cracked Corn Tank 2 (West)		
	183Q	Cracked Corn Discharge Loading Drag		
	183R	Cracked Corn Discharge Loading Leg		
	183S	Cracked Corn Discharge Loading Conveyor		
	183T	Cracked Corn Loading Screw 1 Reversing		
	183U	Cracked Corn Loading Screw 2 Reversing		
183V	Cracked Corn DCL Venting Spout 6K1			
183W	Cracked Corn DCL Venting Spout 6K2			
183X	Cracked Corn DCL Venting Spout 3K			
183Y	Cracked Corn Loading Spout			
CE180	East Baghouse Rotary Valve			
CE181	West Baghouse Rotary Valve			
253	253	Temporary Corn Pile 1	--	7223R1 / 7111
254	254	Temporary Corn Pile 2	--	7224R1 / 7112

**Table 2 – Mill Equipment List**

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
083	083A	Wet Corn Hopper	--	4828 / 5712
	083B	First Grind Tank		
	083C	MR Steepwater Evaporators		
	375	Steep Tank 1E		
	376	Steep Tank 2E		
	377	Steep Tank 3E		
	378	Steep Tank 10E		
	379	Steep Tank 11E		
	380	Steep Tank 12E		
	381	Steep Tank 1F		
	382	Steep Tank 2F		
	383	Steep Tank 3F		
	384	Steep Tank 10F		
	385	Steep Tank 11F		
	386	Steep Tank 12F		
201	201A	Heavy Gluten Storage Tank	--	4829 / 6111
	201B	Mill Water Storage Tank		

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
201	201C	Light Steepwater Storage Tank	--	4829 / 6111
204	204	Biomass Feed Storage Tank	--	4830 / 6150
205	205	Heavy Steepwater Storage Tank	--	4831 / 6151
206	206	Intermediate Steepwater Storage Tank	--	4832 / 6152
210	210	Millhouse Fugitive Emissions	--	6925 / 6759R1
307	307	Steep Tank 1A	--	5575 / 5812
308	308	Steep Tank 2A	--	5576 / 5813
309	309	Steep Tank 3A	--	5577 / 5814
310	310	Steep Tank 4A	--	5578 / 5815
311	311	Steep Tank 5A	--	5579 / 5816
312	312	Steep Tank 6A	--	5580 / 5817
313	313	Steep Tank 7A	--	5581 / 5818
314	314	Steep Tank 8A	--	5582 / 5819
315	315	Steep Tank 9A	--	5583 / 5820
316	316	Steep Tank 10A	--	5584 / 5821
317	317	Steep Tank 11A	--	5585 / 5822
318	318	Steep Tank 12A	--	5586 / 5823
319	319	Steep Tank 13A	--	5587 / 5824
320	320	Steep Tank 14A	--	5588 / 5825
321	321	Steep Tank 15A	--	5589 / 5826
322	322	Steep Tank 16A	--	5590 / 5827
323	323	Steep Tank 17A	--	5591 / 5828
324	324	Steep Tank 18A	--	5592 / 5829
325	325	Steep Tank 1B	--	5593 / 5830
326	326	Steep Tank 2B	--	5594 / 5831
327	327	Steep Tank 3B	--	5595 / 5832
328	328	Steep Tank 4B	--	5596 / 5833
329	329	Steep Tank 5B	--	5597 / 5834
330	330	Steep Tank 6B	--	5598 / 5835
331	331	Steep Tank 7B	--	5599 / 5836
332	332	Steep Tank 8B	--	5600 / 5837
333	333	Steep Tank 9B	--	5601 / 5838
334	334	Steep Tank 10B	--	5602 / 5839
335	335	Steep Tank 11B	--	5603 / 5840
336	336	Steep Tank 12B	--	5604 / 5841
337	337	Steep Tank 13B	--	5605 / 5842
338	338	Steep Tank 14B	--	5606 / 5843
339	339	Steep Tank 15B	--	5607 / 5844
340	340	Steep Tank 16B	--	5608 / 5845
341	341	Steep Tank 17B	--	5609 / 5846
342	342	Steep Tank 18B	--	5610 / 5847
343	343	Steep Tank 1C	--	5611 / 5848
344	344	Steep Tank 2C	--	5612 / 5849
345	345	Steep Tank 3C	--	5613 / 5850
346	346	Steep Tank 4C	--	5614 / 5851
347	347	Steep Tank 5C	--	5615 / 5852
348	348	Steep Tank 6C	--	5616 / 5853
349	349	Steep Tank 7C	--	5617 / 5854
350	350	Steep Tank 8C	--	3618 / 5855
351	351	Steep Tank 9C	--	5619 / 5856

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
352	352	Steep Tank 10C	--	5620 / 5857
353	353	Steep Tank 11C	--	5621 / 5858
354	354	Steep Tank 12C	--	5622 / 5859
355	355	Steep Tank 13C	--	5623 / 5860
356	356	Steep Tank 14C	--	5624 / 5861
357	357	Steep Tank 15C	--	5625 / 5862
358	358	Steep Tank 16C	--	5626 / 5863
359	359	Steep Tank 17C	--	5627 / 5864
360	360	Steep Tank 18C	--	5628 / 5865
361	361	Steep Tank 1D	--	5629 / 5866
362	362	Steep Tank 2D	--	5630 / 5867
363	363	Steep Tank 3D	--	5631 / 5868
364	364	Steep Tank 4D	--	5632 / 5869
365	365	Steep Tank 5D	--	5633 / 5870
366	366	Steep Tank 6D	--	5634 / 5871
367	367	Steep Tank 7D	--	5635 / 5872
368	368	Steep Tank 8D	--	5636 / 5873
369	369	Steep Tank 9D	--	5637 / 5874
370	370	Steep Tank 10D	--	5638 / 5875
371	371	Steep Tank 11D	--	5639 / 5876
372	372	Steep Tank 12D	--	5640 / 5877
373	373	Steep Tank 13D	--	5641 / 5878
374	374	Steep Tank 14D	--	5642 / 5879

**Table 3 – 60% Gluten Meal Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
011	011	Gluten Meal Dryer #1 (Bypass Stack)	--	5346 / 5220R1
013	013	60% Gluten Meal Recycle No. 3	--	5808 / 5768
018	018	#2 Gluten Dryer (Bypass Stack)	--	5347 / 5221
050	050	60% Gluten Meal Recycle No. 2	--	5809 / 5769
051	051	60% Gluten Meal Recycle No. 1	--	7024 / 6744
190	005C	Fiber Feed Dryer #4	--	4900 / 5783R1
	005D	Fiber Feed Dryer #5		
	011	Gluten Meal Dryer #1		
	018	Gluten Meal Dryer #2		
	019	Fiber Feed Dryer #1		
	030	Fiber Feed Dryer #2		
	043	Fiber Feed Dryer #3		
190	RTO #1			
191	005C	Fiber Feed Dryer #4	--	4901 / 5784
	005D	Fiber Feed Dryer #5		
	011	Gluten Meal Dryer #1		
	018	Gluten Meal Dryer #2		
	019	Fiber Feed Dryer #1		
	030	Fiber Feed Dryer #2		
	043	Fiber Feed Dryer #3		
	191A	RTO #2		
191B	RTO #3			

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
192	005C	Fiber Feed Dryer #4	--	4902 / 5785
	005D	Fiber Feed Dryer #5		
	011	Gluten Meal Dryer #1		
	018	Gluten Meal Dryer #2		
	019	Fiber Feed Dryer #1		
	030	Fiber Feed Dryer #2		
	043	Fiber Feed Dryer #3		
	192A	RTO #4		
	192B	RTO #5		
226	226	Gluten Filters 1-15, 19-22; Vacuum Pumps 1-4	--	6974 / 6834
230	230	#16, #17, and #18 Gluten Filter Pumps	--	4838 / 5486

**Table 4 – 21% Fiber Feed Equipment List**

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
019	019	#1 Fiber Feed Dryer (Bypass Stack)	--	5348 / 5222
026	005C	#4 Fiber Feed Dryer (Bypass Stack)	--	5349 / 5223
027	005D	#5 Fiber Feed Dryer (Bypass Stack)	--	5350 / 5224
030	030	#2 Fiber Feed Dryer (Bypass Stack)	--	5351 / 5225
032	032B	#2 Fiber Cooler	--	7167 / 6900
	032C	Stedman Mills 1-8		
043	043	#3 Fiber Feed Dryer (Bypass Stack)	--	5352 / 5226
193	193A	Wet Feed Loadout Hood	--	7422 / 7255
	193B	Wet Feed Mixer		
211	211	Feedhouse Miscellaneous Fugitive Emissions	--	4841 / 6331
271	271	Vertical Fiber Cooler #1	--	7225 / 7057

**Table 5 – Germ Equipment List**

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
006	006	#2 Fluid Bed Germ Dryer (FBGD)	--	7168 / 6901
015	015	#1 Fluid Bed Germ Dryer (FBGD)	--	4541 / 4713R1
016	012	Wet Feed Tank	--	4818 / 5782
	016A	#1 Steam Tube Germ Dryer		
	016B	#2 Steam Tube Germ Dryer		
	016C	#3 Steam Tube Germ Dryer		
	016D	#4 Steam Tube Germ Dryer		
021	021	Germ Cooler	--	4819 / 6149

**Table 6 – Pellet Mill Equipment List**

Emission Point #	Emission Unit #	Emission Unit Description	DNR Permit #	LCPH Permit #
388	001	#4 Pellet Cooler	--	5037 / 6077
	029	#1 Pellet Cooler		
	036	Pellet Mill Dust Collection		
	038	#2 Pellet Cooler		
	039	#3 Pellet Cooler		

**Table 7 – Alcohol Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
055	055	Ethanol Fermenters / CO <sub>2</sub> Fermentation Scrubber	--	6443 / 6507
057	057	Yeast Propagator Tank #1	--	4676 / 5481R1
058	058	Yeast Propagator Tank #2	--	4677 / 5482R1
059	059	Yeast Propagator Tank #3	--	4678 / 5483R1
060	060	Yeast Propagator Tank #4	--	4679 / 5484R1
069	069	190° Product Scrubbing System	--	6426 / 6460
070	070	200° Product Scrubbing System	--	6057 / 6333
071	071	No. 1 Alcohol Storage Tank	--	4684 / 5295
072	072	No. 2 Alcohol Storage Tank	--	4685 / 5296
073	073	No. 3 Alcohol Storage Tank\	--	4686 / 5297
074	074	Denaturant Storage Tank (Gasoline)	--	4687 / 5298
075	075	No. 2 Hi-Wine Transfer Tank	--	4688 / 5299
076	076	Alcohol Loadout	04-A-314P	4689 / 5017
077	077	Corrosion Inhibitor Tank	--	4690 / 5300
080	080	No. 3 Hi-Wine Process Tank	--	4691 / 5301R1
081	081	Fusel Oil Tank	--	4692 / 5302
082	082	190° Storage Tank	--	4693 / 5303
250	250	Alcohol Collection Blower #1	--	6505 / 6334
251	251	Alcohol Collection Blower #2	--	6506 / 6335
252	252	Alcohol Collection Blower #3	--	6507 / 6336

**Table 8 – Starch Manufacturing Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
002	002	Corn Starch Flash Dryer #1	--	3446 / 3497
003	003	Corn Starch Loadout System #1	--	3557 / 3498
004	004	Corn Starch Loadout System #2	--	3558 / 3499
007	007	Starch Dryer to Loadout Pneumatic Transfer	--	3559 / 3500
160	160	Starch Rotex #1	--	6787 / 6657
161	161	Starch Rotex #2	--	6788 / 6658

**Table 9 – Maltodextrin Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
120	120	Maltodextrin Storage Bin #6	--	4513 / 5076
122	122	Maltodextrin Spray Dryer	--	5330 / 5585R1
123	123	Maltodextrin Storage Bin #5	--	4514 / 5077
124	124	Maltodextrin Packaging Transfer Line	--	5025 / 5320
125	125	Maltodextrin Vacuum and Reprocessing	--	3980 / 4033
126	126	Maltodextrin Storage Bin #4	--	4515 / 5078
127	127	Maltodextrin Storage Bin #3	--	4516 / 5079
128	128	Maltodextrin Storage Bin #2	--	4517 / 5080
129	129A	Maltodextrin Packaging System	--	5026 / 5321R1
	129B	#1 Bulk Toter System Aspiration		
	129C	#2 Bulk Toter System Aspiration		
130	130	Maltodextrin Storage Bin #1	--	4518 / 5081

**Table 10 – Fructose Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
153	153	Fructose East MR Evaporator Vent	--	5681 / 5478

**Table 11 – Syrup / Refinery Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
034	034	Carbon Furnace (CF#1)	--	4664 / 5082
112	112	Refinery Acid Tank Scrubber System	--	4490 / 4701
114	114	Carbon Furnace (CF#2)	--	4665 / 5083R1
387	387	Refinery Heavy Steepwater Tank	--	4842 / 6125

**Table 12 – Utilities Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
091	091	Dry Starch Diesel Generator	--	4706 / 4847
092	092	#3 Cooling Tower Diesel Generator	--	4707 / 4848
093	093	Alcohol / Waste Treatment Diesel Generator	--	4708 / 4849
095	095	North Corn Plant Diesel Fire Pump	--	Exempt
096	096	South Corn Plant Diesel Fire Pump	--	Exempt
097	097	No. 2 Boiler Diesel Generator	--	4710 / 4851
170	170A	Cooling Tower #2 – Fructose Cell A	--	5550 / 5767
	170B	Cooling Tower #2 – Fructose Cell B		
	170C	Cooling Tower #2 – Fructose Cell C		
	170D	Cooling Tower #2 – Fructose Cell D		
	170E	Cooling Tower #2 – Fructose Cell E		
171	171A	Cooling Tower #3 Cell #1	--	6933 / 7282
	171B	Cooling Tower #3 Cell #2		
	171C	Cooling Tower #3 Cell #3		
	171D	Cooling Tower #3 Cell #4		
	171E	Cooling Tower #3 Cell #5		
	171F	Cooling Tower #3 Cell #6		
	171G	Cooling Tower #3 Cell #7		
260	260	Rental Fructose Diesel Generator	--	7609 / 7299
516	516	Cogen Diesel Generator	--	4711 / 4852
517	517	East Cogen Diesel Fire Pump	--	Exempt
518	518	West Cogen Diesel Fire Pump	--	Exempt
540	540	No. 2 Cogen Diesel Generator	--	4712 / 4853

**Table 13 – Cogeneration Plant Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
459	459	Natural Gas Fired Boiler #1 (#3)	07-A-579-P	5238 / 5789
460	460	Natural Gas Fired Boiler #2	07-A-580-P	5239 / 5790
501	501A	Cogen Boiler #1	86-A-090-P2	6131 / 6267
	501B	Cogen Boiler #2	86-A-091-P2	
502	502A	Cogen Boiler #3	90-A-083-P2	6132 / 6268
	502B	Cogen Boiler #4	93-A-324-S1	

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
503	503A	1-4 Coal Bunkers	86-A-093	6163 / 6235
	503B	Coal Receiving Fines Blower		
504	504	Crusher Building D.C. System	86-A-092	5801 / 5970
505	505	Limestone Unloading Dust Collector	--	5802 / 5971
506	506	Fly Ash Conveying D.C. System A	86-A-096	5803 / 5972R1
	507	Fly Ash Conveying D.C. System B	88-A-023	
	509	Bed Ash Conveying D.C. System A	86-A-099	
	510	Bed Ash Conveying D.C. System B	86-A-100	
	520	Fly Ash Conveying D.C. System C	--	
	541	Bed Ash Conveying D.C. System C	--	
508	508	Fly Ash Silo Vent Dust Collection	86-A-095	2079 / 2008
511	511	Bed Ash Silo Vent Dust Collection	86-A-097	2076 / 2006
512	512	Cogen Limestone Silo (East)	--	6730 / 6611
513	513	Cogen Limestone Silo (West)	--	6729 / 6612
514	514	Cogen Coal Unloading	86-A-094	6108 / 6236
515	514	Cogen Coal Unloading	86-A-094	6120 / 6237
521	521	Cogen and HCl Neutralization Tanks	--	4943 / 5306
522	522	Cogen Turbine Lube Oil Tanks No. 1-5	--	4092 / 4035
530	530	ACFBC Boiler #5	98-A-507-P2	5096 / 5045
532	532	ACFBC Boiler #5 Fly Ash Conveying System	98-A-509PS1	3735 / 4739
533	533	ACFBC Boiler #6 Fly Ash Conveying System	98-A-510PS1	3734 / 4738
534	534	Boiler #5 Fly Ash Silo Vent	98-A-511-P2	3733 / 4737
535	535	ACFBC Boiler #5 Bed Ash Conveying System	98-A-512PS1	3732 / 4736
536	536	ACFBC Boiler #6 Bed Ash Conveying System	98-A-513PS1	3731 / 4735
537	537	Coal Bunker (#5)	98-A-514P2	5945 / 6055
538	538	Boiler #5 Bed Ash Silo Vent	98-A-515-P2	3729 / 4733
539	539	Cogen Turbine Lube Oil Tank No. 6	--	4093 / 4293
542	542	Cogen Biomass Bin #1	--	5332 / 5479
543	543	Cogen Biomass Bin #2	--	5333 / 5480
544	544A	Cogen Limestone Conveying Bunker 3	--	6284 / 6266
	544B	Cogen Limestone Conveying Bunker 2		
	544C	Cogen Limestone Conveying Bunker 1		
	544D	Cogen Limestone Conveying BC8		
545	545	Turbine Generator #7	15-A-500-P1	6772 / 6902

**Table 14 – Bulk Chemicals Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
009	009	Soda Ash Slur-O-Lyzer	--	4448 / 4700
020	020	HCl Storage Vent	--	2107 / 2025
033	033	Bulk Precoat System	--	3981 / 4034
165	165	Plate Hot Water Wash Tank	--	4283 / 4336

**Table 15 – Waste Treatment Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
240	240	Equalization Basin	--	4843 / 5309
242	242	West Aeration Basin	--	5810 / 5968

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
243	243	East Aeration Basin	--	5811 / 5969
244	244	Biotatron #1	--	4847 / 5312
245	245	Biotatron #2	--	4848 / 5313
246	246	Biotatron #3	--	4849 / 5314
247	247	East Clarifier	--	4850 / 5315
248	248	Central Clarifier	--	4851 / 5316
249	249	West Clarifier	--	4852 / 5317

**Table 16 – Biomass Processing Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>DNR Permit #</b>	<b>LCPH Permit #</b>
087	087	Biomass Dryer #1	--	7452 / 7359
089	089	Biomass Dryer #2	--	7644 / 7448
098	098	Biosolids Bin #1	--	4620 / 5013
099	099	Biosolids Bin #2	--	4621 / 5014
100	100	Biosolids Bin #3	--	4622 / 5015
101	101	Biosolids Loadout	--	4623 / 5086

**Table 17 – Insignificant Activities Equipment List**

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>LCPH Permit #</b>
042	042	Dilute HCl Tank	2110 / 2021
052	052	HCl Reclaiming Tank	1570 / 1293
053	053	Anion Waste Tank	1563 / 1289
054	054	SO <sub>2</sub> Dilution Tank & Magnesium Bisulfite Tank Vents	4099 / 4068
084	084	Treated Outfall #1 – Outfall Plume	3681 / 3505
085	085	Treated Outfall #2 – Outfall Plume	3426 / 3228
088	088	Alcohol Caustic Tank	3769 / 3593
111	111	R-1 Hot Well Sewer Tank	3427 / 3237
117	117	R-7 #3 Converter Hot Well Vent	3431 / 3240
118	118	#3 and #4 Converter Hotwell Vent	3970 / 3900
121	121	Maltodextrin Evaporator / Converter Hotwell Vent	5138 / 5230
151	151	FR-1 North Dextrose M.R. Evaporator Vent	3381 / 3241
152	152	FR-2 South Dextrose M.R. Evaporator Vent	3382 / 3242
154	154	FR-4 East Neutralization Tank Vent	3378 / 3244
155	155	FR-5 West Neutralization Tank Vent	3379 / 3245
159	159	FR-9 West Dextrose M.R. Evaporator Vent	3224 / 3135
164	164	Plate Adhesive Hood	5914 / 5973
225	225	M-25 Mill / Feedhouse Sewer Tank Vent	3395 / 3259
300	300	Cooling Tower #1 Sulfuric Acid Tank	4658 / 4726
301	301	Cooling Tower #2 Sulfuric Acid Tank	4657 / 4727
303	303	Alcohol Sulfuric Acid Tank	4655 / 4729
305	305	Cogen North Cooling Tower Sulfuric Acid Tank	4653 / 4731
306	306	Cogen South Cooling Tower Sulfuric Acid Tank	4652 / 4732
389	389	Carbon Transfer System (East)	5033 / 5304
	389A	#1 Slug Tank (Syrup and Malto)	
	389B	#2 Slug Tank (Fructose)	
	389C	#3 Slug Tank (Dextrose)	
390	390	Carbon Transfer System (West)	5034 / 5305
	389A	#1 Slug Tank (Syrup and Malto)	
	389B	#2 Slug Tank (Fructose)	
	389C	#3 Slug Tank (Dextrose)	
519	519	B-1 Boiler Room Sewer Tank Vent	3439 / 3353
523	523	Corn Plant Diesel Fuel Tank	4590 / 4702
524	524	Corn Plant Unleaded Fuel Tank	4591 / 4703
--	IU-001	New Oil Storage Tanks	--
--	IU-002	Used Oil Storage Tanks	--
--	IU-003	Backup Generator Fuel Tanks	--
--	IU-004	Fire Pump Fuel Tanks	--
--	IU-005	Parts Cleaners	--
--	CDT	Co-Gen Diesel Fuel Tank	--
--	ALO	WM Alcohol Loadout Diesel Tank	--
--	DSD	Dry Starch Generator Diesel Tank	--
--	WTD	Waste Treatment Diesel Tank	--
--	C3D	Cooling Tower 3 Generator Diesel Tank	--
--	FGD	Fructose Generator Diesel Tank	--
--	NFP	Corn Plant North Fire Pump Diesel Tank	--
--	SFP	Corn Plant South Fire Pump Diesel Tank	--
--	BRD	CP Boiler Room Generator Diesel Tank	--

<b>Emission Point #</b>	<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>LCPH Permit #</b>
--	CWF	Cogen West Fire Pump Diesel Tank	--
--	CEF	Cogen East Fire Pump Diesel Tank	--
--	CD1	Cogen Generator #1 Diesel Tank	--
--	CD2	Cogen Generator #2 Diesel Tank	--

**Table 18 – Fugitive Insignificant Activities List**

<b>Emission Unit #</b>	<b>Emission Unit Description</b>
AL142	Wet Mill VOC Equipment Leaks
F1A	Straight Truck Receiving – Fugitives
F1B	Hopper Truck Receiving – Fugitives
F2	Rail Receiving – Fugitives

## II. Plant-Wide Conditions

Facility Name: ADM Corn Processing  
Permit Number: 08-TV-004R2

Permit conditions are established in accordance with 567 Iowa Administrative Code (IAC) rule 24.108. When 567 IAC as amended May 15, 2024, and cited in this permit becomes State Implementation Plan (SIP) approved, it will supersede 567 IAC as amended February 8, 2023. Prior to May 15, 2024, all Title V rule citations in this Title V permit were found and cited in 567 IAC Chapter 22. During the period from May 15, 2024, to the date that 567 IAC as amended May 15, 2024, is approved into the SIP, both 567 IAC as amended May 15, 2024, and 567 IAC as amended February 8, 2023, form the legal basis for the applicable requirements included in this permit. A crosswalk showing citation changes is attached to this permit in Appendix A.

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### Permit Duration

The term of this permit is: less than 5 years  
Commencing on:  
Ending on:

Amendments, modifications and reopenings of this permit shall be obtained in accordance with 567 IAC rules 24.110 – 24.114. Permits may be suspended, terminated, or revoked as specified in 567 IAC rules 24.115.

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### Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant.

Opacity (visible emissions): 40% opacity  
Authority for Requirement: 567 IAC 23.3(2)"d"  
  
Opacity (visible emissions): 20% opacity  
Authority for Requirement: LCCO Sec. 10-60(a)  
  
Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume (ppm<sub>v</sub>)  
Authority for Requirement: 567 IAC 23.3(3)"e"  
LCCO Sec. 10-65(a)(2)

### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot (gr/dscf) of exhaust gas, except as provided in 567—21.2(455B), 23.1(455B), 23.4(455B) and 567—Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from the equation provided in 567 IAC 23.3(2)"a"(2) or amount specified in a permit if based on an emission standard of 0.1 gr/dscf of exhaust gas or established from standards provided in 567—23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

Particulate Matter:

No person shall permit, cause, suffer or allow the emission of particulate matter into the atmosphere in any one hour from any emission point from any process equipment at a rate in excess of that specified in Table 10-62-1 for the process weight rate allocated to such emission point. In any case, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas or Table 10-62-1 of [LCCO Sec. 10-62(a)], whichever would result in the lowest allowable emission rate.

Authority for Requirement: LCCO Sec. 10-62(a)

Fugitive Dust:

Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (The preceding sentence is State only.) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

**Regulatory Authority**

This facility is located in Linn County, Iowa. Linn County Public Health, under agreement with the Iowa Department of Natural Resources (IDNR), is the primary regulatory agency in Linn County. This Title V permit is issued by the Iowa Department of Natural Resources, however, required contacts and information submittals referred to in this permit as required by "the Department" should continue to be directed to the Linn County Public Health office. This will include such items as stack test notification,

stack test results submittal, oral and written excess emission reports, and reports and records required in the Linn County construction permits. Information specifically required by the Title V permit such as the annual EIQ and fees, annual compliance certification, semi-annual monitoring report and any Title V forms submitted for updates, modifications, renewals, etc. must be submitted to the Iowa DNR. Stack test notifications and test results for tests required as periodic monitoring in the Title V permit shall be submitted to Linn County Public Health. Stack test protocols and test results conducted as required by a PSD permit shall be submitted to the IDNR and Linn County Public Health Air Quality Division.

Authority for Requirement: 567 IAC 24.108

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**40 CFR NSPS Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced after January 5, 1981, and on or before November 7, 2006**

The requirements of the NSPS in 40 CFR 60, Subpart VV apply to several pieces of equipment associated with the Alcohol Process Area at this source. ADM Corn Processing is responsible for demonstrating compliance with 40 CFR 60 Subpart VV as printed in the Federal Register.

Authority for Requirement: 40 CFR Part 60, Subpart VV  
567 IAC 23.1(2)"nn"  
LCCO Sec. 10-62(b)(40)

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**40 CFR NSPS Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984, and on or before October 4, 2023**

The requirements of the NSPS in 40 CFR 60, Subpart Kb apply to several pieces of equipment associated with the Alcohol Process Area at this source. ADM Corn Processing is responsible for demonstration compliance with 40 CFR 60 Subpart Kb as printed in the Federal Register.

Authority for Requirement: 40 CFR Part 60, Subpart Kb  
567 IAC 23.1(2)"ddd"  
LCCO Sec. 10-62(b)(56)

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**40 CFR NESHAP Subpart FFFF, Miscellaneous Organic Chemical Manufacturing**

The requirements of the NESHAP in 40 CFR 63, Subpart FFFF apply to the miscellaneous organic chemical manufacturing process units at this source (including but not limited to process vents, storage tanks, transfer stations, pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems used in the ethanol manufacturing process). Specific emission units subject to this requirement will be determined by the compliance date. The requirements include, but are not limited to the following:

The emission limits, work practice standards, and compliance requirements pursuant to 40 CFR §63.2450 – §63.2490.

The notification, reporting, and recordkeeping requirements pursuant to 40 CFR §63.2515 – §63.2525.

The proposed compliance date for the existing chemical manufacturing process units at this source is May 10, 2008. The facility must comply with all requirements of this subpart by the compliance date as determined in the final rule.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
567 IAC 23.1(4)"cf"  
LCCO Sec. 10-62(d)(84)

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**Compliance Plan**

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, ADM Corn Processing is in compliance with all applicable requirements and shall continue to comply with such requirements. For those applicable requirements which become effective during the permit term, ADM Corn Processing shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 24.108(15)

### III. Emission Point-Specific Conditions

Facility Name: ADM Corn Processing  
 Permit Number: 08-TV-004R2

#### Elevator

Emission Point ID Number: 008

Table 19. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
008	010A	60% Gluten Meal Cooler 1	Corn Gluten Meal	18,750 bu/hr	010	Baghouse
	010B	60% Gluten Meal Cooler 2	Corn Gluten Meal	48,000 lb/hr		
	023	Cracked Corn Receiving	Corn	25,000 lb/hr	023	Baghouse
	040	Germ to Storage Conveying	Germ	64,690 lb/hr	040	Baghouse
	048	Gluten Hammermills	Corn Gluten Meal	45,000 lb/hr	048	Baghouse
	049	Gluten to Storage Conveying	Corn Gluten Meal	18,750 bu/hr	049	Baghouse
	086A	Gluten Truck Loadout	Corn Gluten Meal	18,750 bu/hr	086	Baghouse
	086B	Gluten Rail Loadout	Corn Gluten Meal	200 tons/hr		

#### Applicable Requirements

*The emissions from this emission point shall not exceed the levels specified below.*

Table 20. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
008	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 7651 / PTO 7420
	PM / PM <sub>10</sub>	6.05 lb/hr <sup>1</sup>	Requested limit	
	PM <sub>10</sub>	14.4 tons/yr <sup>2</sup>	PSD synthetic minor	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	
	VOC	9.06 lb/hr <sup>4</sup>	03-CV-2066	

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This emission limit is a [Prevention of Significant Deterioration (PSD)] synthetic minor limit that was established for [LCPH] Project #1687, which includes [SEP008], [SEP180], and [SEP181].

<sup>3</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>4</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

#### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

Emission unit EU023 is of the source category for Subpart DD (*Standards of Performance for Grain Elevators*, 40 CFR §60.300 – §60.304); however, this emission unit is not subject because they were constructed prior to August 3, 1978, and 1,000,000 bushels of grain storage applicability of this subpart.

Emission units EU010A, EU010B, EU040, EU048, EU049, EU086A, and EU086B share a common stack with [SEP008], but are ‘by-product handling and loadout equipment’ and are therefore not subject to NSPS Subpart DD.

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.

Authority for Requirement: LCPH ATI 7651 / PTO 7420

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record ‘no visible emissions’ observations on a weekly basis. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The facility-wide grind shall be limited to 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the weekly average facility grind rate.
- C. The differential pressure measured across each baghouse, with the exception of CE086, shall be greater than or equal to 0.2 inches and less than or equal to 6.0 inches of water column. The differential pressure measured across CE086 shall be greater than or equal to 0.1 inches and less than or equal to 6.0 inches of water column. The owner or operator shall monitor and record the pressure differential across each baghouse on a weekly basis while the control equipment and emission units are in operation.
- D. Each baghouse shall be maintained according to the manufacturer’s specifications and/or good operating practices. The owner or operator shall record the date and description of all maintenance and repair completed on the control devices.

Authority for Requirement: LCPH ATI 7651 / PTO 7420

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 21. Stack Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
008	150	V	66	95	125,000	LCPH ATI 7651 / PTO 7420

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 7651 / PTO 7420

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 061, 062, 063, 064**

**Table 22. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
061	061	Steel Corn Silo #1	Corn	45,000 bph	061	Baghouse
062	062	Steel Corn Silo #2	Corn	45,000 bph	062	Baghouse
063	063	Steel Corn Silo #3	Corn	45,000 bph	063	Baghouse
064	064	Steel Corn Silo #4	Corn	45,000 bph	064	Baghouse

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 23. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
061	PM	0.1 gr/dscf	567 IAC 23.4(7)	LCPH ATI 6210 / PTO 6051
062			LCCO Sec. 10-62(a)(7)	LCPH ATI 6211 / PTO 6052
063	PM / PM <sub>10</sub>	0.09 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 6212 / PTO 6053
064	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	LCPH ATI 6213 / PTO 6054

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be installed to control particulate matter. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control devices at all times.

Authority for Requirement:     LCPH ATI 6210 / PTO 6051  
  LCPH ATI 6211 / PTO 6052  
  LCPH ATI 6212 / PTO 6053  
  LCPH ATI 6213 / PTO 6054

**Operating Limits**

- A. The differential pressure measured across the baghouse, CE061 [CE062, CE063, CE064], shall be maintained between 0.25 inch of water column and 7 inches of water column, with the exception of unit startup.
- B. The control equipment on this unit shall be maintained according to the manufacturer’s specifications and good operating practices.
- C. The facility-wide grind rate shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.

Authority for Requirement:     LCPH ATI 6210 / PTO 6051  
   LCPH ATI 6211 / PTO 6052  
   LCPH ATI 6212 / PTO 6053  
   LCPH ATI 6213 / PTO 6054

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record ‘no visible emissions’ observations on a weekly basis. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record any maintenance and repair completed on the control equipment.
- C. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission units are in operation.
- D. Calculate and record the weekly facility grind rate average based on [a] 52-week rolling average.

Authority for Requirement:     LCPH ATI 6210 / PTO 6051  
   LCPH ATI 6211 / PTO 6052  
   LCPH ATI 6212 / PTO 6053  
   LCPH ATI 6213 / PTO 6054

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 24. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
061	88	V	6	70	1,035	LCPH ATI 6210 / PTO 6051
062	88	V	6	70	1,035	LCPH ATI 6211 / PTO 6052
063	88	V	6	70	1,035	LCPH ATI 6212 / PTO 6053
064	88	V	6	70	1,035	LCPH ATI 6213 / PTO 6054

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement:   LCPH ATI 6210 / PTO 6051  
  LCPH ATI 6211 / PTO 6052  
  LCPH ATI 6212 / PTO 6053  
  LCPH ATI 6213 / PTO 6054

**Agency Approved Operations & Maintenance Plan Required?**                   Yes        No

**Facility Maintained Operation & Maintenance Plan Required?**                   Yes <sup>1</sup>       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                   Yes        No

Authority for Requirement:   567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 180**

**Table 25. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
180	180	Bulk Weigh Scale	Corn	40,000 bph	180	Baghouse
	180B	Steel Tank Leg	Corn	20,000 bph		
	180C	Silo to Steeps 1 West Belt Conveyor	Corn	25,000 bph		
	180D	Silo to Steeps 2 East Belt Conveyor	Corn	25,000 bph		
	180E	Steep House Corn Hopper	Corn	84 tons		
	181	Rail Dump	Corn	30,000 bph		
	181B	200 Leg	Corn	30,000 bph		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 26. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
180	PM	0.01 gr/dscf	40 CFR §60.302(b)(1)	LCPH ATI 8206 / PTO --
	Opacity	0% <sup>1,2</sup>	40 CFR §60.302(b)(2)	
		0% (fugitive emission limit for grain handling operations) <sup>1</sup>	40 CFR §60.302(c)(2)	
		5% (fugitive emissions limit for truck and rail unloading) <sup>1</sup>	40 CFR §60.302(c)(1)	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Pursuant to 40 CFR §60.302(b)(2), no process except a grain dryer shall discharge to the atmosphere emissions which exhibit greater than 0% opacity.

**Table 27. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
180	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 8206 / PTO --
	PM / PM <sub>10</sub>	1.03 lb/hr <sup>1</sup>	Requested limit	
	PM <sub>10</sub>	14.4 tons/yr <sup>2</sup>	PSD synthetic minor	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This emission limit is a PSD synthetic minor limit that was established for Project #1682, which includes [SEP-008], [SEP-180], and [SEP-181].

<sup>3</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

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

The following subparts apply to the emission unit(s) in this permit:

**Table 28. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
180 180B-E 181B	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	DD	Standards of Performance for Grain Elevators	--	10-62(b)(67)	§60.300 – §60.304

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.

Authority for Requirement: LCPH ATI 8206 / PTO --

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record ‘no visible emissions’ observations on a weekly basis. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly conduct an EPA Method 9 evaluation to determine compliance with the NSPS Subpart DD opacity limit, investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The facility-wide grind shall be limited to 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the weekly average facility grind rate (i.e., calculate the average weekly grind using each calendar day’s total grind for that calendar week).
- C. The baghouse (CE180) shall be maintained according to the manufacturer’s specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the baghouse.
- D. The differential pressure across the baghouse (CE180) shall be maintained between 0.2 and 6.0 inches of water column.<sup>1</sup> The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis while the control equipment and emission units are in operation.

Authority for Requirement: LCPH ATI 8206 / PTO --

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<sup>1</sup> If the indicator is out of range, corrective action will be initiated as soon as possible, but not later than 8 hours from observation of the abnormal condition. This does not include periods of startup, shutdown, or cleaning of the control equipment.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 29. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
180	130	V	43	85	35,000	LCPH ATI 8206 / PTO --

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 8206 / PTO --

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 181**

**Table 30. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
181	180	Bulk Weigh Scale	Corn	40,000 bph	181	Baghouse
	180B	Steel Tank Leg	Corn	20,000 bph		
	180C	Silo to Steeps 1 West Belt Conveyor	Corn	25,000 bph		
	180D	Silo to Steeps 2 East Belt Conveyor	Corn	25,000 bph		
	180E	Steep House Corn Hopper	Corn	84 tons		
	181	Rail Dump	Corn	30,000 bph		
	181B	200 Leg	Corn	30,000 bph		
	182F	West Reclaim Leg Bucket Elevator	Corn	60,000 bph		
	182G	14 & 15 Reclaim Conveyor	Corn	20,000 bph		
	182H	South to North Reclaim Conveyor	Corn	25,000 bph		
	182I	West to East Reclaim Conveyor	Corn	20,000 bph		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 31. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
181	PM	0.01 gr/dscf	40 CFR §60.302(b)(1)	LCPH ATI 8207 / PTO --
	Opacity	0% <sup>1,2</sup>	40 CFR §60.302(b)(2)	
		0% (fugitive emission limit for grain handling operations) <sup>1</sup>	40 CFR §60.302(c)(2)	
		5% (fugitive emissions limit for truck and rail unloading) <sup>1</sup>	40 CFR §60.302(c)(1)	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Pursuant to 40 CFR §60.302(b)(2), no process except a grain dryer shall discharge to the atmosphere emissions which exhibit greater than 0% opacity.

**Table 32. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
181	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
	PM / PM <sub>10</sub>	1.03 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 8207 / PTO --
	PM <sub>10</sub>	14.4 tons/yr <sup>2</sup>	PSD synthetic minor	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This emission limit is a PSD synthetic minor limit that was established for [Project #1682] which includes [SEP-008], [SEP-180] and [SEP-181].

<sup>3</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

## **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 33. NSPS Subpart Summary**

<b>EU ID</b>	<b>Subpart</b>	<b>Title</b>	<b>Type</b>	<b>Local Reference (LCCO Sec.)</b>	<b>Federal Reference (40 CFR)</b>
180 180B-E	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
181B 182F-I	DD	Standards of Performance for Grain Elevators	--	10-62(b)(67)	§60.300 – §60.304

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.

Authority for Requirement: LCPH ATI 8207 / PTO --

### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly conduct an EPA Method 9 evaluation to determine compliance with the NSPS Subpart DD opacity limit, investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The facility-wide grind shall be limited to 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the average daily facility grind rate on a weekly basis (i.e., calculate the average weekly grind using each calendar day's total grind for that calendar week).
- C. The baghouse (CE181) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the baghouse.
- D. The differential pressure across the baghouse (CE181) shall be maintained between 0.2 and 6.0 inches of water column.<sup>1</sup> The owner or operator shall monitor and record the differential pressure

across the baghouse on a weekly basis while the control equipment and emission units are in operation.

Authority for Requirement: LCPH ATI 8207 / PTO --

<sup>1</sup> If the indicator is out of range, corrective action will be initiated as soon as possible, but not later than 8 hours from observation of abnormal condition. This does not include periods of startup, shutdown, or cleaning of the control equipment.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 34. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
181	130	V	43	85	35,000	LCPH ATI 8207 / PTO --

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 8207 / PTO --

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 182**

**Table 35. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
182	182A	Corn Truck Unload Pit 1 (North)	Corn	22,500 bph	182	Baghouse
	182B	Corn Truck Unload Pit 2 (South)	Corn	22,500 bph		
	182C	Truck Pit 1 Conveyor (North)	Corn	22,500 bph		
	182D	Truck Pit 2 Conveyor (South)	Corn	22,500 bph		
	182E	West Reclaim Leg Feed Conveyor	Corn	45,000 bph		
	182F	West Reclaim Leg Bucket Elevator	Corn	60,000 bph		
	182G	14 & 15 Reclaim Conveyor	Corn	20,000 bph		
	182H	North to South Reclaim Conv.	Corn	25,000 bph		
	182I	West to East Reclaim Conveyor	Corn	20,000 bph		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 36. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
182	PM	0.01 gr/dscf	40 CFR §60.302(b)(1)	LCPH ATI 8208 / PTO --
	Opacity	0% <sup>1,2</sup>	40 CFR §60.302(b)(2)	
		0% (fugitive emission limit for grain handling operations) <sup>1</sup>	40 CFR §60.302(c)(2)	
		5% (fugitive emissions limit for truck unloading) <sup>1</sup>	40 CFR §60.302(c)(1)	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Pursuant to 40 CFR §60.302(b)(2), no process except a grain dryer shall discharge to the atmosphere emissions which exhibit greater than 0% opacity.

**Table 37. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
182	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 8208 / PTO --
	PM / PM <sub>10</sub>	1.44 lb/hr <sup>1</sup>	Requested Limit	
	PM <sub>2.5</sub>	0.35 lb/hr <sup>1</sup>		
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

<sup>1</sup> The emission limit is to limit the potential to emit for Project #2404 below PSD significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub>.

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible

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emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 38. NSPS Subpart Summary**

<b>EU ID</b>	<b>Subpart</b>	<b>Title</b>	<b>Type</b>	<b>Local Reference (LCCO Sec.)</b>	<b>Federal Reference (40 CFR)</b>
182A – 182I	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	DD	Standards of Performance for Grain Elevators	--	10-62(b)(67)	§60.300 – §60.304

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.

Authority for Requirement: LCPH ATI 8208 / PTO --

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly conduct an EPA Method 9 evaluation to determine compliance with the NSPS Subpart DD opacity limit, investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The baghouse (CE182) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the baghouse.
- C. The differential pressure across the baghouse (CE182) shall be maintained between 0.5 and 8.0 inches of water column.<sup>1</sup> The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis.

Authority for Requirement: LCPH ATI 8208 / PTO --

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<sup>1</sup> If the indicator is out of range, corrective action will be initiated as soon as possible, but not later than 8 hours from observation of abnormal condition. This does not include periods of startup, shutdown, or cleaning of the control equipment.

#### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 39. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
182	150	V	43	Amb.	42,000	LCPH ATI 8208 / PTO --

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 8208 / PTO --

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 183**

**Table 40. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
183	180B	Steel Tank Leg	Corn	20,000 bph	183	Baghouse
	183A	Corn Cleaner Feed Tank	Corn	2,850 bu		
	183B	Corn Cleaner 1 Feed Screw (East)	Corn	15,000 bph		
	183C	Corn Cleaner 2 Feed Screw (Center)	Corn	15,000 bph		
	183D	Corn Cleaner 3 Feed Screw (West)	Corn	15,000 bph		
	183E	Corn Cleaner 1 – 6 Rolls (East)	Corn	9,000 bph		
	183F	Corn Cleaner 2 – 6 Rolls (Center)	Corn	9,000 bph		
	183G	Corn Cleaner 3 – 6 Rolls (West)	Corn	9,000 bph		
	183H	Clean Corn Discharge Conveyor 1	Corn	30,000 bph		
	183I	Clean Corn Discharge Conveyor 2	Corn	30,000 bph		
	183J	Clean Corn Leg	Corn	30,000 bph		
	183K	Cracked Corn Discharge Conveyor 1	Corn	1,500 bph		
	183L	Cracked Corn Discharge Conveyor 2	Corn	1,500 bph		
	183M	Corn Overs Drag	Corn	1,500 bph		
	183N	Cracked Corn Fill Leg	Corn	1,500 bph		
	183O	Cracked Corn Tank 1 (East)	Corn	9,500 bu		
	183P	Cracked Corn Tank 2 (West)	Corn	9,500 bu		
	183Q	Cracked Corn Discharge Loading Drag	Corn	5,600 bph		
	183R	Cracked Corn Discharge Loading Leg	Corn	6,000 bph		
	183S	Cracked Corn Discharge Loading Conveyor	Corn	6,500 bph		
	183T	Cracked Corn Loading Screw 1 Reversing	Corn	160 tons/hr		
183U	Cracked Corn Loading Screw 2 Reversing	Corn	160 tons/hr			
183V	Cracked Corn DCL Venting Spout 6K1	Corn	6,000 cfm			
183W	Cracked Corn DCL Venting Spout 6K2	Corn	6,000 cfm			
183X	Cracked Corn DCL Venting Spout 3K	Corn	3,000 cfm			
183Y	Cracked Corn Loading Spout	Corn	2,000 cfm			
CE180	East Baghouse Rotary Valve	Corn	N/A			
CE181	West Baghouse Rotary Valve	Corn	N/A			

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 41. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
183	PM	0.01 gr/dscf	40 CFR §60.302(b)(1)	LCPH ATI 8210 / PTO --
	Opacity	0% <sup>1,2</sup>	40 CFR §60.302(b)(2)	
		0% (fugitive emission limit for grain handling operations) <sup>1</sup>	40 CFR §60.302(c)(2)	

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
183	Opacity	5% (fugitive emissions limit for rail loading) <sup>1</sup>	40 CFR §60.302(c)(1)	LCPH ATI 8210 / PTO --
		10% (fugitive emissions limit for truck loading) <sup>1</sup>	40 CFR §60.302(c)(3)	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Pursuant to 40 CFR §60.302(b)(2), no process except a grain dryer shall discharge to the atmosphere emissions which exhibit greater than 0% opacity.

**Table 42. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
183	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 8210 / --
	PM / PM <sub>10</sub>	1.5 lb/hr	Requested limit	
	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 43. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
180B, 183A – 183Y	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	DD	Standards of Performance for Grain Elevators	--	10-62(b)(67)	§60.300 – §60.304

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.

Authority for Requirement: LCPH ATI 8210 / --

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly conduct an EPA Method 9 evaluation to determine compliance with the NSPS Subpart DD opacity limit, investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The baghouse (CE183) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance performed on the baghouse.
- C. The pressure drop across the baghouse (CE183) shall be maintained between 0.5 and 20.0 inches of water column.<sup>1</sup> The owner or operator shall monitor and record the differential pressure across the baghouse on a daily basis while the control equipment and emission units are in operation.

Authority for Requirement: LCPH ATI 8210 / --

<sup>1</sup> If the indicator is out of range, corrective action will be initiated as soon as possible, but not later than 8 hours from observation of abnormal condition. This does not include periods of startup, shutdown, or cleaning of the control equipment.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 44. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
183	150	V	45.5	Amb.	42,000	LCPH ATI 8210 / --

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 8210 / --

- Agency Approved Operations & Maintenance Plan Required?** Yes  No
- Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No
- Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 253, 254**

**Table 45. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
253	253	Temporary Corn Pile 1	Corn	2.2 MM bu	253	Tarp
254	254	Temporary Corn Pile 2	Corn	2.2 MM bu	254	Tarp

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 46. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
253	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 7223R1 / PTO 7111 LCPH ATI 7224R1 / PTO 7112
		4.9 lb/hr	Requested limit	
254	PM <sub>10</sub>	2.57 lb/hr <sup>1</sup>	NAAQS	
254	Opacity	20%	LCCO Sec. 10-60(a)	
		No fugitive emissions at the lot line		

<sup>1</sup> The emission limit is based on a control efficiency of the truck dump of 80% due to choke flow control and established to limit PTE.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

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

These emission units are of the source category for Subpart DD (*Standards of Performance for Grain Elevators*; 40 CFR §60.300 – §60.304). However, these emission units are not subject because these are temporary corn storage piles, with sides but no roof, and do not meet the definition of permanent storage capacity, as defined in 40 CFR §60.301(d).

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.

Authority for Requirement: LCPH ATI 7223R1 / PTO 7111  
LCPH ATI 7224R1 / PTO 7112

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 be limited to processing 22,222,222 bushels of corn through the Temporary Corn Piles (EU253 and EU254) per 12-month rolling period. Record the amount of grain handled, in bushels, on a monthly basis. Calculate and record rolling 12-month totals.
- B. The owner or operator shall be limited to 14 hours of filling and/or emptying the corn piles per day and 2,000 hours of filling the corn piles per year based on a 12-month rolling total. Record the number of hours spent filling or emptying the two Temporary Corn Piles (EU253 and EU254) on a daily basis and calculate a total at the end of each month. Calculate and record the 12-month rolling total hours.
- C. The owner or operator may only fill or empty one Temporary Corn Pile at a time. Record which Temporary Corn Pile is filled or emptied when recording hours and amount of grain handled.
- D. The owner or operator shall cover the Temporary Corn Pile[s] at all times to reduce fugitive emissions.
- E. If feasible, loadouts shall use socks and drop-down spouts or sleeves, or equivalent, which extend at least 6 inches below the sides of the corn pile to minimize grain free-fall distance, except for topping off.
- F. To the extent possible, the flow of the grain through the spout shall be regulated to minimize dust emissions from the corn pile when the corn pile is empty to only partially full.

Authority for Requirement:     LCPH ATI 7223R1 / PTO 7111  
   LCPH ATI 7224R1 / PTO 7112

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 47. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
253	72	Volume source	--	Amb.	--	LCPH ATI 7223R1 / PTO 7111
254	72	Volume source	--	Amb.	--	LCPH ATI 7224R1 / PTO 7112

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Mill**

**Emission Point ID Number: 083**

**Table 48. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
083	083A	Wet Corn Hopper	Corn	60,000 gph	083A 083B	MR Pre-Scrubber MR Scrubber
	083B	First Grind Tank	Corn	55,000 gph		
	083C	MR Steepwater Evaporators	Corn	120,000 gph		
	375	Steep Tank 1E	Corn	156,393 gal		
	376	Steep Tank 2E	Corn	156,393 gal		
	377	Steep Tank 3E	Corn	156,393 gal		
	378	Steep Tank 10E	Corn	156,393 gal		
	379	Steep Tank 11E	Corn	156,393 gal		
	380	Steep Tank 12E	Corn	156,393 gal		
	381	Steep Tank 1F	Corn	156,393 gal		
	382	Steep Tank 2F	Corn	156,393 gal		
	383	Steep Tank 3F	Corn	156,393 gal		
	384	Steep Tank 10F	Corn	156,393 gal		
	385	Steep Tank 11F	Corn	156,393 gal		
	386	Steep Tank 12F	Corn	156,393 gal		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 49. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement	
083	PM / PM <sub>10</sub>	[0.1 gr/dscf] <sup>1</sup>	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 4828 / PTO 5712	
	PM <sub>10</sub>	0.20 lb/hr <sup>2</sup>	NAAQS		
	Opacity	20%	LCCO Sec. 10-60(a)		
	SO <sub>2</sub>	1.19 lb/hr	Requested limit		567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)
		5.19 tpy			
		50 ppm <sub>v</sub>			
	VOC	500 ppm <sub>v</sub>	03-CV-2066		
		0.32 lb/hr <sup>3</sup>			
		1.42 tpy			
		20 ppm			

<sup>1</sup> This limit was unintentionally written as 0.01 gr/dscf in LCPH ATI 4828 / PTO 5712.

<sup>2</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>3</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Control Equipment**

A MR pre-scrubber and MR scrubber shall be used to control VOC and SO<sub>2</sub> emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4828 / PTO 5712

#### **Operating Limits**

- A. Maintain the MR pre-scrubber and MR scrubber according to the manufacturer's specifications and/or good operating practices.
- B. Water flow shall be maintained at a minimum of 150 gpm to the MR pre-scrubber (1<sup>st</sup> pass).
- C. Recycle water flow shall be maintained at a minimum of 400 gpm in the MR scrubber (2<sup>nd</sup> pass).
- D. Fresh makeup water flow to the MR scrubber shall be maintained at a minimum of 34 gpm.

Authority for Requirement: LCPH ATI 4828 / PTO 5712

#### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the water flow to the MR pre-scrubber on a daily basis.
- B. Monitor and record the recycle water flow to the MR scrubber on a daily basis.
- C. Monitor and record the fresh makeup water flow to the MR scrubber on a daily basis.
- D. Record all maintenance and repair completed on the control devices.

Authority for Requirement: LCPH ATI 4828 / PTO 5712

### **Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

#### **Description**

Control Equipment CE083A (MR Pre-Scrubber) is not currently permitted to control emissions from Emission Unit EU083A exhausting through SEP083; however, CE083A is currently configured to control emissions from EU083A, as indicated by ADM. This change needs to be addressed in the local construction permit for SEP083 (LCPH ATI 4828 / PTO 5712).

#### **Condition**

The permittee shall apply for a construction permit from Linn County Public Health within 6 months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the



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**Emission Point ID Number: 201****Table 51. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
201	201A	Heavy Gluten Storage Tank	Corn Gluten	24,000 gph	--	None
	201B	Mill Water Storage Tank	Mill Water	24,000 gph		
	201C	Light Steepwater Storage Tank	Light Steepwater	96,000 gph		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 52. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
201	SO <sub>2</sub>	1.35 lb/hr	Requested limit	LCPH ATI 4829 / PTO 6111
		500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
	VOC	2.63 lb/hr <sup>1</sup>	03-CV-2066	

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<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 53. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
201	98	V	16	125	300	LCPH ATI 4829 / PTO 6111

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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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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**Emission Point ID Number: 204, 205, 206****Table 54. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
204	204	Biomass Feed Tank	Biomass	118,332 gal	--	None
205	205	Heavy Steepwater Tank	Heavy Steepwater	118,332 gal	--	None
206	206	Intermediate Steepwater Tank	Steepwater	118,332 gal	--	None

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**Applicable Requirements**

*The emissions from these emission points shall not exceed the levels specified below.*

**Table 55. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
204	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 4830 / PTO 6150
	VOC	0.03 lb/hr <sup>1</sup>	03-CV-2066	
205	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 4831 / PTO 6151
	VOC	0.19 lb/hr <sup>1</sup>	03-CV-2066	
206	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 4832 / PTO 6152
	VOC	0.19 lb/hr <sup>1</sup>	03-CV-2066	

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<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

**Description**

Emission unit EU204 (Biomass Feed Tank) is currently permitted at 18,750 gallons; however, EU204 is currently configured at 118,332 gallons, as indicated by ADM. This change needs to be addressed in the local construction permit for SEP204 (LCPH ATI 4830 / PTO 6150).

**Condition**

The permittee shall apply for a construction permit from Linn County Public Health to modify the rated capacity of EU204 within 6 months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 56. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
204	96	V	18	154	114	LCPH ATI 4830 / PTO 6150
205	96	V	18	134	43	LCPH ATI 4831 / PTO 6151
206	81	V	16	134	43	LCPH ATI 4832 / PTO 6152

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 210**

**Table 57. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
210	210	Millhouse Fugitive Emissions	Corn	450,000 bpd	210A	Packed Bed Scrubber

The following equipment are associated with EU210:

East MST Underflow Tank	3 <sup>rd</sup> Grind Tank	Clarifier Overflow Tank
West MST Underflow Tank	Clarifier Underflow Tank	South Primary Underflow Tank
Primary Overflow Tank	North Primary Overflow Tank	Sharples Feed Tank
Fine Fiber Troughs Tank	2 <sup>nd</sup> Grind Tank	H-Fiber Set
1 <sup>st</sup> Grind Tank	Wet Corn Tank	Mill Sewer Tank
G Fiber Tank	A Fiber Set	B Fiber Set
East Fiber Transfer	East MST Overflow Tank	MST Overflow North Tank
GT Overflow Tank	Light Gluten Tank	Clarifier Feed Tank
Dorr Clone Feed Tank	Primary Feed Tank	MST Feed Tank
Fiber Wash Water Tank	MST Transfer Tank	IR Feed Tank

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 58. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
210	SO <sub>2</sub>	6.11 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 6925 / PTO 6759R1
		500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
	VOC	2.54 lb/hr <sup>2</sup>	03-CV-2066	

<sup>1</sup> Emission limit used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 control equipment associated with these emission units shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the control equipment.

- B. The facility-wide grind shall be limited to 450,000 bushels of corn per day. The owner or operator shall calculate and record the weekly facility grind rate average, based on a 52-week rolling average.
- C. The normal differential pressure across the packed bed scrubber (CE210A) shall be maintained between 0.5" and 12" of water column. The owner or operator shall monitor and record the differential pressure across the packed bed scrubber on a daily basis.
- D. The minimum total water flowrate in the packed bed scrubber (CE210A) shall be maintained at a minimum of 240 gallons per minute. The owner or operator shall monitor and record the total water flowrate in the packed bed scrubber on a daily basis.

Note: An audible low water flow alarm system for the packed bed scrubber can be operated in lieu of daily recording of the total water flowrates; however, the individual low water flow alarms must be recorded to demonstrate compliance with the total water flowrate of 240 gallons per minute in the packed bed scrubber (CE210A).

Authority for Requirement: LCPH ATI 6925 / PTO 6759R1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 59. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
210	150	V	30	70	19,925	LCPH ATI 6925 / PTO 6759R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Compliance Assurance Monitoring is required for SO<sub>2</sub> and VOC emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

**Emission Point ID Number:** 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374

**Table 60. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
307	307	Steep Tank 1A	Corn, Steepwater	71,680 gal	--	None
308	308	Steep Tank 2A	Corn, Steepwater	71,680 gal	--	None
309	309	Steep Tank 3A	Corn, Steepwater	71,680 gal	--	None
310	310	Steep Tank 4A	Corn, Steepwater	71,680 gal	--	None
311	311	Steep Tank 5A	Corn, Steepwater	71,680 gal	--	None
312	312	Steep Tank 6A	Corn, Steepwater	71,680 gal	--	None
313	313	Steep Tank 7A	Corn, Steepwater	71,680 gal	--	None
314	314	Steep Tank 8A	Corn, Steepwater	71,680 gal	--	None
315	315	Steep Tank 9A	Corn, Steepwater	71,680 gal	--	None
316	316	Steep Tank 10A	Corn, Steepwater	71,680 gal	--	None
317	317	Steep Tank 11A	Corn, Steepwater	71,680 gal	--	None
318	318	Steep Tank 12A	Corn, Steepwater	71,680 gal	--	None
319	319	Steep Tank 13A	Corn, Steepwater	71,680 gal	--	None
320	320	Steep Tank 14A	Corn, Steepwater	71,680 gal	--	None
321	321	Steep Tank 15A	Corn, Steepwater	71,680 gal	--	None
322	322	Steep Tank 16A	Corn, Steepwater	71,680 gal	--	None
323	323	Steep Tank 17A	Corn, Steepwater	71,680 gal	--	None
324	324	Steep Tank 18A	Corn, Steepwater	71,680 gal	--	None
325	325	Steep Tank 1B	Corn, Steepwater	71,680 gal	--	None
326	326	Steep Tank 2B	Corn, Steepwater	71,680 gal	--	None
327	327	Steep Tank 3B	Corn, Steepwater	71,680 gal	--	None
328	328	Steep Tank 4B	Corn, Steepwater	71,680 gal	--	None
329	329	Steep Tank 5B	Corn, Steepwater	71,680 gal	--	None
330	330	Steep Tank 6B	Corn, Steepwater	71,680 gal	--	None
331	331	Steep Tank 7B	Corn, Steepwater	71,680 gal	--	None
332	332	Steep Tank 8B	Corn, Steepwater	71,680 gal	--	None
333	333	Steep Tank 9B	Corn, Steepwater	71,680 gal	--	None
334	334	Steep Tank 10B	Corn, Steepwater	71,680 gal	--	None
335	335	Steep Tank 11B	Corn, Steepwater	71,680 gal	--	None
336	336	Steep Tank 12B	Corn, Steepwater	71,680 gal	--	None
337	337	Steep Tank 13B	Corn, Steepwater	71,680 gal	--	None
338	338	Steep Tank 14B	Corn, Steepwater	71,680 gal	--	None
339	339	Steep Tank 15B	Corn, Steepwater	71,680 gal	--	None
340	340	Steep Tank 16B	Corn, Steepwater	71,680 gal	--	None
341	341	Steep Tank 17B	Corn, Steepwater	71,680 gal	--	None
342	342	Steep Tank 18B	Corn, Steepwater	71,680 gal	--	None
343	343	Steep Tank 1C	Corn, Steepwater	71,680 gal	--	None
344	344	Steep Tank 2C	Corn, Steepwater	52,131 gal	--	None
345	345	Steep Tank 3C	Corn, Steepwater	52,131 gal	--	None
346	346	Steep Tank 4C	Corn, Steepwater	52,131 gal	--	None
347	347	Steep Tank 5C	Corn, Steepwater	52,131 gal	--	None
348	348	Steep Tank 6C	Corn, Steepwater	52,131 gal	--	None

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
349	349	Steep Tank 7C	Corn, Steepwater	52,131 gal	--	None
350	350	Steep Tank 8C	Corn, Steepwater	52,131 gal	--	None
351	351	Steep Tank 9C	Corn, Steepwater	52,131 gal	--	None
352	352	Steep Tank 10C	Corn, Steepwater	71,680 gal	--	None
353	353	Steep Tank 11C	Corn, Steepwater	52,131 gal	--	None
354	354	Steep Tank 12C	Corn, Steepwater	52,131 gal	--	None
355	355	Steep Tank 13C	Corn, Steepwater	52,131 gal	--	None
356	356	Steep Tank 14C	Corn, Steepwater	52,131 gal	--	None
357	357	Steep Tank 15C	Corn, Steepwater	52,131 gal	--	None
358	358	Steep Tank 16C	Corn, Steepwater	52,131 gal	--	None
359	359	Steep Tank 17C	Corn, Steepwater	52,131 gal	--	None
360	360	Steep Tank 18C	Corn, Steepwater	52,131 gal	--	None
361	361	Steep Tank 1D	Corn, Steepwater	71,680 gal	--	None
362	362	Steep Tank 2D	Corn, Steepwater	71,680 gal	--	None
363	363	Steep Tank 3D	Corn, Steepwater	71,680 gal	--	None
364	364	Steep Tank 4D	Corn, Steepwater	71,680 gal	--	None
365	365	Steep Tank 5D	Corn, Steepwater	71,680 gal	--	None
366	366	Steep Tank 6D	Corn, Steepwater	71,680 gal	--	None
367	367	Steep Tank 7D	Corn, Steepwater	71,680 gal	--	None
368	368	Steep Tank 8D	Corn, Steepwater	71,680 gal	--	None
369	369	Steep Tank 9D	Corn, Steepwater	71,680 gal	--	None
370	370	Steep Tank 10D	Corn, Steepwater	71,680 gal	--	None
371	371	Steep Tank 11D	Corn, Steepwater	71,680 gal	--	None
372	372	Steep Tank 12D	Corn, Steepwater	71,680 gal	--	None
373	373	Steep Tank 13D	Corn, Steepwater	71,680 gal	--	None
374	374	Steep Tank 14D	Corn, Steepwater	71,680 gal	--	None

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 61. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
Applies to each SEP in Table 60	SO <sub>2</sub>	0.26 lb/hr	Requested limit	See List Below
		500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
	VOC	0.66 lb/hr <sup>1</sup>	03-CV-2066	

<sup>1</sup> This emission limit is established pursuant to paragraph 39 of Consent Decree, *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois).

Authority for Requirement: LCPH ATI 5575 / PTO 5812, LCPH ATI 5576 / PTO 5813  
LCPH ATI 5577 / PTO 5814, LCPH ATI 5578 / PTO 5815  
LCPH ATI 5579 / PTO 5816, LCPH ATI 5580 / PTO 5817  
LCPH ATI 5581 / PTO 5818, LCPH ATI 5582 / PTO 5819

LCPH ATI 5583 / PTO 5820, LCPH ATI 5584 / PTO 5821  
 LCPH ATI 5585 / PTO 5822, LCPH ATI 5586 / PTO 5823  
 LCPH ATI 5587 / PTO 5824, LCPH ATI 5588 / PTO 5825  
 LCPH ATI 5589 / PTO 5826, LCPH ATI 5590 / PTO 5827  
 LCPH ATI 5591 / PTO 5828, LCPH ATI 5592 / PTO 5829  
 LCPH ATI 5593 / PTO 5830, LCPH ATI 5594 / PTO 5831  
 LCPH ATI 5595 / PTO 5832, LCPH ATI 5596 / PTO 5833  
 LCPH ATI 5597 / PTO 5834, LCPH ATI 5598 / PTO 5835  
 LCPH ATI 5599 / PTO 5836, LCPH ATI 5600 / PTO 5837  
 LCPH ATI 5601 / PTO 5838, LCPH ATI 5602 / PTO 5839  
 LCPH ATI 5603 / PTO 5840, LCPH ATI 5604 / PTO 5841  
 LCPH ATI 5605 / PTO 5842, LCPH ATI 5606 / PTO 5843  
 LCPH ATI 5607 / PTO 5844, LCPH ATI 5608 / PTO 5845  
 LCPH ATI 5609 / PTO 5846, LCPH ATI 5610 / PTO 5847  
 LCPH ATI 5611 / PTO 5848, LCPH ATI 5612 / PTO 5849  
 LCPH ATI 5613 / PTO 5850, LCPH ATI 5614 / PTO 5851  
 LCPH ATI 5615 / PTO 5852, LCPH ATI 5616 / PTO 5853  
 LCPH ATI 5617 / PTO 5854, LCPH ATI 5618 / PTO 5855  
 LCPH ATI 5619 / PTO 5856, LCPH ATI 5620 / PTO 5857  
 LCPH ATI 5621 / PTO 5858, LCPH ATI 5622 / PTO 5859  
 LCPH ATI 5623 / PTO 5860, LCPH ATI 5624 / PTO 5861  
 LCPH ATI 5625 / PTO 5862, LCPH ATI 5626 / PTO 5863  
 LCPH ATI 5627 / PTO 5864, LCPH ATI 5628 / PTO 5865  
 LCPH ATI 5629 / PTO 5866, LCPH ATI 5630 / PTO 5867  
 LCPH ATI 5631 / PTO 5868, LCPH ATI 5632 / PTO 5869  
 LCPH ATI 5633 / PTO 5870, LCPH ATI 5634 / PTO 5871  
 LCPH ATI 5635 / PTO 5872, LCPH ATI 5636 / PTO 5873  
 LCPH ATI 5637 / PTO 5874, LCPH ATI 5638 / PTO 5875  
 LCPH ATI 5639 / PTO 5876, LCPH ATI 5640 / PTO 5877  
 LCPH ATI 5641 / PTO 5878, LCPH ATI 5642 / PTO 5879

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

No applicable requirements at this time.

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 62. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
307	56	V	20 x 20	125	54	LCPH ATI 5575 / PTO 5812
308	56	V	20 x 20	125	54	LCPH ATI 5576 / PTO 5813
309	56	V	20 x 20	125	54	LCPH ATI 5577 / PTO 5814
310	56	V	20 x 20	125	54	LCPH ATI 5578 / PTO 5815

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
311	56	V	20 x 20	125	54	LCPH ATI 5579 / PTO 5816
312	56	V	20 x 20	125	54	LCPH ATI 5580 / PTO 5817
313	56	V	20 x 20	125	54	LCPH ATI 5581 / PTO 5818
314	56	V	20 x 20	125	54	LCPH ATI 5582 / PTO 5819
315	56	V	20 x 20	125	54	LCPH ATI 5583 / PTO 5820
316	56	V	20 x 20	125	54	LCPH ATI 5584 / PTO 5821
317	56	V	20 x 20	125	54	LCPH ATI 5585 / PTO 5822
318	56	V	20 x 20	125	54	LCPH ATI 5586 / PTO 3823
319	56	V	20 x 20	125	54	LCPH ATI 5587 / PTO 5824
320	56	V	20 x 20	125	54	LCPH ATI 5588 / PTO 5825
321	56	V	20 x 20	125	54	LCPH ATI 5589 / PTO 5826
322	56	V	20 x 20	125	54	LCPH ATI 5590 / PTO 5827
323	56	V	20 x 20	125	54	LCPH ATI 5591 / PTO 5828
324	56	V	20 x 20	125	54	LCPH ATI 5592 / PTO 5829
325	56	V	20 x 20	125	54	LCPH ATI 5593 / PTO 5830
326	56	V	20 x 20	125	54	LCPH ATI 5594 / POT 5831
327	56	V	20 x 20	125	54	LCPH ATI 5595 / PTO 5832
328	56	V	20 x 20	125	54	LCPH ATI 5596 / PTO 5833
329	56	V	20 x 20	125	54	LCPH ATI 5597 / PTO 5834
330	56	V	20 x 20	125	54	LCPH ATI 5598 / PTO 5835
331	56	V	20 x 20	125	54	LCPH ATI 5599 / PTO 5836
332	56	V	20 x 20	125	54	LCPH ATI 5600 / PTO 5837
333	56	V	20 x 20	125	54	LCPH ATI 5601 / PTO 5838
334	56	V	20 x 20	125	54	LCPH ATI 5602 / PTO 5839
335	56	V	20 x 20	125	54	LCPH ATI 5603 / PTO 5840
336	56	V	20 x 20	125	54	LCPH ATI 5604 / PTO 5841
337	56	V	20 x 20	125	54	LCPH ATI 5605 / PTO 5842
338	56	V	20 x 20	125	54	LCPH ATI 5606 / PTO 5843
339	56	V	20 x 20	125	54	LCPH ATI 5607 / PTO 5844
340	56	V	20 x 20	125	54	LCPH ATI 5608 / PTO 5845
341	56	V	20 x 20	125	54	LCPH ATI 5609 / PTO 5846
342	56	V	20 x 20	125	54	LCPH ATI 5610 / PTO 5847
343	56	V	20 x 20	125	54	LCPH ATI 5611 / PTO 5848
344	52	V	14 x 18	125	54	LCPH ATI 5612 / PTO 5849
345	52	V	14 x 18	125	54	LCPH ATI 5613 / PTO 5850
346	52	V	14 x 18	125	54	LCPH ATI 5614 / PTO 5851
347	52	V	14 x 18	125	54	LCPH ATI 5615 / PTO 5852
348	52	V	14 x 18	125	54	LCPH ATI 5616 / PTO 5853
349	52	V	14 x 18	125	54	LCPH ATI 5617 / PTO 5854
350	52	V	14 x 18	125	54	LCPH ATI 5618 / PTO 5855
351	52	V	14 x 18	125	54	LCPH ATI 5619 / PTO 5856
352	56	V	20 x 20	125	54	LCPH ATI 5620 / PTO 5857
353	52	V	14 x 18	125	54	LCPH ATI 5621 / PTO 5858
354	52	V	14 x 18	125	54	LCPH ATI 5622 / PTO 5859
355	52	V	14 x 18	125	54	LCPH ATI 5623 / PTO 5860
356	52	V	14 x 18	125	54	LCPH ATI 5624 / PTO 5861
357	52	V	14 x 18	125	54	LCPH ATI 5625 / PTO 5862
358	52	V	14 x 18	125	54	LCPH ATI 5626 / PTO 5863
359	52	V	14 x 18	125	54	LCPH ATI 5627 / PTO 5864

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
360	52	V	14 x 18	125	54	LCPH ATI 5628 / PTO 5865
361	56	V	20 x 20	125	54	LCPH ATI 5629 / PTO 5866
362	56	V	20 x 20	125	54	LCPH ATI 5630 / PTO 5867
363	56	V	20 x 20	125	54	LCPH ATI 5631 / PTO 5868
364	56	V	20 x 20	125	54	LCPH ATI 5632 / PTO 5869
365	56	V	20 x 20	125	54	LCPH ATI 5633 / PTO 5870
366	56	V	20 x 20	125	54	LCPH ATI 5634 / PTO 5871
367	56	V	20 x 20	125	54	LCPH ATI 5635 / PTO 5872
368	56	V	20 x 20	125	54	LCPH ATI 5636 / PTO 5873
369	56	V	20 x 20	125	54	LCPH ATI 5637 / PTO 5874
370	56	V	20 x 20	125	54	LCPH ATI 5638 / PTO 5875
371	56	V	20 x 20	125	54	LCPH ATI 5639 / PTO 5876
372	56	V	20 x 20	125	54	LCPH ATI 5640 / PTO 5877
373	56	V	20 x 20	125	54	LCPH ATI 5641 / PTO 5878
374	56	V	20 x 20	125	54	LCPH ATI 5642 / PTO 5879

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

## 60% Gluten Meal

**Emission Point ID Number: 011, 018**

**Table 63. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
011	011A	Gluten Meal Dryer #1 (Bypass)	Gluten Meal	7.7 tph	011	Multivane Scrubber
	011B	Gluten Meal Dryer #1 (Bypass)	Natural Gas	80 Mcf/hr		
018	018A	#2 Gluten Dryer (Bypass)	Gluten Meal	15.1 tph	018	Multivane Scrubber
	018B	#2 Gluten Dryer (Bypass)	Natural Gas	130 Mcf/hr		

### Applicable Requirements

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 64. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
011	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)

The basis for not stating any [emission point-specific] pollutant limits from this source is under normal startup operating procedures of the dryer, emissions will not be present, provided feed is not introduced into the dryer and the burner is not ignited during the purge cycle. In addition, any emissions generated during periods of startup are not considered excess emissions under the provisions of [LCCO Sec. 10-67].

[The LCCO Sec. 10-60(a)] opacity limit does not apply as opacity cannot be determined in accordance with 40 CFR Part 60 Appendix A Method 9 based on the duration of the startup events.

Authority for Requirement: LCPH ATI 5346 / PTO 5220R1  
LCPH ATI 5347 / PTO 5221

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Control Equipment**

A multivane scrubber shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operated during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5346 / PTO 5220R1  
 LCPH ATI 5347 / PTO 5221

**Operating Limits**

- A. This source shall only exhaust air from the dryer chambers prior to the dryer igniters being activated.
- B. No combustion gases and no feed shall be added to the dryer while the dryer exhaust is venting through the bypass.
- C. The control equipment on this unit shall be maintained and operated according to the manufacturer's specification and good operating practices.

Authority for Requirement: LCPH ATI 5346 / PTO 5220R1  
 LCPH ATI 5347 / PTO 5221

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Record the date and duration of each purge exhausted through the bypass stack.
- B. All maintenance and repair completed on the control device.

Authority for Requirement: LCPH ATI 5346 / PTO 5220R1  
 LCPH ATI 5347 / PTO 5221

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 65. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
011	48	V	24	70	51,200	LCPH ATI 5346 / PTO 5220R1
018	49	V	24	70	51,200	LCPH ATI 5347 / PTO 5221

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes

No

Authority for Requirement: 567 IAC 24.108(3)

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**Emission Point ID Number: 013, 050, 051****Table 66. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
013	013	60% Gluten Meal Recycle No. 3	Corn Gluten Meal	3.5 tph	013	Baghouse
050	050	60% Gluten Meal Recycle No. 2	Corn Gluten Meal	3.5 tph	050	Baghouse
051	051	60% Gluten Meal Recycle No. 1	Corn Gluten Meal	4 tph	051	Baghouse

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 67. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
013	PM	0.1 gr/dscf	567 IAC 23.4(7)	LCPH ATI 5808 / PTO 5768
050			LCCO Sec. 10-62(a)(7)	LCPH ATI 5809 / PTO 5769
051	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	LCPH ATI 7024 / PTO 6744

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<sup>1</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

*The emissions from these emission points shall not exceed the levels specified below.*

**Table 68. Specific Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
013	PM / PM <sub>10</sub>	0.11 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 5808 / PTO 5768
050	PM / PM <sub>10</sub>	0.07 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 5809 / PTO 5769
	VOC	0.16 lb/hr	Requested limit	
051	PM / PM <sub>10</sub>	0.1 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 7024 / PTO 6744
	VOC	0.31 lb/hr <sup>2</sup>	03-CV-2066	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operational. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5808 / PTO 5768  
LCPH ATI 5809 / PTO 5769

### **Operating Limits**

- A. The [control equipment] on this unit shall be maintained according to the manufacturer's specifications and good operating practices.
- B. The differential pressure measured across the baghouse shall be greater than one-half (0.5) inch of water column and less than six (6) inches of water column.

Authority for Requirement: LCPH ATI 5808 / PTO 5768  
LCPH ATI 5809 / PTO 5769

- C. The facility-wide grind shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 5809 / PTO 5769

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the differential pressure across the baghouse on a weekly basis.
- B. Monitor and record "no visible emissions" observations on a weekly basis and any action resulting from the observation.
- C. Record all maintenance and repair completed on the control device.

Authority for Requirement: LCPH ATI 5808 / PTO 5768  
LCPH ATI 5809 / PTO 5769

- D. Record the weekly average facility grind rate.

Authority for Requirement: LCPH ATI 5809 / PTO 5769

### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The baghouse associated with this emission unit (CE051) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the baghouse.
- C. The normal differential pressure across the baghouse (CE051) shall be maintained between 0.3" and 8" of water column. The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis.

Authority for Requirement: LCPH ATI 7024 / PTO 6744

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 69. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
013	16	V	8	190	2,486	LCPH ATI 5808 / PTO 5768
050	16	V	8	190	1,466	LCPH ATI 5809 / PTO 5769
051	55	V	8	143	1,883	LCPH ATI 7024 / PTO 6744

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5808 / PTO 5768  
 LCPH ATI 5809 / PTO 5769  
 LCPH ATI 7024 / PTO 6744

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1,2</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> For SEPs 050 and 051: Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit.

**Emission Point ID Number: 190**

**Table 70. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
190	005CA	Fiber Feed Dryer #4	Corn Gluten Feed	45 tph	005A 005C	#1 Packed Scrubber Ducon Scrubber
	005CB	Fiber Feed Dryer #4-NG	Natural Gas	0.19 MMcf/hr	005B 190	#2 Packed Scrubber RTO #1
	005DA	Fiber Feed Dryer #5	Corn Gluten Feed	45 tph	005A 005D	#1 Packed Scrubber Ducon Scrubber
	005DB	Fiber Feed Dryer #5-NG	Natural Gas	0.19 MMcf/hr	190	RTO #1
	011A	Gluten Meal Dryer #1	Corn Gluten Meal	7.7 tph	011 025	Ducon Scrubber Entoleter Scrubber
	011B	Gluten Meal Dryer #1-NG	Natural Gas	0.08 MMcf/hr	190	RTO #1
	018A	Gluten Meal Dryer #2	Corn Gluten Meal	15.1 tph	018 005B	Ducon Scrubber #2 Packed Scrubber
	018B	Gluten Meal Dryer #2-NG	Natural Gas	0.13 MMcf/hr	190	RTO #1
	019A	Fiber Feed Dryer #1	Corn Gluten Feed	15.75 tph	019 025	Ducon Scrubber Entoleter Scrubber
	019B	Fiber Feed Dryer #1-NG	Natural Gas	0.08 MMcf/hr	190	RTO #1
	030A	Fiber Feed Dryer #2	Corn Gluten Feed	15.75 tph	030 025	Ducon Scrubber Entoleter Scrubber
	030B	Fiber Feed Dryer #2-NG	Natural Gas	0.08 MMcf/hr	190	RTO #1
	043A	Fiber Feed Dryer #3	Corn Gluten Feed	20 tph	043 005B	Ducon Scrubber #2 Packed Scrubber
	043B	Fiber Feed Dryer #3-NG	Natural Gas	0.08 MMcf/hr	190	RTO #1
	190	RTO #1 – Natural Gas	Natural Gas	0.011 MMcf/hr	190	RTO #1

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 71. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
190	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 4900 / PTO 5783R1
	PM / PM <sub>10</sub>	3.00 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20%	LCCO Sec. 10-60(a)	
		No VE <sup>2</sup>	LCCO Sec. 10-58(c)(2)	
	SO <sub>2</sub>	7.30 lb/hr <sup>1</sup>	NAAQS	
	NO <sub>x</sub>	13.78 lb/hr <sup>1,3</sup>		
			27.55 lb/hr <sup>1,3</sup>	
VOC <sup>4</sup>	≤ 10 ppm <sup>5</sup>	03-CV-2066		
CO <sup>4</sup>	≤100 ppm			

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

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<sup>2</sup> The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

<sup>3</sup> EP190 shall not exceed 13.78 lb/hr when RTO #1 is the only unit operating. The combined limit for all three EPs (190, 191, and 192) is 27.55 lb/hr.

<sup>4</sup> All emission limitations (including operating parameter ranges and limits) apply at all times when the process equipment is operating, except in the case of process equipment or pollution control systems during previously planned startup and shutdown periods (including planned maintenance periods), and malfunctions as defined in 40 CFR Part 63. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events ADM shall minimize emissions to the extent practicable. To the extent practicable, startup and shutdown of pollution control systems will be performed during times when process equipment is also shut down. Also, ADM shall, to the extent practicable, control emissions during a malfunction event in a manner consistent with good air pollution control practice for minimizing emissions. In addition, for dryers controlled by RTOs not designed for on-line regeneration (i.e., bake-out) and that are not preceded by a WESP or equivalent device(s), the emission limitations do not apply to periods of off-line RTO regeneration not to exceed 50 dryer operation hours per calendar year and individual off-line RTO regeneration not to exceed 12 dryer operating hours. For RTOs servicing more than one dryer, a dryer operating hour is any hour in which one or more of the dryers are on-line. Off-line RTO regeneration while all associated dryers are shut down is not included in these operating limitations. Also, off-line RTO regeneration periods that can be completed during unrelated shutdown or malfunction periods (i.e., periods not related to the need to perform an off-line RTO regeneration) are not included in these limitations (i.e., ADM may perform 'preventative' off-line RTO regenerations during periods when the RTO is off-line for other reasons such as when the RTO is off-line due to maintenance or malfunction of upstream PM control equipment which requires bypass of the RTO). ADM may petition USEPA and Iowa DNR to adjust these operating limitations for a specific RTO based on operating experience with the RTO and the dryer(s) on which the RTO is installed. Changes to regeneration hour limitations shall be considered non-material modifications under Paragraph 5 of the Consent Decree, provided ADM obtains written approval of the change(s) from USEPA and Iowa DNR. *ADM Consent Decree (United States of America v. Archer Daniels Midland Company, Civil Action No. 03-CV-2066), Cedar Rapids Control Technology Plan Section 7.0, Footnote 1.*

<sup>5</sup> As propane.

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## **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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:

#### Dryers

- A. Each gluten and fiber feed dryer (EUs 005CA, 005DA, 011A, 018A, 019A, 030A, 043A) outlet temperature shall operate  $\leq 391$  °F, based upon an 8-hour rolling average. The owner or operator shall monitor and record the outlet temperature of each gluten and fiber feed dryer and calculate the 8-hour rolling average.

- B. Each gluten and fiber feed dryer (EUs 005CA, 005DA, 011A, 018A, 019A, 030A, 043A) inlet temperature shall operate  $\leq 1,265$  °F, based upon an 8-hour rolling average. The owner or operator shall monitor and record the inlet temperature of each gluten and fiber feed dryer and calculate the 8-hour rolling average.

#### Scrubbers

- C. The Packed Tower Scrubbers #1 & #2 (CEs 005A and 005B), Ducon Scrubbers (CEs 005C, 005D, 011, 018, 019, 030, and 043), and Entoleter Centrifuged Super Scrubber (CE025) shall be operated at all times the equipment each device controls is in operation.
- D. The Recirculation water flowrate to each Packed Tower Scrubber (CEs 005A and 005B) shall be maintained  $\geq 5,340$  gpm. The owner or operator shall monitor and record the recirculation water flowrate to each Packed Tower Scrubber on a daily basis.
- E. The differential pressure across each Packed Tower Scrubber (CEs 005A and 005B) shall be maintained between 1" and 14" of water column. The owner or operator shall monitor and record the differential pressure across each Packed Tower Scrubber on a daily basis.
- F. The scrubbing liquor pH to each Packed Tower Scrubber (CEs 005A and 005B) shall be maintained  $\geq 5.4$  S.U. The owner or operator shall monitor and record the scrubbing liquor pH for each Packed Tower Scrubber on a daily basis.
- G. The Entoleter Super Scrubber (CE025) make-up water flowrate shall be maintained  $\geq 115$  gpm. The owner or operator shall monitor and record the make-up water flowrate to the Entoleter Super Scrubber on a daily basis.
- H. The differential pressure across the Entoleter Super Scrubber (CE025) shall be maintained between 1" and 10" of water column. The owner or operator shall monitor and record the differential pressure across the Entoleter Super Scrubber on a daily basis.
- I. The scrubbing liquor pH to the Entoleter Super Scrubber (CE025) shall be maintained  $\geq 8.0$  S.U. The owner or operator shall monitor and record the scrubbing liquor pH for the Entoleter Super Scrubber.

#### Regenerative Thermal Oxidizer (RTO)

- J. The one-hour average combustion temperature of the RTO (CE190) shall be maintained  $\geq 1,550$  °F.
- K. The RTO (CE190) shall combust only natural gas.
- L. As an approved alternate operating scenario, RTOs 2 (CE191A), 3 (CE191B), 4 (CE192A), or 5 (CE192B) may be operated during periods when CE190 is not operating, provided that sufficient RTO capacity is maintained as defined by the minimum temperature requirements specified in Condition [J of this section]. All conditions specified in this permit applicable to CEs 191A, 191B, 192A, and 192B are applicable to CEs 191A, 191B, 192A, and 192B during such periods of operation.
- M. The RTO (CE190) shall be equipped with a thermocouple or equivalent device capable of continuously monitoring the combustion chamber temperature of the RTO. The thermocouple or equivalent device shall monitor temperature on a continuous basis, with the one-hour average temperature recorded every hour. The thermocouple or equivalent device shall be installed, operated, calibrated, and maintained according to the manufacturer's specifications. The owner or operator shall monitor and record the combustion chamber temperature (monitored as a 1-hour average).
- N. The owner or operator shall monitor and record the differential pressure across the RTO (CE190) on a daily basis while the control equipment is in operation.

- O. The owner or operator shall monitor and record the date and dryer operating hours during periods of off-line RTO regeneration.

General Operating Limits

- P. Routine observations conducted at least once each week during daylight hours of scrubbers and RTO shall be conducted to determine whether there are visible emissions from the stack, leaks, atypical operating parameters (e.g., pressure differential, temperature) or other indications that may necessitate corrective action. Corrective action shall be taken immediately, if necessary. The owner or operator shall maintain a written record of the weekly opacity observation and any action resulting from the observation. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit.
- Q. All control equipment on the emission units shall be maintained according to the manufacturer's specifications and good operating practices.
  - 1. The owner or operator shall record the results of the weekly routine maintenance checks of the scrubbers and RTO associated with this emission point and any corrective action taken.
  - 2. The owner or operator shall record the results of the preventative maintenance inspections completed for the RTO (CE190).
  - 3. The owner or operator shall maintain records of all maintenance and repair completed on the control devices.
- R. The facility shall monitor the stack for opacity on a weekly basis during a period when the emission unit on this emission point is at or near full capacity and record the reading. Opacity shall be observed to ensure that no visible emission occur during the material handling operation of the unit. If observations are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.
- S. The ADM Corn Processing Wet Mill shall not grind more than 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the weekly average facility grind rate.
- T. The owner or operator shall prepare and submit the periodic reports specified in Condition 12.B(6) of [LCPH ATI 4900 / PTO 5783R1].

Authority for Requirement: LCPH ATI 4900 / PTO 5783R1

**Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

**Description**

Emission unit EU005C (Fiber Feed Dryer #4) is currently permitted to exhaust through control equipment CE005C (Ducon Scrubber) and CE005A (#1 Packed Bed Scrubber); however, EU005C is currently configured to exhaust through CE005C, CE005A (#1 Packed Bed Scrubber), and CE005B (#2 Packed Bed Scrubber), as indicated by ADM. This change needs to be addressed in the local construction permit for SEP190 (LCPH ATI 4900 / PTO 5783R1).

**Condition**

The permittee shall apply for a construction permit from Linn County Public Health to modify the associated control equipment of EU005C within 6 months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through

this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 72. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
190	150	V	84	275	100,000	LCPH ATI 4900 / PTO 5783R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4900 / PTO 5783R1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

<sup>1</sup> A Facility-maintained operation & maintenance plan is required for PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, and CO emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 191, 192**

**Table 73. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
191 192	011A	Gluten Meal Dryer #1	Corn Gluten Meal	7.7 tph	011 025	Ducon Scrubber Entoleter Scrubber
	011B	Gluten Meal Dryer #1-NG	Natural Gas	0.08 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191 192	018A	Gluten Meal Dryer #2	Corn Gluten Meal	15.1 tph	005B 018	#2 Packed Scrubber Ducon Scrubber
	018B	Gluten Meal Dryer #2-NG	Natural Gas	0.13 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191 192	019A	Fiber Feed Dryer #1	Corn Gluten Feed	15.75 tph	019 025	Ducon Scrubber Entoleter Scrubber
	019B	Fiber Feed Dryer #1-NG	Natural Gas	0.08 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191 192	030A	Fiber Feed Dryer #2	Corn Gluten Feed	15.75 tph	025 030	Entoleter Scrubber Ducon Scrubber
	030B	Fiber Feed Dryer #2-NG	Natural Gas	0.08 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191 192	043A	Fiber Feed Dryer #3	Corn Gluten Feed	20 tph	005B 043	#2 Packed Scrubber Ducon Scrubber
	043B	Fiber Feed Dryer #3-NG	Natural Gas	0.08 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191 192	005CA	Fiber Feed Dryer #4	Corn Gluten Feed	45 tph	005A 005C	#1 Packed Scrubber Ducon Scrubber
	005CB	Fiber Feed Dryer #4-NG	Natural Gas	0.19 MMcf/hr	005B 191A&B 192A&B	#2 Packed Scrubber RTO #2, RTO #3 RTO #4, RTO #5
191 192	005DA	Fiber Feed Dryer #5	Corn Gluten Feed	45 tph	005A 005D	#1 Packed Scrubber Ducon Scrubber
	005DB	Fiber Feed Dryer #5-NG	Natural Gas	0.19 MMcf/hr	191A&B 192A&B	RTO #2, RTO #3 RTO #4, RTO #5
191	191A	RTO #2 – Natural Gas	Natural Gas	0.011 MMcf/hr	191A	RTO #2
	191B	RTO #3 – Natural Gas	Natural Gas	0.011 MMcf/hr	191B	RTO #3
192	192A	RTO #4 – Natural Gas	Natural Gas	0.011 MMcf/hr	192A	RTO #4
	192B	RTO #5 – Natural Gas	Natural Gas	0.011 MMcf/hr	192B	RTO #5

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 74. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
191 192	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 4901 / PTO 5784 LCPH ATI 4902 / PTO 5785
	Opacity	20%	LCCO Sec. 10-60(a)	

**Table 75. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
191 192	PM / PM <sub>10</sub>	6.01 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4901 / PTO 5784 LCPH ATI 4902 / PTO 5785
	Opacity	No VE <sup>2</sup>	LCCO Sec. 10-58(c)(3)	
	SO <sub>2</sub>	14.61 lb/hr <sup>1</sup>	NAAQS	
	NO <sub>x</sub>	27.55 lb/hr <sup>1,3</sup>		
	VOC	≤ 10 ppm <sup>4,5</sup>	03-CV-2066	
CO	≤ 100 ppm <sup>5</sup>			

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

<sup>3</sup> The combined limit for all three EPs (190, 191 and 192) is 27.55 lb/hr.

<sup>4</sup> As propane.

<sup>5</sup> All emission limitations (including operating parameter ranges and limits) apply at all times when the process equipment is operating, except in the case of process equipment or pollution control systems, during previously planned startup and shutdown periods (including planned maintenance periods), and malfunctions as defined in 40 CFR Part 63. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, ADM shall minimize emissions to the extent practicable. To the extent practicable, startup and shutdown of pollution control systems will be performed during times when process equipment is also shut down. Also, ADM shall, to the extent practicable, control emissions during a malfunction event in a manner consistent with good air pollution control practice for minimizing emissions. In addition, for dryers controlled by RTOs not designed for on-line regeneration (i.e., bake-out) and that are not preceded by a WESP or equivalent device(s), the emission limitations do not apply to periods of off-line RTO regeneration not to exceed 50 dryer operating hours per calendar year and individual off-line RTO regeneration periods not to exceed 12 dryer operating hours. For RTOs servicing more than one dryer, a dryer operating hour is any hour in which one or more of the dryers on-line. Off-line RTOs regeneration while all associated dryers are shut down is not included in these operating limitations. Also, off-line RTO regeneration periods that can be completed during unrelated shutdown, or malfunction periods (i.e., periods not related to the need to perform an off-line RTO regeneration) are not included in these limitations (i.e., ADM may perform "preventative" off-line RTO regenerations during periods when the RTO is off-line for other reasons such as when the RTO is off-line due to maintenance or malfunction of upstream PM control equipment which requires bypass of the RTO). ADM may petition the USEPA and Iowa DNR to adjust these operating limitations for a specific RTO based on operating experience with the RTO and the dryer(s) on which the RTO is installed. Changes to regeneration hour limitations shall be considered non-material modifications under Paragraph 5 of the Consent Decree, provided ADM obtains written approval of these change(s) from USEPA and Iowa DNR. *ADM Consent Decree (United States of America vs. Archer Daniels Midland Company, Civil Action No. 03-CV-2066), Cedar Rapids Control Technology Plan Section 7.0, Footnote 1.*

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Control Equipment**

The control devices listed [in Table 73] shall be installed to control emissions. All control equipment shall be maintained properly and operated at all times the air pollution source is in operation unless specified

otherwise in this permit. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times. The wet electrostatic precipitators [#2 (CE191C), #3 (CE191D), #4 (CE192C), and #5 (CE192D)] are installed to extend the life of the RTOs and are not required to operate as a condition of [LCPH ATI 4901 / PTO 5784 and LCPH ATI 4902 / PTO 5785].

Authority for Requirement: LCPH ATI 4901 / PTO 5784  
LCPH ATI 4902 / PTO 5785

## **Operating Limits**

### Dryers

- A. Each gluten and fiber feed dryer [EUs 011A, 018A, 019A, 030A, 043A, 005CA, 005DA] outlet temperature shall operate  $\leq 391$  °F based upon an 8-hour rolling average.
- B. Each gluten and fiber feed dryer [EUs 011A, 018A, 019A, 030A, 043A, 005CA, 005DA] inlet temperature shall operate  $\leq 1,265$  °F based upon an 8-hour rolling average.

### Scrubbers

- C. The Packed Tower Scrubbers #1 & #2 (CE005A and CE005B), Ducon Scrubbers [CEs 005C, 005D, 018, 019, 030, 043], Entoleter Centrifiged Super Scrubber (CE025), and Ducon Scrubber (CE011) shall be operated at all times the equipment each device controls is in operation.
- D. The recirculation water flowrate to each Packed Tower Scrubber (CE005A and CE005B) shall be maintained  $\geq 5,340$  gpm.
- E. The differential pressure across each Packed Tower Scrubber (CE005A and CE005B) shall be maintained between 1" and 14" w.c.
- F. The scrubbing liquor pH to each packed tower scrubber (CE005A and CE005B) shall be maintained  $\geq 5.4$ .
- G. The Entoleter Super Scrubber (CE025) make-up water flowrate shall be maintained  $\geq 115$  gpm.
- H. The differential pressure across the Entoleter Super Scrubber (CE025) shall be maintained between 1" to 10" w.c.
- I. The scrubbing liquor pH to the Entoleter Super Scrubber (CE025) shall be maintained  $\geq 8.0$ .

### Regenerative Thermal Oxidizers (RTOs)

- J. The one-hour average combustion temperature of RTOs [CEs 191A, 191B, 192A, and 192B] shall be maintained  $\geq 1,550$  °F.
- K. RTOs [CEs 191A, 191B, 192A, and 192B] shall only combust natural gas.
- L. As an approved alternate operating scenario [any of the RTOs (CEs 190, 191A, 191B, 192A, and 192B) may operate during periods when another RTO (CEs 190, 191A, 191B, 192A, and 192B)] are not operating provided that sufficient RTO capacity is maintained as defined by the minimum temperature requirements specified in Condition [J above]. All conditions specified in [LCPH ATI 4901 / PTO 5784 and LCPH ATI 4902 / PTO 5785] applicable to CE190, CE191A, CE191B, CE192A, and CE192B are applicable to CE190, CE191A, CE191B, CE192A, and CE192B during such periods of operation.
- M. Each RTO shall be equipped with a thermocouple or equivalent device capable of continuously monitoring the combustion chamber temperature of the RTO. The thermocouple or equivalent device shall monitor temperature on a continuous basis, with the one-hour average temperature

recorded each hour. The thermocouple or equivalent device shall be installed, operated, calibrated, and maintained according to the manufacturer's specifications.

#### General Operating Limits

- N. Routine observations conducted at least once each week during daylight hours of scrubbers and RTOs shall be conducted to determine whether there are visible emissions from the stack, leaks, atypical operating parameters (e.g., pressure differential, temperature) or other indications that may necessitate corrective action. Corrective action shall be taken immediately if necessary.
- O. All control equipment on the emission units shall be maintained according to the manufacturer's specifications and good operating practices.
- P. The facility shall monitor the stack for opacity on a weekly basis during a period when the emission unit on this emission point is at or near full capacity and record the reading. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.
- Q. The ADM Corn Processing Wet Mill shall not grind more than 450,000 bushels of corn per day based on a 52-week rolling average.

Authority for Requirement:     LCPH ATI 4901 / PTO 5784  
  LCPH ATI 4902 / PTO 5875

#### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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:

#### Dryers

- A. Record the inlet temperature of each gluten and fiber feed dryer [EUs 011A, 018A, 019A, 030A, 043A, 005CA, 005DA] based upon an 8-hour rolling average.
- B. Record the outlet temperature of each gluten and fiber feed dryer [EUs 011A, 018A, 019A, 030A, 043A, 005CA, 005DA] based upon an 8-hour rolling average.

#### Scrubbers

- C. Record the recirculation water flowrate to Packed Tower Scrubbers #1 and #2 (CE005A and CE005B) on a daily basis.
- D. Record the differential pressure across each Packed Tower Scrubber (CE005A and CE005B) on a daily basis.
- E. Record the scrubbing liquor pH to each Packed Tower Scrubber (CE005A and CE005B) on a daily basis.
- F. Record the make-up flowrate to the Entoleter Super Scrubber (CE025) on a daily basis.
- G. Record the differential pressure across the Entoleter Super Scrubber (CE025) on a daily basis.
- H. Record the scrubbing liquor pH to the Entoleter Super Scrubber (CE025).

#### RTOs

- I. Record each RTO [CEs 191A, 191B, 192A, and 192B) combustion chamber temperature (monitored as a one-hour average).

- J. Record pressure drop across each RTO [CEs 191A, 191B, 192A, and 192B] on a daily basis while the control equipment is in operation.
- K. Record the date and dryer operating hours during periods of off-line RTO regeneration.

General Recordkeeping

- L. Record the results of the weekly routine maintenance checks of the scrubbers and RTOs associated with this emission point and any corrective action that is taken.
- M. Record the results of the preventative maintenance inspections completed for each RTO [CEs 191A, 191B, 192A, and 192B).
- N. Maintain a written record of the weekly opacity observation and any action resulting from the observation. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit.
- O. Records of all maintenance and repair completed on the control devices.
- P. Record the weekly average facility grind rate.

Authority for Requirement:     LCPH ATI 4901 / PTO 5784  
   LCPH ATI 4902 / PTO 5875

**Reporting Requirements**

The following information shall be submitted to this department by the 30<sup>th</sup> of each month for the previous quarter (January 30, April 30, July 30, and October 30).

- A. Submit a quarterly report summarizing the weekly average facility grind rate.
- B. Submit a quarterly report summarizing the dryer operating hours during periods of off-line RTO regeneration and the date(s) of occurrence.
- C. Submit semi-annual report listing deviations from the operating limits specified in [the Operating Limits and Operating Condition Monitoring and Recordkeeping sections above]. The Title V annual compliance certification and semi-annual compliance certification may be used to satisfy this requirement.

Authority for Requirement:     LCPH ATI 4901 / PTO 5784  
   LCPH ATI 4902 / PTO 5785

**Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

**Description**

Emission unit EU005C (Fiber Feed Dryer #4) is currently permitted to exhaust through control equipment CE005C (Ducon Scrubber) and CE005A (#1 Packed Scrubber); however, EU005C is currently configured to exhaust through CE005C, CE005A (#1 Packed Scrubber), and CE005B (#2 Packed Scrubber), as indicated by ADM. This change needs to be addressed in the local construction permit for SEP191 and SEP192 (LCPH ATI 4901 / PTO 5784 and ATI 4902 / PTO 5785).

**Condition**

The permittee shall apply for a construction permit from Linn County Public Health to modify the associated control equipment of EU005C within 6 months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through

this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 76. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
191	150	V	120	275	200,000	LCPH ATI 4901 / PTO 5784
192	150	V	120	275	200,000	LCPH ATI 4902 / PTO 5785

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

These emission points are subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4901 / PTO 5784  
LCPH ATI 4902 / PTO 5785

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A Facility-maintained operation & maintenance plan is required for PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, and CO emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan shall be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 226, 230****Table 77. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
226	226	Gluten Filters 1-15, 19-22, and Vacuum Pumps 1-4	Corn Gluten Meal	17.93 tph	--	None
230	230	#16, #17, and #18 Gluten Filter Pumps	Corn Gluten Meal	2,446 bph	--	None

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 78. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
226	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e"	LCPH ATI 6974 / PTO 6834
230			LCCO Sec. 10-65(a)(2)	LCPH ATI 4838 / PTO 5486
226	VOC	0.04 lb/hr <sup>1</sup>	03-CV-2066	LCPH ATI 6974 / PTO 6834
		0.19 tpy <sup>1</sup>		
230	VOC	0.04 lb/hr <sup>1</sup>	03-CV-2066	LCPH ATI 4838 / PTO 5486
		0.16 tpy <sup>1</sup>		

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<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 79. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
226	58	V	34	124	140	LCPH ATI 6974 / PTO 6834
230	72	V	8	99	103	LCPH ATI 4838 / PTO 5486

---

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

**21% Fiber Feed**

**Emission Point ID Number: 019, 026, 027, 030, 043**

**Table 80. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
019	019A	#1 Fiber Dryer (Bypass)	Corn Gluten Feed	15.75 tph	019	Multivane Scrubber
	019B	#1 Fiber Dryer (Bypass)	Natural Gas	80 Mcf/hr		
026	005CA	#4 Fiber Dryer (Bypass)	Corn Gluten Feed	45 tph	005C	Multivane Scrubber
	005CB	#4 Fiber Dryer (Bypass)	Natural Gas	190 Mcf/hr		
027	005DA	#5 Fiber Dryer (Bypass)	Corn Gluten Feed	45 tph	005D	Multivane Scrubber
	005DB	#5 Fiber Dryer (Bypass)	Natural Gas	190 Mcf/hr		
030	030A	#2 Fiber Dryer (Bypass)	Corn Gluten Feed	15.75 tph	030	Multivane Scrubber
	030B	#2 Fiber Dryer (Bypass)	Natural Gas	80 Mcf/hr		
043	043A	#3 Fiber Dryer (Bypass)	Corn Gluten Feed	20 tph	043	Multivane Scrubber
	043B	#3 Fiber Dryer (Bypass)	Natural Gas	80 Mcf/hr		

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 81. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
019 026 027	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
030 043	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)

The basis for not stating any [emission point-specific] pollutant limits from [these sources] is under normal startup operating procedures of the dryer, emissions will not be present, provided feed is not introduced into the dryer and the burner is not ignited during the purge cycle. In addition, any emissions generated during periods of startup are not considered excess emissions under the provisions of [LCCO Sec. 10-67].

[The LCCO Sec. 10-60(a)] opacity limit does not apply as opacity cannot be determined in accordance with 40 CFR Part 60 Appendix A Method 9 based on the duration of the startup events.

Authority for Requirement:      LCPH ATI 5348 / PTO 5222  
    LCPH ATI 5349 / PTO 5223  
    LCPH ATI 5350 / PTO 5224  
    LCPH ATI 5351 / PTO 5225  
    LCPH ATI 5352 / PTO 5226

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### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Control Equipment**

A multivane scrubber shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement:     LCPH ATI 5348 / PTO 5222  
  LCPH ATI 5349 / PTO 5223  
  LCPH ATI 5350 / PTO 5224  
  LCPH ATI 5351 / PTO 5225  
  LCPH ATI 5352 / PTO 5226

#### **Operating Limits**

- A. This source shall only exhaust air from the dryer chambers prior to the dryer igniters being activated.
- B. No combustion gases and no feed shall be added to the dryer while the dryer exhaust is venting through the bypass.
- C. The control equipment on this unit shall be maintained and operated according to the manufacturer's specifications and good operating practices.

Authority for Requirement:     LCPH ATI 5348 / PTO 5222  
  LCPH ATI 5349 / PTO 5223  
  LCPH ATI 5350 / PTO 5224  
  LCPH ATI 5351 / PTO 5225  
  LCPH ATI 5352 / PTO 5226

#### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Record the date and duration of each purge exhausted through the bypass stack.
- B. All maintenance and repair completed on the control device.

Authority for Requirement:     LCPH ATI 5348 / PTO 5222  
  LCPH ATI 5349 / PTO 5223  
  LCPH ATI 5350 / PTO 5224  
  LCPH ATI 5351 / PTO 5225  
  LCPH ATI 5352 / PTO 5226

#### **Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 82. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
019	48	V	24	70	51,200	LCPH ATI 5348 / PTO 5222
026	60	V	30	70	80,000	LCPH ATI 5349 / PTO 5223
027	60	V	30	70	80,000	LCPH ATI 5350 / PTO 5224
030	50	V	24	70	51,200	LCPH ATI 5351 / PTO 5225
043	57	V	24	70	51,200	LCPH ATI 5352 / PTO 5226

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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**Emission Point ID Number: 032**

**Table 83. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
032	032B	#2 Fiber Cooler	Corn Gluten Feed	80,000 lb/hr	032	Baghouse
	032C	Stedman Mills 1-8	Corn Gluten Feed	252,000 lb/hr		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 84. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
032	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 7167 / PTO 6900
	PM / PM <sub>10</sub>	1.25 lb/hr <sup>1</sup>	PSD synthetic minor	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-65(a)(2)	
	VOC	4.84 lb/hr <sup>3</sup>	03-CV-2066	

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<sup>1</sup> The emission limit is consistent with the PSD synthetic minor limits established during the 1992 Grind Expansion.

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The baghouse (CE032) shall be maintained according to the manufacturer's specifications and good operating conditions. The owner or operator shall record the date and description of all maintenance and repair completed on the control device.

- C. The facility-wide grind shall be limited to 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the weekly average grind rate and maintain a 52-week rolling average grind rate.
- D. The normal differential pressure across the baghouse (CE032) shall be maintained between 0.5 and 8 inches of water column, with the exception of unit startup. The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis.

Authority for Requirement: LCPH ATI 7167 / PTO 6900

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 85. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
032	76	V	52	140	40,000	LCPH ATI 7167 / PTO 6900

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 7167 / PTO 6900

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A Facility Operations and Maintenance Plan is required for PM and PM<sub>10</sub> emissions; however, Compliance Assurance Monitoring is more stringent. Therefore, refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

<sup>2</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 193****Table 86. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
193	193A	Wet Feed Loadout Hood	Corn Gluten Feed	180 tph	--	None
	193B	Wet Feed Mixer	Corn Gluten Feed	180 tph		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 87. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
193	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)
		2.30 lb/hr	Requested limit	LCPH ATI 7422 / PTO 7255
	VOC	3.45 lb/hr		

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Operation of the wet feed loadout (EUs 193A and 193B) is restricted to 50 trucks per day, based on a 365-day rolling average. The owner or operator shall monitor and record the number of trucks loaded out each day and calculate a 365-day rolling average.

Authority for Requirement: LCPH ATI 7422 / PTO 7255

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 88. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
193	150	V	30	100	20,000	LCPH ATI 7422 / PTO 7255

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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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes                       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes                       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes                       No

Authority for Requirement:                      567 IAC 24.108(3)

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**Emission Point ID Number: 211****Table 89. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
211	211	Feedhouse Miscellaneous Fugitive Emission Sources	Corn	126.6 tph	211	Packed Bed Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 90. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
211	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	LCPH ATI 4841 / PTO 6331
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
		6.11 lb/hr	NAAQS	
	VOC	2.72 lb/hr <sup>2</sup>	03-CV-2066	

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<sup>1</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Requested limit per Consent Decree, *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A packed bed scrubber shall be installed to control SO<sub>2</sub> emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4841 / PTO 6331

**Operating Limits**

- A. The differential pressure measured across the scrubber, CE211, shall be maintained between 0.5 inches of water column and 10 inches of water column, with the exception of unit startup.
- B. The fresh water flowrate to the scrubber, CE211, shall be maintained at 133 gallons per minute or higher.
- C. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

- D. The facility-wide grind rate shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 4841 / PTO 6331

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record any maintenance and repair completed on the control equipment.
- C. Monitor and record the differential pressure on the wet scrubber on a daily basis while the control equipment and emission units are in operation.
- D. Monitor and record the fresh water flowrate in the scrubber on a daily basis.
- E. Calculate and record the weekly facility grind rate average based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 4841 / PTO 6331

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 91. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
211	73	V	30	75	11,462	LCPH ATI 4841 / PTO 6331

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4841 / PTO 6331

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**

Yes

No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes <sup>1</sup>

No

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<sup>1</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required in LCPH ATI 4841 / PTO 6331.

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**Emission Point ID Number: 271****Table 92. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
271	271	Vertical Fiber Cooler #1	Corn Gluten Feed	60 tph	271	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 93. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
271	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 7225 / PTO 7057
	PM / PM <sub>10</sub>	1.88 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	VOC	3.0 lb/hr	Requested limit	

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<sup>1</sup> Emission limit used in facility-wide non-PSD dispersion modeling for Project Number 4568 to predict attainment of the NAAQS.

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 across the control equipment shall be maintained between 0.1 and 8 inches of water column. The owner or operator shall monitor and record the differential pressure across the control equipment on a weekly basis.
- B. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- C. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall maintain records of all maintenance completed on the control equipment.

Authority for Requirement: LCPH ATI 7225 / PTO 7057

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 94. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
271	76	V	36	120	25,000	LCPH ATI 7225 / PTO 7057

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 7225 / PTO 7057

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

## Germ

Emission Point ID Number: 006

Table 95. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
006	006	#2 Fluid Bed Germ Dryer (FBGD)	Germ	95,000 lb/hr (wet) 32,344 lb/hr (dry)	006A 006B 006C	Cyclone Cyclone Wet Scrubber

### Applicable Requirements

The emissions from this emission point shall not exceed the levels specified below.

Table 96. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
006	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 7168 / PTO 6901
	PM / PM <sub>10</sub>	4.02 lb/hr <sup>1</sup>	Requested limit	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
		13.08 lb/hr	Requested limit	
VOC	10.13 lb/hr <sup>3</sup>	03-CV-2066		

<sup>1</sup> The emission limit is consistent with the PSD synthetic minor limits established during the 1992 Grind Expansion.

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

### Operating Limits and Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

- B. The cyclones (CE006A and CE006B) and wet scrubber (CE006C) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance and repair completed on the control equipment associated with this emission point.
- C. The facility-wide grind shall be limited to 450,000 bushels of corn per day, based on a 52-week rolling average. The owner or operator shall monitor and record the weekly average facility grind rate and maintain a 52-week rolling average grind rate.
- D. The recirculated water flowrate to the wet scrubber (CE006C) shall be greater than or equal to 600 gallons per minute (gpm). The fresh water (make-up) flowrate to the wet scrubber shall be greater than or equal to 32 gpm. The owner or operator shall monitor and record the recirculated and fresh water flowrates to the wet scrubber on a daily basis.
- E. The normal differential pressure measured across the wet scrubber (CE006C) shall be maintained between 0.5 and 14 inches of water column. The owner or operator shall monitor and record the differential pressure on a weekly basis.

Authority for Requirement: LPCH ATI 7168 / PTO 6901

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 97. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
006	142	V	72	125	90,749	LCPH ATI 7168 / PTO 6901

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 7168 / PTO 6901

**Agency Approved Operations & Maintenance Plan Required?** Yes <sup>1</sup> No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>2</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>3</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Agency-approved operations and maintenance requirements are waived due to Agency O&M-equivalent monitoring required by LCPH ATI 7168 / PTO 6901.

<sup>2</sup> Facility maintained operation & maintenance plans are required for PM, PM<sub>10</sub>, and VOC. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>3</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required in LCPH ATI 7168 / PTO 6901.

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**Emission Point ID Number: 015****Table 98. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
015	015	#1 Fluid Bed Germ Dryer	Germ	95,000 lb/hr	015A 015B 015C	Cyclone Cyclone Wet Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 99. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
015	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 4541 / PTO 4713R1
	PM / PM <sub>10</sub>	2.79 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
		10% <sup>2</sup>	ATI 4541 / PTO 4713R1	
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
		≤ 20 ppm <sub>v</sub> or 90% control <sup>3,4</sup>	03-CV-2066	
	VOC	5.17 lb/hr	Requested limit	
22.64 tpy				

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> All emission limitations (including operating parameter ranges and limits) apply at all times when the process equipment is operating, except, in the case of process equipment or pollution control systems, during previously planned startup, and shutdown periods (including planned maintenance periods), and malfunctions as defined in 40 CFR Part 63. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, ADM shall minimize emissions to the extent practicable. To the extent practicable, startup and shutdown of pollution control systems will be performed during times when process equipment is also shut down. Also, ADM shall to the extent practicable, control emissions during a malfunction event in a manner consistent with good air pollution control practice for minimizing emissions. *ADM Consent Decree, Cedar Rapids Control Technology Plan Section 7.0, Footnote 1.*

<sup>4</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

## **Control Equipment**

A wet scrubber shall be installed to control sulfur dioxide and particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4541 / PTO 4713R1

## **Operating Limits**

- A. Water flow to the scrubber shall be greater than 400 gallons per minute.
- B. pH of the scrubbing liquor shall be maintained above 6.8.
- C. Pressure drop across the scrubber shall be maintained between 1 – 10 inches of water.
- D. The ADM Corn Processing Wet Mill shall not grind more than 450,000 bushels of corn per day, based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 4541 / PTO 4713R1

## **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the scrubber on a daily basis while the control equipment is in operation.
- C. Monitor and record the scrubber water flowrate on a daily basis.
- D. Monitor and record scrubber pH on a daily basis.
- E. Monitor and record any maintenance and repair completed on the control unit.
- F. Record the weekly average facility grind rate.
- G. Maintain copies of source test results until a new approved representative test is conducted or for five (5) years, whichever is longer.

Authority for Requirement: LCPH ATI 4541 / PTO 4713R1

## **Reporting Requirements**

The following information shall be submitted to this department by the 15<sup>th</sup> of each month for the previous quarter (January 15, April 15, July 15, and October 15).

- A. Submit a quarterly report summarizing the weekly average facility grind rate.

Authority for Requirement: LCPH ATI 4541 / PTO 4713R1

## **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 100. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
015	146	V	60	135	65,000	LPCH ATI 4541 / PTO 4713R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4541 / PTO 4713R1

**Agency Approved Operations & Maintenance Plan Required?** Yes <sup>1</sup> No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>2</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>3</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Agency-approved operations and maintenance requirements are waived due to Agency O&M-equivalent monitoring required by LCPH ATI 4541 / PTO 4713R1.

<sup>2</sup> A facility operation and maintenance plan is required for SO<sub>2</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>3</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by LCPH ATI 4541 / PTO 4713R1.

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**Emission Point ID Number: 016****Table 101. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
016	012	Wet Feed Tank	Corn Gluten Feed	18,750 bph	016A	Cyclone
	016A	#1 Steam Tube Germ Dryer	Germ	18,750 bph	016B	Cyclone
	016B	#2 Steam Tube Germ Dryer	Germ	18,750 bph	016C	Cyclone
	016C	#3 Steam Tube Germ Dryer	Germ	18,750 bph	016D	Cyclone
	016D	#4 Steam Tube Germ Dryer	Germ	18,750 bph	016E	Wet Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 102. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
016	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 4818 / PTO 5782
	PM / PM <sub>10</sub>	1.65 lb/hr <sup>1</sup>	NAAQS	
	PM <sub>10</sub>	14.3 tpy <sup>2</sup>	1992 Grind Exp. Limit	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	
		10% <sup>3</sup>	1992 Grind Exp. Limit	
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
		4.7 lb/hr	NAAQS	
	NO <sub>x</sub>	38 tpy <sup>2</sup>	1992 Grind Exp. Limit	
VOC	21.36 lb/hr <sup>4</sup>	03-CV-2066		

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> Standard is a 12-month rolling total.

<sup>3</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>4</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A wet scrubber and four cyclones shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4818 / PTO 5782

**Operating Limits**

- A. The facility-wide grind shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.
- B. The fresh water flow to the scrubber shall be no less than 45 gpm.
- C. The recirculation water flow to the scrubber shall be no less than 610 gpm.
- D. The pH of the scrubber liquid shall be no less than 7.0.
- E. The pressure differential across the scrubber shall be maintained between 0.5" to 10" w.c.
- F. The scrubber on this unit shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 4818 / PTO 5782

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 record the weekly average facility grind rate.
- B. The owner or operator shall monitor and record the recirculation water flowrate in the scrubber on a daily basis.
- C. The owner or operator shall monitor and record the fresh water flowrate in the scrubber on a daily basis.
- D. The owner or operator shall monitor and record the pH of the scrubbing liquid on a daily basis.
- E. The owner or operator shall monitor and record the pressure differential across the scrubber on a daily basis.
- F. The owner or operator shall maintain a record of all maintenance completed on the control device.
- G. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

Authority for Requirement: LCPH ATI 4818 / PTO 5782

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 103. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
016	144	V	72	125	106,022	LCPH ATI 4818 / PTO 5782

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4818 / PTO 5782

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 021****Table 104. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
021	021	Germ Cooler	Germ	32.8 tph	021A	Cyclone
			Corn	18,750 bph	021B 021C	Cyclone Wet Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 105. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
021	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(2)	LCPH ATI 4819 / PTO 6149
	PM / PM <sub>10</sub>	0.20 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	VOC	2.16 lb/hr <sup>3</sup>	03-CV-2066	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emission will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance.

<sup>3</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

Dual cyclones and a wet scrubber shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4819 / PTO 6149

**Operating Limits**

- A. The facility-wide grind rate shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.
- B. Water flow to the scrubber unit shall be maintained at a minimum of 104 gallons per minute at all times while the unit is in operation.

- C. The differential pressure measured across the scrubber shall be greater than 0.5 inch of water column and less than 10 inches of water column.
- D. The control equipment shall be maintained according to the manufacturer's specification and/or good operating practices.

Authority for Requirement: LCPH ATI 4819 / PTO 6149

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the pressure differential across the scrubber on a daily basis.
- B. Monitor and record the water flowrate to the scrubber on a daily basis.
- C. Monitor and record "no visible emissions" observations on a weekly basis. An exceedance of "no visible emissions" will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the findings and corrective action taken.
- D. Calculate and record the weekly facility grind rate on a 52-week rolling average basis.
- E. Record all maintenance and repair completed on the control devices.

Authority for Requirement: LCPH ATI 4819 / PTO 6149

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 106. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
021	100	V	30	105	16,298	LCPH ATI 4819 / PTO 6149

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4819 / PTO 6149

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**

Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

## Pellet Mill

Emission Point ID Number: 388

Table 107. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
388	001	#4 Pellet Cooler	Corn Gluten Feed	39 tph	001A 001B	Baghouse Cyclone
	029	#1 Pellet Cooler	Corn Gluten Feed	26 tph	029A 029B	Cyclone Cyclone
	036	Pellet Mill – Dust Collection	Corn Gluten Feed	130 tph	036	Baghouse
	038	#2 Pellet Cooler	Corn Gluten Feed	26 tph	038A 038B	Cyclone Cyclone
	039	#3 Pellet Cooler	Corn Gluten Feed	36 tph	039A 039B	Cyclone Cyclone

### Applicable Requirements

The emissions from this emission point shall not exceed the levels specified below.

Table 108. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
388	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	LCPH ATI 5037 / PTO 6077
	PM / PM <sub>10</sub>	4.54 lb/hr <sup>1</sup>	NAAQS	
	PM <sub>10</sub>	3.28 lb/hr <sup>2</sup>	PSD synthetic minor	
		14.4 tpy		
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	
VOC	16.35 lb/hr	03-CV-2066		

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> PM<sub>10</sub> potential to emit from Coolers #1 (EU029), #2 (EU038), #3 (EU039), and #4 (EU001) shall be limited to 3.28 pounds per hour and 14.4 tons per year for [Project #5037] to remain below PSD significance thresholds.

<sup>3</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If opacity continues to be seen after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

### Operating Limits and Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Control Equipment

Two baghouses and seven cyclones shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating

Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5037 / PTO 6077

**Operating Limits**

- A. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.
- B. Pressure drop across the baghouse (CE036) shall be maintained between 0.5 to 8 inches of water.
- C. Pressure drop across the baghouse (CE001A), shall be maintained between 0.2 to 6 inches of water.
- D. The facility-wide grind shall be limited to 450,000 bushels of corn per day based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 5037 / PTO 6077

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Pressure drop across the baghouse, CE036, shall be recorded on a daily basis while the control equipment is in operation.
- B. Pressure drop across the baghouse, CE001A, shall be recorded on a daily basis while the control equipment is in operation.
- C. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis while the control equipment is in operation. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- D. Record the weekly average facility grind rate.
- E. Record all maintenance and repair completed to the control equipment.
- F. Retain copies of emission test results for compliance testing completed on this emission source.

Authority for Requirement: LCPH ATI 5037 / PTO 6077

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 109. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
388	140	V	74	140	99,487	LCPH ATI 5037 / PTO 6077

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5037 / PTO 6077

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by LCPH ATI 5037 / PTO 6077.

## Alcohol

**Emission Point ID Number: 055**

**Table 110. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
055	055	Ethanol Fermenters / CO <sub>2</sub> Fermentation Scrubber	Ethanol	100.4 tph	055	Packed Bed Scrubber

### Applicable Requirements

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 111. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
055	VOC	72.4 lb/hr	PSD synthetic minor	LCPH ATI 6443 / PTO 6507
		95% control <i>or</i> 20 ppm <sub>v</sub> <sup>1,2</sup>	03-CV-2066	

<sup>1</sup> All emission limitations (including operating parameter ranges and limits) apply at all times when the process equipment is operating, except, in the case of process equipment or pollution control system, during previously planned startup and shutdown periods (including planned maintenance periods), and malfunctions as defined in 40 CFR Part 63. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, ADM shall minimize emissions to the extent practicable. To the extent practicable, startup and shutdown of pollution control systems will be performed during times when process equipment is also shut down. Also, ADM shall to the extent practicable, control emissions during a malfunction event in a manner consistent with good air pollution control practice for minimizing emissions. *ADM Consent Decree, Cedar Rapids Control Technology Plan Section 7.0, Footnote 1.*

<sup>2</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 112. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
055	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: LCPH ATI 6443 / PTO 6507

### **Control Equipment**

A packed bed scrubber shall be installed to control volatile organic compounds emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Limits section below] shall be installed, maintained and operating during the operation of the emission unit and control equipment at all times.

Authority for Requirement: LCPH ATI 6443 / PTO 6507

### **Operating Limits**

- A. This facility is limited to the following production amounts:
  - 1. A maximum of  $316.5 \times 10^6$  gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of  $82.4 \times 10^6$  gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of  $332.3 \times 10^6$  gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of  $86.5 \times 10^6$  gallons of completely denatured alcohol per calendar quarter.
- B. The fresh water flow to the top bed of the scrubber shall be maintained at 131 gallons per minute or greater.
- C. The recycled water flow to the bottom bed of the scrubber shall be maintained at 350 gallons per minute or greater.
- D. If the recirculation rate operates below 350 gallons per minute, the fresh water flow to the scrubber shall be maintained at 245 gallons per minute or greater.
- E. The differential pressure measured across the scrubber, CE055, shall be maintained between 2 and 22 inches of water column during normal operations.
- F. The differential pressure measured across the scrubber, CE055, is not required to be monitored or maintained in the "normal operations" range when the blender rate (feedstock) drops below 2,100 gallons per minute.
- G. The owner or operator shall comply with all applicable requirements set forth in 40 CFR 63 Subpart A (40 CFR §63.1 through 40 CFR §63.15) and 40 CFR 63 Subpart FFFF (40 CFR §63.2430 through 40 CFR §63.2550).
- H. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

Authority for Requirement: LCPH ATI 6443 / PTO 6507

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record the fresh water flowrate to the top bed of the scrubber on a daily basis while the control equipment is in operation.

- B. The owner or operator shall monitor and record the recycled water flowrate to the bottom bed of the scrubber on a daily basis while the control equipment is in operation.
- C. The owner or operator shall monitor and record the differential pressure across the scrubber on a daily basis while the control equipment is in operation and the blender rate is 2,100 gallons per minute or above.
- D. The owner or operator shall monitor and record the daily blender (feedstock) rate.
- E. The owner or operator shall calculate and record the amount of 200° alcohol and completely denatured alcohol produced monthly, per calendar quarter and 12-month rolling period.
- F. The owner or operator shall comply with all applicable recordkeeping, notification, and reporting requirements as set forth in 40 CFR Subpart A (40 CFR §63.1 through [40 CFR §63.16]) and 40 CFR Subpart FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525).

Authority for Requirement: LCPH ATI 6443 / PTO 6507

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 113. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
055	123	V	30	85	35,838	LCPH ATI 6443 / PTO 6507

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes <sup>1</sup>    No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes                       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes <sup>2</sup>    No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Agency-approved operation and maintenance plan required for VOC emissions.

<sup>2</sup> This emission unit is subject to NESHAP Subpart FFFF and is exempt from Compliance Assurance Monitoring requirements.

**Emission Point ID Number: 057, 058, 059, 060**

**Table 114. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
057	057	Yeast Propagator Tank #1	Yeast	14,381 gal	057	Scrubber
058	058	Yeast Propagator Tank #2	Yeast	14,381 gal	058	Scrubber
059	059	Yeast Propagator Tank #3	Yeast	14,381 gal	059	Scrubber
060	060	Yeast Propagator Tank #4	Yeast	14,381 gal	060	Scrubber

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 115. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
057	VOC	0.96 lb/hr <sup>1,2</sup>	03-CV-2066	LCPH ATI 4676 / PTO 5481R1
058				LCPH ATI 4677 / PTO 5482R1
059		4.2 tpy <sup>1,2</sup>		LCPH ATI 4678 / PTO 5483R1
060				LCPH ATI 4679 / PTO 5484R1

<sup>1</sup> This emission limit is for the combined emissions from EP057 Yeast Propagator Tank 1, EP058 Yeast Propagator Tank 2, EP059 Yeast Propagator Tank 3, and EP060 Yeast Propagator Tank 4.

<sup>2</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 116. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
057	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
058	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550
059					
060					

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.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 scrubber on this unit [CEs 057, 058, 059, 060] shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance performed on the scrubber.
- B. The water flowrate in the scrubber [CEs 057, 058, 059, 060] shall be no less than 5% below the minimum water flowrate recorded during a successful compliance test for VOC emissions. The owner or operator shall monitor and record the flowrate on the scrubber on a daily basis.
- C. The facility is limited to the following production amounts:
  - 1. A maximum of 316,500,000 gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of 82,400,000 gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of 332,300,000 gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of 86,500,000 gallons of completely denatured alcohol per calendar quarter.
- D. The owner or operator shall monitor and record the amount of 200° alcohol and completely denatured alcohol produced each month and calculate the respective calendar quarter and 12-month rolling totals.

Authority for Requirement: LCPH ATI 4676 / PTO 5481R1  
 LCPH ATI 4677 / PTO 5482R1  
 LCPH ATI 4678 / PTO 5483R1  
 LCPH ATI 4679 / PTO 5484R1

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 117. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
057	53	V	6	67	54	LCPH ATI 4676 / PTO 5481R1
058	53	V	6	67	54	LCPH ATI 4677 / PTO 5482R1
059	53	V	6	67	54	LCPH ATI 4678 / PTO 5483R1
060	53	V	6	67	54	LCPH ATI 4679 / PTO 5484R1

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

**Emission Point ID Number: 069**

**Table 118. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
069	069	190° Product Scrubbing System	190° Ethanol	1,100 gal	069	Packed Bed Scrubber

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 119. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
069	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 6426 / PTO 6460
		0.3 lb/hr	Requested limit	
	VOC	2.0 lb/hr	Requested limit	

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

This emission unit is not subject to the NSPS for Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels because the storage vessel capacity is less than 75 cubic meters (m<sup>3</sup>).

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):

The following subparts apply to the emission unit(s) in this permit:

**Table 120. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
069	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: LCPH ATI 6426 / PTO 6460

### **Control Equipment**

A packed bed scrubber shall be installed to control VOC and SO<sub>2</sub> emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control equipment at all times.

Authority for Requirement: LCPH ATI 6426 / PTO 6460

### **Operating Limits**

- A. This facility is limited to the following production amounts:
  1. A maximum of 316.5 x 10<sup>6</sup> gallons of 200° alcohol per 12-month rolling period.
  2. A maximum of 82.4 x 10<sup>6</sup> gallons of 200° alcohol per calendar quarter.
  3. A maximum of 332.3 x 10<sup>6</sup> gallons of completely denatured alcohol per [12-month rolling period].
  4. A maximum of 86.5 x 10<sup>6</sup> gallons of completely denatured alcohol per calendar quarter.
- B. The fresh water flowrate to the scrubber unit shall be maintained at a minimum of 19.2 gallons per minute at all times while the unit is in operation.
- C. The differential pressure measured across the packed bed scrubber, CE069, shall be maintained between 0.2 inches of water and 10 inches of water column with the exception of unit startup.
- D. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.
- E. The owner or operator shall comply with all applicable requirements set forth in NESHAP Subparts A (40 CFR §63.1 through [40 CFR §63.16]) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550).
- F. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: LCPH ATI 6426 / PTO 6460

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the scrubber water flowrate on a daily basis while the control equipment and emission unit are in operation.
- B. Monitor and record the differential pressure on the wet scrubber on a weekly basis while the control equipment and emission unit are in operation. If the pressure drop deviates from the 0.2 to 10 INWC range then an inspection of the system shall be completed and any observations, unusual process conditions, and corrective actions shall be recorded.
- C. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control device.
- D. Calculate and record monthly the amount of 200° alcohol produced per calendar quarter and 12-month rolling period.

- E. Calculate and record monthly the amount of completely denatured alcohol produced per calendar quarter and 12-month rolling period.
- F. The owner or operator shall comply with all applicable recordkeeping, notification, and reporting requirements as set forth in NESHAP Subparts A (40 CFR §63.1 through [40 CFR §63.16]) and FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525).

Authority for Requirement: LCPH ATI 6426 / PTO 6460

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 121. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
069	115	V, obstructed	8	70	336	LCPH ATI 6426 / PTO 6460

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for VOC emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

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Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> This emission unit is subject to NESHAP Subpart FFFF and is exempt from Compliance Assurance Monitoring requirements.

**Emission Point ID Number: 070**

**Table 122. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
070	070	200° Product Scrubbing System	200° Ethanol	36,130 gph	070	Wet Scrubber

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 123. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
070	VOC	1.05 lb/hr <sup>1</sup>	03-CV-2066	LCPH ATI 6057 / PTO 6333

<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 124. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
070	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
567 IAC 23.1(4)"cf"  
LCCO Sec. 10-62(d)(84)

**Control Equipment**

A wet scrubber shall be installed to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and

Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6057 / PTO 6333

**Operating Limits**

- A. This facility is limited to the following production amounts:
  - 1. A maximum 316.5 x 10<sup>6</sup> gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of 82.4 x 10<sup>6</sup> gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of 332.3 x 10<sup>6</sup> gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of 86.5 x 10<sup>6</sup> gallons of completely denatured alcohol per calendar quarter.
- B. The scrubber shall only use fresh water and have a minimum flowrate of 19 gallons per minute.
- C. The scrubber on this unit shall be maintained according to the manufacturer's specifications and/or good operating practices.
- D. The pressure drop range across the scrubber shall be 1 to 12 inches of water column.

Authority for Requirement: LCPH ATI 6057 / PTO 6333

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the fresh water flowrate in the scrubber on a weekly basis.
- B. Monitor and record the pressure drop across the scrubber on a weekly basis.
- C. Calculate and record the amount of 200° alcohol produced per calendar quarter and 12-month rolling period.
- D. Calculate and record the amount of completely denatured alcohol produced per calendar quarter and 12-month rolling period.

Authority for Requirement: LCPH ATI 6057 / PTO 6333

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 125. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
070	96	V, spark arrestor	8	60	392	LCPH ATI 6057 / PTO 6333

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> This emission unit is subject to NESHAP Subpart FFFF and is exempt from Compliance Assurance Monitoring requirements.

**Emission Point ID Number: 071, 072, 075, 077, 080, 081, 082**

**Table 126. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
071	071	No. 1 Alcohol Storage Tank	Denatured Ethanol	500,000 gal	071	Internal Floating Roof Seal
072	072	No. 2 Alcohol Storage Tank	Denatured Ethanol	500,000 gal	072	Internal Floating Roof Seal
075	075	No. 2 Hi-Wine Transfer Tank	200° Ethanol	200,000 gal	075	Internal Floating Roof Seal
077	077	Corrosion Inhibitor Tank	Corrosion Inhibitor	8,761 gal	--	None
080	080	No. 3 Hi-Wine Process Tank	200° Ethanol	200,000 gal	080	Internal Floating Roof Seal
081	081	Fusel Oil Tank	Fusel Oil	16,920 gal	--	None
082	082	190° Storage Tank	190° Ethanol	154,224 gal	--	None

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 127. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
071	VOC	None	None	LCPH ATI 4684 / PTO 5295
072				LCPH ATI 4685 / PTO 5296
075				LCPH ATI 4688 / PTO 5299
077				LCPH ATI 4690 / PTO 5300
080				LCPH ATI 4691 / PTO 5301R1
081				LCPH ATI 4692 / PTO 5302
082				LCPH ATI 4693 / PTO 5303

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

- A. New Source Performance Standards (NSPS):  
The following subparts apply to the emission unit(s) in this permit:

**Table 128. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
071 072 075 077	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
080 081 082	VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing		10-62(b)(40)	§60.480 – §60.489

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.

Authority for Requirement: LCPH ATI 4684 / PTO 5295  
 LCPH ATI 4685 / PTO 5296  
 LCPH ATI 4688 / PTO 5299  
 LCPH ATI 4690 / PTO 5300  
 LCPH ATI 4691 / PTO 5301R1  
 LCPH ATI 4692 / PTO 5302  
 LCPH ATI 4693 / PTO 5303

B. National Emission Standards for Hazardous Air Pollutants (NESHAP):  
 The following subparts apply to the emission unit(s) in this permit:

**Table 129. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
071 072 075 077	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
080 081 082	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)

**Control Equipment**

An internal floating roof shall be installed to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitor and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4684 / PTO 5295  
LCPH ATI 4685 / PTO 5296  
LCPH ATI 4688 / PTO 5299

### **Operating Limits**

- A. This facility shall comply with the requirements of NSPS Subpart VV by meeting the standards of 40 CFR §60.482-1 through 40 CFR §60.485.
- B. This facility is limited to the following production amounts:
  - 1. A maximum of  $316.5 \times 10^6$  gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of  $82.4 \times 10^6$  gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of  $332.3 \times 10^6$  gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of  $86.5 \times 10^6$  gallons of completely denatured alcohol per calendar quarter.

Authority for Requirement: LCPH ATI 4684 / PTO 5295  
LCPH ATI 4685 / PTO 5296  
LCPH ATI 4688 / PTO 5299  
LCPH ATI 4690 / PTO 5300  
LCPH ATI 4692 / PTO 5302  
LCPH ATI 4693 / PTO 5303

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Recordkeeping for NSPS Subpart VV shall be done according to 40 CFR §60.486.
- B. Reporting for NSPS Subpart VV shall be done according to 40 CFR §60.487.
- C. Record the amount of 200° alcohol and completely denatured alcohol produced. Calculate and record monthly, calendar quarter and 12-month rolling totals.

Authority for Requirement: LCPH ATI 4684 / PTO 5295  
LCPH ATI 4685 / PTO 5296  
LCPH ATI 4688 / PTO 5299  
LCPH ATI 4690 / PTO 5300  
LCPH ATI 4692 / PTO 5302  
LCPH ATI 4693 / PTO 5303

### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 comply with the requirements of NSPS Subpart VV by meeting the standards of 40 CFR §60.482 through §60.485.
- B. The owner or operator shall comply with the recordkeeping requirements of NSPS Subpart VV pursuant to 40 CFR §60.486.

- C. The owner or operator shall comply with the reporting requirements of NSPS Subpart VV pursuant to 40 CFR §60.487.
- D. The facility is limited to the following production amounts:
  1. A maximum of 316,500,000 gallons of 200° alcohol per 12-month rolling period.
  2. A maximum of 82,400,000 gallons of 200° alcohol per calendar year.
  3. A maximum of 332,300,000 gallons of completely denatured alcohol per 12-month rolling period.
  4. A maximum of 86,500,000 gallons of completely denatured alcohol per calendar quarter.
- E. The owner or operator shall monitor and record the amount of 200° alcohol and completely denatured alcohol produced each month and calculate the respective calendar quarter and 12-month rolling totals.

Authority for Requirement: LCPH ATI 4691 / PTO 5301R1

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 130. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
071	42	Horizontal	24 x 10 (4 vents)	80	Passive	LCPH ATI 4684 / PTO 5295
072	42	Horizontal	24 x 10 (4 vents)	80	Passive	LCPH ATI 4685 / PTO 5296
075	32	Horizontal	24 x 10 (3 vents)	89	Passive	LCPH ATI 4688 / PTO 5299
077	17	V, obstructed	3	Amb.	Passive	LCPH ATI 4690 / PTO 5300
080	32	Horizontal	24 x 10 (3 vents)	70	Passive	LCPH ATI 4691 / PTO 5301R1
081	17	V, obstructed	4	Amb.	Passive	LCPH ATI 4692 / PTO 5302
082	44	V, obstructed	4	89	Passive	LCPH ATI 4693 / PTO 5303

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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**Emission Point ID Number: 073, 074****Table 131. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
073	073	No. 3 Alcohol Storage Tank	Denatured Ethanol	1,000,000 gal	073	Internal Floating Roof Seal
074	074	Denaturant Storage Tank (Gasoline)	Denaturant	200,000 gal	074	Internal Floating Roof Seal

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**Applicable Requirements**

*The emissions from these emission points shall not exceed the levels specified below.*

**Table 132. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
073	VOC	None	None	LCPH ATI 4686 / PTO 5297
074	VOC	0.27 lb/hr <sup>1</sup>	03-CV-2066	LCPH ATI 4687 / PTO 5298
		1.19 tpy <sup>1</sup>		

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<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

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

The following subparts apply to the emission unit(s) in this permit:

**Table 133. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
073 074	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing		10-62(b)(40)	§60.480 – §60.489
	Kb	Volatile Organic Liquid Storage Vessels		10-62(b)(56)	§60.110b – §60.117b

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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.

Authority for Requirement: LCPH ATI 4686 / PTO 5297  
LCPH ATI 4687 / PTO 5298

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

The following subparts apply to the emission unit(s) in this permit:

**Table 134. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
073 074	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
567 IAC 23.1(4)"cf"  
LCCO Sec. 10-62(d)(84)

**Control Equipment**

An internal floating roof shall be installed to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitor and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4686 / PTO 5297  
LCPH ATI 4687 / PTO 5298

**Operating Limits**

- A. This facility shall comply with the requirements of NSPS Subpart VV by meeting the standards of 40 CFR §60.482-1 through 40 CFR §60.485.
- B. This facility shall comply with the requirements of NSPS Subpart Kb by meeting the standards of 40 CFR §60.112b and the testing and procedures of 40 CFR §60.113b.
- C. This facility is limited to the following production amounts:
  - 1. A maximum of 316.5 x 10<sup>6</sup> gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of 82.4 x 10<sup>6</sup> gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of 332.3 x 10<sup>6</sup> gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of 86.5 x 10<sup>6</sup> gallons of completely denatured alcohol per calendar quarter.

Authority for Requirement: LCPH ATI 4686 / PTO 5297  
LCPH ATI 4687 / PTO 5298

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Recordkeeping for NSPS Subpart VV shall be done according to 40 CFR §60.486.
- B. Reporting for NSPS Subpart VV shall be done according to 40 CFR §60.487.

- C. Recordkeeping for NSPS Subpart Kb shall be done according to 40 CFR §60.115b and 40 CFR §60.116b.
- D. Reporting for NSPS Subpart Kb shall be done according to 40 CFR §60.115b.
- E. Record the amount of 200° alcohol and completely denatured alcohol produced. Calculate and record monthly, calendar quarter and 12-month rolling totals.

Authority for Requirement: LCPH ATI 4686 / PTO 5297  
 LCPH ATI 4687 / PTO 5298

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 135. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
073	48	Horizontal	24 x 10 (6 vents)	80	Passive	LCPH ATI 4686 / PTO 5297
074	32	Horizontal	24 x 10 (4 vents)	Amb.	Passive	LCPH ATI 4687 / PTO 5298

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operations & Maintenance Plan Required?      Yes       No
- Facility Maintained Operation & Maintenance Plan Required?      Yes       No
- Compliance Assurance Monitoring (CAM) Plan Required?      Yes       No

**Emission Point ID Number: 076**

**Table 136. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
076	076A	Alcohol Loadout	Denatured Ethanol	270,000 gph	076	Flare
	076B	Alcohol Loadout – Natural Gas	Natural Gas	2,760 cfm		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 137. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
076	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)(1)	PSD Permit #04-A-314P LCPH ATI 4689 / PTO 5017
	Opacity	40% <sup>1</sup>	567 IAC 23.3(2)"d"	PSD Permit #04-A-314P
		20% <sup>1</sup>	LCCO Sec. 10-60(a)	LCPH ATI 4689 / PTO 5017
	SO <sub>2</sub>	0.02 lb/hr	BACT	PSD Permit #04-A-314P LCPH ATI 4689 / PTO 5017
		0.09 tpy		
	NO <sub>x</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
		4.05 lb/hr	BACT	
		3.94 tpy		
	0.15 lb/MMBtu			
	VOC	4.82 lb/hr	03-CV-2066 <sup>2</sup> PSD synthetic minor	
		12.2 tpy		
95% reduction <sup>3</sup>				

<sup>1</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/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 DNR or Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

<sup>3</sup> All emission limitations (including operating parameter ranges and limits) apply at all times when the process equipment is operating, except, in the case of process equipment or pollution control systems, during previously planned startup and shutdown periods (including planned maintenance periods), and malfunctions as defined in 40 CFR Part 63. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, ADM shall minimize emissions to the extent practicable. To the extent practicable, startup and shutdown of pollution control systems will be performed during times when process equipment is also shut down. Also, ADM shall, to the extent practicable, control emissions during a malfunction event in a manner consistent with good air pollution control practice for minimizing emissions. *ADM Consent Decree, Cedar Rapids Control Technology Plan, Section 7.0, Footnote 1.*

## **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 138. NSPS Subpart Summary**

<b>EU ID</b>	<b>Subpart</b>	<b>Title</b>	<b>Type</b>	<b>Local Reference (LCCO Sec.)</b>	<b>Federal Reference (40 CFR)</b>
076	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing	--	10-62(b)(40)	§60.480 – §60.489

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.

Authority for Requirement: PSD Permit #04-P-314P  
LCPH ATI 4689 / PTO 5017

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

The following subparts apply to the emission unit(s) in this permit:

**Table 139. NESHAP Subpart Summary**

<b>EU ID</b>	<b>Subpart</b>	<b>Title</b>	<b>Type</b>	<b>Local Reference (LCCO Sec.)</b>	<b>Federal Reference (40 CFR)</b>
076	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	FFFF	Miscellaneous Organic Chemical Manufacturing	Group 2	10-62(d)(84)	§63.2430 – §63.2550

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.

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
567 IAC 23.1(4)"cf"  
LCCO Sec. 10-62(d)(84)

### **Control Equipment**

A flare shall be used to control VOC emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4689 / PTO 5017

**Operating Limits**

- A. This facility shall comply with the requirements of NSPS Subpart VV by meeting the standards of 40 CFR §60.482-1 through 40 CFR §60.485.
- B. The facility is limited to the following production amounts:
  - 1. A maximum of  $316.5 \times 10^6$  gallons of 200° alcohol per 12-month rolling period.
  - 2. A maximum of  $82.4 \times 10^6$  gallons of 200° alcohol per calendar quarter.
  - 3. A maximum of  $332.3 \times 10^6$  gallons of completely denatured alcohol per 12-month rolling period.
  - 4. A maximum of  $86.5 \times 10^6$  gallons of completely denatured alcohol per calendar quarter.
- C. This flare shall be designed and operated to achieve a minimum of 95% reduction of VOC emissions from the rail and truck loadout operations.
- D. This flare shall use only natural gas or propane as the auxiliary fuel.

Authority for Requirement: PSD Permit #04-P-314P  
LCPH ATI 4689 / PTO 5017

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Recordkeeping for NSPS Subpart VV shall be done according to 40 CFR §60.486.
- B. Reporting for NSPS Subpart VV shall be done according to 40 CFR §60.487.
- C. The loadout flare shall be monitored continuously for the presence of the pilot flame. Loadout operations shall be discontinued anytime the pilot flame is out.
- D. Record the amount of 200° alcohol and completely denatured alcohol produced. Calculate and record monthly, calendar quarter and 12-month rolling totals.
- E. Record the amount of natural gas and propane used in this flare. Calculate and record monthly and 12-month rolling totals.

Authority for Requirement: PSD Permit #04-P-314P  
LCPH ATI 4689 / PTO 5017

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 140. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
076	40	V	72	1,400	61,000	PSD Permit #04-A-314P LCPH ATI 4689 / PTO 5017

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes <sup>2</sup>      No

Authority for Requirement:      567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for VOC emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> This emission unit is subject to NSPS Subpart VV and NESHAP Subpart FFFF and is exempt from Compliance Assurance Monitoring requirements.

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**Emission Point ID Number: 250, 251, 252**

**Table 141. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
250	250	Alcohol Collection Blower #1	Alcohol	212 cfm	--	None
251	251	Alcohol Collection Blower #2	Alcohol	212 cfm	--	None
252	252	Alcohol Collection Blower #3	Alcohol	212 cfm	--	None

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 142. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
250 251 252	VOC	1.27 lb/hr	Requested limit	LCPH ATI 6505 / PTO 6334 LCPH ATI 6506 / PTO 6335 LCPH ATI 6507 / PTO 6336

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 143. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
250	13	V	2	100	212	LCPH ATI 6505 / PTO 6334
251	13	V	2	100	212	LCPH ATI 6506 / PTO 6335
252	13	V	2	100	212	LCPH ATI 6507 / PTO 6336

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

## Starch Manufacturing

Emission Point ID Number: 002

Table 144. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
002	002A	Corn Starch Flash Dryer #1	Starch	50,000 lb/hr	002A 002B	Wet Scrubber Wet Scrubber
	002B	Corn Starch Flash Dryer #1 – Natural Gas	Natural Gas	50 Mcf/hr		

### Applicable Requirements

*The emissions from this emission point shall not exceed the levels specified below.*

Table 145. General Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
002	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)(1)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)(1)
	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)
	SO2	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)

Table 146. Other Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
002	PM <sub>10</sub>	2.0 lb/hr	Requested limit	LCPH ATI 3446 / PTO 3497
		8.9 tpy		
	Opacity	10%	Permit requirement	

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### Control Equipment

A wet scrubber shall be used to control particulate emissions. The control device shall be operated at all times when any equipment controlled by the control device is operating. The control device shall be maintained on this source in a good operating condition at all times.

All appropriate probes and gauges needed to measure the parameters outlined in [the Compliance Testing and Monitoring Requirements section below] shall be installed and maintained in a good operating condition.

Authority for Requirement: LCPH ATI 3446 / PTO 3497

The unit is not conditioned to anything less than the maximum operating capacity of the device.

Dryer design rate: 50,000 lb/hr corn starch  
Dryer design rate: 50 MMBtu/hr  
Maximum exhaust air flowrate: 125,000 dscfm

The water flowrate to the scrubbers shall be maintained at a minimum of 165 gallons per minute.

The dryer shall be limited to the production of common starch only and shall not be used for the production of modified starch. The dryer shall burn only natural gas.

Authority for Requirement: LCPH ATI 3446 / PTO 3497

### **Recordkeeping Requirements**

A log of operation shall be maintained for [EU002].

- A. Monthly process rate for dryer.
- B. Monthly natural gas consumption.
- C. Daily pressure drop readings.
- D. Daily scrubber water flowrate readings.
- E. Any changes in operation that would affect emissions, including changes in fan speed.
- F. Records of all maintenance and repair completed on the control device.
- G. Copies of test results shall be retained until a new approved representative test is conducted or 3 years, whichever is longer.

These records shall be available on site at all times for viewing by the air pollution control personnel.

Authority for Requirement: LCPH ATI 3446 / PTO 3497

### **Compliance Testing and Monitoring Requirements**

The following information shall be monitored:

- A. Monthly process rate for dryer.
- B. Monthly natural gas consumption.
- C. Daily pressure drop.
- D. Daily scrubber water flowrate.

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 3446 / PTO 3497

### **Reporting**

Submit quarterly emissions report summarizing the following items by the 15<sup>th</sup> of each month for the previous quarter.

- A. Monthly average drying rate.
- B. Monthly natural gas consumption.

Authority for Requirement: LCPH ATI 3446 / PTO 3497

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

No applicable requirements at this time.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 003, 004**

**Table 147. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
003	003	Corn Starch Loadout System #1	Starch	180,000 lb/hr	003	Baghouse
004	004	Corn Starch Loadout System #2	Starch	180,000 lb/hr	004	Baghouse

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 148. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
003	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
		0.10 lb/hr	Requested limit	LCPH ATI 3557 / PTO 3498 LCPH ATI 3558 / PTO 3499
004	PM <sub>10</sub>	0.44 tpy		
	Opacity	20%	LCCO Sec. 10-60(a)	

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate matter emissions. The control device shall be operated at all times when any equipment controlled by the control device is operating. The control device shall be maintained on this source in a good operating condition at all times.

All appropriate probes and gauges needed to measure the parameters outlined in Condition 6 [of the LCPH ATI / PTO listed below] shall be installed and maintained in a good operating condition.

Authority for Requirement:     LCPH ATI 3557 / PTO 3498  
  LCPH ATI 3558 / PTO 3499

**Operating Limits**

The unit is not conditioned to anything less than the maximum operating capacity of the device.

Loadout rate:                             180,000 lb/hr  
Maximum exhaust air flowrate:     1,579 scfm (1,640 acfm)

Note: This source exhausts into an enclosed structure eliminating any potential uncontrolled release to the atmosphere.

Authority for Requirement: LCPH ATI 3557 / PTO 3498  
LCPH ATI 3558 / PTO 3499

**Recordkeeping Requirements**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 log of operation shall be maintained for [EU003 and EU004].

- A. Any changes in operation that would affect emissions, including changes in fan speed.
- B. Records of all maintenance and repair completed on the control device.
- C. Copies of test results shall be retained until a new approved representative test is conducted or for 3 years, whichever is longer.

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 3557 / PTO 3498  
LCPH ATI 3558 / PTO 3499

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

No applicable requirements at this time.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 007**

**Table 149. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
007	007	Starch Dryer to Loadout Pneumatic Transfer	Starch	50,000 lb/hr	007	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 150. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
007	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
	PM <sub>10</sub>	0.27 lb/hr	Requested limit	LCPH ATI 3559 / PTO 3500
		1.18 tpy		
Opacity	20%	LCCO Sec. 10-60(a)		

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate emissions. The control device shall be operated at all times when any equipment controlled by the control device is operating. The control device shall be maintained on this source in a good operating condition at all times.

Operation parameters for the control device delineated at the time of final source testing shall become a part of [the LCPH ATI 3559 / PTO 3500 permit conditions.] All appropriate probes and gauges needed to measure the parameters outlined in [the Compliance Testing and Monitoring Requirements] shall be installed and maintained in a good operating condition.

Authority for Requirement: LCPH ATI 3559 / PTO 3500

**Operating Limits**

This unit is not conditioned to anything less than the maximum operating capacity of the device.

Loadout rate: 50,000 lb/hr

Maximum exhaust air flowrate: 2,000 scfm

Authority for Requirement: LCPH ATI 3559 / PTO 3500

## Compliance Testing and Monitoring Requirements

The following information shall be monitored:

- A. Daily pressure drop readings when operating.

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 3559 / PTO 3500

## Recordkeeping Requirements

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 log of operations shall be maintained for [EU007].

- A. Daily pressure drop readings.
- B. Any changes in operation that would affect emissions, including changes in fan speed.
- C. Records of all maintenance and repair completed on the control device.
- D. Copies of test results shall be retained until a new approved representative test is conducted or for 3 years, whichever is longer.

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 3559 / PTO 3500

## Emission Point Characteristics

*The emission point shall conform to the specifications listed below.*

**Table 151. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
007	16	Horizontal	12	127	2,000	LCPH ATI 3559 / PTO 3500

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 flowrate 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.

## Monitoring Requirements

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

### Stack Testing

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 160, 161****Table 152. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
160	160	Starch Rotex #1	Starch	100 tph	160	Cartridge Filters
161	161	Starch Rotex #2	Starch	100 tph	161	Cartridge Filters

---

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 153. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
160	PM	0.1 gr/dscf	567 IAC 23.4(7)	LCPH ATI 6787 / PTO 6657
161			LCCO Sec. 10-62(a)(7)	LCPH ATI 6788 / PTO 6658
	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> The observation of visible emissions of air contaminants as defined in [LCCO Sec. 10-55] will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emission continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements with Associating Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 control equipment on this unit shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the control equipment.
- B. The normal differential pressure across the cartridge filters [CE160, CE161] shall be maintained between 0.2" and 10" of water column. The owner or operator shall monitor and record the differential pressure across the cartridge filters on a weekly basis.

Authority for Requirement: LCPH ATI 6787 / PTO 6657  
LCPH ATI 6788 / PTO 6658

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*



## Maltodextrin

**Emission Point ID Number: 120, 123, 126, 127, 128, 130**

**Table 155. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
120	120	Maltodextrin Storage Bin #6	Maltodextrin	12,000 lb/hr	120	Baghouse
123	123	Maltodextrin Storage Bin #5	Maltodextrin	12,000 lb/hr	123	Baghouse
126	126	Maltodextrin Storage Bin #4	Maltodextrin	12,000 lb/hr	126	Baghouse
127	127	Maltodextrin Storage Bin #3	Maltodextrin	12,000 lb/hr	127	Baghouse
128	128	Maltodextrin Storage Bin #2	Maltodextrin	12,000 lb/hr	128	Baghouse
130	130	Maltodextrin Storage Bin #1	Maltodextrin	12,000 lb/hr	130	Baghouse

### Applicable Requirements

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 156. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
120	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(2)	LCPH ATI 4513 / PTO 5076
	PM / PM <sub>10</sub>	0.0152 gr/scf	Requested limit	
		0.10 lb/hr		
	Opacity	20%	LCCO Sec. 10-60(a)	
123 126 127 128 130	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(2)	567 IAC 23.4(7) LCCO Sec. 10-62(a)(2)
	PM / PM <sub>10</sub>	0.0152 gr/scf	Requested limit	LCPH ATI 4514 / PTO 5077
		0.10 lb/hr		LCPH ATI 4515 / PTO 5078
	Opacity	20%	LCCO Sec. 10-60(a)	LCPH ATI 4516 / PTO 5079 LCPH ATI 4517 / PTO 5080 LCPH ATI 5418 / PTO 5081

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Control Equipment**

A baghouse shall be used to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4513 / PTO 5076  
 LCPH ATI 4514 / PTO 5077  
 LCPH ATI 4515 / PTO 5078  
 LCPH ATI 4516 / PTO 5079  
 LCPH ATI 4517 / PTO 5080  
 LCPH ATI 4518 / PTO 5081

**Operating Limits**

- A. All six bins combined shall not operate more than 8,760 hours per year based on a 12-month rolling total.

Authority for Requirement: LCPH ATI 4513 / PTO 5076  
 LCPH ATI 4514 / PTO 5077  
 LCPH ATI 4515 / PTO 5078  
 LCPH ATI 4516 / PTO 5079  
 LCPH ATI 4517 / PTO 5080  
 LCPH ATI 4518 / PTO 5081

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Non-resettable hour meters shall be installed on each bin.
- B. During the first twelve (12) months of operation, determine the cumulative hours of operation for each bin for each month of operation.
- C. After the first twelve (12) months of operation, determine the annual hours of operation on a rolling 12-month basis for each month of operation.
- D. Daily pressure drop readings.
- E. Records of all maintenance and repair complete to the control equipment.
- F. Copies of test results shall be retained until a new approved representative test is conducted or for 5 years, whichever is longer.

Authority for Requirement: LCPH ATI 4513 / PTO 5076  
 LCPH ATI 4514 / PTO 5077  
 LCPH ATI 4515 / PTO 5078  
 LCPH ATI 4516 / PTO 5079  
 LCPH ATI 4517 / PTO 5080  
 LCPH ATI 4518 / PTO 5081

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 157. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
120	64	Downward	6	130-165	800	LCPH ATI 4513 / PTO 5076

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
123	64	Downward	6	130-165	800	LCPH ATI 4514 / PTO 5077
126	64	Downward	6	130-165	800	LCPH ATI 4515 / PTO 5078
127	64	Downward	6	130-165	800	LCPH ATI 4516 / PTO 5079
128	64	Downward	6	130-165	800	LCPH ATI 4517 / PTO 5080
130	64	Downward	6	130-165	800	LCPH ATI 4518 / PTO 5081

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 flowrate 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.

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### **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 122****Table 158. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
122	122A	Maltodextrin Spray Dryer	Maltodextrin	6 tph <sup>1</sup>	122A	Baghouse
	122B	Maltodextrin Spray Dryer – NG	Natural Gas	0.04 MMft <sup>3</sup> /hr	122B	Baghouse

<sup>1</sup> The maximum nameplate capacity of the Spray Dryer is 5 tons/hr; however, an actual process rate of up to 6 tons/hr is possible.

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 159. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
122	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 5330 / PTO 5585R1
	PM / PM <sub>10</sub>	2.06 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	0.02 lb/hr <sup>1</sup>	NAAQS	
		0.02 tpy <sup>1</sup>		
	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)		

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner / operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

- B. The baghouses (CE122A, CE122B) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance performed on the baghouses.
- C. The pressure drop across each baghouse (CE122A, CE122B) shall be maintained between 0.5" and 10.0" of water column. The owner or operator shall monitor and record the pressure drop across each baghouse on a daily basis while the spray dryer (EU122) is in operation.
- D. The spray dryer (EU122) shall burn pipeline quality natural gas or steam heat only.
- E. The owner or operator shall maintain copies of source test results until a new approved representative test is conducted for this emission point.

Authority for Requirement: LCPH ATI 5330 / PTO 5585R1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 160. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
122	141	V	78	160	65,000	LCPHATI 5330 / PTO 5585R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5530 / PTO 5585R1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by LCPH ATI 5530 / PTO 5585R1.

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**Emission Point ID Number: 124****Table 161. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
124	124	Maltodextrin Packaging Transfer Line	Maltodextrin	48,000 lb/hr	124	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 162. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
124	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 5025 / PTO 5320
	PM / PM <sub>10</sub>	0.31 lb/hr <sup>1,2</sup>	NAAQS	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-65(a)(2)	

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<sup>1</sup> Limit given [for the project] to remain minor for PSD.

<sup>2</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>3</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5025 / PTO 5320

**Operating Limits**

- A. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.
- B. Pressure drop across the baghouse, CE124, shall be maintained between 0.3 to 6 inches of water.

Authority for Requirement: LCPH ATI 5025 / PTO 5320

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Pressure drop readings across the baghouse, CE124, shall be recorded on a daily basis while the control equipment is in operation.
- B. Monitor and record "no visible emissions" observations on a weekly basis. An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance.
- C. Record all maintenance and repair completed to the control equipment.
- D. Retain copies of emission test results for compliance testing completed on this emission source.

Authority for Requirement: LCPH ATI 5025 / PTO 5320

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 163. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
124	43	V	12	155	5,400	LCPH ATI 5025 / PTO 5320

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5025 / PTO 5320

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 125**

**Table 164. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
125	125	Maltodextrin Vacuum and Reprocessing	Maltodextrin	1,000 scfm	125	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 165. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
125	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)
	PM <sub>10</sub>	0.09 lb/hr	Requested limit	LCPH ATI 3980 / PTO 4033
		0.38 tpy		
Opacity	20%	LCCO Sec. 10-60(a)		

---

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate emissions. The control device shall be operated at all times when any equipment controlled by the control device is operating. The control device shall be maintained on this source in a good operating condition at all times.

All appropriate probes and gauges needed to measure the parameters outlined in [the Monitoring Requirements section below] shall be installed and maintained in good operating condition.

Authority for Requirement: LCPH ATI 3980 / PTO 4033

**Operating Limits**

This source shall be limited to 5,865 hours of operation calculated on a 12-month rolling sum.

The airflow rate as it associates to emission calculations for this source has been limited to 1,000 scfm. Any increase in airflow may necessitate a new Permit to Operate.

Authority for Requirement: LCPH ATI 3980 / PTO 4033

**Monitoring Requirements**

The following information shall be monitored:

- A. Monthly hours of operation from a non-resettable hour meter.
- B. Daily pressure drop readings when operating.

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 3980 / PTO 4033

**Recordkeeping Requirements**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Hours of operation calculated on a 12-month rolling sum.
- B. Daily pressure drop readings (kept 6 months minimum).
- C. Records of maintenance and repair completed on the control device.

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 3980 / PTO 4033

**Reporting**

- A. Submit an annual report summarizing the hours of operation based on a 12-month rolling sum.
- B. Submit excess emission reports as required in [LCCO Sec. 10-67].

Authority for Requirement: LCPH ATI 3980 / PTO 4033

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 166. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
125	74	V	6	68	1,000	LCPH ATI 3980 / PTO 4033

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operations & Maintenance Plan Required?**                      Yes       No
- Facility Maintained Operation & Maintenance Plan Required?**                      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes  No

Authority for Requirement: 567 IAC 24.108(3)

---

<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 129****Table 167. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
129	129A	Maltodextrin Packaging System	Maltodextrin	54,000 lb/hr	129	Baghouse
	129B	#1 Bulk Toter System Aspiration	Maltodextrin	48,000 lb/hr		
	129C	#2 Bulk Toter System Aspiration	Maltodextrin	48,000 lb/hr		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 168. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
129	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)(2)	LCPH ATI 5026 / PTO 5321R1
	PM / PM <sub>10</sub>	0.73 lb/hr <sup>1,2</sup>	NAAQS PSD synthetic minor	
	Opacity	20% <sup>3</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> Limit given [for this project] to remain minor for PSD permitting.

<sup>2</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>3</sup> The observation of visible emissions of air contaminants as defined in [LCCO Sec. 10-55] will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Limits section below] shall be installed, maintained and operating during the operation of the emission unit and control equipment at all times.

Authority for Requirement: LCPH ATI 5026 / PTO 5321R1

**Operating Limits**

- A. Pressure drop across the baghouse, CE129, shall be maintained between 0.3 to 14 inches of water.
- B. The emission point shall be limited to packaging 420,480,000 pounds of maltodextrin per year.

Authority for Requirement: LCPH ATI 5026 / PTO 5321R1

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Pressure drop readings across the baghouse, CE129, shall be recorded on a daily basis while the control equipment is in operation.
- B. Record process rate on a 12-month rolling basis.
- C. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- D. Record all maintenance and repair completed to the control equipment.
- E. Retain copies of emission test results for compliance testing completed on this emission source.

Authority for Requirement: LCPH ATI 5026 / PTO 5321R1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 169. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
129	110	V	20	71	9,684	LCPHATI 5026 / PTO 5321R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5026 / PTO 5321R1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

## Fructose

Emission Point ID Number: 153

Table 170. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
153	153	Fructose East MR Evaporator Vent	Corn	39,000 gph	--	None

### Applicable Requirements

*The emissions from this emission point shall not exceed the levels specified below.*

Table 171. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
153	SO <sub>2</sub>	0.10 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 5681 / PTO 5478
		500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### Operating Limits

- A. The operation of this emission unit(s) while operating on stillage is prohibited. The use of stillage would necessitate the owner or operator to apply for an authorization to install permit prior to this modification.

Authority for Requirement: LCPH ATI 5681 / PTO 5478

### Emission Point Characteristics

*The emission point shall conform to the specifications listed below.*

Table 172. Emission Point Characteristics

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
153	55	V	6	192	25	LCPH ATI 5681 / PTO 5478

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

**Syrup / Refinery**

**Emission Point ID Number: 034, 114**

**Table 173. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
034	034A	Carbon Furnace [#1]	Spent Carbon	80,000 lb/day	034A 034B	Venturi Scrubber Zero Hearth Furnace Afterburner
	034B	Carbon Furnace [#1] – Natural Gas	Natural Gas	23 MMBtu/hr		
114	114A	Carbon Furnace [#2]	Spent Carbon	80,000 lb/day	114A 114B	Venturi Scrubber Zero Hearth Furnace Afterburner
	114B	Carbon Furnace [#2] – Natural Gas	Natural Gas	23 MMBtu/hr		

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 174. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
034 114	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 4664 / PTO 5082 LCPH ATI 4665 / PTO 5083R1
	PM / PM <sub>10</sub>	0.033 gr/dscf <sup>1</sup>	PSD synthetic minor	
		1.61 lb/hr		
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	4.49 lb/hr <sup>1</sup>	PSD synthetic minor	
	NO <sub>x</sub>	4.49 lb/hr <sup>1</sup>		
	VOC	4.49 lb/hr <sup>1</sup>		
CO	11.34 lb/hr <sup>1</sup>			

<sup>1</sup> Emissions are limited to maintain synthetic minor status for the project. Project emissions include the installation of two carbon furnaces (EP034 and EP114).

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A venturi scrubber shall be used to control particulate and sulfur dioxide emissions. The zero hearth furnace afterburner shall be used to control VOC and CO emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate

probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4664 / PTO 5082

### **Operating Limits**

- A. Re-circulation water to the scrubber shall be greater than 350 gallons per minute.
- B. pH of the scrubbing liquor shall be maintained above 5.
- C. This unit shall burn natural gas only.

Authority for Requirement: LCPH ATI 4664 / PTO 5082

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Daily pressure drop readings.
- B. Daily scrubber water re-circulation rate.
- C. Daily scrubber pH.
- D. Visible emissions shall be observed on a weekly basis to ensure that no visible emissions occur during material handling of the unit.
- E. Maintenance and repair completed to the control unit.
- F. Maintain copies of source test results until a new approved representative test is conducted or for five (5) years, whichever is longer.

Authority for Requirement: LCPH ATI 4664 / PTO 5082

### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The venturi scrubber (CE114A) and zero hearth furnace afterburner (CE114B) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of maintenance performed on the control equipment.
- C. The carbon furnace (EU114) shall burn pipeline quality natural gas only.
- D. Recirculation water to the venturi scrubber (CE114A) shall be greater than 350 gallons per minute. The owner or operator shall monitor and record the scrubber water recirculation rate on a daily basis.
- E. The pH of the scrubbing liquor in the venturi scrubber (CE114A) shall be maintained above 5 standard units (S.U.). The owner or operator shall monitor and record the pH of the scrubbing liquor on a daily basis.

- F. The owner or operator shall monitor and record the pressure drop readings across the venturi scrubber on a daily basis.
- G. The owner or operator shall maintain copies of source test results until a new approved representative test is conducted or for five (5) years, whichever is longer.

Authority for Requirement: LCPH ATI 4665 / PTO 5083R1

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 175. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (dscfm)	Authority for Requirement
034	110	V	27	160	5,700	LCPH ATI 4664 / PTO 5082
114	110	V	27	160	5,700	LCPH ATI 4665 / PTO 5083R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

These emission points are subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4664 / PTO 5082  
LCPH ATI 5665 / PTO 5083R1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM, PM<sub>10</sub>, and SO<sub>2</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> Compliance Assurance Monitoring is required for VOC and CO emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 112****Table 176. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
112	112	Refinery Acid Tank Scrubber System	HCl	900 gph	112	Packed Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 177. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
112	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 4490 / PTO 4701
	PM / PM <sub>10</sub>	0.16 lb/hr	Requested limit	
	Opacity	20%	LCCO Sec. 10-65(a)(2)	

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A packed scrubber shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4490 / PTO 4701

**Operating Limits**

- A. Throughput through the tanks shall be limited to 900 gallons per hour (7,884,000 gallons per year) for all tanks combined.
- B. Tanks shall not be removed or added without obtaining the proper permits.

Authority for Requirement: LCPH ATI 4490 / PTO 4701

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Annual acid throughput calculated on a 12-month rolling total.
- B. Records of all maintenance and repair completed to the scrubber.

Authority for Requirement: LCPH ATI 4490 / PTO 4701

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 178. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
112	45	V	8	90	200	LCPH ATI 4490 / PTO 4701

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operations & Maintenance Plan Required?      Yes       No
- Facility Maintained Operation & Maintenance Plan Required?      Yes       No
- Compliance Assurance Monitoring (CAM) Plan Required?      Yes       No

Authority for Requirement: 567 IAC 24.108(3)

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**Emission Point ID Number: 387**

**Table 179. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
387	387	Refinery Heavy Steepwater Tank	Heavy Steepwater	3,000 gal 350 gpm	--	None

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 180. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
387	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 4842 / PTO 6125
		0.08 lb/hr <sup>1</sup>	03-CV-2066	
	VOC	0.20 lb/hr <sup>1</sup>		

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<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 181. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
387	42	V	8	134	47	LCPH ATI 4842 / PTO 6125

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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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

## Utilities

**Emission Point ID Number: 091, 092, 093, 097, 516, 540**

**Table 182. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
091	091	Dry Starch Diesel Generator	Diesel	600 kW	--	None
092	092	#3 Cooling Tower Diesel Generator	Diesel	700 kW	--	None
093	093	Alcohol / Waste Treatment Diesel Generator	Diesel	600 kW	--	None
097	097	No. 2 Boiler Diesel Generator	Diesel	600 kW	--	None
516	516	Cogen Diesel Generator	Diesel	600 kW	--	None
540	540	No. 2 Cogen Diesel Generator	Diesel	800 kW	--	None

### Applicable Requirements

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 183. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
091 092 093 097	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 4706 / PTO 4847 LCPH ATI 4707 / PTO 4848 LCPH ATI 4708 / PTO 4849 LCPH ATI 4710 / PTO 4851
516 540	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 4711 / PTO 4852 LCPH ATI 4712 / PTO 4853

**Table 184. Specific Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
091 093 097	PM / PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub>	0.86 lb/hr <sup>1</sup> 3.10 lb/hr <sup>1</sup> 19.64 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4706 / PTO 4847 LCPH ATI 4708 / PTO 4849 LCPH ATI 4710 / PTO 4851
092	PM / PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub>	0.95 lb/hr <sup>1</sup> 3.42 lb/hr <sup>1</sup> 21.66 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4707 / PTO 4848
516	PM PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub>	0.81 lb/hr <sup>1</sup> 0.86 lb/hr <sup>1</sup> 2.93 lb/hr <sup>1</sup> 18.59 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4711 / PTO 4852
540	PM / PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub>	1.14 lb/hr <sup>1</sup> 4.10 lb/hr <sup>1</sup> 25.95 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4712 / PTO 4853

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

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**Operating Limits and Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

**Federal Standards****A. New Source Performance Standards (NESHAP):**

The following subparts apply to the emission unit(s) in this permit:

**Table 185. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
091 092 093	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
097 516 540	ZZZZ	Stationary Reciprocating Internal Combustion Engine	Existing Emergency Generator	10-62(d)(104)	§63.6580 – §63.6675

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.

**NESHAP:**

The emergency engine is subject to 40 CFR Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR §63.6590(a)(2)(i), this emergency engine, located at a major source, is a new stationary RICE as it was constructed on or after December 19, 2002.

According to 40 CFR §63.6590(b)(1)(i), a new emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is not subject to the requirements of 40 CFR Part 63 Subpart ZZZZ and Subpart A except for initial notification requirements of 40 CFR §63.6645(f).

Authority for Requirement: 40 CFR Part 63, Subpart ZZZZ  
567 IAC 23.1(4)"cz"  
LCCO Sec. 10-62(d)(104)

**Operating Limits**

- A. This emission unit shall not operate more than 500 hours in any rolling twelve-month period.
- B. This emission unit shall operate on #1 or #2 distillate fuel only.
- C. The sulfur content of the fuel oil shall not exceed 0.5 percent by weight.

Authority for Requirement: LCPH ATI 4706 / PTO 4847  
LCPH ATI 4707 / PTO 4848  
LCPH ATI 4708 / PTO 4849  
LCPH ATI 4710 / PTO 4851  
LCPH ATI 4711 / PTO 4852  
LCPH ATI 4712 / PTO 4853

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Maintain records clearly showing the type of fuel utilized and the sulfur content of that fuel.
- B. Record the hours of operation for the emission unit for each month of operation.
- C. The annual hours of operation for the emission unit shall be updated on a 12-month rolling basis, for each month of operation.

Authority for Requirement:     LCPH ATI 4706 / PTO 4847  
   LCPH ATI 4707 / PTO 4848  
   LCPH ATI 4708 / PTO 4849  
   LCPH ATI 4710 / PTO 4851  
   LCPH ATI 4711 / PTO 4852  
   LCPH ATI 4712 / PTO 4853

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 186. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
091	30	V	10	650	5,018	LCPH ATI 4706 / PTO 4847
092	29	V	10	650	6,536	LCPH ATI 4707 / PTO 4848
093	34	V	8	650	5,018	LCPH ATI 4708 / PTO 4849
097	44	V	11	650	5,018	LCPH ATI 4710 / PTO 4851
516	12	V	10	650	3,669	LCPH ATI 4711 / PTO 4852
540	12	V	8	964	6,879	LCPH ATI 4712 / PTO 4853

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                     Yes      No

**Facility Maintained Operation & Maintenance Plan Required?**                     Yes      No

**Compliance Assurance Monitoring (CAM) Plan Required?**                     Yes      No

Authority for Requirement:     567 IAC 24.108(3)

**Emission Point ID Number: 095, 096, 517, 518**

**Table 187. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
095	095	North Corn Plant Diesel Fire Pump	Diesel	302 hp	--	None
096	096	South Corn Plant Diesel Fire Pump	Diesel	302 hp	--	None
517	517	East Cogen Diesel Fire Pump	Diesel	340 hp	--	None
518	518	West Cogen Diesel Fire Pump	Diesel	340 hp	--	None

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 188. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
095	PM	0.1 gr/dscf	567 IAC 23.2(a)(1)	567 IAC 23.2(a)(1)
096			LCCO Sec. 10-62(a)	LCCO Sec. 10-62(a)
517	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)
518	SO <sub>2</sub>	2.5 lb/MMBtu	567 IAC 23.3(3)"b"(2)	567 IAC 23.3(3)"b"(2)
		1.5 lb/MMBtu	LCCO Sec. 10-65(a)(1)(b)	LCCO Sec. 10-65(a)(1)(b)

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 189. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
095	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
096	ZZZZ	Stationary Reciprocating Internal Combustion Engine	Existing	10-62(d)(104)	§63.6580 – §63.6675
517			Emergency		
518			Generator		

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.

NESHAP:

The emergency engine is subject to 40 CFR Subpart ZZZZ – National Emission Standards for Hazardous

Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(ii), this compression ignition emergency engine, located at a major source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

Compliance Date:

Per 40 CFR §63.6595(a)(1), you must comply with the provisions of Subpart ZZZZ that are applicable by May 3, 2013.

Operation and Maintenance Requirements 40 CFR §63.6602, §63.6625, §63.6640, and Tables 2c and 6 to Subpart ZZZZ:

- A. Change oil and filter every 500 hours of operation or within 1 year + 30 days, whichever comes first. See 40 CFR §63.6625(i) for the oil analysis option to extend time frame of requirements.
- B. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days, whichever comes first, and replace as necessary.
- C. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days, whichever comes first, and replace as necessary.
- D. Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- E. Install a non-resettable hour meter if one is not already installed.
- F. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

Operating Limits 40 CFR §63.6640(f):

- G. Any operation other than emergency operation, maintenance and testing and operation in non-emergency situations (*up to*) 50 hours per year is prohibited.
- H. There is no time limit on the use of emergency stationary RICE in emergency situations.
- I. The owner or operator may operate the emergency stationary RICE up to 100 combined hours per calendar year for maintenance checks and readiness testing. See 40 CFR §63.6640(f)(2) for additional information and restrictions.
- J. The owner or operator may operate the emergency stationary RICE up to 50 hours per calendar year for non-emergency situations, but those 50 hours are counted toward the 100 hours of maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Recordkeeping Requirements 40 CFR §63.6655:

- K. Keep records of the maintenance conducted on the stationary RICE.
- L. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. See 40 CFR §63.6655(f) for additional information.

Notification and Reporting Requirements 40 CFR §63.6645, §63.6650, and Table 2c to Subpart ZZZZ:

- M. An initial notification is not required per 40 CFR §63.6645(a)(5).

N. A report may be required for failure to perform the work practice requirements on the schedule required in Table 2c. See Footnote 1 of Table 2c for more information.

Authority for Requirement: 40 CFR Part 63, Subpart ZZZZ  
567 IAC 23.1(4)"cz"  
LCCO Sec. 10-62(d)(104)

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

No applicable requirements at this time.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 170**

**Table 190. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
170	170A	Cooling Tower #2 – Fructose Cell A	Cooling Water	750,000 gph	170	Drift Eliminators
	170B	Cooling Tower #2 – Fructose Cell B	Cooling Water	750,000 gph		
	170C	Cooling Tower #2 – Fructose Cell C	Cooling Water	750,000 gph		
	170D	Cooling Tower #2 – Fructose Cell D	Cooling Water	750,000 gph		
	170E	Cooling Tower #2 – Fructose Cell E	Cooling Water	750,000 gph		

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 191. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
170	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 5550 / PTO 5767
	PM <sub>10</sub>	0.57 lb/hr <sup>1,2</sup>	NAAQS	
	Opacity	20%	LCCO Sec. 10-60(a)	

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> Emission limit represents the sum of cells 2A, 2B, 2C, 2D, and 2E.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 192. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
170	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	Q	Industrial Process Cooling Towers	--	10-62(d)(17)	§63.400 – §63.407

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.

Authority for Requirement: LCPH ATI 5550 / PTO 5767

**Control Equipment**

Drift eliminators shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPHA ATI 5550 / PTO 5767

**Operating Limits**

- A. The circulating water in the cooling tower shall not exceed 2,500 parts per million by weight (ppm<sub>w</sub>) (2,500 mg/L) total dissolved solids (TDS).
- B. Chromium based or VOC containing water treatment chemicals shall not be used in these emission units.
- C. The owner or operator shall maintain the cooling tower drift eliminators according to the manufacturer's specifications, instructions and maintenance schedule.

Authority for Requirement: LCPH ATI 5550 / PTO 5767

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 complete an analysis of the TDS of the water in the cooling tower at least once for each calendar month this emission unit is in operation.
- B. The owner or operator shall maintain a record of the manufacturer's drift loss guarantee for the cooling tower drift eliminators.
- C. Maintain a material safety data sheet of all water treatment chemicals used.
- D. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the cooling tower.

Authority for Requirement: LCPH ATI 5550 / PTO 5767

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 193. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
170	42	V	408 (5 cells)	80	1,186,751 (4 cells) 1,171,570 (1 cell)	LCPH ATI 5550 / PTO 5767

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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**Emission Point ID Number: 171****Table 194. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
171	171A	Cooling Tower #3 Cell #1	Cooling Water	10,500 gpm	171	Drift Eliminator
	171B	Cooling Tower #3 Cell #2	Cooling Water	10,500 gpm		
	171C	Cooling Tower #3 Cell #3	Cooling Water	10,500 gpm		
	171D	Cooling Tower #3 Cell #4	Cooling Water	10,500 gpm		
	171E	Cooling Tower #3 Cell #5	Cooling Water	10,500 gpm		
	171F	Cooling Tower #3 Cell #6	Cooling Water	10,500 gpm		
	171G	Cooling Tower #3 Cell #7	Cooling Water	10,500 gpm		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 195. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
171	PM	0.1 gr/dscf	567 IAC 23.3(3)"a" LCCO Sec. 10-62(a)	LCPH ATI 6933 / PTO 7282
	PM / PM <sub>10</sub>	0.83 lb/hr	Requested limit	
	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the correction, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards****A. New Source Performance Standards (NESHAP):**

These emission units are of the source category for Subpart Q (*National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers*; 40 CFR §63.400 – §63.407). However, these emission units are not subject because they do not meet the applicability criteria of 40 CFR §63.400(a).

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.

Authority for Requirement: LCPH ATI 6933 / PTO 7282

**Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 cooling tower drift eliminators (CE171) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall maintain a record of the manufacturer's drift loss guarantee. The owner or operator shall record the date and description of all maintenance completed on the cooling tower.
- B. The Total Dissolved Solids (TDS) concentration in the cooling tower circulating water shall not exceed 4,500 parts per million, by weight (4,500 mg/L). The owner or operator shall sample the cooling tower circulating water for TDS at least once per calendar month these emission units are in operation.
- C. Chromium-based or VOC-containing water treatment chemicals shall not be used in Cooling Tower #3. The owner or operator shall maintain the Safety Data Sheet (SDS) for each chemical additive used in the cooling tower circulating water to demonstrate compliance with the requirement.

Authority for Requirement: LCPH ATI 6933 / PTO 7282

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 196. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
171	50	V	336 (7 cells)	Amb. +20	903,527 (7 cells)	LCPH ATI 6933 / PTO 7282

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operations & Maintenance Plan Required?** Yes  No
- Facility Maintained Operation & Maintenance Plan Required?** Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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**Emission Point ID Number: 260****Table 197. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
260	260	Rental Fructose Diesel Generator	Diesel	EPA Tier 3 ≤ 560 kW	--	None

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 198. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
260	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
	SO <sub>2</sub>	2.5 lb/MMBtu	567 IAC 23.3(3)"b"(2)	567 IAC 23.3(3)"b"(2)
	PM	0.6 lb/MMBtu	Permit Requirement	LCPH ATI 7609 / PTO 7299
	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	1.5 lb/MMBtu	LCCO Sec. 10-65(a)(1)(b)	

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<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

**Table 199. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
260	PM	0.20 g/kW-hr	40 CFR Part 1039, Appendix I, Table 3	LCPH ATI 7609 / PTO 7299
	NMHC <sup>1</sup> + NO <sub>x</sub>	4.0 g/kW-hr		
	CO	3.5 g/kW-hr		
	Opacity	20% <sup>2</sup>	40 CFR §1039.105(b)(1)	
		15% <sup>3</sup>	40 CFR §1039.105(b)(2)	
50% <sup>4</sup>		40 CFR §1039.105(b)(3)		

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<sup>1</sup> Non-methane hydrocarbons.

<sup>2</sup> Acceleration mode.

<sup>3</sup> Lugging mode.

<sup>4</sup> Peaks in acceleration or lugging mode.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 200. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
260	A	General Conditions	NA	10-62(b)	§60.1 – §60.16
	III	Stationary Compression Ignition Internal Combustion Engine	Tier 3 EPA	10-62(b)(77)	§60.4200 – §60.4219

1. In accordance with 40 CFR §60.4211(c), each rental engine brought onsite must be certified by its manufacturer to comply with the emission standards for emergency engines from 40 CFR §60.4205(b) and §60.4202(a)(2). The emission standards that the engine must be certified by the manufacturer to meet are [included in Table 199].
2. In accordance with 40 CFR §60.4211(c), the owner or operator must comply with the required NSPS emissions standards by purchasing an engine certified by its manufacturer to meet the applicable emission standards for the same model year and engine power. The engine must be installed and configured to the manufacturer's specifications. Provided these requirements are satisfied, no further demonstration of compliance with the emission standards of 40 CFR §60.4205(b) and §60.4202(a)(2) is required. However, if the engines are not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, a compliance demonstration is required in accordance with 40 CFR §60.4211(g).

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. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 201. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
260	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	ZZZZ	Stationary Reciprocating Internal Combustion Engine	New Emergency Generator	10-62(d)(104)	§63.6580 – §63.6675

The engine is a new reciprocating internal combustion engine located at a major source of HAP. In accordance with 40 CFR §63.6590(b)(1)(i), this new emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP and is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) does not have to meet the requirements of NESHAP Subpart ZZZZ except for the initial notification requirements of §63.6645(f).

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.

Authority for Requirement: LCPH ATI 7609 / PTO 7299

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 engine (EU260) shall be considered a stationary source pursuant to 40 CFR §60.4200(e) and shall be certified to EPA Tier 3 emission standards for compression ignition engines. Any replacement engine provided by the rental agency shall be identified as EU260 and shall be certified to EPA Tier 3 emission standards.
- B. Only one (1) engine shall be operated as EU260 at any time.
- C. The combination of any engine identified as EU260 is limited to operating a maximum of 500 hours in any 12-month period.
- D. The combination of any engine identified as EU260 is limited to operate as an emergency stationary internal combustion engine, as defined in 40 CFR §60.4219 and in accordance with §60.4211(f)
  1. There is no time limit on the use of the engine(s) in emergency situations, provided that the hour limit established in [Condition C of this section] is not exceeded. In accordance with 40 CFR §60.4211(f)(2), all engines identified as EU260 are limited to operate a maximum combined 100 hours per year for maintenance checks and readiness testing.
  2. In accordance with 40 CFR §60.4211(f)(3), all engines identified as EU260 are also allowed to operate up to a combined 50 hours per year in non-emergency situations, but the 50 hours are counted toward the 100 hours provided for maintenance and testing. The 50 hours per year for non-emergency operation cannot be used for peak-shaving or non-emergency power as part of a financial arrangement with another entity.
- E. In accordance with 40 CFR §60.4209(a), any engine that operates as EU260 shall be equipped with a non-resettable hour meter.
- F. The owner or operator shall maintain the following monthly records for each engine identified as EU260:
  1. The number of hours that the engine operated for maintenance checks and readiness testing;
  2. The number of hours that the engine operated for allowed non-emergency operations; and
  3. The total number of hours that the engine operated.
- G. The owner or operator shall maintain the following monthly records for all engines identified as EU260:
  1. The rolling 12-month total combined number of hours that all EU260 engines operated.
- H. The owner or operator shall maintain the following annual records for each engine identified as EU260:
  1. The number of hours that the engine operated for maintenance checks and readiness testing; and
  2. The number of hours that the engine operated for allowed non-emergency operations.
- I. The owner or operator shall maintain the following annual records for all engines identified as EU260:
  1. The total combined number of hours that all EU260 engines operated for maintenance checks, readiness testing, and allowed non-emergency operations.
- J. In accordance with 40 CFR §60.4207(b), the diesel fuel oil burned in EU260 shall meet the following specifications from 40 CFR [§1090.305] for nonroad diesel fuel:

Parameter	Limit
Sulfur (S) content	15 ppm (0.0015% by weight)
Minimum cetane index or Maximum aromatic content	40 35% (by volume)

The owner or operator shall comply with the requirements listed above by one of the following methods:

1. Have a fuel supplier certify that the fuel delivered meets the definition of nonroad diesel fuel, as defined by 40 CFR [§1090.305];
  2. Obtain a fuel analysis for the supplier showing the sulfur content and cetane index or aromatic content of the fuel delivered; or
  3. Perform an analysis of the fuel to determine the sulfur content and cetane index or aromatic content of the fuel received.
- K. All engines operated as EU260 must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR §60.4211(g).
- L. In accordance with 40 CFR §60.4211(a), all engines operated as EU260 shall be operated and maintained in accordance with the manufacturer's emission-related written instructions. The owner or operator may only change emission-related engine settings that are permitted by the manufacturer.
- M. The owner or operator shall notify the Department each time the engine operating as EU260 is exchanged by the rental agency. This notification shall contain the following information:
1. Make, model, size (in kW), and fuel consumption of the new engine;
  2. Record of the number of hours on the non-resettable hour meter when the engine is brought onsite;
  3. Calculation of the potential emissions (PTE) of the new engine;
  4. A copy of the EPA certification demonstrating compliance with the Tier 3 standards for compression ignition engines; and
  5. Final record of the number of hours on the non-resettable hour meter of the engine being replaced.

Authority for Requirement: LCPH ATI 7609 / PTO 7299

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 202. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
260	11	V	6	895	3,418	LCPH ATI 7609 / PTO 7299

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

## Cogeneration Plant

**Emission Point ID Number: 459, 460**

**Table 203. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
459	459	Natural Gas Fired Boiler #1 [#3]	Natural Gas	292.5 MMBtu/hr	459	Advanced Ultra Low NO <sub>x</sub> Burners with FGR <sup>1</sup>
460	460	Natural Gas Fired Boiler #2	Natural Gas	292.5 MMBtu/hr	460	Advanced Ultra Low NO <sub>x</sub> Burners with FGR <sup>1</sup>

<sup>1</sup> Flue Gas Recirculation.

**Table 204. Associated Continuous Monitoring Systems**

SEP	EU	ME	Pollutant	Applicable Specifications <sup>1</sup>	Authority for Requirement
459	459	459A	Diluent O <sub>2</sub>	40 CFR Part 60 40 CFR Part 60, Appendix F 40 CFR Part 60, Appendix A & B	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55) PSD Permit #07-A-579-P LCPH ATI 5238 / PTO 5789
		459B	NO <sub>x</sub>		
		459C	CO		
460	460	460A	Diluent O <sub>2</sub>	40 CFR Part 60 40 CFR Part 60, Appendix F 40 CFR Part 60, Appendix A & B	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55) PSD Permit #07-A-580-P LCPH ATI 5239 / PTO 5790
		460B	NO <sub>x</sub>		
		460C	CO		

<sup>1</sup> Includes Operational Specifications, Ongoing System Calibration / Quality Assurance, and Reporting & Recordkeeping requirements.

### Applicable Requirements

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 205. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
459 460	PM / PM <sub>10</sub>	0.005 lb/MMBtu	BACT	PSD Permit #07-A-579-P LCPH ATI 5238 / PTO 5789 PSD Permit #07-A-580-P LCPH ATI 5239 / PTO 5790
	Opacity	0%		
	SO <sub>2</sub>	0.0006 lb/MMBtu		
	NO <sub>x</sub>	0.02 lb/MMBtu <sup>1</sup>		
		25.62 tpy <sup>2</sup>		
	VOC	0.0054 lb/MMBtu		
	CO	0.072 lb/MMBtu <sup>1</sup>		
		92.24 tpy <sup>2</sup>		

<sup>1</sup> The NO<sub>x</sub> and CO pound per million Btu standards apply at all times except during periods of startup, shutdown, or malfunction.

<sup>2</sup> The NO<sub>x</sub> and CO ton per year standards are expressed as a 12-month rolling total and apply at all times including during periods of startup, shutdown, or malfunction.

**Table 206. NSPS and NESHAP Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
459 460	PM	0.030 lb/MMBtu <sup>1</sup>	40 CFR §60.43b	PSD Permit #07-A-579-P
	SO <sub>2</sub>	0.20 lb/MMBtu <sup>2</sup>	40 CFR §60.42b	LCPH ATI 5238 / PTO 5789
	NO <sub>x</sub>	0.20 lb/MMBtu <sup>2,3</sup>	40 CFR §60.44b	PSD Permit #07-A-580-P
	CO	400 ppm <sub>vd</sub> <sup>4</sup>	40 CFR §63.7500	LCPH ATI 5239 / PTO 5790

<sup>1</sup> Standard is expressed as the average of 3 test runs and applies at all times excluding periods of startup, shutdown, and malfunction. Per 40 CFR §60.43b(h)(5), if the boiler combusts only gaseous fuels with potential sulfur dioxide emission rates of 0.32 lb/MMBtu heat input or less, it is not subject to the PM limit listed above.

<sup>2</sup> Standard is expressed as a 30-day rolling average and applies at all times, including periods of startup, shutdown, and malfunction.

<sup>3</sup> The boiler may comply with an optional limit of 270 ng/J (2.1 lb/MWh) gross energy output, based on a 30-day rolling average. Units complying with this output-based limit must demonstrate compliance according to the procedures of 40 CFR §60.46a(i)(1), and must monitor emissions according to §60.47a(c)(1), (c)(2), (k), and (l).

<sup>4</sup> Standard is a 30-day rolling average corrected to 3% O<sub>2</sub> and applies at all times except during periods of startup, shutdown, malfunction, and when [the] boiler or process heater is operating at less than 50 percent of rated capacity.

**Table 207. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
459 460	PM	0.1 gr/dscf	Permit Requirement	LCPH ATI 5238 / PTO 5789 LCPH ATI 5239 / PTO 5790
		0.6 lb/MMBtu	567 IAC 23.3(2)"b" LCCO Sec. 10-61(b)	
	PM <sub>10</sub>	1.46 lb/hr <sup>1</sup>	NAAQS	
	Opacity	40%	567 IAC 23.3(2)"d"	PSD Permit #07-A-579-P
		20%	LCCO Sec. 10-60(a)	LCPH ATI 5238 / PTO 5789
	SO <sub>2</sub>	0.17 lb/hr <sup>1</sup>	NAAQS	PSD Permit #07-A-580-P
		500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	LCPH ATI 5239 / PTO 5790
	NO <sub>x</sub>	5.85 lb/hr <sup>1</sup>	NAAQS	
CO	21.06 lb/hr <sup>1</sup>			

<sup>1</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment and the annual increment for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS and increment for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is established to limit emissions below levels that predict exceedances of the annual NAAQS and increment for NO<sub>x</sub>. The limit for CO emissions is established to limit emissions below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 208. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
459 460	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Db	Industrial-Commercial-Institutional Steam Generating Units	--	10-62(b)(55)	§60.40b – §60.49b

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. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 209. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
459 460	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters	> 100 MMBtu/hr	--	§63.11140 – §63.11145

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.

Authority for Requirement: PSD Permit #07-A-579-P  
 LCPH ATI 5238 / PTO 5789  
 PSD Permit #07-A-580-P  
 LCPH ATI 5239 / PTO 5790

**Operating Limits**

- A. [Each Boiler (EUs 459 and 460)] shall be limited to firing on natural gas only.
- B. The owner or operator shall operate and maintain [each Boiler (EUs 459 and 460)] and all control equipment according to the provisions in 40 CFR §63.6(e).
- C. The owner or operator shall develop and implement a written startup, shutdown and malfunction plan (SSMP) for [each Boiler (EUs 459 and 460)] according to the provisions in 40 CFR §63.6(e).
- D. The owner or operator shall furnish the Department with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in in [Table 205. PSD Emission Limits, Table 206. NSPS and NESHAP Emission Limits, and Table 207. Other Emission Limits]. In addition, the facility shall detail all revisions made to the affected emission units and provide a startup, shutdown, malfunction plan for the emission unit

and control device. This information shall be submitted to the Department at least 30 days in advance of construction of any control equipment.

Authority for Requirement: PSD Permit #07-A-579-P  
LCPH ATI 5238 / PTO 5789  
PSD Permit #07-A-580-P  
LCPH ATI 5239 / PTO 5790

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 maintain records of monthly fuel use by [each Boiler (EUs 459 and 460)] including the type of fuel and amount according to 40 CFR §63.7555 and 40 CFR §63.7560.
- B. The owner or operator shall follow the notification, recordkeeping and reporting requirements of 40 CFR §60.49b and 40 CFR §63.7550.
- C. The owner or operator of an affected facility subject to the nitrogen oxides standards under [40 CFR] §60.44b shall maintain records of the following information for each steam generating unit operating day:
  1. Calendar date.
  2. The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (ng/J or lb/million Btu heat input) measured or predicted.
  3. The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
  4. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under [40 CFR] §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
  5. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
  6. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
  7. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.
  8. Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.
  9. Description of any modification to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.
  10. Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.
- D. The owner or operator shall maintain records of fuel supplier certification of sulfur content reported in pounds per MMBtu of the fuels burned in [each Boiler (EUs 459 and 460)]. The facility shall request monthly fuel certification from the vendor unless the certification of the

sulfur content from the previous month did not change. The owner or operator shall maintain a record of the date they contacted the vendor to determine if the certification is still valid. The facility shall request a new certification if the previous month's certification of the sulfur content is no longer representative of the boiler's combusted fuel. The facility may use preliminary data available from the vendor to determine the sulfur content of the fuel. If the preliminary data indicate that the sulfur content is within 90% of the emission limit established in [Table 205. PSD Emission Limits], the facility shall request a formal certification from the supplier of the sulfur content of the fuel.

- E. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and the monitoring services.

Authority for Requirement: PSD Permit #07-A-579-P  
 LCPH ATI 5238 / PTO 5789  
 PSD Permit #07-A-580-P  
 LCPH ATI 5239 / PTO 5790

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 210. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
459	75	V	78	294	72,000	PSD Permit #07-A-579-P LCPH ATI 5238 / PTO 5789
460	75	V	78	294	72,000	PSD Permit #07-A-580-P LCPH ATI 5239 / PTO 5790

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Continuous Emission Monitoring**

Per 40 CFR §60.48b, the owner or operator shall demonstrate compliance with the nitrogen oxide emission limits of [PSD Permits #07-A-579-P and 07-A-580-P] through the use of a continuous emission monitoring system (CEMS). The facility shall install, calibrate, maintain, and operate a CEMS for measuring nitrogen oxides emissions discharged to the atmosphere. CEM shall be installed, evaluated, operated and data collected as required under 40 CFR §60.48b(c), (d), (e), and (f).

Per 40 CFR §63.7525, the owner or operator shall demonstrate compliance with the carbon monoxide emission limits of [PSD Permits #07-A-579-P and 07-A-580-P] through the use of a continuous emission

monitoring system (CEMS). The facility shall install, operate, and maintain a CEMS for carbon monoxide and oxygen according to the procedures in paragraphs (a)(1) through (6) of 40 CFR §63.7525.

The CEMS required by this permit shall be operated and data recorded during all periods of operation of the boiler except for CEM breakdowns and repairs. Data shall be recorded during calibration checks and zero and span adjustments.

Authority for Requirement: PSD Permit #07-A-579-P  
LCPH ATI 5238 / PTO 5789  
PSD Permit #07-A-580-P  
LCPH ATI 5239 / PTO 5790

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>2</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for NO<sub>x</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

<sup>2</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by PSD Permits #07-A-579-P and #07-A-580-P, and LCPH ATI 5238 / PTO 5789 and ATI 5239 / PTO 5790.

**Emission Point ID Number: 501, 502 (Boiler #3)**

**Table 211. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
501	501A	Co-Gen Boiler #1	Coal	551.5 MMBtu/hr	501A 501C 501E	Baghouse Limestone Injection SNCR <sup>1</sup>
	501AN	Co-Gen Boiler #1 – Natural Gas	Natural Gas	220,000 cfh		
	501AF	Co-Gen Boiler #1 – Fuel Oil	Fuel Oil	224.4 MMBtu/hr		
	501B	Co-Gen Boiler #2	Coal	551.5 MMBtu/hr	501B 501D 501F	Baghouse Limestone Injection SNCR <sup>1</sup>
	501BN	Co-Gen Boiler #2 – Natural Gas	Natural Gas	220,000 cfh		
	501BF	Co-Gen Boiler #2 – Fuel Oil	Fuel Oil	224.4 MMBtu/hr		
502	502A	Co-Gen Boiler #3	Coal	551.5 MMBtu/hr	502A 502D 502F	Baghouse Limestone Injection SNCR <sup>1</sup>
	502AN	Co-Gen Boiler #3 – Natural Gas	Natural Gas	220,000 cfh		
	502AF	Co-Gen Boiler #3 – Fuel Oil	Fuel Oil	224.4 MMBtu/hr		

<sup>1</sup> Selective Non-Catalytic Reduction.

**Table 212. Associated Continuous Emissions Monitoring Systems**

SEP	EU	ME	Pollutant	Applicable Specifications <sup>1</sup>	Authority for Requirement
501	501A	501A	NO <sub>x</sub>	40 CFR Part 60	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55) PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267
	501AN	501D	Diluent O <sub>2</sub>	40 CFR Part 60, Appendix F	
	501AF	501F	SO <sub>2</sub>	40 CFR Part 60, Appendix A & B	
	501B	501B	NO <sub>x</sub>	40 CFR Part 60	
	501BN	501E	Diluent O <sub>2</sub>	40 CFR Part 60, Appendix F	
	501BF	501G	SO <sub>2</sub>	40 CFR Part 60, Appendix A & B	
	501A	501C	Opacity	40 CFR Part 60 40 CFR Part 60 Appendix F 40 CFR Part 60 Appendix B	
	501AN		Flow		
	501AF	501H	Diluent CO <sub>2</sub>	40 CFR Part 60 40 CFR Part 60 Appendix F 40 CFR Part 60 Appendix B	
	501B				
	501BN				
501BF	501I				
502	502A 502AN 502AF	502A	NO <sub>x</sub>	40 CFR Part 60	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55) PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268
		502D	Diluent O <sub>2</sub>	40 CFR Part 60, Appendix F	
		502F	SO <sub>2</sub>	40 CFR Part 60, Appendix A & B	
		502C	Opacity	40 CFR Part 60	
		502H	Flow	40 CFR Part 60 Appendix F	
		502I	Diluent CO <sub>2</sub>	40 CFR Part 60 Appendix B	

<sup>1</sup> Includes Operational Specifications, Ongoing System Calibration / Quality Assurance, and Reporting & Recordkeeping requirements.

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 213. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
501 502	CO	0.20 lb/MMBtu <sup>1</sup>	BACT	PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267 PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268
	Fluoride	0.75 lb/hr <sup>1</sup>		

<sup>1</sup> Standard is a 3-hour rolling average.

**Table 214. NSPS and NESHAP Emission Limits**

SEP	Pollutant	Emission Limit(s) <sup>1</sup>	Reference/Basis	Authority for Requirement
501 502	PM	0.051 lb/MMBtu <sup>2</sup>	40 CFR §60.43b(a)(1)	PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267 PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268
	Opacity	20% <sup>3</sup>	40 CFR §60.43b(f)	
	SO <sub>2</sub>	1.2 lb/MMBtu	40 CFR §60.42b(a), (e), (g)	
		90% reduction <sup>4,5,6</sup>		
NO <sub>x</sub>	0.6 lb/MMBtu <sup>4</sup>	40 CFR §60.44b(a)		

<sup>1</sup> The emission limit is expressed as the average of three (3) runs.

<sup>2</sup> Per 40 CFR §60.46b(a), this limit shall apply at all times, except during periods of startup, shutdown, or malfunction.

<sup>3</sup> Per 40 CFR §60.43b(f), this emission limit is based on a six (6) minute average, except for one 6-minute period per hour of not more than 27%.

<sup>4</sup> Standard is a 30-day rolling average.

<sup>5</sup> Applies when SO<sub>2</sub> at the inlet is greater than 2.0 lb/MMBtu.

<sup>6</sup> The equivalent inlet SO<sub>2</sub> emission rate means the stack emissions (on a lb/MMBtu heat input basis) that would result from the combustion of 'as-fired' coal in the boiler without SO<sub>2</sub> absorption, assuming 100% conversion of sulfur in the coal to SO<sub>2</sub>.

**Table 215. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
501 502	PM / PM <sub>10</sub>	0.03 lb/MMBtu <sup>1</sup>	NAAQS	PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267 PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268
	Opacity	40% <sup>2</sup>	567 IAC 23.3(2)"d"	
		20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	5 lb/MMBtu	LCCO Sec. 10-65(a)(1)(a)	
		1.5 lb/MMBtu	LCCO Sec. 10-65(a)(1)(b)	
		500 ppm <sub>v</sub>	LCCO Sec. 10-65(a)(2)	
		0.45 lb/MMBtu <sup>3,4</sup>	PSD Netting	
	0.20 lb/MMBtu <sup>3,5</sup>			
	NO <sub>x</sub>	0.07 lb/MMBtu <sup>6,7</sup>	Requested limit	
	Lead	0.068 lb/hr	Synthetic minor	
< 1.24x10 <sup>-4</sup> lb/MMBtu				
Beryllium	< 4.56x10 <sup>-5</sup> lb/hr	Synthetic minor		
	< 8.28x10 <sup>-8</sup> lb/MMBtu			
501	SO <sub>2</sub>	1.03 lb/MMBtu <sup>8</sup>	PSD Netting	PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
502	SO <sub>2</sub>	0.94 lb/MMBtu <sup>8</sup>	PSD Netting	PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268
	PM	16.55 lb/hr	Requested limit	LCPH ATI 6132 / PTO 6268
	SO <sub>2</sub>	248.2 lb/hr <sup>3</sup>	PSD Netting	
	VOC	1.45 lb/hr	BACT	
	CO	110.3 lb/hr	BACT	
	Lead	0.07 lb/hr	Synthetic minor	
	Beryllium	8.4x10 <sup>-5</sup> lb/hr		

<sup>1</sup> The emission limit was established to demonstrate compliance with PM<sub>10</sub> National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of the indicator opacity 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).

<sup>3</sup> Standard is a 30-day rolling average.

<sup>4</sup> Applies when SO<sub>2</sub> at the inlet is greater than 2.0 lb/MMBtu.

<sup>5</sup> Applies when SO<sub>2</sub> at the inlet is less than 2.0 lb/MMBtu.

<sup>6</sup> This standard is a 30-day rolling average that includes all periods of operation except for cold startup periods. A cold startup period is defined as that period of time when a coal-fired cogen boiler is increasing the temperature in the lower combustor from less than 400 °F to at least 1,500 °F. This period shall last no more than forty-eight (48) hours and NO<sub>x</sub> emissions data from this period shall be excluded when determining compliance with the permitted emission limit. Ammonia injection shall begin as soon as the lower combustor temperature reaches 1,500 °F and the cold startup period will end at this time. All data from cold startup periods after the first forty-eight (48) hours, or while ammonia is injected in the boiler, will be included in determining compliance with the optimized limit.

<sup>7</sup> The emission limit is based on the "SNCR System Optimization Study Report" for ADM Corn Processing Cedar Rapids Unit #5, prepared January 29, 2004. ADM submitted on September 9, 2012 to satisfy the SNCR optimization study requirement of Conditions 14.C, 14.D, and 14.E of [DNR PSD permits #86-A-090-P1, #86-A-091-P1, and #90-A-083-P1].

<sup>8</sup> Standard is a 3-hour rolling average.

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 216. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
501A / AN / AF 501B / BN / BF 502A / AN / AF	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Db	Industrial-Commercial-Institutional Steam Generating Units	Coal Cogen Boiler	10-62(b)(55)	§60.40b – §60.49b

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. New Source Performance Standards (NESHAP):**

The following subparts apply to the emission unit(s) in this permit:

**Table 217. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
501A / AN / AF	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
501B / BN / BF 502A / AN / AF	DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters	> 100 MMBtu/hr	--	§63.11140 – §63.11145

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.

Authority for Requirement: PSD Permit #86-A-090-P2  
 PSD Permit #86-A-091-P2  
 LCPH ATI 6131 / PTO 6267  
 PSD Permit #90-A-083-P2  
 LCPH ATI 6132 / PTO 6268

**Control Equipment**

A baghouse shall be installed to control particulate matter emissions and a Selective Non-Catalytic Reduction (SNCR) system shall be installed to control NO<sub>x</sub> emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6131 / PTO 6267

A baghouse shall be installed to control particulate matter emissions from [Boiler #3]. A Selective Non-Catalytic Reduction (SNCR) system shall be installed to control NO<sub>x</sub> emissions on Boiler #3. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6132 / PTO 6268

**Operating Limits**

- A. The fuel combusted shall be limited to gas (for startup), oil (for startup), and coal.
- B. The owner or operator must receive an approval from the IDNR central office and Linn County Public Health (LCPH) before a fuel other than specified above is combusted in the boilers. The IDNR and LCPH shall reevaluate the fuel and may impose best available control technology (BACT) emission standards (including a percent reduction requirement) for the fuel type (or combination) in question. Other PSD-related procedures (e.g., dispersion modeling studies) may also be required.
- C. The owner/operator may conduct a study on the boiler to determine the optimized performance of the SNCR system within one year after the startup date. In lieu of submitting a study plan and conducting a study, ADM may submit documentation showing that a boiler is equivalent in design, size and operation to a unit for which an optimization study has already been complete

and approved, and request that the results of the earlier study be applied to the equivalent unit(s). The Department shall review the optimization study and revise the NO<sub>x</sub> emission limit as the Department determines is appropriate so as to reflect optimized performance of the SNCR system as indicated by the SNCR percent NO<sub>x</sub> reduction for the various operating conditions tested. The Department will include a margin of up to twenty percent (20%) to provide for excess emissions over an averaging period adequate to reflect the variability of the operating parameters the Department determines have the dominant impact on emission rates. Prior to initiating the study, ADM shall submit a detailed study plan for IDNR approval including the specific dates of the optimization study and the boiler operation conditions to be tested. The optimization study shall monitor and record, but not limited to, the following items:

1. Reagent injections rates,
2. Boiler NO<sub>x</sub> prior to injection,
3. Reagent injection to boiler NO<sub>x</sub> ratios,
4. Boiler temperature,
5. CO, SO<sub>2</sub>, and chlorine levels prior to injection,
6. Boiler load in MMBtu/hr and percent of rated capacity,
7. Steam generation rate,
8. Bed calcium to sulfur ratios,
9. Fuel type, percent ash and percent sulfur,
10. NO<sub>x</sub> emission rate,
11. SNCR NO<sub>x</sub> emission reduction in percent,
12. Ammonia emission rates, and
13. Opacity.

This information shall be collected or calculated hourly during the study unless otherwise specified in the detailed study plan to be submitted by ADM as approved by the IDNR. In addition, at least three separate visible emission tests shall be conducted for each set of operation/injection conditions identified in the study.

- D. Within one year after beginning operation, the optimization study data and report shall be submitted to the IDNR and LCPH.
- E. ADM shall also submit a summary of study activities with the Quarterly CEM reports covering the same time period as the CEM report.
- F. The owner shall furnish the IDNR and LCPH written reports as follows:
  1. Initial Compliance Demonstration Reports required in Condition 13 [of LCPH ATI 6131 / PTO 6267].
  2. CEMS performance evaluation.
  3. The maximum heat input capacity data from the demonstration of the boiler's maximum heat input capacity.
  4. The owner shall submit a written emissions report to the IDNR central office and LCPH each calendar quarter. Reports shall be submitted to the IDNR and LCPH postmarked no later than 30 days after the end of the calendar quarter starting with the quarter in which initial start-up of the boiler occurs. The report shall include the following:
    - i. Calendar dates covered by the report,
    - ii. Dates and hours of startup, shutdown or malfunction,
    - iii. Type, quality and quantity of fuel combusted,
    - iv. Each hourly SO<sub>2</sub> and NO<sub>x</sub> emissions, a summary of excess opacity emissions and diluent gas emission rate, as well as each operating day's 30-day average SO<sub>2</sub> and

- NO<sub>x</sub>. Emission rate and percent SO<sub>2</sub> reduction determined during the reporting period,
- v. Each instance of excess emissions and of non-standard or manual data collection and how those data were collected. Where data was excluded, exceeded full span of the CEMS or was not available for any other reason, together with reasons for each of these instances of noncompliance and a description of the corrective action taken, and any statistics required pursuant to 40 CFR §60.49b(m),
  - vi. "F" Factor, method of determination and fuel description,
  - vii. Description of any modification to the CEMS and its potential effect on CEMS performance,
  - viii. Results of daily CEMS drift test and quarterly accuracy assessments and related data as required under 40 CFR Part 60, Appendix F,
  - ix. Coal sampling and analysis results,
  - x. Lead (Pb) quarterly test results.
- G. The owner or operator shall record the amount of each fuel combusted during each day and calculate a new annual capacity factor for each fuel type at the end of each calendar month as specified in 40 CFR §60.49b(d).
  - H. The owner or operator shall record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually according to 40 CFR §60.49b(d).
  - I. The owner or operator shall record the net actual electrical output to any utility power distribution system for sale annually, calculated as an average over any three (3) calendar year period.
  - J. The owner or operator shall furnish the IDNR and LCPH with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in [Tables 213, 214, and 215]. This information shall be submitted to the IDNR at least 30 days in advance of construction of any control equipment.

Authority for Requirement: LCPH ATI 6131 / PTO 6267

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. All records as required by [LCPH ATI 6131 / PTO 6267] shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:
- B. The owner or operator shall maintain a record of periods of startup, shutdown, or malfunction. Operating hours shall be averaged on a 12-month basis rolled over monthly.
- C. The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month as specified in 40 CFR §60.49b(d).
- D. The owner or operator shall maintain records of the net actual electrical output to any utility power distribution system for sale annually, calculated as an average over any three (3) calendar year period.

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 fuel combusted in Co-Gen Boiler #1, #2 [(EUs 501A, 501B) and Boiler #3 (EU502A)] shall be limited to natural gas (for startup), distillate oil (for startup), and coal.
- B. The owner or operator must receive an approval from the DNR central office before a fuel other than specified in [Condition A of this section] is combusted in Boiler #1, #2 [(EUs 501A, 501B) and Boiler #3 (EU502A)]. The DNR's approval shall include a re-evaluation of the fuel and may impose Best Available Control Technology (BACT) emission standards (including a percent reduction requirement) for the fuel type, or combination of fuel types, in question. Other PSD-related procedures (e.g., dispersion modeling studies) may also be required.
- C. The owner or operator shall record the amount of each fuel combusted on each operating day and calculate a new annual capacity factor for each approved fuel type on a 12-month rolling average basis, with a new annual capacity factor calculated at the end of each calendar month, as specified in 40 CFR §60.49b(d).
- D. The owner or operator shall record the net actual electrical output to any utility power distribution system for sale annually, calculated as an average over any three (3) calendar year period.
- E. The owner or operator shall maintain a twelve (12) month rolling record of periods of startup, shutdown, or malfunction.
- F. The owner or operator shall submit quarterly written reports to the DNR, to be postmarked no later than 30 days after the end of the calendar quarter, starting with the quarter in which initial startup of Boiler #1, #2 [(EUs 501A, 501B) and Boiler #3 (EU502A)] occurs. Each report shall include the following:
  1. Calendar dates covered by the report;
  2. Dates and hours of startup, shutdown, or malfunction;
  3. Type, quality, and quantity of fuel combusted;
  4. Hourly SO<sub>2</sub> and NO<sub>x</sub> emissions;
  5. A summary of excess emissions, including excess opacity emissions and diluent gas emission rates;
  6. 30-day average SO<sub>2</sub> and NO<sub>x</sub> emission rates for each operating day;
  7. Percent SO<sub>2</sub> reduction;
  8. Non-standard or manual data collection and how those data were collected;
  9. Where data was excluded, exceeded full span of the CEMS, or was not available for any other reason (with reason given for each instance of noncompliance and a description of the corrective actions taken), and any statistics required pursuant to 40 CFR §60.49b(m);
  10. 'F' Factor, method of determination, and fuel description;
  11. Description of any modification to the CEMS and its potential effect on CEMS performance;
  12. Results of daily CEMS drift test and quarterly accuracy assessments and related data, as required under 40 CFR Part 60, Appendix F;
  13. Coal sampling and analysis results; and
  14. Lead (Pb) quarterly test results.

Authority for Requirement: PSD Permit #86-A-090-P2  
 PSD Permit #86-A-091-P2  
 PSD Permit #90-A-083-P2

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 218. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
501	350	V	138	358	403,000 <sup>1</sup>	PSD Permit #86-A-090-P2 PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267
502	350	V	138	358	201,500 <sup>2</sup>	PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268

<sup>1</sup> Flowrate includes exhaust from Boiler #1 and #2.

<sup>2</sup> Flowrate includes exhaust from Boiler #3. Exhaust is assumed to be exactly half of the permitted exhaust flowrate through this stack.

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Continuous Emissions Monitoring Systems (CEMS)**

The owner or operator shall continuously demonstrate compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission limitations and SO<sub>2</sub> percent reduction requirements of this permit, in part, through the use of continuous emission monitoring systems (CEMS). The owner shall install, calibrate, operate, maintain, audit, and record the output from CEMS capable of measuring SO<sub>2</sub>, NO<sub>x</sub>, and the appropriate diluent gas (oxygen or carbon dioxide). The CEMS shall be installed, calibrated, operated, maintained, audited, and data recorded in accordance with the provisions found at 40 CFR §60.13 (Monitoring Requirements); 40 CFR Part 60, Appendix B, Performance Specifications 2 and 3 (Specifications and Test Procedures for SO<sub>2</sub>, NO<sub>x</sub>, and Diluent CEMS); and 40 CFR Part 60, Appendix F (Quality Assurance Requirements for Gas CEMS Used for Compliance Determinations).

The CEMS shall be operated and data recorded during any period fuel is combusted in the boilers. Hourly parts-per-million (ppm) data recorded by the pollutant CEMS shall be converted to pound-pollutant per million Btu (lb/MMBtu) heat input using the equations and methodology specified in 40 CFR Part 60, Appendix A, Method 19 (as it appears in the July 1, 1992, Code of Federal Regulations). Hourly emission rate data shall be recorded and used by the owner or operator to calculate compliance with the applicable emission rates and percent reductions for the specified averaging times.

The owner or operator shall also install, operate, and maintain a fuel sampling and analysis (FSA) system to collect 'as-fired' fuel data. The FSA system shall meet or exceed the design and performance specifications set forth in 40 CFR Part 60, Appendix A, Method 19 (incorporated, by reference, from ASTM Method D2334-76, et al.). As specified by Method 19, at least a minimum number of sample increments shall be collected at a location immediately preceding each day bunker, composited, and analyzed daily. Coal analysis shall be conducted for weight percent sulfur (%S) and gross heat value (GHV, expressed in Btu/lb-coal).

The owner may develop an in-house coal analysis program or may send collected samples to a laboratory for analysis. In either case, the analytical results shall be available to the proposed boiler operator within 72 hours of the sample collection time.

The 'as-fired' fuel data shall be used in conjunction with the SO<sub>2</sub> CEMS emission rate data to determine compliance with the SO<sub>2</sub> 30-day rolling percent reduction limit.

The owner shall calculate an individual SO<sub>2</sub> rate for each bunker, using the %S and GHV obtained through daily FSA, using the following equation:

$$\text{Equivalent SO}_2\text{Inlet Rate} = \frac{\%S \times \text{GHV}}{K}$$

Where,

$$K = 20,000 \times \frac{\text{lb} \times \text{Btu}}{\% \times \text{MMBtu}}$$

If the equivalent SO<sub>2</sub> inlet rates for coal contained in each day bunker which feeds to a single boiler differ by 0.2 lb-SO<sub>2</sub>/MMBtu heat input or less, the arithmetic average of the two equivalent SO<sub>2</sub> inlet rates shall be used as the 'equivalent hourly average SO<sub>2</sub> inlet rate' for each hourly percent reduction calculation during the boiler operation day.

Otherwise, the owner shall: (1) use the smaller of the two equivalent SO<sub>2</sub> inlet rates as the 'equivalent hourly average SO<sub>2</sub> inlet rate' for each hourly percent reduction calculation during the boiler operating day; or (2), calculate an 'equivalent hourly average SO<sub>2</sub> inlet rate' for each hour of operation using the following heat input weighted equation:

$$\text{Equivalent Hourly Average SO}_2\text{Inlet Rate} = \frac{(W_1 \times \%S_1 + W_2 \times \%S_2)}{(W_1 \times \text{GHV}_1 + W_2 \times \text{GHV}_2)} \times K$$

Where,

W<sub>1</sub> = Tons of coal fed to the first pair of day bunkers during the hour;

W<sub>2</sub> = Tons of coal fed to the second of paired day bunkers during the hour;

%S<sub>1</sub> = Weight percent sulfur of coal contained in the first bunker;

%S<sub>2</sub> = Weight percent sulfur of coal contained in the second bunker;

GHV<sub>1</sub>=Gross heating value of coal contained in the first bunker; and  
GHV<sub>2</sub>=Gross heating value of coal contained in the second bunker.

The existing continuous monitoring system for measuring the opacity of emissions discharged into the atmosphere shall be operated and maintained during all periods of operation of the boiler, except for continuous monitoring system breakdowns and repairs. Operation shall be in conformance with 40 CFR §60.48b, which includes recording the output of the system. Reporting and recordkeeping requirements shall be in conformance with 40 CFR §60.49b, which shall include filing a quarterly report of excess emissions, as outlined therein.

Authority for Requirement: PSD Permit #86-A-090-P2  
PSD Permit #86-A-091-P2  
LCPH ATI 6131 / PTO 6267  
PSD Permit #90-A-083-P2  
LCPH ATI 6132 / PTO 6268

<b>Agency Approved Operations &amp; Maintenance Plan Required?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Facility Maintained Operation &amp; Maintenance Plan Required?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Compliance Assurance Monitoring (CAM) Plan Required?</b>	Yes <input checked="" type="checkbox"/> <sup>1</sup>	No <input type="checkbox"/>

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

Compliance Assurance Monitoring requirements for SO<sub>2</sub> and NO<sub>x</sub> emissions are fulfilled by CAM-equivalent monitoring required by PSD Permits #86-A-090-P2, #86-A-091-P2, #90-A-083-P2, LCPH ATI 6131 / PTO 6267, and ATI 6132 / PTO 6268.

**Emission Point ID Number: 502 (Boiler #4)**

**Table 219. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
502	502B	CFBC Boiler #4	Coal	551.5 MMBtu/hr	502B 502C 502E	Baghouse SNCR <sup>1</sup> Limestone Injection
	502BN	Cogen Boiler #4 – Natural Gas	Natural Gas	220,000 cfh		
	502BF	Cogen Boiler #4 – Fuel Oil	Fuel oil	224.4 MMBtu/hr		

B

<sup>1</sup> Selective Non-Catalytic Reduction

**Table 220. Associated Continuous Emissions Monitoring Systems**

SEP	EU	ME	Pollutant	Applicable Specifications <sup>1</sup>	Authority for Requirement
502	502B 502BN 502BF	502B	NO <sub>x</sub>	40 CFR Part 60	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55)
		502E	Diluent O <sub>2</sub>	40 CFR Part 60, Appendix F	
		502G	SO <sub>2</sub>	40 CFR Part 60, Appendix A & B	
		502C	Opacity	40 CFR Part 60	
		502H	Flow	40 CFR Part 60 Appendix F	
		502I	Diluent CO <sub>2</sub>	40 CFR Part 60 Appendix B	

<sup>1</sup> Includes Operational Specifications, Ongoing System Calibration / Quality Assurance, and Reporting & Recordkeeping requirements.

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 221. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
502	PM <sub>10</sub>	0.03 lb/MMBtu <sup>1,2</sup>	BACT	PSD Permit #93-A-324-S1
	NO <sub>x</sub>	0.070 lb/MMBtu <sup>2</sup>		
	CO	0.20 lb/MMBtu <sup>1,2</sup>		
	Fluoride	0.75 lb/hr <sup>1,2</sup>		
		3 tpy <sup>2</sup>		
	SO <sub>2</sub>	0.450 lb/MMBtu <sup>2</sup>	PSD Netting	
		0.94 lb/MMBtu <sup>1,2,3,4</sup>		
	Lead	2.28x10 <sup>-4</sup> lb/MMBtu <sup>2,5</sup>	PSD synthetic minor	
		0.55 tpy <sup>2</sup>		
	Beryllium	1.53x10 <sup>-7</sup> lb/MMBtu <sup>2,6</sup>		
3.68x10 <sup>-4</sup> tpy <sup>2</sup>				

<sup>1</sup> This emission limit is based on a 3-hour average.

<sup>2</sup> The 30-day rolling average standards apply at all times including periods of startup, shutdown or malfunction. All other standards apply at all times except during periods of startup, shutdown or malfunction. The three-month averaging period

for Lead (Pb) shall be rolled over monthly and the twelve-month averaging period for Beryllium (Be) shall be rolled over monthly.

<sup>3</sup> This limit is effective on and after the date the 30-day SO<sub>2</sub> compliance demonstration is completed.

<sup>4</sup> The equivalent inlet SO<sub>2</sub> emission rate means the stack emissions (on a lb/MMBtu heat input basis) that would result from the combustion of "as fired" coal in the boiler without SO<sub>2</sub> absorption, assuming 100% conversion of sulfur in the coal of SO<sub>2</sub>.

<sup>5</sup> This emission limit is based on a 3-month average.

<sup>6</sup> This emission limit is based on a 12-month rolling average.

**Table 222. NSPS and NESHAP Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
502	Opacity	20%	40 CFR §60.43b(f) LCCO Sec. 10-60(a)	PSD Permit #93-A-324-S1 LCPH ATI 6132 / PTO 6268
	SO <sub>2</sub>	90% reduction <sup>1,2</sup>	40 CFR §60.42b	

<sup>1</sup> Reduction applies to the equivalent inlet SO<sub>2</sub> emission rate. The equivalent inlet SO<sub>2</sub> emission rate means the stack emissions (on a lb/MMBtu heat input basis) that would result from the combustion of "as fired" coal in the boiler without SO<sub>2</sub> absorption, assuming 100% conversion of sulfur in the coal to SO<sub>2</sub>.

<sup>2</sup> The 30-day rolling average standards apply at all times including periods of startup, shutdown or malfunction. All other standards apply at all times except during periods of startup, shutdown or malfunction.

**Table 223. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
502	PM	0.6 lb/MMBtu	567 IAC 23.3(2)"b" LCCO Sec. 10-61(b)	LCPH ATI 6132 / PTO 6268
	SO <sub>2</sub>	500 ppm <sub>v</sub>	567 IAC 23.3(3)"e" LCCO Sec. 10-65(a)(2)	
	VOC	1.45 lb/hr	BACT	

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 224. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
502B / BN / BF	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Db	Industrial-Commercial-Institutional Steam Generating Units	--	10-62(b)(55)	§60.40b – §60.49b

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. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 225. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
502B / BN / BF	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters	> 100 MMBtu/hr	--	§63.11140 – §63.11145

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.

Authority for Requirement: PSD Permit #93-A-324-S1  
LCPH ATI 6132 / PTO 6268

**Control Equipment**

A baghouse shall be installed to control particulate matter emissions from [Boiler #4]. A Selective Non-Catalytic Reduction (SNCR) system shall be installed to control NO<sub>x</sub> emissions on [Boiler #4]. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Continuous Emission Monitoring and Fuel Sampling Analysis section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6132 / PTO 6268

**Operating Limits**

The boiler fuel is restricted to coal, with gas or oil startup. The owner must receive the approval of the DNR central office before a fuel other than coal is combusted in the boiler. The agency may impose best available control technology (BACT) emission standards (including a percent reduction requirement) for the fuel type (or combination) in question even if an emissions reduction will occur with the other fuel type(s). Other PSD-related procedures (e.g., dispersion modeling studies) may also be required.

Authority for Requirement: PSD Permit #93-A-324-S1

**Operating Condition Monitoring**

For [CFBC Boiler #4], the owner shall maintain a record of periods of startup, shutdown or malfunction. Operating hours shall be averaged on a 12-month basis rolled over monthly.

Authority for Requirement: PSD Permit #93-A-324-S1

**Notification, Reporting and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 shall furnish the IDNR written notification of the following conditions:

1. Any usage of this source contrary to those limitations specified in [Tables 221, 222, and 223] as required by [Chapter 21] of the IAC.
  2. The date that construction of the boiler has begun postmarked within seven (7) days of that date.
  3. The anticipated date of initial startup of the proposed boiler, postmarked not more than sixty (60) days nor less than thirty (30) days prior to such date.
  4. The actual date of start of operation postmarked within fifteen (15) days following the start of operation.
  5. The anticipated date of each performance test postmarked not more than forty-five (45) days nor less than thirty (30) days prior to the date of the test.
  6. The actual date of installation and startup of each CEMS required herein, postmarked within fifteen (15) days of completion.
  7. The anticipated dates of the operational test period, test protocol, and daily schedule of the monitor tests postmarked thirty (30) days prior to such activities.
- B. The owner shall furnish the IDNR written reports as follows:
1. Initial Compliance Demonstration Reports required in Condition #12 [of PSD Permit #93-A-324-S1].
  2. The owner shall submit a written emissions report to the IDNR central office each calendar quarter. Reports shall be submitted to the IDNR postmarked no later than 30 days after the end of the calendar quarter starting with the quarter in which initial start-up of the boiler occurs.

The report shall include the following:

- i. Calendar dates covered by the report,
- ii. Dates and hours of startup, shutdown or malfunction,
- iii. Type, quality and quantity of fuel combusted,
- iv. Each hourly SO<sub>2</sub>, NO<sub>x</sub>, opacity and diluent gas emission rate as well as each operating day's 30-day average SO<sub>2</sub>, and NO<sub>x</sub> emission rate and percent SO<sub>2</sub> reduction determined during the reporting period,
- v. Each instance of excess emissions, and of non-standard or manual data collection and how those data were collected. Where data was excluded, exceeded full span of the CEMS or was not available for any other reason, together with reasons for each of these instances of noncompliance and a description of the corrective actions taken, and any statistics required pursuant to 40 CFR §60.49b(m).
- vi. "F" factor, method of determination and fuel description,
- vii. Description of any modification to the CEMS and its potential effect on CEMS performance,
- viii. Results of daily CEMS drift test and quarterly accuracy assessments and related data as required under 40 CFR Part 60, Appendix F,
- ix. Coal sampling and analysis results, [and]
- x. PM<sub>10</sub>, Lead (Pb) and Beryllium (Be) quarterly test results.

All data, records, reports, documentation, 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 three (3) years from the date of recording.

- C. The owner shall furnish the [DNR] with construction plans as follows:

1. Final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in Condition 8 [of PSD Permit #93-A-324-S1] shall be submitted to the [DNR] at least 30 days in advance of construction of any control equipment.
- D. All notifications, reports and correspondence except items concerning emission testing shall be sent to [the current Iowa DNR Air Quality Bureau reporting address].
- E. All emissions testing notifications, reports and correspondence shall be sent to [the current Iowa DNR Air Quality Bureau reporting address].

Authority for Requirement: PSD Permit #93-A-324-S1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 226. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
502	350	V	138	320	201,500 <sup>1</sup>	PSD Permit #93-A-324-S1

<sup>1</sup> Flowrate includes exhaust from Boiler #4. Exhaust is assumed to be exactly half of the permitted exhaust flowrate.

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Continuous Emission Monitoring and Fuel Sampling Analysis**

For [CFBC Boiler #4].

- A. SO<sub>2</sub> and NO<sub>x</sub>

The owner shall continuously demonstrate compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission limitations and SO<sub>2</sub> percent reduction requirements of this permit through the use of a continuous emission monitoring system (CEMS) and a fuel sampling and analysis (FSA) system. These systems shall be installed, operating and calibrated prior to beginning the initial compliance demonstration set forth in [Condition 12 of PSD Permit #93-A-324-S1] according to 40 CFR §60.13.

In the case where a CEMS is to be used as the test method for demonstrating compliance, the performance certification report shall be submitted to IDNR prior to initiating the facility compliance testing.

Compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission rate limitation and the SO<sub>2</sub> percent reduction requirements shall be calculated as the average of all valid hourly emission rate data and valid hourly SO<sub>2</sub> percent reduction data for the 30 previous boiler operating days during which each standard applies. The owner or operator shall calculate a new 30-day average at the end of each boiler operating day.

Unless otherwise approved by the Department, the selection of CEMS span value (maximum data display output) for each parameter shall be those specified in Subpart Db of the Code of Federal Regulations.

In addition to the provisions of 40 CFR Part 60, Appendix B, the performance specifications applicable to the CEMS required by the permit shall include a data recovery requirement of 90% and shall meet precision and accuracy requirements of 10% of the applicable standard respective, unless otherwise specified in the permit. When the minimum data requirements of the permit cannot be obtained, the methods and procedures of 40 CFR §60.47b(c) and §60.48b(f) shall be employed by the owner to obtain the required data.

#### 1. 30-Day Rolling NO<sub>x</sub> and SO<sub>2</sub> Emission Rate Compliance

The owner shall install, calibrate, operate, maintain, audit, and record the output from CEMS capable of measuring SO<sub>2</sub>, NO<sub>x</sub>, and the appropriate diluent gas (oxygen or carbon dioxide). The CEMS shall be installed, calibrated, operated, maintained, and audited. Data shall be recorded in accordance with the provisions found at 40 CFR §60.13 (Monitoring Requirements); 40 CFR Part 60, Appendix B, Performance Specifications 2 and 3 (Specification and Test Procedures for SO<sub>2</sub>, NO<sub>x</sub>, and diluent CEMS); and 40 CFR Part 60, Appendix F (Quality Assurance Requirements for Gas CEMS Used for Compliance Demonstrations), as adopted by the Department for reference.

The CEMS shall be operated and data recorded during any period any fuel is combusted in the boiler. Hourly parts-per-million data recorded by the pollutant CEMS shall be converted to pound of pollutant per million Btu (lb/MMBtu) heat input using the equations and methodology specified in 40 CFR Part 60, Appendix A, Method 19 (as it appears in the July 1, 1992, Code of Federal Regulations). Hourly emission rate data shall be recorded and used by the owner/operator to calculate compliance with the applicable emission rates and percent reductions for the specified averaging times.

The owner shall successfully complete SO<sub>2</sub> and NO<sub>x</sub> CEMS performance evaluations including relative accuracy and calibration drift assessment evaluations prior to beginning the initial compliance demonstration.

#### 2. SO<sub>2</sub> Percent Reduction Compliance

The owner shall install, calibrate, operate, and maintain a fuel sampling and analysis (FSA) system to collect "as fired" fuel data. The FSA system shall meet or exceed the design and performance specifications set forth in 40 CFR Part 60, Appendix A, Method 19 (incorporating by reference of ASTM Method D2234-76, et al.).

Analyses shall be performed for weight percent sulfur (%S) and gross heat value (GHV, expressed in Btu/lb-coal). The owner may develop an in-house coal analysis program or may send collected samples to a laboratory for analysis. In either case, the analytical results shall be available to the proposed boiler operator within 72 hours of the sample collection time.

The "as fired" fuel data shall be used to determine the equivalent hourly average SO<sub>2</sub> inlet rate to the boiler, and shall be used in conjunction with the SO<sub>2</sub> CEMS emission rate data to determine compliance with the SO<sub>2</sub> 30-day rolling percent reduction limit.

The owner shall calculate an equivalent SO<sub>2</sub> rate for each bunker using the weight percent sulfur and the gross heating value obtained through daily FSA, using the following equation:

$$\text{Equivalent SO}_2, \text{ inlet rate of individual bunker} = \frac{\%S}{GHV} K$$

Where,

$$K = 20,000 \frac{\text{lb x Btu}}{\% \text{ x MMBtu}}$$

If the equivalent inlet SO<sub>2</sub> rate for coal contained in each day bunker which feeds to a single boiler differ by 0.2 lb-SO<sub>2</sub>/MMBtu heat input or less, the arithmetic average of the two equivalent SO<sub>2</sub> inlet rates shall be used as the "equivalent hourly average SO<sub>2</sub> inlet rate" for each hourly percent reduction calculation during the boiler operation day.

Otherwise, the owner shall: (1) use the smaller of the two equivalent SO<sub>2</sub> inlet rates as the "equivalent hourly average SO<sub>2</sub> inlet rate" for each hourly percent reduction calculation during the boiler operating day or (2) calculate an "equivalent hourly average SO<sub>2</sub> inlet rate" for each hour of operation using the following heat input weighted equation:

$$\text{Equivalent hourly average SO}_2, \text{ inlet rate} = \frac{W_2 \times \%S_1 + W_1 \times \%S_2}{W_1 \times GHV_1 + W_2 \times GHV_2} K$$

Where,

W<sub>1</sub> = Tons of coal fed to first of paired day bunkers during hour

W<sub>2</sub> = Tons of coal fed to the second of paired day bunkers during hour

%S<sub>1</sub> = Weight percent sulfur of coal contained in first bunker

%S<sub>2</sub> = Weight percent sulfur of coal contained in second bunker

GHV<sub>1</sub> = Gross heating value of coal contained in first bunker

GHV<sub>2</sub> = Gross heating value of coal contained in second bunker

K = 20,000 (lb x Btu) / (% x MMBtu)

#### B. Particulate (PM<sub>10</sub>)

The existing continuous monitoring system for measuring the opacity of emissions discharged into the atmosphere shall be operated, and maintained during all periods of operation of the boiler except for continuous monitoring system breakdowns and repairs. Operation shall be in conformance with 40 CFR §63.48b, which includes recording the output of the system. Reporting and recordkeeping requirements shall be in conformance with 40 CFR §60.49b, which shall include filing a quarterly report of excess emissions as outlined therein.

C. Lead (Pb) and Beryllium (Be)

Coal samples shall be analyzed for Lead (Pb) and Beryllium (Be) and the results submitted in writing to the IDNR on a quarterly basis. Fuel Sampling shall be conducted as specified in [Condition A.2 of this section]. Sample Analysis for Lead (Pb) and Beryllium (Be) shall be performed as specified in SW-846 Method 6010. The test results shall be reported as specified in [Condition B.2 of the Notification, Reporting and Recordkeeping section above].

Authority for Requirement: PSD Permit #93-A-324-S1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

Compliance Assurance Monitoring requirements for SO<sub>2</sub> and NO<sub>x</sub> emissions are fulfilled by CAM-equivalent monitoring required by PSD Permit #93-A-324-S1 and LCPH ATI 6132 / PTO 6268.

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**Emission Point ID Number: 503****Table 227. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
503	503A	1-4 Coal Bunkers	Coal	600 tph	503	Baghouse
	503B	Coal Receiving Fines Blower	Coal	760 cfm		

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 228. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement	
503	PM	0.1 gr/dscf	567 567 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 6163 / PTO 6235	
		0.01 gr/dscf	BACT	PSD Permit #86-A-093 LPCH ATI 6163 / PTO 6235	
	PM / PM <sub>10</sub>	2.41 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 6163 / PTO 6235	
	PM <sub>10</sub>	14.4 tpy <sup>2</sup>	PSD synthetic minor		
	Opacity		0% <sup>3</sup>	BACT	PSD Permit #86-A-093
			5% <sup>4</sup>		
			20%	40 CFR §60.252 LCCO Sec. 10-60(a)	PSD Permit #86-A-093 LCPH ATI 6163 / PTO 6235 LCPH ATI 6163 / PTO 6235

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> This emission limit is a PSD Synthetic minor limit that was established for this project which includes EP503, EP514 and EP515. Compliance with this annual emission limit is demonstrated pursuant to [Condition G of the Operating Condition Monitoring and Recordkeeping section below].

<sup>3</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>4</sup> At the pick-up point(s).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

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

The following subparts apply to the emission unit(s) in this permit:

**Table 229. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
503	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Y	Coal Preparation and Processing Plants	--	10-62(b)(22)	§60.250 – §60.258

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.

Authority for Requirement: LCPH ATI 6163 / PTO 6235

**Control Equipment**

A baghouse shall be installed to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6163 / PTO 6235

**Operating Limits**

- A. The pressure differential across the baghouse shall be between 0.5 inches of water column and 8.0 inches of water column.
- B. The control equipment on this unit shall be maintained according to the manufacturer's specifications and good operating practices.
- C. This facility shall meet all applicable requirements of 40 CFR 60 (NSPS Subpart A) to comply with [LCCO Sec. 10-62(b)].
- D. This facility shall meet the applicable standards for coal processing and conveying equipment, coal storage systems, transfer and loading systems, and open storage piles of 40 CFR §60.254 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- E. This facility shall meet the performance tests and other compliance requirements of 40 CFR §60.255 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- F. This facility shall meet the test methods and procedures of 40 CFR §60.257 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- J. The owner or operator of this equipment shall comply with the operational limits and requirements listed in IDNR PSD permit 86-A-093.<sup>1</sup>

Authority for Requirement: LCPH ATI 6163 / PTO 6235

<sup>1</sup> Note, Conditions G, H, and I from LCPH ATI 6163 / PTO 6235 were omitted from this operating permit because the established 10 year monitoring period for Project 1722 has passed and these conditions no longer apply. While omitted here for simplicity, these conditions still exist in the associated permits.

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The owner or operator shall record all maintenance and repair completed on the control device.
- C. The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis.
- D. Notification and recordkeeping requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.7.
- E. General notification and reporting requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.19.
- I. The owner or operator of this equipment shall comply with the monitoring and recordkeeping requirements listed in IDNR PSD permit 86-A-093.<sup>1</sup>

Authority for Requirement: LCPH ATI 6163 / PTO 6235

<sup>1</sup> Note, Conditions F, G, and H from LCPH ATI 6163 / PTO 6235 were omitted from this operating permit because the established 10 year monitoring period for Project 1722 has passed and these conditions no longer apply. While omitted here for simplicity, these conditions still exist in the associated permits.

**Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

**Description**

Emission point SEP503 (1-4 Coal Bunkers) is currently permitted to exhaust at a rate of 30,000 scfm; however, stack testing in July 2010, and October 2017, were performed at approximately 18,000 to 20,000 scfm. Pursuant to DNR policy, a difference of ±25% of the flowrate requires the owner or operator to submit a request to determine if a permit amendment is required or submit a permit application requesting to amend the permit. This change needs to be addressed in the local construction permit for SEP503 (LCPH ATI 6163 / PTO 6235).

**Condition**

The permittee shall apply for a construction permit from Linn County Public Health within six months of the issuance of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 230. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
503	165	V	36	103	20,000	PSD Permit #86-A-093 LCPH ATI 6163 / PTO 6235

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 6163 / PTO 6235

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 504****Table 231. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
504	504	Crusher Building D.C. System	Coal	1,800 tph	504	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 232. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
504	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
		0.01 gr/dscf	BACT	PSD Permit #86-A-092
	PM / PM <sub>10</sub>	2.18 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 5801 / PTO 5970
	Opacity	0% <sup>2</sup>	BACT	PSD Permit #86-A-092
		5% <sup>2</sup>		
20% <sup>2</sup>		40 CFR §60.254(a) LCCO Sec. 10-60(a)	LCPH ATI 5801 / PTO 5970	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions from the stack or 5% from the pick-up point(s) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

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

The following subparts apply to the emission unit(s) in this permit:

**Table 233. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
504	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Y	Coal Preparation and Processing Plants	--	10-62(b)(22)	§60.250 – §60.258

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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.

Authority for Requirement: LCPH ATI 5801 / PTO 5970

### **Control Equipment**

A baghouse shall be installed to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5801 / PTO 5970

### **Operating Limits**

- A. The pressure differential across the baghouse shall be between 0.5 inches of water column and 8.0 inches of water column.
- B. The control equipment on this unit shall be maintained according to the manufacturer's specifications and good operating practices.
- C. This facility shall meet all applicable requirements of 40 CFR 60 (NSPS Subpart A) to comply with [LCCO Sec. 10-62(b)].
- D. This facility shall meet the applicable standards for coal processing and conveying equipment, coal storage systems, transfer and loading systems, and open storage piles of 40 CFR §60.254 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- E. This facility shall meet the performance tests and other compliance requirements of 40 CFR §60.255 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- F. This facility shall meet the test methods and procedures of 40 CFR §60.257 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].

Authority for Requirement: LCPH ATI 5801 / PTO 5970

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The differential pressure across the baghouse shall be monitored and recorded on a weekly basis.
- C. Maintain records of all maintenance completed on the control device.
- D. Notification and recordkeeping requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.7.
- E. General notification and reporting requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.19.

Authority for Requirement: LCPH ATI 5801 / PTO 5970

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 234. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
504	61	V	36	58	25,000	LCPH ATI 5801 / PTO 5970

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5801 / PTO 5970

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 505****Table 235. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
505	505	Limestone Unloading Dust Collector	Limestone	250 tph	505	Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 236. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
505	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 5802 / PTO 5971
	PM / PM <sub>10</sub>	2.18 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be installed to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5802 / PTO 5971

**Operating Limits**

- A. The differential pressure across the baghouse shall be between 0.5 inches of water column and 8.0 inches of water column.

Authority for Requirement: LCPH ATI 5802 / PTO 5971

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The differential pressure across the baghouse shall be monitored and recorded on a weekly basis.
- C. All maintenance performed on the control device shall be recorded.

Authority for Requirement: LCPH ATI 5802 / PTO 5971

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 237. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
505	150	V	36	58	25,000	LCPH ATI 5802 / PTO 5971

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5802 / PTO 5971

- Agency Approved Operations & Maintenance Plan Required?** Yes  No
- Facility Maintained Operation & Maintenance Plan Required?** Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 506****Table 238. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
506	506	Fly Ash Conveying D.C. System A	Ash	55 tph	506	Baghouse
	507	Fly Ash Conveying D.C. System B	Ash	55 tph	507	Baghouse
	509	Bed Ash Conveying D.C. System A	Ash	15 tph	509	Baghouse
	510	Bed Ash Conveying D.C. System B	Ash	15 tph	510	Baghouse
	520	Fly Ash Conveying D.C. System C	Ash	55 tph	520	Baghouse
	541	Bed Ash Conveying D.C. System C	Ash	15 tph	509 510	Baghouse Baghouse

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 239. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
506	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
		0.02 gr/dscf	BACT	PSD Permit #86-A-096 PSD Permit #88-A-023 PSD Permit #86-A-099
	Opacity	0% <sup>1</sup>	BACT	PSD Permit #86-A-100 LCPH ATI 5803 / PTO 5972R1
	PM / PM <sub>10</sub>	1.95 lb/hr <sup>2</sup>	NAAQS	LCPH ATI 5803 / PTO 5972R1
	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)

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<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>2</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits and Requirements**

At no time shall more than two of the following three emission units operate simultaneously: EU506, EU507, and EU520.

Authority for Requirement: PSD Permit #88-A-023  
PSD Permit #86-A-096

At no time shall more than two of the following three emission units operate simultaneously: EU509, EU510, and EU541.

Authority for Requirement: PSD Permit #86-A-099  
PSD Permit #86-A-100

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The baghouses (CEs 506, 507, 509, 510, and 520) shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance performed on the control equipment.
- C. The differential pressure across each baghouse (CEs 506, 507, 509, 510, and 520) shall be maintained between 0.5" and 8.0" of water column. The owner or operator shall monitor and record the differential pressure across each baghouse on a weekly basis.

Authority for Requirement: LCPH ATI 5803 / PTO 5972R1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 240. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
506	145	V	16	160	13,350	LCPH ATI 5803 / PTO 5972R1

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5803 / PTO 5972R1

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

**Emission Point ID Number: 508, 511, 534, 538**

**Table 241. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
508	508	Fly Ash Silo Vent Dust Collection	Ash	110 tph	508	Baghouse
511	511	Bed Ash Silo Vent Dust Collection	Ash	85 tph	511	Baghouse
534	534	Boiler #5 Fly Ash Silo Vent	Ash	30 tph	534	Baghouse
538	538	Boiler #5 Bed Ash Silo Vent	Ash	14 tph	538	Baghouse

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 242. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
508 511	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
534 538	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)

**Table 243. BACT Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
534 538	PM / PM <sub>10</sub>	0.012 gr/dscf	BACT	PSD Permit #98-A-511-P2 LCPH ATI 3733 / PTO 4737
	PM <sub>10</sub>	0.21 lb/hr <sup>1</sup>	NAAQS	PSD Permit #98-A-515-P2 LCPH ATI 3729 / PTO 4733
	Opacity	10%	BACT	

<sup>1</sup> Emission rate used to demonstrate the boiler project was below PSD significant impact levels for PM<sub>10</sub>.

**Table 244. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
508 511	PM Opacity	0.02 gr/dscf 0%	BACT	PSD Permit #86-A-095 PSD Permit #86-A-097
508	PM	0.0013 gr/dscf 0.00013 lb/hr	Requested limit	LCPH ATI 2079 / PTO 2008
511	PM	0.006 gr/dscf 0.0005 lb/hr	Requested limit	LCPH ATI 2076 / PTO 2006

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

## Control Equipment

A [baghouse] shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 3733 / PTO 4737  
LCPH ATI 3729 / PTO 4733

## Emission Point Characteristics

*The emission points shall conform to the specifications listed below.*

**Table 245. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
534	127	H	24 x 48	70	2,100	LCPH ATI 3733 / PTO 4737
538	127	H	24 x 48	70	2,100	LCPH ATI 3729 / PTO 4733

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 flowrate 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.

## Monitoring Requirements

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1,2</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

<sup>1</sup> Applies to SEP534 and SEP538.

<sup>2</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 512, 513****Table 246. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
512	512	Cogen Limestone Silo (East)	Limestone	250 tph	512	Bin Vent Filter
513	513	Cogen Limestone Silo (West)	Limestone	250 tph	513	Bin Vent Filter

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 247. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
512	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 6730 / PTO 6611 LCPH ATI 6729 / PTO 6612
513	PM <sub>10</sub>	0.086 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

---

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A bin vent filter shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [Operating Limits section below] shall be installed, maintained and operating during the operation of the emission unit and control equipment at all times.

Authority for Requirement: LCPH ATI 6730 / PTO 6611  
LCPH ATI 6729 / PTO 6612

**Operating Limits**

- A. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.
- B. The differential pressure across the bin vent filter shall be 0.2 inches of water column to 6 inches of water column.

Authority for Requirement: LCPH ATI 6730 / PTO 6611  
 LCPH ATI 6729 / PTO 6612

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Record all maintenance and repair completed on the control device.
- C. Monitor and record differential pressure across the bin vent filter on a weekly basis.

Authority for Requirement: LCPH ATI 6730 / PTO 6611  
 LCPH ATI 6729 / PTO 6612

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 248. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
512	138	H	7.5 x 10	Amb.	1,000	LCPH ATI 6730 / PTO 6611
513	138	H	7.5 x 10	Amb.	1,000	LCPH ATI 6729 / PTO 6612

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 6730 / PTO 6611  
 LCPH ATI 6729 / PTO 6612

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 514, 515**

**Table 249. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
514 515	514	Cogen Coal Unloading	Coal	1,200 tph	514	Baghouse

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 250. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
514 515	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 6108 / PTO 6236
	Opacity	20% <sup>1</sup>	40 CFR §60.254(a) LCCO Sec. 10-60(a)	LCPH ATI 6120 / PTO 6237

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

**Table 251. Specific Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
514 515	PM	0.18 tpy <sup>1</sup>	BACT	DNR Permit #86-A-094
	PM / PM <sub>10</sub>	1.6 lb/hr <sup>2</sup>	NAAQS	LCPH ATI 6108 / PTO 6236
	PM <sub>10</sub>	14.4 tpy <sup>3</sup>	PSD Synthetic Minor	LCPH ATI 6120 / PTO 6237
	Opacity	10% <sup>4</sup>	BACT	DNR Permit #86-A-094 LCPH ATI 6108 / PTO 6236 LCPH ATI 6120 / PTO 6237

<sup>1</sup> This emission limit was established as a Lowest Achievable Emission Rate (LAER) prior to the installation of the baghouse (CE514). This emission limit applies to fugitive emissions only.

<sup>2</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>3</sup> This emission limit is a PSD synthetic minor limit that was established for this project, which includes EP503, EP514, and EP515. Compliance with this annual emission limit is demonstrated pursuant to [Condition G of the Operating Condition Monitoring and Recordkeeping section] of this permit.

<sup>4</sup> The 10% opacity limit applies only to fugitive emissions from the Dump Pit pursuant to DNR Permit #86-A-094.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 252. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
514	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Y	Coal Preparation and Processing Plants	--	10-62(b)(22)	§60.250 – §60.258

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.

Authority for Requirement: LCPH ATI 6108 / PTO 6236  
LCPH ATI 6120 / PTO 6237

**Control Equipment**

A baghouse shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Limits section below] shall be installed, maintained and operating during the operation of the emission unit and control equipment at all times.

Authority for Requirement: LCPH ATI 6108 / PTO 6236  
LCPH ATI 6120 / PTO 6237

**Operating Limits**

- A. This source shall be limited to a total of 5,280 hours of operation per 12-month rolling period.
- B. The differential pressure across the baghouse shall be 0.5 inches of water column to 8 inches of water column.
- C. This facility shall meet all applicable requirements of 40 CFR §60.1 through 40 CFR §60.19 (NSPS Subpart A) to comply with [LCCO Sec. 10-62(b)].
- D. This facility shall meet the applicable standards for coal processing and conveying equipment, coal storage systems, transfer and loading systems, and open storage piles of 40 CFR §60.254 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- E. This facility shall meet the performance test and other compliance requirements of 40 CFR §60.255 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- F. This facility shall meet the test methods and procedures of 40 CFR §60.257 (NSPS Subpart Y) to comply with [LCCO Sec. 10-62(b)(22)].
- J. The owner or operator of this equipment shall comply with the federally enforceable requirements listed in Iowa DNR Permit #86-A-094.<sup>1</sup>

Authority for Requirement: LCPH ATI 6108 / PTO 6236  
LCPH ATI 6120 / PTO 6237

<sup>1</sup> Note, Conditions G, H, and I from LCPH ATI 6108 / PTO 6236 and LCPH ATI 6120 / PTO 6237 were omitted from this operating permit because the established 10 year monitoring period for Project 1722 has passed and these conditions no longer apply. While omitted here for simplicity, these conditions still exist in the associated permits.

### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The owner or operator shall calculate and record the average hours of operation of the coal dump pit dust collection system on a monthly basis.
- C. The owner or operator shall record all maintenance and repair completed on the control device.
- D. The owner or operator shall monitor and record the differential pressure across the baghouse on a weekly basis.
- E. Notification and recordkeeping requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.7.
- F. General notification and reporting requirements for NSPS Subpart A shall be done in accordance with 40 CFR §60.19.
- I. The owner or operator of this equipment shall comply with the monitoring and recordkeeping requirements listed in Iowa DNR Permit #86-A-094.<sup>1</sup>

Authority for Requirement:     LCPH ATI 6108 / PTO 6236  
   LCPH ATI 6120 / PTO 6237

<sup>1</sup> Note, Conditions F, G, and H from LCPH ATI 6108 / PTO 6236 and LCPH ATI 6120 / PTO 6237 were omitted from this operating permit because the established 10 year monitoring period for Project 1722 has passed and these conditions no longer apply. While omitted here for simplicity, these conditions still exist in the associated permits.

### **Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 253. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
514	85	V	52	70	75,000	LCPH ATI 6108 / PTO 6236
515	85	V	52	70	75,000	LCPH ATI 6120 / PTO 6237

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement:    LCPH ATI 6108 / PTO 6236  
  LCPH ATI 6120 / PTO 6237

**Agency Approved Operations & Maintenance Plan Required?**                    Yes         No

**Facility Maintained Operation & Maintenance Plan Required?**                    Yes         No

**Compliance Assurance Monitoring (CAM) Plan Required?**                        Yes <sup>1</sup>        No

Authority for Requirement:    567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 521****Table 254. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
521	521	Cogen HCl and Neutralization Tanks	HCl	10,000 gph	521A 521B	Venturi Scrubber Neutralization Tank Spray Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 255. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
521	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-60(a)	LCPH ATI 4943 / PTO 5306
	PM / PM <sub>10</sub>	0.26 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A venturi and a spray scrubber shall be used to control HCl emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4943 / PTO 5306

**Operating Limits**

A. Fresh water flow to the spray scrubber shall be maintained at 3 gallons per minute or greater.

Authority for Requirement: LCPH ATI 4943 / PTO 5306

## Operating Condition Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Record the fresh water flow to the spray scrubber on a daily basis.
- B. Monitor and record "no visible emissions" observations on a weekly basis.
- C. Record all maintenance and repairs completed on the control devices.

Authority for Requirement: LCPH ATI 4943 / PTO 5306

## Emission Point Characteristics

*The emission point shall conform to the specifications listed below.*

**Table 256. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
521	24	V	16	65	300	LCPH ATI 4943 / PTO 5306

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 flowrate 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.

## Monitoring Requirements

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

### Opacity Monitoring

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4943 / PTO 5306

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on-site for at least 5 years. The plans and associated

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recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 522, 539****Table 257. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
522	522	Cogen Turbine Lube Oil Tanks No. 1-5	Lube Oil	19,800 gph	522	Smog Hog
539	539	Cogen Turbine Lube Oil Tank No. 6	Lube Oil	2,810 gal	539	Smog Hog

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 258. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
522 539	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)
10%		LCCO Sec. 10-58(c)(3)	LCPH ATI 4092 / PTO 4035 LCPH ATI 4093 / PTO 4293	

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A "Smog Hog" industrial air cleaner shall be used to control particulate emissions. This unit shall be operated and maintained according to the manufacturer's specifications.

Authority for Requirement: LCPH ATI 4092 / PTO 4035

A Smog-Hog Air Cleaning System (SH-10-PE-XB) shall be used to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4093 / PTO 4293

**Operating Limits**

A. The oil tank shall not exceed 2,810 gallons.

Authority for Requirement: LCPH ATI 4093 / PTO 4293

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 log of operation shall be maintained for the operation of the above listed unit.

- A. Amount of oil consumed tracked on a 12-month rolling total.

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 4093 / PTO 4293

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 259. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
539	20	H	12	110	150	LCPH ATI 4093 / PTO 4293

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1,2</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Applies to EP522.

<sup>2</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

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Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 530**

**Table 260. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
530	530A	ACFBC Boiler #5	Coal	1,500 MMBtu/hr	530A 530B 530C	Baghouse SNCR <sup>1</sup> Limestone Injection
	530AN	ACFBC Boiler #5 – Natural Gas	Natural Gas	0.28 MMcf/hr		
	530AF	ACFBC Boiler #5 – Fuel Oil	Fuel Oil	285.6 MMBtu/hr		

<sup>1</sup> Selective Non-Catalytic Reduction.

**Table 261. Associated Continuous Emissions Monitoring Systems**

SEP	EU	ME	Pollutant	Applicable Specifications <sup>1</sup>	Authority for Requirement
530	530A 530AN	530A	SO <sub>2</sub>	40 CFR Part 60	40 CFR §60.47b 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55)
		530B	NO <sub>x</sub>	40 CFR Part 60 Appendix F	
		530D	Diluent O <sub>2</sub>	40 CFR Part 60 Appendix A & B	
		530C	Opacity	40 CFR Part 60	
		530E	Flow	40 CFR Part 60 Appendix F	
		530F	Diluent CO <sub>2</sub>	40 CFR Part 60 Appendix B	

<sup>1</sup> Includes Operational Specifications, Ongoing System Calibration / Quality Assurance, and Reporting & Recordkeeping requirements.

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 262. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
530	PM	0.015 lb/MMBtu	BACT	PSD Permit #98-A-507-P2 LCPH ATI 5096 / PTO 5045
	PM <sub>10</sub>	0.03 lb/MMBtu		
	SO <sub>2</sub>	0.36 lb/MMBtu <sup>1</sup>		
		92% reduction <sup>2</sup>		
	NO <sub>x</sub>	0.07 lb/MMBtu <sup>3,4</sup>		
	VOC	0.0072 lb/MMBtu		
	CO	0.15 lb/MMBtu		
	Lead	0.000228 lb/MMBtu <sup>5</sup>		
Fluoride	0.00124 lb/MMBtu			

<sup>1</sup> This standard is a 30-day rolling average that includes periods of startup, shutdown and malfunction.

<sup>2</sup> This reduction is in the equivalent inlet SO<sub>2</sub> emission rate. The equivalent inlet SO<sub>2</sub> emission rate means the stack emissions (on a lb/MMBtu heat input basis) that would result from the combustion of "as fired" fuels in the boiler without SO<sub>2</sub> absorption, assuming 100% conversion on sulfur in the fuels to SO<sub>2</sub>.

<sup>3</sup> This standard is a 30-day rolling average that includes all periods of operation except for cold startup periods. A cold startup period is defined as that period of time when a coal-fired cogen boiler is proceeding to increase the temperature in the

lower combustor from less than 400 °F to at least 1,500 °F. This period shall last no more than forty-eight (48) hours and NO<sub>x</sub> emissions data from this period shall be excluded when determining compliance with the permitted emission limit. Ammonia injection shall begin as soon as the lower combustor temperature reaches 1,500 °F and the cold startup period will end at this time. All data from cold startup periods after the first forty-eight (48) hours, or while ammonia is injected in the boiler, will be included in determining compliance with the optimized limit.

<sup>4</sup> This emission limit is waived for the specific SNCR optimization study activity as detailed in [the Operating Limits section below] not to extend more than 380 days after the Initial Compliance Demonstration of Condition 12 [of PSD Permit #98-A-507-P2].

<sup>5</sup> This standard is a three (3) month rolling average.

**Table 263. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
530	PM	22 ng/J <sup>1</sup>	40 CFR Part 60, Subpart Db 567 IAC 23.1(2)"ccc" LCCO Sec. 10-62(b)(55)	PSD Permit #98-A-507-P2 LCPH ATI 5096 / PTO 5045
	Opacity	20% <sup>2</sup>		
	SO <sub>2</sub>	674.88 lb/hr <sup>3</sup>		
		Calculated <sup>4</sup>		
NO <sub>x</sub>	260 ng/J <sup>5</sup>			

<sup>1</sup> 22 ng/J = 0.051 lb/MMBtu.

<sup>2</sup> Opacity shall not exceed 20% (6-minute average), except for one (1) 6-minute period per hour of not more than 27% opacity.

<sup>3</sup> Emission rate used to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS).

<sup>4</sup> SO<sub>2</sub> emission limit is determined by the following formula:  $E_S = (K_a H_a + K_b H_b) / (H_a + H_b)$ ,

Where: E<sub>s</sub> is the SO<sub>2</sub> emission limit (in either ng/J or lb/MMBtu heat input);

K<sub>a</sub> is 520 ng/J or 1.2 lb/MMBtu;

K<sub>b</sub> is 340 ng/J or 0.8 lb/MMBtu;

H<sub>a</sub> is the heat input from the combustion of coal (in either J or MMBtu); and

H<sub>b</sub> is the heat input from the combustion of oil (in either J or MMBtu).

Only the heat input supplied from the combustion of coal and oil is counted. No credit is provided for the heat input from the combustion of natural gas, wood, municipal-type solid waste, or other fuels or heat input from other sources such as gas turbines, internal combustion engines, kilns, etc. This limit is a 30-day rolling average and applies at all times including periods of startup, shutdown, and malfunction. This standard applies to all three units.

<sup>5</sup> Per 40 CFR §60.44b(h) and 40 CFR §60.44b(i), the limit is a 30-day rolling average that includes periods of startup, shutdown and malfunction.

**Table 264. NESHAP Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
530	PM or TSM <sup>1</sup>	0.07 lb/MMBtu or 0.001 lb/MMBtu	40 CFR Part 63, Subpart DDDDD	LCPH ATI 5096 / PTO 5045
	HCl	0.09 lb/MMBtu		
	Mercury	0.000009 lb/MMBtu		

<sup>1</sup> Total Selected Metals.

**Table 265. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
530	SO <sub>2</sub>	5 lb/MMBtu <sup>1</sup>	LCCO Sec. 10-65(a)(1)(a)	LCCO Sec. 10-65(a)(1)(a)
		1.5 lb/MMBtu <sup>2</sup>	LCCO Sec. 10-65(a)(1)(b)	LCCO Sec. 10-65(a)(1)(b)
		500 ppm <sub>v</sub>	LCCO Sec. 10-65(a)(2)	LCCO Sec. 10-65(a)(2)

<sup>1</sup> Per LCCO Sec. 10-65(a)(1)(a), this limit applies when combusting solid fuel (or any combination of fuels containing solid fuels).

<sup>2</sup> Per LCCO Sec. 10-65(a)(1)(b), this limit applies when combusting liquid fuel.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 266. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
530A	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Db	Industrial-Commercial-Institutional Steam Generating Units	--	10-62(b)(55)	§60.40b – §60.49b

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. New Source Performance Standards (NESHAP):

The following subparts apply to the emission unit(s) in this permit:

**Table 267. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
530A	A	General Conditions	NA	10-62(d)	§63.1 – §63.16
	DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters	--	--	§63.11140 – §63.11145

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.

Authority for Requirement: PSD Permit #98-A-507-P2  
LCPH ATI 5096 / PTO 5045

## Control Equipment

Limestone injection shall be used to control SO<sub>2</sub> emissions, SNCR shall be used to reduce NO<sub>x</sub> emissions, a baghouse shall be used to control particulate matter, and combustion controls shall be used to reduce VOC and CO emissions. The control equipment shall be maintained properly and operated all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5096 / PTO 5045

## Operating Limits

- A. The fuel combusted shall be limited to gas (for startup), oil (for startup), coal and less than 20% of blends of alternative fuels.
- B. The alternative fuels combusted are limited to petroleum coke, tire derived fuel (TDF), wood derived fuels, corn gluten feed, corn germ, dried wastewater treatment biomass (from ADM's Cedar Rapids and Clinton facilities only), oat hulls, shell corn, seed corn, and corn screenings.
- C. The owner or operator must receive an approval from the [DNR] central office before a fuel other than specified above is combusted in the boilers. The [DNR] shall reevaluate the fuel and may impose best available control technology (BACT) emission standards (including a percentage reduction requirement) for the fuel type (or combination) in question. Other PSD-related procedures (e.g., dispersion modeling studies) may also be required.
- D. The owner/operator shall conduct a study on the boiler to determine the optimized performance of the SNCR system within one year after the startup date. The Department shall review the optimization study and revise the NO<sub>x</sub> emission rate as the Department determines is appropriate so as to reflect optimized performance of the SNCR system as indicated by the SNCR percent NO<sub>x</sub> reduction for the various operating conditions tested. The Department will include a margin of up to twenty percent (20%) to provide for excess emissions over an averaging period adequate to reflect the variability of the operating parameters the Department determines have the dominant impact on emission rates. (It is anticipated that this adjustment will not exceed the "provisionally guaranteed" 0.12 lb/MMBtu). Prior to initiating the study, ADM shall submit a detailed plan for [DNR] approval including the specific dates of the optimization study and the boiler operation conditions to be tested. The optimization study shall monitor and record, but is not limited to, the following items:
  1. Reagent injection rates,
  2. Boiler NO<sub>x</sub> prior to injection,
  3. Reagent injection to boiler NO<sub>x</sub> ratios,
  4. Boiler temperature,
  5. CO, SO<sub>2</sub>, and chlorine levels prior to injection,
  6. Boiler load in MMBtu/hr and percent of rated capacity,
  7. Steam generation rate,
  8. Bed calcium to sulfur ratios,
  9. Fuel type, percent ash and percent sulfur,
  10. NO<sub>x</sub> emission rate,
  11. SNCR NO<sub>x</sub> emission reduction in percent,
  12. Ammonia emission rates, and
  13. Opacity.

This information shall be collected or calculated hourly during the study unless otherwise specified in the detailed study plan to be submitted to ADM as approved by the [DNR]. In addition, at least three separate visible emission tests shall be conducted for each set of operating/injection conditions identified for the study.

- E. Within one year after beginning operation, the optimization study data and report shall be submitted to the [DNR].
- F. ADM shall also submit a summary of study activities with the Quarterly CEM reports covering the same time period as the CEM report.
- G. The owner shall furnish the [DNR] written reports as follows:
  - 1. Initial Compliance Demonstration Reports required in Condition 11 [of PSD Permit #98-A-507-P2].
  - 2. CEMS performance evaluation.
  - 3. The maximum heat input capacity data from the demonstration of the boiler's maximum heat input capacity.
  - 4. The owner shall submit a written emissions report to the [DNR] central office each calendar quarter. Reports shall be submitted to the [DNR] postmarked no later than 30 days after the end of the calendar quarter starting with the quarter in which initial start-up of the boiler occurs. The report shall include the following:
    - i. Calendar dates covered by the report;
    - ii. Dates and hours of startup, shutdown or malfunction;
    - iii. Type, quality and quantity of fuel combusted;
    - iv. Each hourly SO<sub>2</sub> and NO<sub>x</sub> emissions, a summary of excess opacity emissions and diluent gas emission rate as well as each operating day's 30-day average SO<sub>2</sub> and NO<sub>x</sub> emission rate and percent SO<sub>2</sub> reduction determined during the reporting period;
    - v. Each instance of excess emissions and of non-standard or manual data collection and how those data were collected, where data was excluded, exceeded full span of the CEMS or was not available for any other reason, together with reasons for each of these instances of noncompliance and a description of the corrective actions taken, and any statistics required pursuant to 40 CFR §60.49b(m);
    - vi. "F" factor, method of determination, and fuel description;
    - vii. Description of any modification to the CEMS and its potential effect on CEMS performance;
    - viii. Results of daily CEMS drift test and quarterly accuracy assessment and related data as required under 40 CFR Part 60, Appendix F;
    - ix. Coal sampling and analysis results; and
    - x. Lead (Pb) quarterly test results.
- H. The owner or operator shall record the amounts of each fuel combusted during each day and calculate a new annual capacity factor for each fuel type at the end of each calendar month as specified in 40 CFR §60.49b(d).
- I. The owner or operator shall record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually according to 40 CFR §60.49b(d)
- J. The owner or operator shall record the net actual electrical output to any utility power distribution system for sale annually, calculated as an average over any three (3) calendar year period.
- K. The owner or operator shall furnish the [DNR] with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in [Table 262. PSD Emission Limits, Table 263. NSPS Emission Limits, Table 264. NESHAP Emission

Limits, and Table 265. Other Emission Limits]. This information shall be submitted to the [DNR] at least 30 days in advance of construction of any control equipment.

Authority for Requirement: PSD Permit #98-A-507-P2  
LCPH ATI 5096 / PTO 5045

- L. This facility must comply with all applicable requirements of NESHAP Subpart DDDDD no later than September 13, 2007, as specified by 40 CFR §63.7495.
- M. The owner or operator shall comply with the requirements of NESHAP Subpart DDDDD by meeting the emission limits, work practice standards, and operating limits of 40 CFR §63.7500.
- N. The owner or operator shall comply with the requirements of NESHAP Subpart DDDDD by meeting the general compliance requirements of 40 CFR §63.7505 – §63.7507.
- O. The owner or operator shall comply with the requirements of NESHAP Subpart DDDDD by meeting the testing, fuel analyses, and initial compliance requirements of 40 CFR §63.7510 – §63.7530.

Authority for Requirement: LCPH ATI 5096 / PTO 5045

### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 maintain a record of periods of startup, shutdown, or malfunction. Operating hours shall be averaged on a 12-month basis rolled over monthly.
- B. The owner or operator shall maintain records of the amounts of each fuel combusted during each day and calculate a new annual capacity factor for each fuel type at the end of each calendar month as specified in 40 CFR §60.49b(d).
- C. The owner or operator shall maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually according to 40 CFR §60.49b(d).
- D. The owner or operator shall maintain records of the net actual electrical output to any utility power distribution system for sale annually, calculated as an average over any three (3) calendar year period.

Authority for Requirement: PSD Permit #98-A-507-P2  
LCPH ATI 5096 / PTO 5045

- E. Recordkeeping for NESHAP Subpart DDDDD shall be done according to 40 CFR §63.7555 and 40 CFR §63.7560.
- F. Reporting for NESHAP Subpart DDDDD shall be done according to 40 CFR §63.7545 and 40 CFR §63.7550.

Authority for Requirement: LCPH ATI 5096 / PTO 5045

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 268. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
530	412.5	V	144	310	320,400	PSD Permit #98-A-507-P2 LCPH ATI 5096 / PTO 5045

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 flowrate 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.

### **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

#### **Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

#### **Continuous Emission Monitoring**

##### **A. SO<sub>2</sub> and NO<sub>x</sub>**

The owner shall continuously demonstrate compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission limitations and SO<sub>2</sub> percent reduction requirements of this permit through the use of a continuous emission monitoring system (CEMS) and a fuel sampling and analysis (FSA) system. These systems shall be installed, operating and calibrated prior to beginning the initial compliance demonstration set forth according to 40 CFR §60.13.

Compliance with the SO<sub>2</sub> and NO<sub>x</sub> emission rate limitations and the SO<sub>2</sub> percent reduction requirements shall be calculated as the average of all valid hourly emission rate data and valid hourly SO<sub>2</sub> percent reduction data for the 30 previous boiler operating days during which each standard applies. The owner shall calculate a new 30-day average at the end of each boiler operating day.

Unless otherwise approved by the Department, the selection of the CEMS span value (maximum data display output) for each parameter shall be those specified in 40 CFR Part 60, Subpart Db.

In addition to the provisions of 40 CFR Part 60, Appendix B, the performance specifications applicable to the CEMS required by [PSD Permit #98-A-507-P2] shall include a data recovery requirement of 90% and shall meet precision and accuracy requirements of 10 percent and 10 percent of the applicable standard respectively, unless otherwise specified in the permit. When the minimum data requirements of the permit cannot be obtained, the method and procedures of 40 CFR §60.47b(c) and §60.48b(f) shall be employed by the owner to obtain the required data.

### *30-Day Rolling NO<sub>x</sub> and SO<sub>2</sub> Emission Limit Compliance*

The owner shall install, calibrate, operate, maintain, audit and record the output from the CEMS capable of measuring SO<sub>2</sub>, NO<sub>x</sub> and the appropriate diluent gas (oxygen or carbon dioxide). The CEMS shall be installed, calibrated, operated, maintained and audited. Data shall be recorded in accordance with the provisions found at 40 CFR §60.13 (Monitoring Requirements); 40 CFR Part 60, Appendix B (Performance Specifications 2 and 3: Specification and Test Procedures for SO<sub>2</sub>, NO<sub>x</sub> and Diluent CEMS); and 40 CFR Part 60, Appendix F (Quality Assurance Requirements for Gas CEMS Used for Compliance Determinations), as adopted by the Department by reference.

The CEMS shall be operated and data recorded during any period any fuel is combusted in the boiler. Hourly parts-per-million data recorded by the pollutant CEMS shall be converted to pound of pollutant per million Btu (lb/MMBtu) heat input using the equations and methodology specified in 40 CFR Part 60, Appendix A, Method 19 (as it appears in the July 1, 1997 Code of Federal Regulations). Hourly emission rate data shall be recorded and used by the owner/operator to calculate compliance with the applicable emission rates and percent reductions for the specified averaging times.

The owner shall successfully complete SO<sub>2</sub> and NO<sub>x</sub> CEMS performance evaluations including relative accuracy and calibration of drift assessment evaluations prior to beginning the initial compliance demonstration.

The owner shall notify the [DNR] central office at least 30 days in advance of conducting any relative accuracy test.

### *SO<sub>2</sub> Percent Reduction Compliance*

The owner or operator shall install, calibrate, operate and maintain a fuel sampling and analysis (FSA) system to collect "as fired" fuel data. The FSA system shall meet or exceed the design and performance specifications set forth in 40 CFR Part 60, Appendix A, Method 19 (incorporating by reference of ASTM Method D2234-76, et al.).

Analyses shall be performed for weight percent sulfur (%S) and gross heat value (GHV, expressed in Btu/lb-fuel). The owner may develop an in-house fuel analysis program or may send collected samples to a laboratory for analysis. In either case, the analytical results shall be available to the proposed boiler operator within 72 hours of the sample collection time.

The "as fired" fuel data shall be used to determine the equivalent hourly average SO<sub>2</sub> inlet rate to the boiler and shall be used in conjunction with the SO<sub>2</sub> CEMS emission rate data to determine compliance with the SO<sub>2</sub> 30-day rolling percent reduction limit.

The owner shall calculate an equivalent SO<sub>2</sub> rate for each bunker using the weight percent sulfur and the gross heating value obtained through daily FSA, using the equation specified in 40 CFR Part 60, Appendix A, Method 19, Section 5.3.2, Equations 19-24.

If the equivalent inlet SO<sub>2</sub> rates for fuel contained in each day bunker which feeds to a single boiler differ by 0.2 lbs-SO<sub>2</sub>/MMBtu heat input or less, the arithmetic average of the two equivalent SO<sub>2</sub> inlet rates shall be used as the "equivalent hourly average SO<sub>2</sub> inlet rate" for each hourly percent reduction calculation during the boiler operation day. Otherwise, the owner shall: (1) use the smaller of the two equivalent SO<sub>2</sub> inlet rates as the "equivalent hourly average SO<sub>2</sub>

inlet rate" for each hourly percent reduction calculation during the boiler operating day; or (2) calculate an "equivalent hourly average SO<sub>2</sub> inlet rate" for each hour of operation using the following heat input weighted equation.

Equivalent hourly average SO<sub>2</sub>:

$$\text{Equivalent Hourly Average SO}_2\text{ Inlet Rate} = \frac{(W_1 \times \%S_1 + W_2 \times \%S_2)}{(W_1 \times \text{GHV}_1 + W_2 \times \text{GHV}_2)} \times K$$

Where,

- W<sub>1</sub> = Tons of coal fed to the first pair of day bunkers during the hour;
- W<sub>2</sub> = Tons of coal fed to the second of paired day bunkers during the hour;
- %S<sub>1</sub> = Weight percent sulfur of coal contained in the first bunker;
- %S<sub>2</sub> = Weight percent sulfur of coal contained in the second bunker;
- GHV<sub>1</sub> = Gross heating value of coal contained in the first bunker; and
- GHV<sub>2</sub> = Gross heating value of coal contained in the second bunker.

**B. Opacity**

A continuous monitoring system for measuring the opacity of emissions discharged into the atmosphere from the boiler shall be operated and maintained during all periods of operation of the boiler except for continuous monitoring system breakdowns and repairs. Operation shall be in conformance with 40 CFR §60.48b that includes recording the output of the system. Reporting and recordkeeping requirements shall be in conformance with 40 CFR §60.49b that shall include filing a quarterly report of excess emissions as outlined therein.

**C. Lead (Pb)**

Fuel samples shall be analyzed for lead (Pb) and the results submitted in writing to the [DNR] on a quarterly basis. Fuel sampling shall be conducted as specified in Condition 12.A.2 [of PSD Permit #98-A-507-P2]. Sample analysis for lead (Pb) shall be performed as specified in SW-846 Method 6010. The quarterly testing results shall be reported as specified in [Condition F of the Operating Limits section above].

Authority for Requirement: PSD Permit #98-A-507-P2  
LCPH ATI 5096 / PTO 5045

- Agency Approved Operations & Maintenance Plan Required?** Yes  No
- Facility Maintained Operation & Maintenance Plan Required?** Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

Compliance Assurance Monitoring requirements for SO<sub>2</sub> and NO<sub>x</sub> emissions are fulfilled by CAM-equivalent monitoring required by PSD Permits #98-A-507-P2, LCPH ATI 5096 / PTO 5045.

**Emission Point ID Number: 532, 533, 535, 536**

**Table 269. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
532	532	ACFBC Boiler #5 Fly Ash Conveying System	Ash	30 tph	532	Baghouse
533	533	ACFBC Boiler #6 Fly Ash Conveying System	Ash	30 tph	533	Baghouse
535	535	ACFBC Boiler #5 Bed Ash Conveying System	Ash	7 tph	535	Baghouse
536	536	ACFBC Boiler #6 Bed Ash Conveying System	Ash	7 tph	536	Baghouse

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 270. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
532 533 535 536	PM <sub>10</sub>	0.01 gr/dscf	BACT	PSD Permit #98-A-509PS1 PSD Permit #98-A-510PS1 PSD Permit #98-A-512PS1 PSD Permit #98-A-513PS1
532 533 535 536	Opacity	10%	BACT	PSD Permit #98-A-509PS1 LCPH ATI 3735 / PTO 4739 PSD Permit #98-A-510PS1 LCPH ATI 3734 / PTO 4738 PSD Permit #98-A-512PS1 LCPH ATI 3732 / PTO 4736 PSD Permit #98-A-513PS1 LCPH ATI 3731 / PTO 4735

**Table 271. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
532 533	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
535 536	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)

**Table 272. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
532	PM	0.01 gr/dscf	Requested limit	LCPH ATI 3735 / PTO 4739
533				LCPH ATI 3734 / PTO 4738
535				LCPH ATI 3732 / PTO 4736
536				LCPH ATI 3731 / PTO 4735

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in Condition 16 [of the associated LCPH ATI and PTO permits] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement:     LCPH ATI 3735 / PTO 4739  
   LCPH ATI 3734 / PTO 4738  
   LCPH ATI 3732 / PTO 4736  
   LCPH ATI 3731 / PTO 4735

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 273. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
532	160	V	16	140	5,363	PSD Permit #98-A-509PS1 LCPH ATI 3735 / PTO 4739
533	160	V	16	140	5,363	PSD Permit #98-A-510PS1 LCPH ATI 3734 / PTO 4738
535	160	V	14	140	3,478	PSD Permit #98-A-512PS1 LCPH ATI 3732 / PTO 4736
536	160	V	14	140	3,478	PSD Permit #98-A-513PS1 LCPH ATI 3731 / PTO 4735

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

SEPs 533 and 535 are subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: PSD Permit #98-A-509PS1  
LCPH ATI 3735 / PTO 4739  
PSD Permit #98-A-510PS1  
LCPH ATI 3734 / PTO 4738  
PSD Permit #98-A-512PS1  
LCPH ATI 3732 / PTO 4736  
PSD Permit #98-A-513PS1  
LCPH ATI 3731 / PTO 4735

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

**Emission Point ID Number: 537**

**Table 274. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
537	537	Coal Bunker [#5]	Coal	600 tph	537	Baghouse

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 275. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
537	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
	PM / PM <sub>10</sub>	0.01 gr/dscf	BACT	PSD Permit #98-A-514P2
		2.14 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 5945 / PTO 6055
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)
		10%	BACT	PSD Permit #98-A-514P2 LCPH ATI 5945 / PTO 6055

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Federal Standards**

A. New Source Performance Standards (NSPS):

The following subparts apply to the emission unit(s) in this permit:

**Table 276. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
537	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	Y	Coal Preparation and Processing Plants	--	10-62(b)(22)	§60.250 – §60.258

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.

Authority for Requirement: PSD Permit #98-A-514P2  
LCPH ATI 5945 / PTO 6055

### Control Equipment

A baghouse shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5945 / PTO 6055

### Operating Limits

- A. The pressure drop across the baghouse, CE537, shall be maintained between 0.5 and 8.0 inches of water.
- B. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: PSD Permit #98-A-514P2  
LCPH ATI 5945 / PTO 6055

### Operating Requirements and Associated Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Pressure drop reading across the baghouse, CE537, shall be recorded on a weekly basis while the control equipment is in operation.
- C. Record all maintenance and repair completed to the control equipment.

Authority for Requirement: PSD Permit #98-A-514P2  
LCPH ATI 5945 / PTO 6055

### Emission Point Characteristics

*The emission point shall conform to the specifications listed below.*

**Table 277. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
537	195	V	24	70	25,000	PSD Permit #98-A-514P2 LCPH ATI 5945 / PTO 6055

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: PSD Permit #98-A-514P2  
LCPH ATI 5945 / PTO 6055

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM and PM<sub>10</sub> emissions. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 542, 543**

**Table 278. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
542	542	Cogen Biomass Bin #1	Biomass	16,000 gph	542	Baghouse
543	543	Cogen Biomass Bin #2	Biomass	16,000 gph	543	Baghouse

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**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 279. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
542	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 5332 / PTO 5479 LCPH ATI 5333 / PTO 5480
543	PM / PM <sub>10</sub>	0.21 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 5332 / PTO 5479  
LCPH ATI 5333 / PTO 5480

**Operating Limit**

- A. Pressure drop across the baghouse, [CE542 and CE543], shall be maintained between 0.5 inches of water column to 6.0 inches of water column.
- B. The control equipment on this unit shall be maintained and operated according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 5332 / PTO 5479  
 LCPH ATI 5333 / PTO 5480

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record pressure drop across the control equipment, [CE542 and CE543], on a weekly basis while the emission unit is in operation.
- C. Monitor and record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 5332 / PTO 5479  
 LCPH ATI 5333 / PTO 5480

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 280. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
542	73	V	6	80	1,200	LCPH ATI 5332 / PTO 5479
543	73	V	6	80	1,200	LCPH ATI 5333 / PTO 5480

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 5332 / PTO 5479  
 LCPH ATI 5333 / PTO 5480

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 544****Table 281. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
544	544A	Cogen Limestone Conveying, Bunker 3	Limestone	250 tph	544A	Cartridge Filter
	544B	Cogen Limestone Conveying, Bunker 2	Limestone	250 tph	544B	Cartridge Filter
	544C	Cogen Limestone Conveying, Bunker 1	Limestone	250 tph	544C	Cartridge Filter
	544D	Cogen Limestone Conveying, BC8	Limestone	250 tph	544D	Cartridge Filter

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 282. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
544	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
	PM / PM <sub>10</sub>	0.005 gr/dscf	Requested limit	LCPH ATI 6284 / PTO 6266
		0.17 lb/hr <sup>1</sup>	NAAQS	
	Opacity	20% <sup>2</sup>	LCCO Sec. 10-60(a)	

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<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

<sup>2</sup> An exceedance of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A cartridge filter shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 6284 / PTO 6266

**Operating Limits**

- A. The pressure drop across each of the cartridge filters, [CEs 544A, 544B, 544C, and 544D], shall be maintained between 0.25 and 5.0 inches of water.
- B. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 6284 / PTO 6266

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Pressure drop reading across each of the cartridge filters, [CEs 544A, 544B, 544C, and 544D], shall be recorded on a weekly basis while the control equipment is in operation.
- C. Record all maintenance and repair completed to the control equipment.

Authority for Requirement: LCPH ATI 6284 / PTO 6266

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 283. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
544	155	V	14	Amb.	4,000	LCPH ATI 6284 / PTO 6266

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 6284 / PTO 6266

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

---

<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

**Emission Point ID Number: 545**

**Table 284. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
545	545	Turbine Generator #7	Natural Gas	472 MMBtu/hr	545A 545B	SCR <sup>1</sup> NO <sub>x</sub> Catalyst CO Catalyst

<sup>1</sup> Selective Catalytic Reduction

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 285. PSD Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
545	PM <sub>10</sub> / PM <sub>2.5</sub>	0.010 lb/MMBtu	BACT	PSD Permit #15-A-500-P1 LCPH ATI 6772 / PTO 6902
	Opacity	No VE		
	CO <sub>2c</sub>	249,891 tpy <sup>1</sup>		
		970 lb/MWh <sup>2,3</sup>		

<sup>1</sup> Standard is a 12-month rolling total.

<sup>2</sup> Standard is a 12-month rolling average.

<sup>3</sup> Standard includes all emissions including startup, shutdown, and malfunction.

**Table 286. NSPS Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
545	NO <sub>x</sub>	25 ppm <sup>1</sup> or 1.2 lb/MWh of useful output	40 CFR §60.4320(a) 567 IAC 23.1(2)"aaaa" LCCO Sec. 10-62(b)(79)	PSD Permit #15-A-500-P1 LCPH ATI 6772 / PTO 6902

<sup>1</sup> Limit of 25 ppm corrected to 15% O<sub>2</sub>.

**Table 287. Other Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
545	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	PSD Permit #15-A-500-P1 LCPH ATI 6772 / PTO 6902
	PM <sub>10</sub> / PM <sub>2.5</sub>	4.72 lb/hr <sup>1</sup>	NAAQS	
	Opacity	40% <sup>2</sup>	567 IAC 23.3(2)"d"	
		20% <sup>2</sup>	LCCO Sec. 10-60(a)	
	NO <sub>x</sub>	7.00 lb/hr <sup>3</sup>	PSD synthetic minor	
		39.4 tpy <sup>4</sup>		
	VOC	6.70 lb/hr <sup>3</sup>		
		39.4 tpy <sup>4</sup>		
	CO	17.60 lb/hr <sup>5</sup>		
		99.4 tpy <sup>4</sup>		

- <sup>1</sup> Emission rate used in the dispersion model to demonstrate the impacts from Project Number 15-214 was less than the PSD significant impact level and therefore, did not require a full NAAQS or increment analysis.
- <sup>2</sup> 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).
- <sup>3</sup> Limit established to avoid PSD applicability and keep Project 15-214 minor for PSD. Limit applies during steady state operating conditions.
- <sup>4</sup> Limit established to avoid PSD applicability and keep Project 15-214 minor for PSD. Limit includes 120 hours for startup, shutdown, and malfunctions.
- <sup>5</sup> Limit established in Project 17-432 to limit the potential to emit. Limit applies during steady state operating conditions.

### **Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### **Federal Standards**

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

The following subparts apply to the emission unit(s) in this permit:

**Table 288. NSPS Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
545	A	General Conditions	NA	10-62(b)	§60.1 – §60.19
	KKKK	Stationary Gas Turbines	Natural Gas	10-62(b)(79)	§60.4300 – §60.4420

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. New Source Performance Standards (NESHAP):**

The following subparts apply to the emission unit(s) in this permit:

**Table 289. NESHAP Subpart Summary**

EU ID	Subpart	Title	Type	Local Reference (LCCO Sec.)	Federal Reference (40 CFR)
545	A	General Conditions	NA	10-62(d)(1)	§63.1 – §63.16
	YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	Natural Gas	10-62(d)(103)	§63.6080 – §63.6175

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.

Authority for Requirement: PSD Permit #15-A-500-P1  
LCPH ATI 6772 / PTO 6902

#### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 turbine (E545) shall be fired by natural gas only. The owner or operator shall maintain records of the sulfur content in the natural gas combusted in the turbine.
- B. The owner or operator shall limit annual net-electric sales from its Cedar Rapids facility (57-01-080) to no more than either 219,000 megawatt-hours (MWh) or the product of the design efficiency and the potential electric output of Turbine #7 (EU545), whichever is greater. Compliance with this limit shall be determined annually using the existing plant-wide electrical metering system which totals electrical imports and exports from the facility. The owner or operator shall monitor and record the annual net-electric sales from this facility, in MWh.
- C. The Selective Catalytic Reduction (SCR, CE545A) shall be operated at all times during steady-state operation, which includes all times when the load is at or greater than 60% of the generator net output. The owner or operator shall record the date of each SCR catalyst replacement.
- D. The Oxidation Catalyst (CE545B) shall be operated at all times during the operation of the turbine generator (EU545). The owner or operator shall record the date of each Oxidation Catalyst Replacement.
- E. The owner or operator shall record the date, time, and duration of each startup and shutdown event. The following requirements apply during Turbine Generator (EU545) startup and shutdown:
  - 1. The turbine shall not operate in startup or shutdown mode more than 120 hours per year.
  - 2. Startup is defined as the period of time during which a unit is brought from shutdown status to its operational temperature and pressure, including the time required by the unit's emission control system to reach full operations and demonstrate compliance with the emission limits in [Tables 285, 286, and 287] of this permit.
  - 3. Shutdown is defined as the period beginning with the lowering of fuel firing rate from 60% of the generator net output and lasting until fuel flow is completely off and combustion has ceased.
  - 4. During startup, the turbine generator and HRSG emissions shall comply with emission limits in [Tables 285, 286, and 287] of this permit. The SCR system, including ammonia injection, shall be operated during startup in a manner to minimize emissions, as technologically feasible, and not later than when the load reaches 60% of the generator net output.
- F. ADM may not burn in the subject stationary combustion turbine (EU545) any fuel which contains total potential sulfur emissions in excess of 0.060 lb-SO<sub>2</sub>/MMBtu heat input (40 CFR §60.4330(a)). Pursuant to 40 CFR §60.4365, ADM may elect not to monitor the total sulfur content of the fuel combusted in the turbine by documenting the maximum total sulfur content from a valid purchase contract, tariff sheet, or transportation contract specifying that the total sulfur content for natural gas use is 20 grains of sulfur or less per 100 standard cubic feet.
- G. The owner or operator shall maintain a monthly record of useful thermal energy output of steam produced in MWh in a given month relative to ISO conditions (temperature = 15 C, relative humidity = 60%, and ambient air pressure at sea level).
- H. The owner or operator shall calculate the total CO<sub>2e</sub> emissions on a 12-month rolling basis based on unit-specific greenhouse gas emission factors and the gross energy output in MWh. The gross energy output shall be determined by the following formula:

$$\text{MWh}_{\text{eq}} = \frac{P_e}{0.95} + (0.75 \times P_t)$$

Where,

MWh<sub>eq</sub> is the gross energy output in megawatt-hours

$P_e$  is the electrical output of the turbine generator, in MWh; and  
 $P_t$  is the useful thermal energy output of steam, in MWh.

$P_t$  is calculated as follows:

$$P_t = Q \frac{H}{C}$$

Where,

Q is the measured steam flow, in pounds;

H is the enthalpy of the steam (in Btu/lb) relative to the enthalpy of water at ISO conditions; and

$C = 3.413 \times 10^6$  Btu/MWh

I. The owner or operator shall submit reports, as required by 40 CFR §60.4375.

Authority for Requirement: PSD Permit #15-A-500-P1  
 LCPH ATI 6772 / PTO 6902

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 290. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
545	225	V	132	280	251,064	PSD Permit #15-A-500-P1 LCPH ATI 6772 / PTO 6902

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing**

This emission point is subject to the stack testing requirements in Appendix F of this permit.

Authority for Requirement: 567 IAC 24.108(3)

- Agency Approved Operations & Maintenance Plan Required?** Yes  No
- Facility Maintained Operation & Maintenance Plan Required?** Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> This emission unit is subject to NSPS Subpart KKKK and is exempt from Compliance Assurance Monitoring requirements.

## Bulk Chemicals

Emission Point ID Number: 009

Table 291. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
009	009	Soda Ash Slur-O-Lyzer	Sodium Carbonate	16,250 lb/hr	009	Venturi Scrubber

### Applicable Requirements

*The emissions from this emission point shall not exceed the levels specified below.*

Table 292. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
009	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 4448 / PTO 4700
	PM / PM <sub>10</sub>	0.89 lb/hr	Requested limit	
		3.92 tpy		
Opacity	20%	LCCO Sec. 10-60(a)		

### Operating Limits and Requirements

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

#### Control Equipment

A venturi scrubber shall be used to control particulate emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4448 / PTO 4700

#### Operating Limits

- A. Water feed rate to the scrubber shall be maintained at a level not less than 17.4 gpm.
- B. Maximum capacity: 16,250 lb/hr.

Authority for Requirement: LCPH ATI 4448 / PTO 4700

## Operating Condition Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 log of operation shall be maintained for the operation of the above-listed unit.

- A. Weekly pressure drop readings across scrubber.
- B. Weekly recirculation water flowrates (gpm) to the scrubber.
- C. Records of all maintenance and repair complete to the control equipment.

Authority for Requirement: LCPH ATI 4448 / PTO 4700

## Compliance Plan

*The owner/operator of this equipment shall comply with the following compliance plan.*

### Description

Emission point SEP009 (Soda Ash Slur-O-Lyzer) is currently permitted to exhaust through a stack with a height of 20 feet above ground; however, SEP009 is currently configured to exhaust through a stack with a height of 42 feet above ground, as indicated by ADM. This change needs to be addressed in the local construction permit for SEP009 (LCPH ATI 4448 / PTO 4700).

### Condition

The permittee shall apply for a construction permit from Linn County Public Health within six months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

## Emission Point Characteristics

*The emission point shall conform to the specifications listed below.*

**Table 293. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
009	42	V	12	130–150	1,200	LCPH ATI 4448 / PTO 4700

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 flowrate 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.

## Monitoring Requirements

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 22.108(14)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM and PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 020**

**Table 294. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
020	020	HCl Storage Vent	HCl	34,000 gph	020	Venturi Scrubber

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 295. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
020	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)
	Opacity	20%	LCCO Sec. 10-60(a)	LCCO Sec. 10-60(a)

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

No applicable requirements at this time.

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

No applicable requirements at this time.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes <sup>1</sup>      No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes       No

Authority for Requirement:      567 IAC 24.108(3)

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<sup>1</sup> A facility operation and maintenance plan is required for PM<sub>10</sub> emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

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Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

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**Emission Point ID Number: 033**

**Table 296. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
033	033	Bulk Precoat System	Clay	33,000 lb/hr	033	Baghouse

---

**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 297. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
033	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 3981 / PTO 4034
	PM <sub>10</sub> / TSP	0.86 lb/hr	Requested limit	
		3.75 tpy		
	Opacity	20%	LCCO Sec. 10-60(a)	

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate emissions. The control equipment shall be maintained on this source in a good operating condition at all times. All appropriate probes and gauges needed to measure the parameters outlined in [the Monitoring Requirements section below] shall be installed and maintained in a good operating condition.

Authority for Requirement: LCPH ATI 3981 / PTO 4034

**Operating Limits**

Based on the inherent limitations of this emission unit, this unit is not conditioned to anything less than the maximum operating capacity of the device.

Maximum Equipment Design Rate: 33,000 lb/hr

Exhaust Airflow Rate: 1,000 scfm

Authority for Requirement: LCPH ATI 3981 / PTO 4034

**Monitoring Requirements**

The following information shall be monitored:

- A. Daily pressure drop readings.

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 3981 / PTO 4034

**Recordkeeping Requirements**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 logbook of operation shall be maintained for this source.

- A. Daily pressure drop readings (kept for 6 months minimum).
- B. Records of all maintenance and repair completed on the control device.

Authority for Requirement: LCPH ATI 3981 / PTO 4034

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

No applicable requirements at this time.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

This emission point is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 22.108(14)

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes <sup>1</sup> No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix C, CAM Plans, for the complete compliance assurance monitoring plan.

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**Emission Point ID Number: 165**

**Table 298. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
165	165	Plate Wash Tanks	Water	1,000 gal	--	None

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**Applicable Requirements**

*The emissions from this emission point shall not exceed the levels specified below.*

**Table 299. Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
165	Opacity	20%	LCCO Sec. 10-60(a)	LCPH ATI 4283 / PTO 4336

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

The maximum operating capacity of this device is:

Tank Capacity: 1,000 gallons each

Exhaust Airflow Rate: 9,500 acfm

Authority for Requirement: LCPH ATI 4283 / PTO 4336

**Compliance Monitoring**

The following information shall be monitored:

- A. Airflow from this source shall not exceed 9,500 acfm. Any increase in airflow would be considered a modification and would necessitate a new Authorization to Install permit.
- B. The total usage of cleaning solvents that contain VOC's or VHAP's from this source shall not exceed a yearly total of 2,000 gallons calculated on a 12-month rolling average. The maximum VOC density (content) of the cleaning material shall not exceed 9 pounds per gallon. Cleaning solvents that do not contain regulated pollutants do not need to be recorded.

Authority for Requirement: LCPH ATI 4283 / PTO 4336

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 log of operation shall be maintained for the facility.

- A. The total usage of cleaning solvents that contain VOC's and VHAP's from this source shall not exceed a yearly total of 2,000 gallons calculated on a 12-month rolling average. The maximum VOC density (content) of the cleaning material shall not exceed 9 pounds per gallon. Cleaning solvents that do not contain regulated pollutants do not need to be recorded.
- B. MSDS's or other documentation showing the VOC content of the cleaning solvents used must be kept with these records.

Authority for Requirement: LCPH ATI 4283 / PTO 4336

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

**Table 300. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
165	10	H	24	90	9,500	LCPH ATI 4283 / PTO 4336

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

## Waste Treatment

**Emission Point ID Number: 240, 242, 243, 244, 245, 246, 247, 248, 249**

**Table 301. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
240	240	Equalization Basin	Wastewater	7,200 gpm	--	None
242	242	West Aeration Basin	Wastewater	4,026 gpm	--	None
243	243	East Aeration Basin	Wastewater	4,026 gpm	--	None
244	244	Biotatron #1	Wastewater	1,057 gpm	--	None
245	245	Biotatron #2	Wastewater	1,057 gpm	--	None
246	246	Biotatron #3	Wastewater	1,057 gpm	--	None
247	247	East Clarifier	Wastewater	1,912 gpm	--	None
248	248	Center Clarifier	Wastewater	1,912 gpm	--	None
249	249	West Clarifier	Wastewater	1,912 gpm	--	None

### Applicable Requirements

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 302. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
240 244 245 246	Single HAP	9.4 tpy	Requested limit	LCPH ATI 4843 / PTO 5309 LCPH ATI 4847 / PTO 5312 LCPH ATI 4848 / PTO 5313 LCPH ATI 4849 / PTO 5314
247 248 249	Total HAP	24.4 tpy	Requested limit	LCPH ATI 4850 / PTO 5315 LCPH ATI 4851 / PTO 5316 LCPH ATI 4852 / PTO 5317

**Table 303. Specific Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
240	VOC	0.339 lb/hr <sup>1</sup>	03-CV-2066	LCPH ATI 4843 / PTO 5309
		1.486 tpy		
242 243	VOC	2.90 lb/hr	03-CV-2066	LCPH ATI 5810 / PTO 5968 LCPH ATI 5811 / PTO 5969
244 245 246	VOC	0.184 lb/hr 0.81 tpy	03-CV-2066	LCPH ATI 4847 / PTO 5312 LCPH ATI 4848 / PTO 5313 LCPH ATI 4849 / PTO 5314
247 248 249	VOC	0.151 lb/hr 0.662 tpy	03-CV-2066	LCPH ATI 4850 / PTO 5315 LCPH ATI 4851 / PTO 5316 LCPH ATI 4852 / PTO 5317

<sup>1</sup> This limit was requested, per Consent Decree *United States v. ADM*, No. 03-CV-2066 (C.D. Illinois), Paragraph 39b.

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**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Operating Limits**

- A. The equalization tank is limited to a flowrate of 7,200 gpm.

Authority for Requirement: LCPH ATI 4843 / PTO 5309

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record the flowrate to the equalization basin on a weekly basis.

Authority for Requirement: LCPH ATI 4843 / PTO 5309

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 304. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (acfm)	Authority for Requirement
240	18	V	720 x 1,440	135	650	LCPH ATI 4843 / PTO 5309
242	5	V	3,648 x 2,580	95	8,500	LCPH ATI 5810 / PTO 5968
243	5	V	3,648 x 2,580	95	8,500	LCPH ATI 5811 / PTO 5969
244	18	V	1,104	95	7,600	LCPH ATI 4847 / PTO 5312
245	18	V	1,104	95	7,600	LCPH ATI 4848 / PTO 5313
246	18	V	1,104	95	7,600	LCPH ATI 4849 / PTO 5314
247	3	V	792	80	--	LCPH ATI 4850 / PTO 5315
248	3	V	792	80	--	LCPH ATI 4851 / PTO 5316
249	3	V	792	80	--	LCPH ATI 4852 / PTO 5317

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 flowrate 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.

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**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**

Yes

No

Authority for Requirement: 567 IAC 24.108(3)

## Biomass Processing

Emission Point ID Number: 087, 089

Table 305. Associated Equipment

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
087	087	Biomass Dryer #1	Sludge	4.2 tph (wet)	087	Spray Chamber
089	089	Biomass Dryer #2	Sludge	4.2 tph (wet)	089	Spray Chamber

### Applicable Requirements

The emissions from each emission point shall not exceed the levels specified below.

Table 306. Emission Limits

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
087	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 7452 / PTO 7359 LCPH ATI 7644 / PTO 7448
	PM / PM <sub>10</sub>	0.06 lb/hr	Requested limit	
089	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	
	SO <sub>2</sub>	500 ppm <sub>v</sub>	LCCO Sec. 10-65(a)(2)	
		100 ppm <sub>v</sub>	Requested limit	

<sup>1</sup> The observation of visible emissions of air contaminants as defined in LCCO Sec. 10-55 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

### Operating Limits and Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Operating Requirements and Associated Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) 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 control equipment on this unit [CE087, CE089] shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the control equipment.
- B. The total liquor flowrate in the spray chamber [CE087, CE089] shall be maintained at a minimum of 175 gallons per minute. The owner or operator shall monitor and record the total liquor flowrate on a daily basis.
- C. The normal pH of the liquor in the spray chamber [CE087, CE089] shall be maintained between 6 and 10 standard units. The owner or operator shall monitor and record the liquor pH on a daily basis.

Authority for Requirement: LCPH ATI 7452 / PTO 7359  
 LCPH ATI 7644 / PTO 7448

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 307. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
087	50	V	4	130	368	LCPH ATI 7452 / PTO 7359
089	50	V	4	130	368	LCPH ATI 7644 / PTO 7448

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operations & Maintenance Plan Required?**                      Yes       No

**Facility Maintained Operation & Maintenance Plan Required?**                      Yes       No

**Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes       No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 098, 099, 100, 101**

**Table 308. Associated Equipment**

SEP	EU	EU Description	Raw Material	Rated Capacity	CE ID	CE Description
098	098	Biosolids Storage Bin #1	Sludge	100,000 lbs	098	Baghouse
099	099	Biosolids Storage Bin #2	Sludge	100,000 lbs	099	Baghouse
100	100	Biosolids Storage Bin #3	Sludge	100,000 lbs	100	Baghouse
101	101	Biosolids Loadout	Sludge	100 tph	101	Baghouse

**Applicable Requirements**

*The emissions from each emission point shall not exceed the levels specified below.*

**Table 309. General Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
098 099	PM	0.1 gr/dscf	567 IAC 23.3(2)"a" LCCO Sec. 10-62(a)	LCPH ATI 4620 / PTO 5013 LCPH ATI 4621 / PTO 5014
100 101	Opacity	20% <sup>1</sup>	LCCO Sec. 10-60(a)	LCPH ATI 4622 / PTO 5015 LCPH ATI 4623 / PTO 5086

<sup>1</sup> An exceedance of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

**Table 310. Specific Emission Limits**

SEP	Pollutant	Emission Limit(s)	Reference/Basis	Authority for Requirement
098 099 100	PM / PM <sub>10</sub>	0.02 gr/dscf 0.17 lb/hr	Requested limit	LCPH ATI 4620 / PTO 5013 LCPH ATI 4621 / PTO 5014 LCPH ATI 4622 / PTO 5015
101	PM / PM <sub>10</sub>	0.17 lb/hr <sup>1</sup>	NAAQS	LCPH ATI 4623 / PTO 5086

<sup>1</sup> Emission rate used to demonstrate no exceedance of the National Ambient Air Quality Standards (NAAQS).

**Operating Limits and Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**Control Equipment**

A baghouse shall be used to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in [the Operating Condition Monitoring and Recordkeeping section below] shall be installed, maintained and operating during the operation of the emission unit and control device at all times.

Authority for Requirement: LCPH ATI 4620 / PTO 5013  
LCPH ATI 4621 / PTO 5014  
LCPH ATI 4622 / PTO 5015  
LCPH ATI 4623 / PTO 5086

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) 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. Monitor and record pressure drop on a weekly basis.

Authority for Requirement: LCPH ATI 4620 / PTO 5013  
LCPH ATI 4621 / PTO 5014  
LCPH ATI 4622 / PTO 5015

B. The owner or operator shall monitor and record "no visible emissions" on a weekly basis.  
C. Maintenance and repair completed on the control devices.

Authority for Requirement: LCPH ATI 4623 / PTO 5086

**Compliance Plan**

*The owner/operator of this equipment shall comply with the following compliance plan.*

**Description**

Emission units EU098 (Biosolids Storage Bin #1), EU099 (Biosolid Storage Bin #2), and EU100 (Biosolids Storage Bin #3) are currently permitted to operate at a maximum capacity of 50,000 pounds of capacity; however, these emission units are currently configured to operate at 100,000 pounds of capacity, as indicated by ADM. Furthermore, emission unit EU101 (Biosolids Loadout) is currently permitted to operate at 20 tons per hour; however, this emission unit is currently configured to operate at 100 tons per hour, as indicated by ADM. These changes need to be addressed in the local construction permits for SEP098, SEP099, SEP100, and SEP101 (LCPH ATI 4620 / PTO 5013, ATI 4621 / PTO 5014, ATI 4622 / PTO 5015, and ATI 4623 / PTO 5086, respectively).

**Condition**

The permittee shall apply for construction permits from Linn County Public Health within six months of the issuance date of this Title V Operating Permit. This point will be in compliance at the time the construction permit for the unit venting through this point is issued. A summary of all emission points subject to a Compliance Plan is located in Appendix G of this operating permit.

Authority for Requirement: 567 IAC 24.108(15)

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

**Table 311. Emission Point Characteristics**

SEP	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Temp (°F)	Flowrate (scfm)	Authority for Requirement
098	65	H	6	130-165	1,000	LCPH ATI 4620 / PTO 5013
099	65	H	6	135-165	1,000	LCPH ATI 4621 / PTO 5014
100	65	H	6	130-165	1,000	LCPH ATI 4622 / PTO 5015
101	25	V	6 x 6	135	1,000	LCPH ATI 4623 / PTO 5086

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 flowrate 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.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Opacity Monitoring**

SEP101 is subject to the opacity monitoring requirements in Appendix E of this permit.

Authority for Requirement: LCPH ATI 4623 / PTO 5086

**Agency Approved Operations & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes <sup>1</sup> No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> A facility operation and maintenance plan is required for PM emissions. Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on-site for at least 5 years. The plans and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

## **IV. General Conditions**

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 24 and Linn County Code of Ordinances (LCCO) Chapter 10 – Environment, Article III, Sec. 10-57.

### **G1. Duty to Comply**

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 24.108(9)"a"
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 24.105 (2)"h"(3)
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 24.108 (1)"b"
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 24.108 (14)
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 24.108 (9)"b"
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 24.108(15)"c"

### **G2. Permit Expiration**

1. Except as provided in rule 567—24.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—24.105(455B). 567 IAC 24.116(2)
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 24.105(2). 567 IAC 24.105

### **G3. Certification Requirement for Title V Related Documents**

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications

shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 24.107 (4)

#### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and Linn County Public Health Air Quality Division. 567 IAC 24.108 (15)"e"

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 24.107(4). The semi-annual monitoring report shall be submitted to the director and Linn County Public Health Air Quality Division. 567 IAC 24.108 (5)

#### **G6. Annual Fee**

1. The permittee is required under subrule 567 IAC 24.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 24.115(1)"d".

## **G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 24.108 (15)"b" and LCO Sec. 10-75

## **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 24.108 (9)"e" and LCO Sec. 10-71 and 10-72

## **G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1) and LCO Sec. 10-67(b)

## **G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements;
  - b. The date the analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses;
  - f. The operating conditions as existing at the time of sampling or measurement; and
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts).
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance

records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 24.108(4), 567 IAC 24.108(12)

### **G11. Evidence Used in Establishing that a Violation Has or Is Occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 24;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 24.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2) and LCO Sec. 10-69(1)

### **G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 24.108(6)

### **G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

### **G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process

equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.

- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 21.7(1)-567 IAC 21.7(4) and LCO Sec. 10-67

### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 24.108(5)"b"

### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4) This notification must be made to Linn County Air Quality Division, in lieu of the Department, upon adoption of the NSPS or NESHAP into Chapter 10.

### **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 24.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—24.140(455B) through 567 - 24.144(455B));
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade,

- v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit,
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 24.110(1)
2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 24.110(2)
  3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 24.110(1). 567 IAC 24.110(3)
  4. The permit shield provided in subrule 24.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 24.110(4)
  5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 24.108(11)

#### **G18. Duty to Modify a Title V Permit**

1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that does any of the following:
    - i. Correct typographical errors;
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - iii. Require more frequent monitoring or reporting by the permittee; or
    - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
  - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
  - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
2. Minor Title V Permit Modification.
  - a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
    - i. Do not violate any applicable requirement;
    - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;

- iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification under rule 567 - 24.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - ii. The permittee's suggested draft permit;
  - iii. Certification by a responsible official, pursuant to 567 IAC 24.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 24.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 24.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.
3. Significant Title V Permit Modification.
- a. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 24, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.
  - b. The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 24.111-567 IAC 24.113

### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 24.1(2) or to meet the parameters established in 567 IAC 24.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. 567 IAC 22.1(1) and LCCO Sec. 10-58

### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in LCCO Sec. 10-63.

### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedances of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 24.108(7)

### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
  5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 24.108(9)"c"
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years.
  - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
  - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 24.108(17)"a", 567 IAC 24.108(17)"b"
3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination.

- b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit.
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 24.114
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 24.114
  5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 24.114

## **G25. Permit Shield**

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
  - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 24.108 (18)

## **G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 24.108 (8)

**G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 24.108 (9)"d"

**G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 24.111(1). 567 IAC 24.111 (1)"d"

**G29. Disclaimer**

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. 567 IAC 22.3(3)"c"

**G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test 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 applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating 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 the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source 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 such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Linn County Public Health  
Air Quality Division  
1020 6th St. SE  
Cedar Rapids, IA 52401  
(319) 892-6000

567 IAC 25.1(7)"a", 567 IAC 25.1(9) and LCCO Sec. 10-70

### **G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

### **G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 7  
Air Permits and Compliance Branch  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
6200 Park Avenue  
Suite 200  
Des Moines, IA 50319-0034  
(515) 725-8200

Reports or notifications to the Linn County local program shall be directed to the supervisor at the Linn County local program. The current address and phone number is:

Linn County Public Health  
Air Quality Division  
1020 6th Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000

## Appendix A: 567 IAC Crosswalk

Table 312. Crosswalk Chapters List

Previous Chapter # (Prior to 5/15/2024)	Current Chapter #	Previous Title & Description (Prior to 5/15/2024)	Current Title & Description	Action Taken
20	20 (Reserved)	Scope of Title – Definitions	N/A	<b>Definitions moved</b> to Ch. 21, 22, & 23 <b>Rescinded</b> Ch. 20 (Reserved)
21	21	Compliance	Compliance, Excess Emissions, and Measurement of Emissions	<b>Kept and Combined</b> with rules from Ch. 24, 25, 26, & 29.
22	22	Controlling Pollution-Permits	Controlling Air Pollution – Construction Permitting	<b>Kept construction permit rules and combined</b> with Ch. 20 (definitions) and Ch. 28 (NAAQS) <b>Moved operating permit rules</b> to Ch. 24
22.100 – 22.300(12)	(New) 24	N/A	Operating Permits	<b>Moved operating permit rules</b> from Ch. 22 to Ch. 24
23	23	Emission Standards	Air Emission Standards	<b>Kept</b>
24	(New) 21	Excess Emissions	Compliance, Excess Emissions, and Measurement of Emissions	<b>Moved rules and combined</b> with Ch. 21 <b>Moved TV rules</b> here (to Ch. 24)
25	(New) 21	Emissions Measurement	Compliance, Excess Emissions, and Measurement of Emissions	<b>Moved rules and combined</b> with Ch. 21 <b>Rescinded</b> Ch. 25 (Reserved)
26	(New) 21	Emergency Air Pollution Episodes	Compliance, Excess Emissions, and Measurement of Emissions	<b>Moved rules and combined</b> with Ch. 21 <b>Rescinded</b> Ch. 26 (Reserved)
27	27	Local Program Acceptance	Local Program Acceptance	<b>Kept</b>
28	22	NAAQS	N/A	<b>Moved rules and combined</b> with Ch. 22 <b>Rescinded</b> Ch. 28 (Reserved)
29	(New) 21	Opacity Qualifications	Compliance, Excess Emissions, and Measurement of Emissions	<b>Moved rules and combined</b> with Ch. 21 <b>Rescinded</b> Ch. 29 (Reserved)
30	30	Fees	Fees	<b>Kept</b>
31	31	Nonattainment Areas	Nonattainment New Source Review	<b>Kept</b>

Previous Chapter # (Prior to 5/15/2024)	Current Chapter #	Previous Title & Description (Prior to 5/15/2024)	Current Title & Description	Action Taken
32	N/A	AFO Field Study	N/A	<b>Rescinded</b> Ch. 32 (Reserved)
33	33	Special regulations and construction permit requirements for major stationary sources—Prevention of Significant Deterioration (PSD) of air quality	Construction permit requirements for major stationary sources—Prevention of Significant Deterioration (PSD)	<b>Kept</b>
34	N/A	Emission Trading-CAIR-CAMR	N/A	<b>Rescinded</b> Ch. 34 (Reserved)
35	N/A	Grant Assistance Programs	N/A	<b>Rescinded</b> Ch 35 (Reserved)

**Table 313. Crosswalk Rules List**

Previous Chapter # (Prior to 5/15/2024)	Current Chapter #	Previous Title & Description (Prior to 5/15/2024)	Current Title & Description	Action Taken
<b>Chapter 20</b>				
20	20 (Reserved)	Scope of Title - Definitions	N/A	<b>Definitions moved</b> to Ch. 21, 22 and 23 <b>Rescinded</b> Ch. 20. (Reserved)
20.1	N/A	Scope of title	N/A	
20.2	Ch. 21, 22, 23	Definitions	Definitions	See beginning of Ch. 21, 22, and 23
20.3	N/A	Air quality forms generally	N/A	
<b>Chapter 21</b>				
<b>21</b>	<b>21</b>	<b>Compliance</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Kept and combined</b> with rules from Chapters 24, 25, 26, and 29.
21.1	21.1	Compliance Schedule	Definitions and compliance requirements	Added definitions from Ch. 21, some language updated
21.2	21.2	Variances	Variances	Some language updated
21.3	21.3	Emission reduction program	Reserved	Reserved
21.4	21.4	Circumvention of rules	Circumvention of rules	Minor language updated
21.5	21.5	Evidence used in establishing that a violation has or is occurring	Evidence used in establishing that a violation has occurred or is occurring	21.5(2) Reserved, some language updated

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
21.6	21.6	Temporary electricity generation for disaster situations	Temporary electricity generation for disaster situations	Minor language updated
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
N/A	21.9	N/A	Compliance with other requirements	New language
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	Moved from Ch. 25, some language updated
25.2	21.11	Continuous emission monitoring under the acid rain program	Continuous emission monitoring under the acid rain program	Moved from Ch. 25, some language updated
25.3	N/A	Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated
26.1	21.14	Prevention of air pollution emergency episodes - General	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions alert level	Abatement strategies emission reduction actions alert level	Moved from Ch. 26, reference federal appendix table

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions warning level	Abatement strategies emission reduction actions warning level	Moved from Ch. 26, reference federal appendix table
<b>Chapter 22</b>				
<b>22</b>	<b>22</b>	<b>Controlling Pollution-Permits</b>	<b>Controlling Air Pollution - Construction Permitting</b>	<b>Kept construction permit rules and combined</b> with Ch. 20 (definitions) and Ch. 28 (NAAQS).  <b>Moved operating permit rules</b> to Chapter 24.
22.1	22.1	Permits required for new or existing stationary sources	Definitions and permit requirements for new or existing stationary sources	Added definitions from Ch. 20, some language updated
22.2	22.2	Processing permit applications	Processing permit applications	
22.3	22.3	Issuing permits	Issuing permits	
22.4	22.4	Special requirements for major stationary sources located in areas designated attainment or unclassified (PSD)	Major stationary sources located in areas designated attainment or unclassified (PSD)	
22.5	22.5	Special requirements for nonattainment areas	Major stationary sources located in areas designated Nonattainment	
22.7	22.7	Alternative emission control program	Alternative emission control program	
22.8	22.8	Permit by rule	Permit by rule	
22.9	22.9	Special requirements for visibility protection	Special requirements for visibility protection	A lot of language updated or removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
22.10	22.10	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	Moved from Ch. 28, minor language updated
22.12 to 22.99	N/A	Reserved	N/A	Removed
<b>22.100 - 22.300(12)</b>	<b>(New) 24</b>	N/A	<b>Operating Permits</b>	<b>Moved operating permit rules</b> from Ch. 22 to Ch. 24.
22.100	24.100	Definitions for Title V operating permits	Definitions for Title V operating permits	Moved from Ch. 22, some language updated, many 40 CFR 70 definitions adopted by reference
22.101	24.101	Applicability of Title V operating permit requirements	Applicability of Title V operating permit requirements	Moved from Ch. 22, some language updated to correct punctuation and remove old dates
22.102	24.102	Source category exemptions	Source category exemptions	Moved from Ch. 22, some language updated to correct punctuation
22.103	24.103	Insignificant activities	Insignificant activities	Moved from Ch. 22, some language updated to correct typos and remove old dates
22.104	24.104	Requirement to have a Title V permit	Requirement to have a Title V permit	Moved from Ch. 22, some language updated no changes to rule text
22.105	24.105	Title V permit applications	Title V permit applications	Moved from Ch. 22, updated language to address electronic submissions and remove past application due dates
22.106	24.106	Annual Title V emissions inventory	Annual Title V emissions inventory	Moved from Ch. 22, no changes to rule text
22.107	24.107	Title V permit processing procedures	Title V permit processing procedures	Moved from Ch. 22, some language updated to update locations of public records and remove old CFR amendment dates

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
22.108	24.108	Permit content	Permit content	Moved from Ch. 22, some language updated to correct punctuation, remove old dates, and adopt 40 CFR 70 rules by reference
22.109	24.109	General permits	General permits	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.110	24.110	Changes allowed without a Title V permit revision (off-permit revisions)	Changes allowed without a Title V permit revision (off-permit revisions)	Moved from Ch. 22, some language updated to remove redundant language
22.111	24.111	Administrative amendments to Title V permits	Administrative amendments to Title V permits	Moved from Ch. 22, no changes to rule text
22.112	24.112	Minor Title V permit modifications	Minor Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.113	24.113	Significant Title V permit modifications	Significant Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.114	24.114	Title V permit reopenings	Title V permit re-openings	Moved from Ch. 22 to Ch. 24, some language updated to adopt 40 CFR 70 rules by reference
22.115	24.115	Suspension, termination, and revocation of Title V permits	Suspension, termination, and revocation of Title V permits	Moved from Ch. 22, no changes to rule text
22.116	24.116	Title V permit renewals	Title V permit renewals	Moved from Ch. 22, no changes to rule text
22.117-22.119	24.117-24.119	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.120	24.120	Acid rain program—definitions	Acid rain program—definitions	Moved from Ch. 22, some language updated to remove old CFR amendment dates and address electronic submissions
22.121	24.121	Measurements, abbreviations, and acronyms	Reserved	Moved from Ch. 22, no changes to rule text
22.122	24.122	Applicability	Applicability	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.123	24.123	Acid rain exemptions	Acid rain exemptions	Moved from Ch. 22, some language updated to correct punctuation

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22.124	24.124	Retired units exemption	Reserved	Moved from Ch. 22, no changes to rule text
22.125	24.125	Standard requirements	Standard requirements	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.126	24.126	Designated representative—submissions	Designated representative—submissions	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.127	24.127	Designated representative—objections	Designated representative—objections	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.128	24.128	Acid rain applications—requirement to apply	Acid rain applications—requirement to apply	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.130	24.130	Acid rain permit application shield and binding effect of permit application	Acid rain permit application shield and binding effect of permit application	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.131	24.131	Acid rain compliance plan and compliance options—general	Acid rain compliance plan and compliance options—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.132	24.132	Repowering extensions	Reserved	Moved from Ch. 22, no changes to rule text
22.133	24.133	Acid rain permit contents—general	Acid rain permit contents—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.134	24.134	Acid rain permit shield	Acid rain permit shield	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.135	24.135	Acid rain permit issuance procedures—general	Acid rain permit issuance procedures—general	Moved from Ch. 22, no changes to rule text
22.136	24.136	Acid rain permit issuance procedures—completeness	Acid rain permit issuance procedures—completeness	Moved from Ch. 22, no changes to rule text
22.137	24.137	Acid rain permit issuance procedures—statement of basis	Acid rain permit issuance procedures—statement of basis	Moved from Ch. 22, no changes to rule text
22.138	24.138	Issuance of acid rain permits	Issuance of acid rain permits	Moved from Ch. 22, some language updated to remove old dates and deadlines
22.139	24.139	Acid rain permit appeal procedures	Acid rain permit appeal procedures	Moved from Ch. 22, no changes to rule text

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22.140	24.140	Permit revisions—general	Permit revisions—general	Moved from Ch. 22, some language updated to remove old dates
22.141	24.141	Permit modifications	Permit modifications	Moved from Ch. 22, no changes to rule text
22.142	24.142	Fast-track modifications	Fast-track modifications	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.143	24.143	Administrative permit amendment	Administrative permit amendment	Moved from Ch. 22, some language updated to remove fax option
22.144	24.144	Automatic permit amendment	Automatic permit amendment	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.145	24.145	Permit reopenings	Permit re-openings	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.146	24.146	Compliance certification—annual report	Compliance certification—annual report	Moved from Ch. 22, no changes to rule text
22.147	24.147	Compliance certification—units with repowering extension plans	Reserved	Moved from Ch. 22, no changes to rule text
22.148	24.148	Sulfur dioxide opt-ins	Sulfur dioxide opt-ins	Moved from Ch. 22, some language updated to update the 40 CFR Part 74 amendment date
22.149 - 22.199	24.149 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.200	24.200 - 24.299	Definitions for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.201	24.200 - 24.299	Eligibility for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.203	24.200 - 24.299	Voluntary operating permit applications	Reserved	Moved from Ch. 22, no changes to rule text
22.204	24.200 - 24.299	Voluntary operating permit fees	Reserved	Moved from Ch. 22, no changes to rule text
22.205	24.200 - 24.299	Voluntary operating permit processing procedures	Reserved	Moved from Ch. 22, no changes to rule text
22.206	24.200 - 24.299	Permit content	Reserved	Moved from Ch. 22, no changes to rule text

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22.207	24.200 - 24.299	Relation to construction permits	Reserved	Moved from Ch. 22, no changes to rule text
22.208	24.200 - 24.299	Suspension, termination, and revocation of voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.209	24.200 - 24.299	Change of ownership for facilities with voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.210 - 22.299	24.200 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
<b>Chapter 23</b>				
<b>23</b>	<b>23</b>	<b>Emission Standards</b>	<b>Air Emission Standards</b>	<b>Kept</b>
23.1	23.1	Emission standards	Emission standards	Kept, language updated, tables used
23.2	23.2	Open burning	Open burning	Kept, some language updated
23.3	23.3	Specific contaminants	Specific contaminants	Kept, some language updated
23.4	23.4	Specific processes	Specific processes	Kept, some language updated
23.5	23.5	Anaerobic lagoons	Anaerobic lagoons	Kept, some language updated
23.6	23.6	Alternative emission limits (the “bubble concept”)	Reserved	Removed
<b>Chapter 24</b>				
<b>24</b>	<b>(New) 21</b>	<b>Excess Emissions</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined</b> with Ch. 21.  <b>Moved operating permit rules</b> here (to Ch. 24).
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
<b>Chapter 25</b>				
<b>25</b>	<b>(New) 21</b>	<b>Emissions Measurement</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined</b> with Ch. 21.  <b>Rescinded</b> Ch. 25. (Reserved)
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	Moved from Ch. 25, some language updated

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
25.2	21.11	Continuous emission monitoring under the acid rain program	Continuous emission monitoring under the acid rain program	Moved from Ch. 25, some language updated
25.3		Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
<b>Chapter 26</b>				
<b>26</b>	<b>(New) 21</b>	<b>Emergency Air Pollution Episodes</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined</b> with Ch. 21. <b>Rescinded</b> Ch. 26. (Reserved)
26.1	21.14	Prevention of air pollution emergency episodes - General	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions alert level	Abatement strategies emission reduction actions alert level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions warning level	Abatement strategies emission reduction actions warning level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table V	Table III	Abatement strategies emission reduction actions emergency level	Abatement strategies emission reduction actions emergency level	Moved from Ch. 26, reference federal appendix table
<b>Chapter 27</b>				
<b>27</b>	<b>27</b>	<b>Local Program Acceptance</b>	<b>Local Program Acceptance</b>	<b>Kept</b>
27.1	27.1	General	General	Kept, some language updated
27.2	27.2	Certificate of acceptance	Certificate of acceptance	Kept, some language updated
27.3	27.3	Ordinance or regulations	Ordinance or regulations	Kept, some language updated

Previous Chapter # (Prior to 5/15/2024)	Current Chapter #	Previous Title & Description (Prior to 5/15/2024)	Current Title & Description	Action Taken
27.4	27.4	Administrative organization	Administrative organization	Kept, some language updated
27.5	27.5	Program activities	Program activities	Kept, some language updated
<b>Chapter 28</b>				
<b>28</b>	<b>22</b>	<b>NAAQS</b>	<b>N/A</b>	<b>Moved rules and combined</b> with Ch. 22. <b>Rescinded</b> Ch. 28. (Reserved)
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	<b>Moved from Ch. 28</b> , minor language updated <b>Rescinded</b> Ch. 28. (Reserved)
<b>Chapter 29</b>				
<b>29</b>	<b>(New) 21</b>	<b>Opacity Qualifications</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined</b> with Ch. 21. <b>Rescinded</b> Ch. 29. (Reserved)
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated
<b>Chapter 30</b>				
<b>30</b>	<b>30</b>	<b>Fees</b>	<b>Fee</b>	<b>Kept</b>
30.1	30.1	Purpose	Purpose	Kept, language updated
30.2	30.2	Fees associated with new source review applications	Fees associated with new source review applications	Kept, some language updated
30.3	30.3	Fees associated with asbestos demolition or renovation notification	Fees associated with asbestos demolition or renovation notification	Kept, some language updated
30.4	30.4	Fees associated with Title V operating permits	Fees associated with Title V operating permits	Kept, some language updated
30.5	30.5	Fee advisory groups	Fee advisory groups	Kept, language updated
30.6	30.6	Process to establish or adjust fees and notification of fee rates	Process to establish or adjust fees and notification of fee rates	Kept, some language updated
30.7	30.7	Fee revenue	Reserved	Language removed
<b>Chapter 31</b>				
<b>31</b>	<b>31</b>	<b>Nonattainment Areas</b>	<b>Nonattainment New Source Review</b>	<b>Kept</b>

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
31.1	31.1	Permit requirements relating to nonattainment areas	Permit requirements relating to nonattainment areas	Kept, some language updated
31.2	31.2	Conformity of general federal actions to the Iowa state implementation plan or federal implementation plan - Rescinded	Reserved	Language removed
31.3	31.3	Nonattainment new source review requirements for areas designated nonattainment on or after May 18, 1998	Nonattainment new source review (NNSR) requirements for areas designated nonattainment	Kept, some language updated
31.4	31.4	Preconstruction review permit program	Preconstruction review permit program	Kept
31.5 - 31.8	31.5 - 31.8	Reserved	Reserved	Kept
31.9	31.9	Actuals PALs	Actuals PALs	Kept, some language updated
31.10	31.10	Validity of rules	Validity of rules	Kept
31.11 - 31.19	N/A	Reserved	N/A	Rescinded and removed
31.20	N/A	Special requirements for nonattainment areas designated before May 18, 1998	N/A	Rescinded and removed
<b>Chapter 32</b>				
<b>32</b>	<b>N/A</b>	<b>AFO Field Study</b>	<b>N/A</b>	<b>Rescinded Ch. 32. (Reserved)</b>
32.1	N/A	Animal feeding operations field study	N/A	Rescinded, reserved, and language removed
32.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
32.3	N/A	Exceedance of the health effects value (HEV) for hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.4	N/A	Exceedance of the health effects standard (HES) for hydrogen sulfide	N/A	Rescinded, reserved, and language removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
32.5	N/A	Iowa Air Sampling Manual	N/A	Rescinded, reserved, and language removed
<b>Chapter 33</b>				
<b>33</b>	<b>33</b>	<b>Special regulations and construction permit requirements for major stationary sources— Prevention of significant deterioration (PSD) of air quality</b>	<b>Construction permit requirements for major stationary sources— Prevention of significant deterioration (PSD)</b>	<b>Kept</b>
33.1	33.1	Purpose	Purpose	Kept, some language updated
33.2	33.2	Reserved	Reserved	Kept
33.3	33.3	Special construction permit requirements for major stationary sources in areas designated attainment or unclassified (PSD)	PSD construction permit requirements for major stationary sources	Kept, some language updated
33.4 - 33.8	33.4 - 33.8	Reserved	Reserved	Kept
33.9	33.9	Plantwide applicability limitations (PALs)	Plantwide applicability limitations (PALs)	Kept, some language updated
33.10	33.10	Exceptions to adoption by reference	Exceptions to adoption by reference	Kept, some language updated
<b>Chapter 34</b>				
<b>34</b>	<b>N/A</b>	<b>Emissions Trading-CAIR-CAMR</b>	<b>N/A</b>	<b>Rescinded Ch. 34. (Reserved)</b>
34.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
34.2 - 34.199	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.200	N/A	Provisions for air emissions trading and other requirements for the Clean Air Interstate Rule (CAIR) - rescinded	N/A	Rescinded, reserved, and language removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
34.201	N/A	CAIR NOx annual trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.202	N/A	CAIR designated representative for CAIR NOx sources - rescinded	N/A	Rescinded, reserved, and language removed
34.203	N/A	Permits - rescinded	N/A	Rescinded, reserved, and language removed
34.204	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.205	N/A	CAIR NOx allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.206	N/A	CAIR NOx allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.207	N/A	CAIR NOx allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.208	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.209	N/A	CAIR NOx opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.210	N/A	CAIR SO2 trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.211 - 34.219	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.220	N/A	CAIR NOx ozone season trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.221	N/A	CAIR NOx ozone season trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.222	N/A	CAIR designated representative for CAIR NOx ozone season sources - rescinded	N/A	Rescinded, reserved, and language removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
34.223	N/A	CAIR NOx ozone season permits - rescinded	N/A	Rescinded, reserved, and language removed
34.224	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.225	N/A	CAIR NOx ozone season allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.226	N/A	CAIR NOx ozone season allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.227	N/A	CAIR NOx ozone season allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.228	N/A	CAIR NOx ozone season monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.229	N/A	CAIR NOx ozone season opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.230 - 34.299	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.300	N/A	Provisions for air emissions trading and other requirements for the Clean Air Mercury Rule (CAMR) - rescinded	N/A	Rescinded, reserved, and language removed
34.301	N/A	Mercury (Hg) budget trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.302	N/A	Hg designated representative for Hg budget sources - rescinded	N/A	Rescinded, reserved, and language removed
34.303	N/A	General Hg budget trading program permit requirements - rescinded	N/A	Rescinded, reserved, and language removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
34.304	N/A	Hg allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.305	N/A	Hg allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.307	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.308	N/A	Performance specifications - rescinded	N/A	Rescinded, reserved, and language removed
<b>Chapter 35</b>				
<b>35</b>	<b>N/A</b>	<b>Grant Assistance Programs</b>	<b>N/A</b>	<b>Rescinded Ch. 35. (Reserved)</b>
35.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
35.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
35.3	N/A	Role of the department of natural resources	N/A	Rescinded, reserved, and language removed
35.4	N/A	Eligible projects	N/A	Rescinded, reserved, and language removed
35.5	N/A	Forms	N/A	Rescinded, reserved, and language removed
35.6	N/A	Project selection	N/A	Rescinded, reserved, and language removed
35.7	N/A	Funding sources	N/A	Rescinded, reserved, and language removed
35.8	N/A	Type of financial assistance	N/A	Rescinded, reserved, and language removed
35.9	N/A	Term of loans	N/A	Rescinded, reserved, and language removed
35.10	N/A	Reduced award	N/A	Rescinded, reserved, and language removed
35.11	N/A	Fund disbursement limitations	N/A	Rescinded, reserved, and language removed
35.12	N/A	Applicant cost share	N/A	Rescinded, reserved, and language removed

<b>Previous Chapter # (Prior to 5/15/2024)</b>	<b>Current Chapter #</b>	<b>Previous Title &amp; Description (Prior to 5/15/2024)</b>	<b>Current Title &amp; Description</b>	<b>Action Taken</b>
35.13	N/A	Eligible costs	N/A	Rescinded, reserved, and language removed
35.14	N/A	Ineligible costs	N/A	Rescinded, reserved, and language removed
35.15	N/A	Written agreement	N/A	Rescinded, reserved, and language removed

## Appendix B: Applicable Federal Standards

A list of the promulgated NSPS rules, EPA Region 7 staff contact information (for questions pertaining to the rule), compliance assistance links and a link to each NSPS and NESHAP can be found at the link below:

<https://www.epa.gov/caa-permitting/air-technology-standards-region-7>

### 40 CFR Part 60 – New Source Performance Standards

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#### Subpart A – General Provisions

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-A?toc=1>

#### Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Db?toc=1>

#### Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984, and on or before October 4, 2023

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Kb?toc=1>

#### Subpart Y – Standards of Performance for Coal Preparation and Processing Plants

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Y?toc=1>

#### Subpart DD – Standards of Performance for Grain Elevators

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-DD?toc=1>

#### Subpart VV – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced after January 5, 1981, and on or before November 7, 2006

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-VV?toc=1>

#### Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-IIII?toc=1>

#### Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-KKKK?toc=1>

## **40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants**

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### **Subpart A – General Provisions**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-A>

### **Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-Q?toc=1>

### **Subpart UU – National Emission Standards for Equipment Leaks – Control Level 2 Standards**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-UU?toc=1>

### **Subpart FFFF – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-FFFF?toc=1>

### **Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-YYYY?toc=1>

### **Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZ>

### **Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters**

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-DDDDDD?toc=1>

## Appendix C: CAM Plan(s) Summary

### I. Background

#### A. Emission Unit

Description: See Table 314 for full listing  
Identification: See Table 314 for full listing  
Facility: ADM Corn Processing  
Cedar Rapids, IA

#### B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: See Table 314 for full listing  
Emission Limit or Standard: See Table 314 for full listing  
Current Monitoring Requirements: See Table 315 for full listing

#### C. Control Technology

See Table 314 for full listing

### II. Monitoring Approach

#### General Monitoring Guidelines

- CAM involves the observation of control equipment indicators. See Table 315 for full listing. This plan defines acceptable ranges for these indicators. CAM also includes control equipment inspections when excursions of the indicator have taken place and possible corrective action and maintenance, if necessary.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.

#### Excursion from Compliance

- An excursion occurs when an observed compliance indicator is outside of its defined applicable indicator range during normal operations, not including startup and shutdown events. An excursion does not necessarily indicate a violation of applicable permit terms, conditions, and/or requirements. However, an excursion must be reported in the Annual Compliance Certification Report.
- Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion.

#### A. Indicator

See Table 315 for a full list of monitoring indicators identified by emission point and associated control equipment.

#### B. Measurement Approach

See Table 315 for individual monitoring frequencies for each of the selected monitoring indicators identified by emission point and associated control equipment.

#### C. Indicator Range

See Table 315 for the appropriate indicator range(s) for each of the selected monitoring indicators identified by emission point and associated control equipment. An excursion is defined as an observation of a monitoring indicator that falls outside/below the identified

indicator range. Where no visible emissions are the monitoring indicator, the presence of visible emissions is defined as an excursion. Excursions trigger an inspection, corrective action, and a recordkeeping requirement.

D. Performance Criteria

Data representativeness:

Excursions from the normal operating range(s) of the monitoring indicators listed in Table 314 could reveal a decrease in the performance of the control equipment and potentially result in an increase of emissions if corrective actions are not initiated.

Recordkeeping and Reporting  
(Verification of operational status):

Record any excursions and corrective actions, inspections, and maintenance resulting from readings outside/below the indicator range, or the presence of visible emissions. Records of the monitoring indicator measurements shall be kept for a minimum of five (5) years and shall be available for inspection by the federal, state, and local air pollution regulatory agencies and/or their representatives. Records shall be legible and maintained in an orderly manner.

QA/QA Practices and Criteria:

All instruments and control equipment will be calibrated, maintained, and operated according to the manufacturer's specifications. For visible emissions observations as identified in Table 314, observe no emissions are being emitted. If any emission is seen, the system is immediately shut down for review.

Data Collection Procedure:

Monitoring indicators are recorded in the plant information system and will be maintained for 5 years. Operator logs and maintenance records will be kept for 5 years.

Averaging Period:

None

Corrective Action:

In all cases, corrective action shall be taken as soon as possible, but no later than 8 hours from the observation of the excursion.

**Table 314. Compliance Assurance Monitoring Plan Summary Table**

SEP	EU	EU Description	CE Description & CE ID	Pollutant	Emission Limit(s)	Regulation No.
007	007	Starch Dryer to Loadout Pneumatic Transfer	Baghouse CE007	PM	0.1 gr/dscf	567 IAC 23.4(7) LCCO Sec. 10-62(a)(7)
008	010A	60% Gluten Meal Cooler 1	Baghouse CE010 Baghouse CE023 Baghouse CE040 Baghouse CE048 Baghouse CE049 Baghouse CE086	PM	0.1 gr/dscf	LCPH ATI 7651 / PTO 7420
	010B	60% Gluten Meal Cooler 2			6.05 lb/hr	
	023	Cracked Corn Receiving		PM10	6.05 lb/hr 14.4 tpy	
	040	Germ to Storage Conveying				
	048	Gluten Hammermills				
	049	Gluten to Storage Conveying				
086A	Gluten Truck Loadout					
086B	Gluten Rail Loadout					
032	032B	#2 Fiber Cooler	Baghouse CE032	PM	0.1 gr/dscf	LCPH ATI 7167 / PTO 6900
	032C	Stedman Mills 1-8		PM <sub>10</sub>	1.25 lb/hr	
033	033	Bulk Precoat System	Baghouse CE033	PM	0.1 gr/dscf	LCPH ATI 3981 / PTO 4034
034	034A	Carbon Furnace	Zero Hearth Furnace Afterburner CE034B	VOC	4.49 lb/hr	LCPH ATI 4664 / PTO 5082
	034B	Carbon Furnace – Natural Gas		CO	11.34 lb/hr	
114	114A	Carbon Furnace	Zero Hearth Furnace Afterburner CE114B	VOC	4.49 lb/hr	LCPH ATI 4665 / PTO 5083R1
	114B	Carbon Furnace – Natural Gas		CO	11.34 lb/hr	
124	124	Maltodextrin Packaging Transfer Line	Baghouse CE124	PM	0.1 gr/dscf 0.31 lb/hr	LCPH ATI 5025 / PTO 5320
129	129A 129B 129C	Maltodextrin Packaging System #1 Bulk Toter System Aspiration #2 Bulk Toter System Aspiration	Baghouse CE129	PM	0.1 gr/dscf 0.73 lb/hr	LCPH ATI 5026 / PTO 5321R1
160	160	Starch Rotex #1	Cartridge Filter CE160	PM	0.1 gr/dscf	LCPH ATI 6787 / PTO 6657
161	161	Starch Rotex #2	Cartridge Filter CE161	PM	0.1 gr/dscf	LCPH ATI 6788 / PTO 6658
210	210	Millhouse Fugitive Emissions	Packed Bed Scrubber CE210A	SO <sub>2</sub>	6.11 lb/hr 500 ppm <sub>v</sub>	LCPH ATI 6925 / PTO 6759R1
				VOC	2.54 lb/hr	
271	271	Vertical Fiber Cooler #1	Baghouse CE271	PM	0.1 gr/dscf 1.88 lb/hr	LCPH ATI 7225 / PTO 7057
				PM <sub>10</sub>	1.88 lb/hr	

SEP	EU	EU Description	CE Description & CE ID	Pollutant	Emission Limit(s)	Regulation No.					
501	501A 501AN	Co-Gen Boiler #1 Co-Gen Boiler #1 – Natural Gas	Baghouse CE501A	PM	0.051 lb/MMBtu 0.03 lb/MMBtu	PSD Permit #86-A-090-P2 LCPH ATI 6131 / PTO 6267					
				PM <sub>10</sub>	0.03 lb/MMBtu						
	501B 501BN	Co-Gen Boiler #2 Co-Gen Boiler #2 – Natural Gas	Baghouse CE501B	PM	0.051 lb/MMBtu 0.03 lb/MMBtu	PSD Permit #86-A-091-P2 LCPH ATI 6131 / PTO 6267					
				PM <sub>10</sub>	0.03 lb/MMBtu						
502	502A 502AN	Co-Gen Boiler #3 Co-Gen Boiler #3 – Natural Gas	Baghouse CE502A	PM	0.051 lb/MMBtu 0.03 lb/MMBtu	PSD Permit #90-A-083-P2 LCPH ATI 6132 / PTO 6268					
				PM <sub>10</sub>	0.03 lb/MMBtu						
	502B 502BN	CFBC Boiler #4 Co-Gen Boiler #4 – Natural Gas	Baghouse CE502B	PM	0.6 lb/MMBtu	PSD Permit #93-A-324-S1 LCPH ATI 6132 / PTO 6268					
				PM <sub>10</sub>	0.03 lb/MMBtu						
503	503A 503B	1-4 Coal Bunkers Coal Receiving Fines Blower	Baghouse CE503	PM	0.1 gr/dscf 0.01 gr/dscf 2.41 lb/hr	PSD Permit #86-A-093 LCPH ATI 6163 / PTO 6235					
				PM <sub>10</sub>	2.41 lb/hr 14.4 tpy						
504	504	Crusher Building D.C. System	Baghouse CE504	PM	0.1 gr/dscf 0.01 gr/dscf 2.18 lb/hr	PSD Permit #86-A-092 LCPH ATI 5801 / PTO 5970					
				PM <sub>10</sub>	2.18 lb/hr						
505	505	Limestone Unloading Dust Collector	Baghouse CE505	PM	0.1 gr/dscf 2.18 lb/hr	LCPH ATI 5802 / PTO 5971					
				PM <sub>10</sub>	2.18 lb/hr						
506	506 507 509	Fly Ash Conveying D.C. System A Fly Ash Conveying D.C. System B Bed Ash Conveying D.C. System A	Baghouse CE506 Baghouse CE507 Baghouse CE509	PM	0.1 gr/dscf 0.02 gr/dscf 1.95 lb/hr	PSD Permit #86-A-096 PSD Permit #88-A-023 PSD Permit #86-A-099 PSD Permit #86-A-100 LCPH ATI 5803 / PTO 5972R1					
							510 520 541	Fly Ash Conveying D.C. System B Fly Ash Conveying D.C. System C Bed Ash Conveying D.C. System C	Baghouse CE510 Baghouse CE520	PM <sub>10</sub>	1.95 lb/hr
	515	514	Cogen Coal Unloading	Baghouse CE515	PM		0.1 gr/dscf 1.6 lb/hr 0.18 tpy	DNR Permit #86-A-094 LCPH ATI 6120 / PTO 6237			

SEP	EU	EU Description	CE Description & CE ID	Pollutant	Emission Limit(s)	Regulation No.
530	530A 530AN	ACFBC Boiler #5 ACFBC Boiler #5 – Natural Gas	Baghouse CE530A	PM	0.015 lb/MMBtu 22 ng/J 0.07 lb/MMBtu or 0.001 lb/MMBtu	PSD Permit #98-A-507-P2 LCPH ATI 5096 / PTO 5045
				PM <sub>10</sub>	0.03 lb/MMBtu	
532	532	ACFBC Boiler #5 Fly Ash Conveying System	Baghouse CE532	PM	0.01 gr/dscf 0.1 gr/dscf	PSD Permit #98-A-509PS1 LCPH ATI 3735 / PTO 4739
533	533	ACFBC Boiler #6 Fly Ash Conveying System	Baghouse CE533	PM	0.01 gr/dscf 0.1 gr/dscf	PSD Permit #98-A-510PS1 LCPH ATI 3734 / PTO 4738
535	535	ACFBC Boiler #5 Bed Ash Conveying System	Baghouse CE535	PM	0.01 gr/dscf 0.1 gr/dscf	PSD Permit #98-A-512PS1 LCPH ATI 3732 / PTO 4736
536	536	ACFBC Boiler #6 Bed Ash Conveying System	Baghouse CE536	PM	0.01 gr/dscf 0.1 gr/dscf	PSD Permit #98-A-513PS1 LCPH ATI 3731 / PTO 4735
537	537	Coal Bunker [#5]	Baghouse CE537	PM	0.1 gr/dscf 0.01 gr/dscf 2.14 lb/hr	PSD Permit #98-A-514P2 LCPH ATI 5945 / PTO 6055
				PM <sub>10</sub>	0.01 gr/dscf 2.14 lb/hr	

**Table 315. Summary of CAM Required Monitoring**

SEP	Pollutant	Current Monitoring Requirements	Monitoring Indicator	Indicator Range	Measurement Approach	Monitoring Frequency
007	PM	Differential pressure readings	$\Delta P$	$\geq 0.1$ and $\leq 7.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
008	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure readings	$\Delta P$	$\geq 0.2$ and $\leq 6.0$ in. w.c. $\geq 0.1$ and $\leq 6.0$ in. w.c. (CE086)	Differential pressure measurement using pressure gauge	Daily
032	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
033	PM	Differential pressure reading	$\Delta P$	$\geq 0.1$ and $\leq 6.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
034	VOC CO	Zero hearth temperature	$^{\circ}F$	$\geq 1,440$ $^{\circ}F$	Zero hearth temperature measured by a thermocouple	Daily
114	VOC CO	Zero hearth temperature	$^{\circ}F$	$\geq 1,440$ $^{\circ}F$	Zero hearth temperature measured by a thermocouple	Daily
124	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.3$ and $\leq 6.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
129	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.3$ and $\leq 14.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
160	PM	Differential pressure reading	$\Delta P$	$\geq 0.2$ and $\leq 10.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily

SEP	Pollutant	Current Monitoring Requirements	Monitoring Indicator	Indicator Range	Measurement Approach	Monitoring Frequency
161	PM	Differential pressure reading	$\Delta P$	$\geq 0.2$ and $\leq 10.0$ in. w.c.	Differential pressure measurement using pressure gauge	Daily
210	SO <sub>2</sub> VOC	Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 12.0$ in. w.c.	Differential pressure measured using pressure gauge	Daily
		Total water flowrate	Total Flowrate	$\geq 240$ gpm	Total water flowrate measured using a flow meter	Daily
271	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.1$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
501	PM / PM <sub>10</sub>	Differential pressure reading	$\Delta P$	$\geq 1.0$ and $\leq 12.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
502	PM / PM <sub>10</sub>	Differential pressure reading	$\Delta P$	$\geq 1.0$ and $\leq 12.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
503	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
504	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
505	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
506	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
514	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
515	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly

SEP	Pollutant	Current Monitoring Requirements	Monitoring Indicator	Indicator Range	Measurement Approach	Monitoring Frequency
515	PM	Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
530	PM / PM <sub>10</sub>	Differential pressure reading	$\Delta P$	$\geq 1.0$ and $\leq 12.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
532	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
533	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
535	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
536	PM	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily
537	PM / PM <sub>10</sub>	Visible emissions	VE	No VE	Visible emissions from baghouse exhaust	Weekly
		Differential pressure reading	$\Delta P$	$\geq 0.5$ and $\leq 8.0$ in. w.c.	Differential pressure measured with pressure gauge	Daily

## Appendix D: Agency O&M Plan(s) Summary

### ADM Corn Processing Packed Bed / General Wet Scrubber Agency Operation & Maintenance Plan

#### Monitoring Guidelines

ADM makes a commitment to take timely corrective action during periods of excursions where the indicators are out of range. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return operation within the indicator range. An excursion is determined by the averaged discrete data point over a period of time. An excursion does not necessarily indicate a violation of an applicable requirement. If the corrective action measures fail to return the indicators to the appropriate range, the facility will report the exceedance to the department and conduct source testing within 90 days of the exceedance to demonstrate compliance with Applicable Requirements. If the test demonstrates compliance with emission limits, then new indicator ranges must be set for monitoring and the new ranges must be incorporated in the operating permit. If the test demonstrates noncompliance with emission limits, then the facility, within 60 days, proposes a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

**Table 316. Emission Points Subject to Agency Operation & Maintenance Plan Requirements**

Emission Point ID	Control Equipment ID	Description
SEP-055	CE055	Packed Bed Scrubber

#### General

- Periodic monitoring is not required during periods of time greater than one day in which the source does not operate.
- If flowrates or pressure drop levels are occurring outside the normal operating range, investigative / corrective action will start within eight (8) hours of finding.

#### Weekly

- Check and document the scrubbing liquid recirculating and make-up flow as appropriate and pressure drop across the scrubber. If the flow or pressure drop falls out of the recent normal operating range, based upon observed averages and ranges over the past year of operation (or outside a specific permit limit range), corrective action will be started within eight (8) hours of findings to return the operations to normal. The recent normal operating range shall also be documented on each record used for documenting the readings. Changes to these operating ranges shall be documented to include the reason and justification for the change. Conduct observations of the stack and area adjacent to the stack to determine if excess droplet re-entrainment may include fallout of solid-containing droplets, discoloration of the stack and adjacent surfaces, or a mud lip around the stack. If excess droplet re-entrainment is occurring, the appropriate measures for remediation will be started within eight (8) hours of findings.
- Maintain a written or electronic record of the inspection and any action resulting from the inspection.

### **Quarterly**

- Conduct a walk-around inspection of the entire system to search for leaks. If leaks in the system are detected, the appropriate measures for remediation will be started within eight (8) hours of findings.
- Maintain a written or electronic record of the inspection and any action resulting from the inspection.

### **Annually (contingent on accessibility during shutdown period)**

- Conduct an internal inspection of the scrubber to search as appropriate for signs of erosion, corrosion, or solids deposits, solids accumulation in mist eliminators, and plugged or eroded spray nozzles. If any of these conditions exist, the appropriate measures for remediation will be started within eight (8) hours of findings.
- Maintain a written or electronic record of the inspection and any action resulting from the inspection.

### **Recordkeeping**

- Maintain a written or electronic record of all inspections and any action resulting from the inspections.
- The facility will keep maintenance and inspection records for five (5) years and will be available upon request.

### **Quality Control**

- The equipment will be operated and maintained according to typical food industry standards and/or as outlined in the above monitoring requirements.

## Appendix E: Opacity Monitoring Summary

The facility shall check the opacity periodically when the emission units listed in Table 317 are at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five (5) years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight (8) hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity is greater than the Opacity Limit from emission units listed in Table 317, this would be a violation and corrective action will be taken as soon as possible, but no later than eight (8) hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts during the required observation period have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

**Table 317. Opacity Monitoring**

SEP ID	EU ID	Opacity Limit <sup>1</sup>	Frequency
006	006	20%	Weekly
007	007	20%	Weekly
008	All	20%	Weekly
009	009	20%	Weekly
013	013	20%	Weekly
015	015	10%	Weekly
016	All	10%	Weekly
021	021	20%	Weekly
032	032B/C	20%	Weekly
033	033	20%	Weekly
034	034A/B	20%	Weekly
050	050	20%	Weekly
051	051	20%	Weekly
061	061	20%	Weekly
062	062	20%	Weekly
063	063	20%	Weekly
064	064	20%	Weekly
101	101	20%	Weekly
114	114A/B	20%	Weekly
122	122	20%	Weekly
124	124	20%	Weekly
129	129A/B/C	20%	Weekly
180	All	0%	Weekly
181	All	0%	Weekly
182	All	0%	Weekly

  

SEP ID	EU ID	Opacity Limit <sup>1</sup>	Frequency
183	All	20%	Weekly
190	All	No VE	Weekly
191	All	No VE	Weekly
192	All	No VE	Weekly
211	211	20%	Weekly
271	271	20%	Weekly
388	All	20%	Weekly
503	503A/B	0%	Weekly
504	504	0%	Weekly
505	505	20%	Weekly
506	506	20%	Weekly
512	512	20%	Weekly
513	513	20%	Weekly
514	514	10%	Weekly
515	514	10%	Weekly
521	521	20%	Weekly
532	532	10%	Weekly
533	533	10%	Weekly
535	535	10%	Weekly
536	536	10%	Weekly
537	537	10%	Weekly
542	542	20%	Weekly
543	543	20%	Weekly
544	544A/B/C/D	20%	Weekly

<sup>1</sup> Opacity limit listed in this table is the most restrictive of all applicable opacity limits.

Authority for Requirement: 567 IAC 24.108(14)

## Appendix F: Stack Testing Summary

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. *567 IAC 21.10(7)*

**Table 318. Stack Testing Summary**

SEP ID	Description	Pollutant	Deadline	Test Method
006	#2 Fluid Bed Germ Dryer (FBGD)	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2029	40 CFR 51, Appendix M, 201A with 202
		SO <sub>2</sub>	5/1/2029	40 CFR 60, Appendix A, Method 6C
		VOC	5/1/2029	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
007	Starch Dryer to Loadout Pneumatic Transfer	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
015	#1 Fluid Bed Germ Dryer (FBGD)	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2029	40 CFR 51, Appendix M, 201A with 202
		VOC	5/1/2029	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
034	Carbon Furnace [#1]	VOC <sup>2</sup>	5/1/2031	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
069	190° Product Scrubbing System / Spray Draw Condensate Tank	VOC	5/1/2029	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
070	200° Product Scrubbing System	VOC	5/1/2029	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
114	Carbon Furnace [#2]	VOC <sup>2</sup>	5/1/2031	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
124	Maltodextrin Packaging Transfer Line	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
180	Bulk Weigh Scale	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
181	Rail Dump	PM	5/1/2029	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
190	RTO 1	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
		NO <sub>x</sub>	5/1/2031	40 CFR 60, Appendix A, Method 7E
		VOC	5/1/2031	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
210	Millhouse Vent Scrubber Stack	VOC	5/1/2031	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
388	Pellet Mill Stack	VOC	5/1/2029	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
501	Cogen Coal Boilers #1 & #2	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
		CO	Periodic <sup>3</sup>	40 CFR 60, Appendix A, Method 10

SEP ID	Description	Pollutant	Deadline	Test Method
502	Cogen Coal Boilers #3 & #4	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
		CO	Periodic <sup>3</sup>	40 CFR 60, Appendix A, Method 10
		HCl	Periodic <sup>3</sup>	40 CFR 60, Appendix A, Method 26
505	Limestone Unloading Dust Collector	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
506	Boiler 1-4 Ash Conveying Systems	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
530	Cogen Coal Boiler #5	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
		VOC	5/1/2031	40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A, Method 18
		CO	Periodic <sup>3</sup>	40 CFR 60, Appendix A, Method 10
533	ACFBC Boiler #6 Fly Ash Conveying System	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
535	ACFBC Boiler #5 Bed Ash Conveying System	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
537	Coal Bunker [#5]	PM	5/1/2031	40 CFR 60, Appendix A, Method 5 40 CFR 51, Appendix M, Method 202
		PM <sub>10</sub> <sup>1</sup>	5/1/2031	40 CFR 51, Appendix M, 201A with 202
545	Turbine Generator #7	NO <sub>x</sub>	Periodic <sup>4</sup>	40 CFR 60, Appendix A, Method 7E

<sup>1</sup> The owner or operator may choose to perform one stack test for PM and assume that PM = PM<sub>10</sub> = PM<sub>2.5</sub>. This one test will satisfy the testing requirements for all three pollutants. If the test results show a violation of the applicable emission limit contained in the applicable permit(s), then the emission point will be considered out of compliance for all three pollutants. The owner or operator shall demonstrate compliance with the emission limits established in the applicable permit(s).

<sup>2</sup> ADM may choose to test either SEP-034 or SEP-114 to satisfy this testing requirement.

<sup>3</sup> Compliance demonstrations for CO and HCl completed to comply with 40 CFR Part 63, Subpart DDDDD will satisfy these testing requirements. Pursuant to 567 IAC 25.1(7) and LCCO Sec. 10-70(e), copies of compliance demonstrations used to satisfy these requirements shall be submitted to the Iowa DNR and Linn County Public Health.

<sup>4</sup> Compliance demonstrations for NO<sub>x</sub> completed to comply with 40 CFR Part 60, Subpart KKKK will satisfy this testing requirement. Pursuant to 567 IAC 25.1(7) and LCCO Sec. 10-70(e), copies of compliance demonstrations used to satisfy these requirements shall be submitted to the Iowa DNR and Linn County Public Health.

Authority for Requirement: 40 CFR Part 60, Subparts Db and KKKK  
40 CFR Part 63, Subpart DDDDD<sup>1</sup>  
567 IAC 23.1(2)"ccc"  
567 IAC 24.108(3)  
LCCO Sec. 10-62(b)(55) and (79)

<sup>1</sup> Submission of required notifications, records, and reports through the Environmental Protection Agency (EPA) Compliance and Emissions Data Reporting Interface (CEDRI) will satisfy the DNR's notification and reporting requirements.

## Appendix G: Compliance Plan Summary

The owner of this equipment or the owner's authorized agent shall complete the compliance actions outlined in Table 319 before the specified deadline. These compliance actions are required in lieu of delaying the issuance of this Title V operating permit and reflect corrections to permit language or actions required to return to compliance at the specified equipment.

**Table 319. Compliance Plan Summary**

SEP ID	Compliance Action	Compliance Deadline	LCPH ATI / PTO	Authority for Requirement
009	Correct stack height from 20 feet to 42 feet	Within 6 months of Title V issuance	4448 / 4700	567 IAC 24.108(15)
083	Correct control equipment configuration to add CE083A	Within 6 months of Title V issuance	4828 / 5712	567 IAC 24.108(15)
098	Correct maximum rated capacity from 50,000 lbs to 100,000 lbs	Within 6 months of Title V issuance	4620 / 5013	567 IAC 24.108(15)
099	Correct maximum rated capacity from 50,000 lbs to 100,000 lbs	Within 6 months of Title V issuance	4621 / 5014	567 IAC 24.108(15)
100	Correct maximum rated capacity from 50,000 lbs to 100,000 lbs	Within 6 months of Title V issuance	4622 / 5015	567 IAC 24.108(15)
101	Correct maximum rated capacity from 20 tph to 100 tph	Within 6 months of Title V issuance	4623 / 5086	567 IAC 24.108(15)
190	Correct control equipment configuration for EU005C	Within 6 months of Title V issuance	4900 / 5783R1	567 IAC 24.108(15)
191	Correct control equipment configuration for EU005C	Within 6 months of Title V issuance	4901 / 5784	567 IAC 24.108(15)
192	Correct control equipment configuration for EU005C	Within 6 months of Title V issuance	4902 / 5785	567 IAC 24.108(15)
204	Correct maximum rated capacity from 18,750 gal to 118,332 gal	Within 6 months of Title V issuance	4830 / 6150	567 IAC 24.108(15)
503	Correct the exhaust rate of 30,000 scfm to reflect the actual exhaust rate as tested.	Within 6 months of Title V issuance	6163 / 6235	567 IAC 24.108(15)