Iowa Department of Natural Resources
Title V Operating Permit

Name of Permitted Facility: Bunge North America, Inc.
Facility Location: 19560 Bunge Avenue, Council Bluffs, IA 51503
Air Quality Operating Permit Number: 02-TV-017R4
Expiration Date: 10/28/2031

Permit Renewal Application Deadline: 4/28/2031

EIQ Number: 92-6880
Facility File Number: 78-01-085

Responsible Official
Name: Christopher Radford
Title: Plant Manager
Mailing Address: 19560 Bunge Ave., Council Bluffs, IA 51503
Phone #: (712) 366-8829

Permit Contact Person for the Facility
Name: Mike Jones
Title: EHS Manager
Mailing Address: 19560 Bunge Ave., Council Bluffs, IA 51503
Phone #: (712) 366-8821

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.

For the Director of the Department of Natural Resources

Corey McCoid

10/29/2026

Corey McCoid, Supervisor of Air Operating Permits Section — Date

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Abbreviations

acfm.....actual cubic feet per minute
CFR.....Code of Federal Regulation
CE .....control equipment
CEM.....continuous emission monitor
^{o}F .....degrees Fahrenheit
EIQ.....emissions inventory questionnaire
EP.....emission point
EU .....emission unit
gal/hr. .....gallons per hour
gr./dscf .....grains per dry standard cubic foot
IAC.....Iowa Administrative Code
IDNR.....Iowa Department of Natural Resources
NAICS.....North American Industry Classification System
NSPS .....new source performance standard
ppmv .....parts per million by volume
lb./hr .....pounds per hour
lb./MMBtu .....pounds per million British thermal units
SCC.....Source Classification Codes
scfm.....standard cubic feet per minute
SIC .....Standard Industrial Classification
TPY .....tons per year
USEPA.....United States Environmental Protection Agency
VMT/day.....Vehicle Miles Traveled per day

Pollutants
PM.....particulate matter
PM_{10} .....particulate matter ten microns or less in diameter
$PM_{2.5}$ .....particulate matter 2.5 microns or less in diameter
SO_2 .....sulfur dioxide
NO_x .....nitrogen oxides
VOC .....volatile organic compound
CO .....carbon monoxide
HAP.....hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Bunge North America, Inc.
Permit Number: 02-TV-017R4

Facility Description: Soybean Oil Mill (SIC 2075)

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit
AS1	AS1	Office Road 1	97-A-373P-S1
AS2	AS2	Office Road 2	
AS3	AS3	Office Road 3	
AS5	AS5	Oil Haul Road	
AS7	AS7	Oil Haul Road	
AS8	AS8	Oil Haul Road	
AS9	AS9	Oil/Meal Haul Road	
AS10	AS10	Oil/Meal Haul Road	
AS11	AS11	Oil/Meal Haul Road	
AS12	AS12	Oil/Meal Haul Road	
AS13	AS13	Oil/Meal Haul Road	
AS15	AS15	Oil/Meal Haul Road	
AS16	AS16	Bean Haul Road	
AS17	AS17	Bean Haul Road	
AS18	AS18	Office Parking Lot	
AS14	AS14	Haul Road	97-A-374
B1	B1	Boiler 1	97-A-377-S2
B2	B2	Boiler 2	97-A-407-S2
B3	B3	Boiler 3	97-A-408-S2
BB1	BB1	Bean Storage Bins	97-A-376
BR1	BR1	Bean Receiving 1	97-A-375-S3
BR2	BR2	Bean Receiving 2	97-A-405-S3
BR3	BR3	Bean Rail Receiving	97-A-406-S3
BS1	BS1	Concrete Bean Storage Silo 1	03-A-1225P-S1
BS2	BS2	Concrete Bean Storage Silo 2	03-A-1226P-S1
BS3	BS3	Concrete Bean Storage Silo 3	03-A-1227P-S1
BS4	BS4	Concrete Bean Storage Silo 4	03-A-1228P-S1
BT1	BT1	Bean Transfer Conveyor 1	01-A-719-S2
C1	C1	Bean Cleaning	97-A-387-P5
C2	C2	Foreign Material (FM) Transfer	97-A-386-S4
D1A	D1	Grain Dryer 1	97-A-388-P1
D1B			97-A-414-P1

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit
D2A	D2	Grain Dryer 2	97-A-389-P1
D2B			97-A-415-P1
DC1	DC1	Meal Dryer/Cooler 1	97-A-380-P4
DC2	DC2	Meal Dryer/Cooler 2	97-A-412-P4
DC3	DC3	Meal Dryer/Cooler 3	97-A-381-P4
DC4	DC4	Meal Dryer/Cooler 4	06-A-433-P1
DH1	DH1	Soybean Dehulling 1	97-A-379-P4
DH2	DH2	Soybean Dehulling 2	97-A-411-P4
DH3	DH3	Soybean Dehulling 3	97-A-382-P4
DH4			21-A-085
E1	E1	Soybean Oil Extraction	97-A-383-P3
EX1	EX1	Expander	06-A-431-P1
FA1	FA1	Flaker Aspiration 1	97-A-385-P5
FA2	FA2	Flaker Aspiration 2	06-A-430-P3
FO1	FO1	Fuel Oil Tank 1	97-A-395
FO2	FO2	Fuel Oil Tank 2	97-A-418
FP1	FP1	Fire Pump 1	97-A-384-S1
GP1	GP1	Ground Pile 1 – Receiving	21-A-261
	GP2	Ground Pile 1 – Handling	
	GP3	Ground Pile 1 – Loadout	
	GP4	Ground Pile 1 – Erosion	
GP2	GP5	Ground Pile 2 – Receiving	21-A-262
	GP6	Ground Pile 2 – Handling	
	GP7	Ground Pile 2 – Loadout	
	GP8	Ground Pile 2 – Erosion	
HP1	HP1	Hull Cooler	97-A-396-S2
MF1	MF1	Meal Finishing	97-A-393-P4
ML1	ML1	Meal Truck/Rail Loading	97-A-394-S1
ML2	ML2	Meal Rail Loading	97-A-417-S1
ML3	ML3	Meal Storage	97-A-392-P4
R1	R1	High Pressure Boiler 1	97-A-390-P2
R2	R2	High Pressure Boiler 2	97-A-416-P2
R5	R5	Clay Storage Tank	97-A-378-S2
R6	R6	Meal Handling	97-A-409-P5
R7	R7	Silica Storage Tank	97-A-410-S2
R9	R9	Hydrogen Plant	97-A-391

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
T1	Crude Oil Tank A (487,451 gallons)
T2	Crude Oil Tank B (487,451 gallons)
T3	Crude Oil Tank C (487,451 gallons)
T4	Crude Oil Tank D (1,883,367 gallons)
T5	RB Tank 1 (273,892 gallons)
T6	RB Tank 2 (273,367 gallons)
T7	RBD Tank 1 (190,535 gallons)
T8	RBD Tank 2 (190,535 gallons)
T9	Crush Tank 0603 (117,469.60 gallons)
T10	Crush Tank 0604 (117,469.60 gallons)
4001	4001 Series Tanks (20) (55,634 gallons each)
4002	4002 Series Tanks (3) (55,634 gallons each)
4003	4003 Series Tanks (2) (55,634 gallons each)
4004	4004 Series Tank (1) (55,634 gallons)
6001	6001 Series Tanks (12) (55,634 gallons each)
6002	6002 Series Tanks (6) (27,842 gallons each)
103	0103 Series Tank (1) (55,634 gallons)
4005	4005 Series Tank (55,634 gallons)
106	0106 Series Tank (55,634 gallons)
8005	8005 Series Tank (55,634 gallons)
104	0104 Series Tank (15,277 gallons)
GP9	Ground Pile 3 – Receiving
GP10	Ground Pile 3 – Handling
GP11	Ground Pile 3 – Loadout
GP12	Ground Pile 3 – Erosion

II. Plant-Wide Conditions

Facility Name: Bunge North America, Inc.
Permit Number: 02-TV-017R4

Permit conditions are established in accord with 567 Iowa Administrative Code rule 24.108.

Permit Duration

The term of this permit is: Five (5) years from permit issuance
Commencing on: 10/29/2026
Ending on: 10/28/2031

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 24.110 - 24.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 24.115.

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"

Sulfur Dioxide (SO_2): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

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 on or 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 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 Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).
Authority for Requirement: 567 IAC 23.3(2)"a"
Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit 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 public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance,

as defined in Iowa Code section 657.1, from becoming airborne. 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 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 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, fertilizers 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.

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

Plant-Wide Operating Limits
The process throughputs from the plant as a whole shall not exceed the following:

Fuel Oil
Process Throughput:

1. The sulfur content of fuel oil combusted in the entire plant shall not exceed 0.05% by weight.
2. The amount of fuel oil combusted in the entire plant shall not exceed 10,674,202 gallons per 12-month period rolled monthly.
3. All combustion units in the facility are restricted to the combustion of natural gas, #1, or #2 fuel oil only.

Reporting & Record keeping:
Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. Record the sulfur content of the fuel oil combusted in the entire plant, in weight percent.
2. Record the amount of fuel oil combusted in the entire plant, in gallons. Calculate and record monthly and rolling 12-month totals.

Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2, 97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1, 97-A-390-P2, 97-A-416-P2

Soybeans
Process Throughput:

1. The amount of soybeans processed at this facility shall not exceed 2,760,000 tons per 12-month rolling period.

Reporting & Record keeping:
Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. Record the amount of soybeans processed at this facility, in tons. Calculate and record monthly and 12-month rolling totals.

Authority for Requirement: DNR Construction Permits and 97-A-387-P5

Consent Decree

Bunge North America, Inc. entered into a Consent Decree with the United States EPA and 8 states in order to resolve a number of alleged violations at its 11 facilities nationwide. Bunge North America, Inc. complied with the requirements of the Consent Decree that applied to this facility, and the Consent Decree was rescinded on July 6th, 2012. However, it was the intent of the conditions in the Consent Decree that they live on in the Title V permit.

III. Emission Point-Specific Conditions

Facility Name: Bunge North America, Inc.
Permit Number: **02-TV-017R4**

Emission Point ID Numbers: Roadways

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
AS1	AS1	Office Road 1	Vehicle Traffic	77.79 VMT/day	
AS2	AS2	Office Road 2	Vehicle Traffic	77.79 VMT/day	
AS3	AS3	Office Road 3	Vehicle Traffic	77.79 VMT/day	
AS5	AS5	Oil Haul Road	Vehicle Traffic	13.73 VMT/day	
AS7	AS7	Oil Haul Road	Vehicle Traffic	13.73 VMT/day	
AS8	AS8	Oil Haul Road	Vehicle Traffic	13.73 VMT/day	
AS9	AS9	Oil/Meal Haul Road	Vehicle Traffic	15.15 VMT/day	
AS10	AS10	Oil/Meal Haul Road	Vehicle Traffic	15.15 VMT/day	97-A-373P-S1
AS11	AS11	Oil/Meal Haul Road	Vehicle Traffic	15.15 VMT/day	
AS12	AS12	Oil/Meal Haul Road	Vehicle Traffic	13.73 VMT/day	
AS13	AS13	Oil/Meal Haul Road	Vehicle Traffic	12.59 VMT/day	
AS15	AS15	Oil/Meal Haul Road	Vehicle Traffic	185 VMT/day	
AS16	AS16	Bean Haul Road	Vehicle Traffic	185 VMT/day	
AS17	AS17	Bean Haul Road	Vehicle Traffic	185 VMT/day	
AS18	AS18	Office Parking Lot	Vehicle Traffic	185 VMT/day	

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 10%[(1)]
Authority for Requirement: DNR Construction Permit 97-A-373P-S1
567 IAC 23.3(2)"d"

[(1)] Per rule 567 IAC 23.3(2)"c", the opacity limit is 0% at the lot line.

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Work practice standards:

1. These roads may be paved at the discretion of Bunge without further permit modification.
2. Any paved roads at Bunge that support truck traffic must reduce particulate emissions by a minimum of 25% by sweeping at least once per week, weather permitting. Road sections that handle only employee vehicles (AS 1, 2, 3, 18) are exempt from the sweeping requirements.

Reporting & Record keeping:

1. Record the frequency of sweeping performed on the paved roads. If the roads are not swept due to weather, a written record must be kept on site outlining the conditions.

Authority for Requirement: DNR Construction Permit 97-A-373P-S1

Monitoring Requirements

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

Weekly:

A trained observer shall check visible emissions at the lot line on a weekly basis during a period when the roads are being used and shall record the observations. EPA Method 22 shall be used, observing visible emissions at the lot line looking generally toward the zenith facing away from the property. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

If visible emissions are observed, this would be a violation and an "Excess Emissions Report" must be filed as specified in 567 IAC 24.1. In addition to the "Excess Emissions Report", 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 a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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: EP-AS14

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-AS14	Haul Road	Vehicle Traffic	79.56 VMT/day	97-A-374

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 10%[(1)] (0% at lot line)[(2)]
Authority for Requirement: DNR Construction Permit 97-A-374
[(1)] 567 IAC 23.3(2)"d"
[(2)] 567 IAC 23.3(2)"c"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.055 lb/hr, 0.24 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-374

Pollutant: Particulate Matter
Emission Limit(s): 0.055 lb/hr, 0.24 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-374

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

There are no applicable requirements at this time.

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

Weekly:
A trained observer shall check visible emissions at the lot line on a weekly basis during a period when the roads are being used and shall record the observations. EPA Method 22 shall be used, observing visible emissions at the lot line looking generally toward the zenith facing away from the property. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

If visible emissions are observed, this would be a violation and an "Excess Emissions Report" must be filed as specified in 567 IAC 24.1. In addition to the "Excess Emissions Report",

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 a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-B1, EP-B2, EP-B3

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-B1	EU-B1	Boiler 1	CEB1: Low NOx Burners, Flue Gas Recirculation	Natural Gas	99 MMBtu/hr	97-A-377-S2
				Fuel Oil	678 gal/hr	
EP-B2	EU-B2	Boiler 2	CEB2: Low NOx Burners, Flue Gas Recirculation	Natural Gas	99 MMBtu/hr	97-A-407-S2
				Fuel Oil	678 gal/hr	
EP-B3	EU-B3	Boiler 3	CEB3: Low NOx Burners, Flue Gas Recirculation	Natural Gas	99 MMBtu/hr	97-A-408-S2
				Fuel Oil	678 gal/hr	

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 20%
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2
40 CFR Part 60 Subpart Dc
567 IAC 23.1(2)"lll"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 1.39 lb/hr, 6.07 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.6 lb/MMBtu, 1.39 lb/hr, 6.07 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2
567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 8.89 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

Pollutant: Sulfur Dioxide (SO_2) – When burning Natural Gas
Emission Limit(s): 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Sulfur Dioxide (SO_2) – When burning #2 Fuel Oil
Emission Limit(s): 2.5 lb/MMBtu
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2
567 IAC 23.3(3)"b"(2)

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): 6.81 lb/hr, 19.11 tons/yr, 70 ppm
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit(s): 2.37 lb/hr, 8.22 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

Pollutant: Carbon Monoxide (CO)
Emission Limit(s): 9.90 lb/hr, 43.36 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability:
These boilers are subject to the requirements of 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Authority for Requirement: 40 CFR 63 Subpart DDDDD

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Process Throughput:

1. The sulfur content of fuel oil combusted in these boilers shall not exceed 0.05% by weight.
2. The amount of fuel oil combusted in the entire plant shall not exceed 10,674,202 gallons per 12-month period rolled monthly.
3. These units are restricted to the combustion of natural gas, #1, or #2 fuel oil only.

Reporting & Recordkeeping:

1. The sulfur content of the fuel oil combusted in these emission units, in weight percent.

2. The amount of fuel oil combusted in these emission units, in gallons. Calculate and record monthly and rolling 12-month totals.
3. The amount of natural gas combusted in these emission units, in million cubic feet, recorded monthly.

Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2
40 CFR Part 60 Subpart Dc
567 IAC 23.1(2)"lll"

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 80
Stack Opening, (inches, dia.): 44
Exhaust Flow Rate (scfm): 28,000
Exhaust Temperature (°F): 305
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 97-A-377-S2, 97-A-407-S2, 97-A-408-S2

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

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

Weekly:
The facility shall check the visible emissions weekly during a period when the emission units connected to these emission points are burning #2 Fuel Oil 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 operation of these units. 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 a visible emissions evaluation or a Method 9 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 daylight portion of the

day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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: EP-BB1

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EP-BB1	Bean Storage Bins	Soybeans	1,500 ton/hr design capacity, 1,000 ton/hr bottleneck capacity	97-A-376

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 5%
Authority for Requirement: DNR Construction Permit 97-A-376
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.1 gr/dscf, 0.26 lb/hr, 1.14 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-376

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf, 0.26 lb/hr, 1.14 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-376
567 IAC 23.4(7)

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

There are no applicable requirements at this time.

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 80
Stack Opening, (inches, dia.): 48
Exhaust Flow Rate (scfm): 311
Exhaust Temperature (°F): 70
Authority for Requirement: DNR Construction Permit 97-A-376

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-BR1, EP-BR2, EP-BR3

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-BR1	EU-BR1	Bean Receiving 1	CE-BR1: Baghouse	Soybeans	750 tons/hr	97-A-375-S3
EP-BR2	EU-BR2	Bean Receiving 2	CE-BR2: Baghouse	Soybeans	750 tons/hr	97-A-405-S3
EP-BR3	EU-BR3	Bean Rail Receiving	CE-BR3: Baghouse	Soybeans	750 tons/hr	97-A-406-S3

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 0%
Authority for Requirement: DNR Construction Permits 97-A-375-S3, 97-A-405-S3, 97-A-406-S3
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.002 gr/dscf, 0.35 lb/hr., 1.54 tons/yr.
Authority for Requirement: DNR Construction Permits 97-A-375-S3, 97-A-405-S3, 97-A-406-S3

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf, 0.35 lb/hr., 1.54 tons/yr.
Authority for Requirement: DNR Construction Permits 97-A-375-S3, 97-A-405-S3, 97-A-406-S3

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

There are no applicable requirements at this time.

Emission Point Characteristics
These emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-BR1	60	Vertical Unobstructed	32	20,080	Ambient	97-A-375-S3
EP-BR2	60		32	20,080	Ambient	97-A-405-S3
EP-BR3	60		32	24,574	Ambient	97-A-406-S3

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

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

Weekly:
The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☒ **No** ☐
Required for Baghouse, CE-BR3

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐
See Appendix A. CAM is required for the baghouses, CE-BR1 and CE-BR2.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Numbers: EP-BS1, EP-BS2, EP-BS3, EP-BS4

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-BS1	EU-BS1	Concrete Bean Storage Silo 1	CE-BS1: Baghouse	Soybeans	1.3 million bushels	03-A-1225-P1
EP-BS2	EU-BS2	Concrete Bean Storage Silo 2	CE-BS2: Baghouse	Soybeans	1.3 million bushels	03-A-1226-P1
EP-BS3	EU-BS3	Concrete Bean Storage Silo 3	CE-BS3: Baghouse	Soybeans	1.3 million bushels	03-A-1227-P1
EP-BS4	EU-BS4	Concrete Bean Storage Silo 4	CE-BS4: Baghouse	Soybeans	1.3 million bushels	03-A-1228-P1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-BS1, EP-BS2, EP-BS3, EP-BS4	Opacity	0%	567 IAC 23.3(2)"d"	03-A-1225-P1, 03-A-1226-P1, 03-A-1227-P1, 03-A-1228-P1
EP-BS1, EP-BS2, EP-BS3	Particulate Matter (PM_{10})	0.007 lb/hr, 0.031 tpy, 0.002 gr/dscf	-	03-A-1225-P1, 03-A-1226-P1, 03-A-1227-P1
	Particulate Matter (PM)	0.019 lb/hr, 0.083 tpy, 0.005 gr/dscf	-	
EP-BS4	Particulate Matter (PM_{10})	0.034 lb/hr, 0.15 tpy, 0.002 gr/dscf	-	03-A-1228-P1
	Particulate Matter (PM)	0.086 lb/hr, 0.38 tpy, 0.005 gr/dscf	-	

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Control equipment parameters:

1. Maintain the control equipment on these units according to manufacturer's specifications.

Reporting & Record keeping:

1. Record and maintenance performed on the control equipment.

Authority for Requirement: DNR Construction Permits 03-A-1225-P1, 03-A-1226-P1, 03-A-1227-P1, 03-A-1228-P1

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-BS1	136	Vertical Unobstructed	10	415	100	03-A-1225-P1
EP-BS2	136			415		03-A-1226-P1
EP-BS3	136			415		03-A-1227-P1
EP-BS4	146			2,000		03-A-1228-P1

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-BT1

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-BT1	Bean Transfer Conveyor 1	CE-BT1: Baghouse	Soybeans	50,000 bushels/hr	01-A-719-S2

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 0%
Authority for Requirement: DNR Construction Permit 01-A-719-S2
40 CFR 60.302(b)(2)
567 IAC 23.1(2) "ooo"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.8 lb/hr
Authority for Requirement: DNR Construction Permit 01-A-719-S2

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permit 01-A-719-S2
40 CFR 60.302(b)(2)
567 IAC 23.1(2) "ooo"

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

There are no applicable requirements at this time.

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Height, (ft., from the ground): 38
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 15,500[(1)] or 31,000[(2)]
Exhaust Temperature (°F): Ambient
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 01-A-719-S2
[(1)] This is the flowrate when bean storage tank 1 is being unloaded.
[(2)] This is the flowrate when bean storage tank 2, 3, or 4 is being unloaded.

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

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

Weekly:
The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☒ **No** ☐
(Required for CE-BT1 & CE-BT2)

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

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.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Numbers: EP-C1 & EP-C2

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-C1	EU-C1	Bean Cleaning	CE-C1: Baghouse	Grain	600 tons/hr design capacity, 400 ton/hr bottleneck capacity	97-A-387-P5
EP-C2	EU-C2	Foreign Material (FM) Transfer	CE-C2: Kice Filter	Foreign Material	450 ton/hr.	97-A-386-S4

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from these emission points shall not exceed the levels specified below.

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-C1 EP-C2	Opacity	0%	40 CFR 60 Subpart DD 567 IAC 23.1(2)"ooo"	97-A-387-P5 97-A-386-P4
EP-C1	Particulate Matter (PM_{10})	0.002 gr/dscf 0.27 lb/hr 1.13 tpy	-	97-A-387-P5
	Particulate Matter (PM)	0.01 gr/dscf 0.27 lb/hr 1.13 tpy	40 CFR 60 Subpart DD 567 IAC 23.1(2)"ooo"	
EP-C2	Particulate Matter (PM_{10})	0.002 gr/dscf 0.13 lb/hr 0.6 tpy	-	97-A-386-S4
	Particulate Matter (PM)	0.01 gr/dscf 0.13 lb/hr 0.6 tpy	40 CFR 60 Subpart DD 567 IAC 23.1(2)"ooo"	

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment. This record shall include, but is not limited to:
        i. The date and time any inspection and/or maintenance was performed on

the control equipment;
ii. Any issues identified during the inspection;
iii. Any issues addressed during the maintenance activities; and,
iv. Identification of the staff member performing the maintenance or inspection.

2. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
   a. A description of project 21-007,
   b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
   c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
3. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
4. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
   a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
   b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
5. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 4. for a period of ten (10) years after the project 21-007 is completed.
6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permit 97-A-387-P5

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (°F)	Construction Permit
EP-C1	55	Vertical Unobstructed	24	16,000	Ambient	97-A-378-P5
EP-C2	92	Vertical Obstructed	13	760	90	97-A-386-S4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when each emission unit on each emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the units shall be observed to ensure that no visible emissions occur during the material handling operation of the units. 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-D1A, EP-D1B, EP-D2A, EP-D2B

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-D1A	EU-D1	Grain Dryer 1	CE-D1: Settling Chamber	Soybeans	200 tons/hr	97-A-388-P1
EP-D1B						97-A-414-P1
EP-D2A	EU-D2	Grain Dryer 2	CE-D2: Settling Chamber	Soybeans	200 tons/hr	97-A-389-P1
EP-D2B						97-A-415-P1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Pollutant	Limit(s)	Authority	Construction Permit
Opacity	5%	567 IAC 23.3(2)"d"	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1
Particulate Matter (PM_{10})	1.12 lb/hr 4.91 tpy 0.013 gr/dscf	-	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1
Particulate Matter (PM)	1.12 lb/hr 4.91 tpy 0.1 gr/dscf	567 IAC 23.4(7)	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1
Sulfur Dioxide (SO_2) (natural gas)	2.4 tpy 500 ppmv	567 IAC 23.3(3)"e"	-
Sulfur Dioxide (SO_2) (fuel oil)	2.4 tpy 2.5 lb/mmBtu	567 IAC 23.3(3)"b"(2)	-
Nitrogen Oxides (NO_x)	3.41 lb/hr 14.93 tpy	-	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1
Volatile Organic Compounds (VOC)	0.47 lb/hr 2.07 tpy	-	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1
Carbon Monoxide (CO)	2.41 lb/hr 10.56 tpy	-	97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1

New Source Performance Standards (NSPS):

The following subparts apply to each emission unit:

Subpart	Title	Type	State Reference (567 IAC)	Federal Reference (40 CFR)
A	General Provisions	NA	23.1(2)	§60.1 – §60.19
DD	Standards of Performance for Grain Elevators	NA	567 IAC 23.1(2)"ooo"	§60.300 – §60.304

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The perforations on the column plate screen must be 0.094 inches or less.
2. The sulfur content of any fuel oil combusted in this dryer shall not exceed 0.05 percent by weight.
    a. Record the sulfur content of any fuel oil combusted in this dryer, in weight percent.
3. The amount of fuel oil combusted in the entire facility (78-01-085) shall not exceed 10,674,202 gallons per 12-month rolling period.
    a. Record the amount of fuel oil combusted in this facility, in gallons. Calculate and record monthly and 12-month rolling totals.
4. This unit shall combust natural gas or fuel oil #2 only. Any fuel oil combusted in this unit shall be certified by the supplier according to 40 CFR 60.48c(f)(1).
5. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of project 21-007,
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
7. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
    b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
8. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 7 for a period of ten (10) years after the project 21-007 is completed.
9. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permits 97-A-388-P1, 97-A-414-P1, 97-A-389-P1,97-A-415-P1

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 76
Stack Opening, (inches, dia.): NA
Exhaust Flow Rate (scfm): 60,000
Exhaust Temperature (°F): 200
Discharge Style: NA
Authority for Requirement: DNR Construction Permits 97-A-388-P1, 97-A-414-P1, 97-A-389-P1, 97-A-415-P1

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

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

Weekly:
The facility shall check for visible emissions weekly during a period when the emission units on these emission points are at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >5%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-DC1, EP-DC2, EP-DC3, EP-DC4

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EP-DC1	EU-DC1	Meal Dryer/Cooler 1 w/ Cyclone Recovery	Meal	500 tons/hr Design Capacity, 235 ton/hr Bottleneck Capacity	97-A-380-P4
EP-DC2	EU-DC2	Meal Dryer/Cooler 2 w/ Cyclone Recovery	Meal	500 tons/hr Design Capacity, 235 ton/hr Bottleneck Capacity	97-A-412-P4
EP-DC3	EU-DC3	Meal Dryer/Cooler 3 w/ Cyclone Recovery	Meal	500 tons/hr Design Capacity, 235 ton/hr Bottleneck Capacity	97-A-381-P4
EP-DC4	EU-DC4	Meal Dryer/Cooler 4 w/ Cyclone Recovery	Meal	500 tons/hr Design Capacity, 235 ton/hr Bottleneck Capacity	06-A-433-P1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-DC1 EP-DC2	Opacity	0%	567 IAC 23.3(2)"d"	97-A-380-P4 97-A-412-P4
	Particulate Matter (PM10)	0.0049 gr/dscf 1.47 lb/hr 6.44 tpy	-	
	Particulate Matter (PM)	0.0067 gr/dscf 2.01 lb/hr 8.80 tpy	-	
EP-DC3 EP-DC4	Opacity	0%	567 IAC 23.3(2)"d"	97-A-381-P4 06-A-433-P1
	Particulate Matter (PM_{10})	1.53 lb/hr 6.70 tpy	-	
	Particulate Matter (PM)	0.0075 gr/dscf 2.25 lb/hr 9.86 tpy	-	
EP-DC3	Particulate Matter (PM_{10})	0.0051 gr.dscf	-	97-A-381-P4
EP-DC4	Particulate Matter (PM_{10})	0.005 gr/dscf	-	06-A-433-P1

National Emission Standards for Hazardous Air Pollutants (NESHAP):
The following subparts apply to these units:

This plant, Plant Number 78-01-085, is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart GGGG – Solvent Extraction of Vegetable Oil Production. It is also subject to the requirements of NESHAP Subpart A, General Provisions.

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment. This record shall include, but is not limited to:
        i. The date and time any inspection and/or maintenance was performed on the control equipment;
        ii. Any issues identified during the inspection;
        iii. Any issues addressed during the maintenance activities; and,
        iv. Identification of the staff member performing the maintenance or inspection.
2. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of project 21-007,
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
3. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
4. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
    b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
5. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing

the information required in condition 4 for a period of ten (10) years after the project 21-007 is completed.

6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permits 97-A-380-P4, 97-A-412-P4, 97-A-381-P4, 06-A-433-P1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-DC1	91	Vertical Unobstructed	42	35,133	127	97-A-380-P4
EP-DC2	91		42	36,035	127	97-A-412-P4
EP-DC3	91		42	35,132	120	97-A-381-P4
EP-DC4	91		42	35,131	120	06-A-433-P1

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

Monitoring Requirements

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

Agency Approved Operation & 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 Numbers: EP-DH1, EP-DH2, EP-DH3, EP-DH4

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-DH1	EU-DH1	Soybean Dehulling 1	CE-DH1: Baghouse	Soybeans	345 tons/hr Design Capacity, 313 ton/hr Bottleneck Capacity	97-A-379-P4
EP-DH2	EU-DH2	Soybean Dehulling 2	CE-DH2: Baghouse	Soybeans	345 tons/hr Design Capacity, 313 ton/hr Bottleneck Capacity	97-A-411-P4
EP-DH3	EU-DH3	Soybean Dehulling 3	CE-DH3: Baghouse	Soybeans	345 tons/hr Design Capacity, 313 ton/hr Bottleneck Capacity	97-A-382-P4
EP-DH4	EU-DH4	Soybean Dehulling 4	CE-DH4: Baghouse	Soybeans	345 tons/hr Design Capacity, 313 ton/hr Bottleneck Capacity	21-A-085

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-DH1	Opacity	0%	567 IAC 23.3(2)"d"	97-A-379-P4
	Particulate Matter (PM10)	0.002 gr/dscf 1.03 lb/hr 4.51 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 1.03 lb/hr 4.51 tpy	567 IAC 23.4(7)	
EP-DH2	Opacity	0%	567 IAC 23.3(2)"d"	97-A-411-P4
	Particulate Matter (PM10)	0.002 gr/dscf 1.11 lb/hr 4.86 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 1.11 lb/hr 4.86 tpy	567 IAC 23.4(7)	

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-DH3	Opacity	0%[(1)]	567 IAC 23.3(2)"d"	97-A-382-P4
	Particulate Matter (PM10)	0.002 gr/dscf 0.94 lb/hr 4.13 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 0.94 lb/hr 4.13 tpy	567 IAC 23.4(7)	
EP-DH4	Opacity	40%	567 IAC 23.3(2)"d"	21-A-085
	Particulate Matter (PM2.5)	0.46lb/hr	-	
	Particulate Matter (PM10)	0.92 lb/hr	-	
	Particulate Matter (PM)	0.92 lb/hr 0.1 gr/dscf	567 IAC 23.4(7)	

[(1)] 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).

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment. This record shall include, but is not limited to:
        i. The date and time any inspection and/or maintenance was performed on the control equipment;
        ii. Any issues identified during the inspection;
        iii. Any issues addressed during the maintenance activities; and,
        iv. Identification of the staff member performing the maintenance or inspection.
2. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of project 21-007,
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
3. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be

documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

4. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
    b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
5. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 4 for a period of ten (10) years after the project 21-007 is completed.
6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permits 97-A-379-P4, 97-A-411-P4, 97-A-382-P4, 21-A-085

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-DH1	59	Vertical Unobstructed	80 x 48	60,000	Ambient	97-A-379-P4
EP-DH2	59		80 x 48	60,000		97-A-411-P4
EP-DH3	59		64 x 64	39,800		97-A-382-P4
EP-DH4	34		50 (dia)	53,300		21-A-085

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

Monitoring Requirements

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

Stack Testing: EP-DH1

Pollutant – Particulate Matter (PM)
Stack Test to be Completed by (date) – 10/28/2028
Test Method - 40 CFR 60, Appendix A, Method 5
Authority for Requirement – 567 IAC 24.108(3)

Stack Testing: EP-DH2

Pollutant – Particulate Matter (PM)
Stack Test to be Completed by (date) – 10/28/2028
Test Method - 40 CFR 60, Appendix A, Method 5
Authority for Requirement – 567 IAC 24.108(3)

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 25.1(7)

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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: EP-E1

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-E1	Soybean Oil Extraction	CE-E1: Mineral Oil Absorber	Soybeans	297 ton/hr	97-A-383-P3

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Pollutant: Opacity
Emission Limit(s): 40% [1]
Authority for Requirement: DNR Construction Permit 97-A-383-P3
567 IAC 23.3(2)"d"

[1] An exceedance of the indicator opacity of 25% 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).

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: DNR Construction Permit 97-A-383-P3
567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.178 gal/ton[2], 1304.5 tons/yr[3]
Authority for Requirement: DNR Construction Permit 97-A-383-P3
[2] Facility-wide limit for solvent loss from vegetable oil production. Standard is a 12-month rolling average.
[3] Facility-wide limit for solvent loss from vegetable oil production, applicable at all times.

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.16 gal/ton[4]
Authority for Requirement: 567 IAC 22.108(14) Facility Requested Limit
[4] Total solvent loss for the entire facility including startups, shutdowns and malfunctions.

Pollutant: Total HAP's (Hazardous Air Pollutants)
Emission Limit(s): 0.2 gal/ton[5]
Authority for Requirement: DNR Construction Permit 97-A-383-P3
567 IAC 23.1(4)"cg"
40 CFR 63 Subpart GGGG
[5] Solvent Loss Factor to be used to determine compliance according with 40 CFR 63.2840 Equation 2. Limit covers entire vegetable oil production process.

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall replace the two Desolventer-Toaster (DT) units currently associated with the soybean oil extraction process with a single DT unit meeting the "replacement unit" requirements in 567 IAC 33.3(1).
    a. The owner or operator shall permanently decommission the two existing DT units within 180 days of the startup of the single DT unit.
    b. The owner or operator shall notify the Department in writing within 15 days of decommissioning the two DT units.

General Requirements

2. The facility-wide solvent loss at Plant No. 78-01-085 shall not exceed 463,410 gallons of solvent (hexane) per rolling 12-month period.
    a. By the end of the next calendar month, the owner or operator shall calculate and record the facility-wide solvent loss (in gallons of hexane) for the previous calendar month.
    b. By the end of the next calendar month, the owner or operator shall calculate and record the facility-wide solvent loss (in gallons of hexane) for the previous rolling 12-month period.
    c. The owner or operator shall determine actual solvent loss according to the procedures in 40 CFR §63.2853 of Subpart GGGG (*NESHAP: Solvent Extraction for Vegetable Oil Production*).
3. The facility-wide amount of soybeans processed at Plant No. 78-01-085 shall not exceed 2,760,000 tons per rolling 12-month period.
    a. By the end of the next calendar month, the owner or operator shall calculate and record the amount of soybeans processed (in tons) for the previous calendar month.
    b. By the end of the next calendar month, the owner or operator shall calculate and record the amount of soybeans processed (in tons) for the previous rolling 12-month period.
    c. The owner or operator shall determine the amount of soybeans processed according to 40 CFR §63.2855 of Subpart GGGG.
4. The owner or operator shall calculate the ratio (Compliance Ratio) of solvent loss to soybeans processed according to 40 CFR §63.2840 of Subpart GGGG.
    a. Per 40 CFR §63.2840(c), the owner or operator shall maintain a Compliance Ratio less than or equal to 1.00 at all times.
        i. By the end of each calendar month, the owner or operator shall calculate and record the Compliance Ratio for the previous 12-month period using the applicable equation in 40 CFR §63.2840(a).
5. The owner or operator shall develop and implement a written plan for demonstrating compliance as specified in 40 CFR §63.2851. This plan shall be kept on-site and made available to the Department upon request.
6. Per 40 CFR §63.2840(g), the owner or operator shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment,

at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions.

7. The owner or operator shall comply with the applicable notifications, reporting, and recordkeeping requirements in 40 CFR §63.2860, §63.2861, and §63.2862, respectively.
8. The owner or operator shall operate the Mineral Oil Scrubber (CE-E1) to capture and recover solvent whenever the soybean oil extraction process is operated.
    a. The owner or operator shall operate, inspect, and maintain the Mineral Oil Scrubber (CE-E1) in accordance with the manufacturer's specifications.
        i. The owner or operator shall install, calibrate, and maintain devices to continuously monitor the mineral oil flow rate and the inlet temperature of the mineral oil.
        ii. The owner or operator shall record the mineral oil flow rate and inlet temperature at least once per day while the extraction process is in operation.
        iii. If any monitored parameter falls outside the range specified by the manufacturer, the owner or operator shall initiate corrective action within 8 hours of discovery.
        iv. The owner or operator shall keep a record of all maintenance and inspection activities performed on the Mineral Oil Scrubber (CE-E1). At a minimum, each entry shall include:
            (a) The date the inspection and/or maintenance was performed;
            (b) A description of any issues identified;
            (c) The date and a description of the corrective action taken to resolve each issue; and
            (d) The name or identification of the individual performing the activity.

PSD Applicability Requirements: Project Number 21-007

9. Per 567 IAC 33.3(18)"*f*"(1), prior to beginning actual construction of Project Number 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of Project Number 21-007;
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by Project Number 21-007; and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
10. Per 567 IAC 33.3(18)"*g*", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
11. Per 567 IAC 33.3(18)"*f*"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM_{10} and $PM_{2.5}$ that is emitted by any emissions unit affected by Project Number 21-007.
    b. Calculate the annual emissions (in tons per year) on a calendar-year basis, for a

period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.

12. Per 567 IAC 33.3(18)"*f*"(5), the owner or operator shall retain a written record containing the information required in condition 11. for a period of ten (10) years after Project Number 21-007 is completed.
13. Per 567 IAC 33.3(18)"*g*", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirements: DNR Construction Permit 97-A-383-P3

Reporting & Record keeping for Facility Requested VOC Limit:

1. The VOC solvent loss ratio (SLR) for this facility shall be 0.16 gallons of solvent lost per ton of oilseed processed for conventional soybean processing at an existing source. To determine compliance with the VOC SLR limit, the facility shall maintain a Compliance Ratio of less than or equal to 1.0, which compliance ratio shall be calculated as follows:

   Compliance Ratio=Actual Solvent Loss(gal)/Allowable Solvent Loss(gal)

   Where:
   Actual Solvent Loss=Gallons of solvent loss during previous 12 operating months
   Allowable Solvent Loss=Oilseed * SLR
   Oilseed=Tons of each oilseed processed during the previous 12 operating months
   SLR=0.16 gal/ton
2. Solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses.
3. For purposes of calculating SLR, the facility may apply the provisions of 40 CFR Part 63, Subpart GGGG, pertaining to malfunction periods when both of the conditions in subparagraphs (a.) and (b.) are met:
   a. The malfunction results in a total plant shutdown, which means a shutdown of the solvent extraction system; and
   b. The total amount of solvent loss to which the provisions of 40 CFR Part 63 Subpart GGGG relating to malfunctions is applied in a rolling 12-month period does not exceed the Allowable Malfunction Volume as defined below. The Allowable Malfunction in gallons is equal to the facility's 12-month Crush capacity times its final VOC SLR limit (0.16 gal/ton) times 0.024, as follows

      Allowable Malfunction Volume(gal) = 12-month Crush capacity(tons) * Final VOC SLR limit (0.16 gal/ton) * 0.24

      Except as otherwise set forth herein, the facility must include all solvent losses when determining compliance with its final VOC SLR limits at each plant. The total solvent loss corresponding to a malfunction period will be calculated as the difference in the solvent inventory, as defined in 40 CFR 63.2862(c)(1), for the day before the malfunction period began and the solvent inventory on the day the plant resumes normal operation. During a malfunction period, the facility shall

comply with the Startup, Shutdown, Malfunction ("SSM") Plan as required under Subpart GGGG.

4. The facility shall monitor and record actual solvent loss on a daily basis. The facility shall also maintain records of the quantity of oilseeds processed. These records shall be maintained for a period of five (5) years from the date of generation. These records shall be kept in a format similar to the following table:

	Total Crush (tons)		**Total Solvent Loss (gallons)**		**Malfunction Period Solvent Loss (gallons)**		**Adjusted Solvent Loss (gallons)**		**SLR (gal/ton)**	**Plant Compliance Ratio**
Date	Monthly	12-Month Rolling	Monthly	12-Month Rolling	Monthly	12-Month Rolling	Monthly	12-Month Rolling	12-Month Rolling	
Month Year										

Authority for Requirement: 567 IAC 22.108(14)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 91
Stack Opening, (inches, dia.): 12
Exhaust Flow Rate (scfm): 500
Exhaust Temperature (°F): 100
Discharge Style: Horizontal
Authority for Requirement: DNR Construction Permit 97-A-383-P3

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

Monitoring Requirements

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

Agency Approved Operation & 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: EP-EX1

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-EX1	Expander	Bean Flakes	1,850 tons/day	06-A-431-P1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 0% (1)
Authority for Requirement: DNR Construction Permit 06-A-431-P1
(1) 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 may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 1.54 lb/hr., 6.74 tons/yr., 0.006 gr/dscf
Authority for Requirement: DNR Construction Permit 06-A-431-P1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 2.61 lb/hr., 11.4 tons/yr., 0.008 gr/dscf
Authority for Requirement: DNR Construction Permit 06-A-431-P1

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 105
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 25,000 – 30,000
Exhaust Temperature (°F): 140
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 06-A-431-P1

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-FA1 & EP-FA2

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-FA1	EU-FA1	Flaker Aspiration 1	CE-FA1: Cyclone	Soybeans	366.4 ton/hr Design Capacity, 292 ton/hr Bottleneck Capacity	97-A-385-P5
EP-FA2	EU-FA2	Flaker Aspiration 2	CE-FA2: Baghouse	Soybeans	297 ton/hr Conditioners, 58.8 ton/hr Flakers	06-A-430-P3

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from these emission points shall not exceed the levels specified below.

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-FA1	Opacity	0%	-	97-A-385-P5
	Particulate Matter (PM10)	0.0043 gr/dscf 1.08 lb/hr 4.73 tpy	-	
	Particulate Matter (PM)	0.0065 gr/dscf 1.5 lb/hr 6.57 tpy 0.1 gr/dscf	567 IAC 23.4(7)	
EP-FA2	Opacity	0%	-	06-A-430-P3
	Particulate Matter (PM10)	0.003 gr/dscf 0.46 lb/hr 2.01 tpy	-	
	Particulate Matter (PM)	0.006 gr/dscf 0.92 lb/hr 4.03 tpy 0.1 gr/dscf	567 IAC 23.4(7)	

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection

activities performed on the control equipment. This record shall include, but is not limited to:

i. The date and time any inspection and/or maintenance was performed on the control equipment;
ii. Any issues identified during the inspection;
iii. Any issues addressed during the maintenance activities; and,
iv. Identification of the staff member performing the maintenance or inspection.

2. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
   a. A description of project 21-007,
   b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
   c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
3. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
4. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
   a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
   b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
5. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 4 for a period of ten (10) years after the project 21-007 is completed.
6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permits 97-A-385-P5, 06-A-430-P3

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-FA1	105	Vertical Unobstructed	36	30,000	138	97-A-385-P5
EP-FA2	105		36	17,000	138	06-A-430-P3

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

Monitoring Requirements

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

Stack Testing: EP-FA1

Pollutant – Particulate Matter (PM)
Stack Test to be Completed by (date) – 10/28/2028
Test Method - 40 CFR 60, Appendix A, Method 5
40 CFR 51 Appendix M Method 202
Authority for Requirement – 567 IAC 24.108(3)

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-FO1, EP-FO2

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EP-FO1	EU-FO1	Fuel Oil Tank 1	Fuel Oil	200,000 gallons	97-A-395
EP-FO2	EU-FO2	Fuel Oil Tank 2	Fuel Oil	200,000 gallons	97-A-418

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.5 tons/yr
Authority for Requirement: DNR Construction Permits 97-A-395, 97-A-418

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The owner or operator shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel.

Authority for Requirement: 40 CFR 60.116b(b)
567 IAC 23.1(2)"ddd"

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.

Stack Temperature (^{o}F): Ambient
Authority for Requirement: DNR Construction Permits 97-A-395, 97-A-418

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

Monitoring Requirements

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

Agency Approved Operation & 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 Numbers: EP-FP1

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-FP1	Fire Pump 1	Fuel Oil	3.5 gal/hr	97-A-384-S1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 0 %
Authority for Requirement: DNR Construction Permit 97-A-384-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.15 lb/hr, 0.67 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf, 0.15 lb/hr, 0.67 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 2.5 lb/MMBtu, 0.62 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): 2.16 lb/hr, 9.46 ton/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.17 lb/hr, 0.75 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1

Pollutant: Carbon Monoxide (CO)
Emission Limit(s): 0.47 lb/hr, 2.04 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-384-S1

National Emission Standards for Hazardous Air Pollutants (NESHAP):
The emergency engine is subject to 40 CFR 63 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.

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Hours of Operation:

1. This unit shall be operated no more than 40 hours per 12-month rolling period.

Material Usage:

1. The sulfur content of any fuel oil combusted in this fire pump shall not exceed 0.05 percent by weight.
2. The amount of fuel oil combusted in this entire facility shall not exceed 10,674,202 gallons/year.
3. This source is restricted to the combustion of #1 or #2 fuel oil only.

Reporting & Record keeping:

1. The number of hours this unit is operated per 12-month rolling period, rolled monthly.
2. The sulfur content of any fuel oil combusted in this fire pump, in weight percent.
3. The amount of fuel oil combusted in this fire pump, in gallons. Calculate and record monthly and rolling 12-month totals.

Authority for Requirement: DNR Construction Permit 97-A-384-S1
567 IAC 108(14)

Compliance Date
Per 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

1. Change oil and filter every 500 hours of operation or within 1 year + 30 days, whichever comes first. (See 63.6625(i) for the oil analysis option to extend time frame of requirements.)
2. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days, whichever comes first, and replace as necessary.
3. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days, whichever comes first, and replace as necessary.
4. 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.
5. Install a non-resettable hour meter if one is not already installed.

6. 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.

Recordkeeping Requirements 40 CFR 63.6655

1. Keep records of the maintenance conducted on the stationary RICE.
2. Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spend 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

1. An initial notification is not required per 40 CFR 63.6645(a)(5).
2. 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"

Emission Point Characteristics

This emission points shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 33
Stack Opening, (inches, dia.): 6
Exhaust Flow Rate (scfm): 200
Exhaust Temperature (°F): 300
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 97-A-384-S1

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

Monitoring Requirements

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

Agency Approved Operation & 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: EP-GP1

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
GP1	Ground Pile 1 – Receiving	Grain	30,000 bushels/hour	21-A-261
GP2	Ground Pile 1 – Handling		30,000 bushels/hour	
GP3	Ground Pile 1 – Loadout		20,000 bushels/hour	
GP4	Ground Pile 1 – Erosion		30,000 bushels/hour	

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40% [(1)]
Authority for Requirement: DNR Construction Permit 21-A-261
567 IAC 23.3(2)"d"

[(1)] 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).

Pollutant: Particulate Matter ($PM_{2.5}$)
Emission Limit(s): 0.55 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-261

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 3.23 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-261

Pollutant: Particulate Matter (PM)
Emission Limit(s): 8.28 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-261

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The amount of grain stored in Ground Pile 1 shall not exceed 3.0 million bushels per 12-month rolling period.
    a. Record the amount of grain stored in Ground Pile 1, in bushels. Calculate and record monthly and 12-month rolling totals.

2. The owner or operator shall take reasonable precautions, as defined in 567 IAC 23.3(2)(c), to prevent visible emissions of dust from Ground Pile 1 from crossing the property line.
    a. Record any precautions taken to reduce visible emissions from Ground Pile 1, including, but not limited to, the use of loadout socks, grain oiling or wetting, or reduced drop heights.

Authority for Requirement: DNR Construction Permit 21-A-261

Monitoring Requirements

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

Agency Approved Operation & 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: EP-GP2

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
GP5	Ground Pile 2 – Receiving	Grain	30,000 bushels/hour	21-A-262
GP6	Ground Pile 2 – Handling		30,000 bushels/hour	
GP7	Ground Pile 2 – Loadout		20,000 bushels/hour	
GP8	Ground Pile 2 – Erosion		30,000 bushels/hour	

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40% [(1)]
Authority for Requirement: DNR Construction Permit 21-A-262
567 IAC 23.3(2)"d"

[(1)] 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).

Pollutant: Particulate Matter ($PM_{2.5}$)
Emission Limit(s): 0.91 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-262

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 5.35 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-262

Pollutant: Particulate Matter (PM)
Emission Limit(s): 13.74 lb/hr
Authority for Requirement: DNR Construction Permit 21-A-262

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The amount of grain stored in Ground Pile 2 shall not exceed 5.0 million bushels per 12-month rolling period.
    a. Record the amount of grain stored in Ground Pile 2, in bushels. Calculate and record monthly and 12-month rolling totals.

2. The owner or operator shall take reasonable precautions, as defined in 567 IAC 23.3(2)(c), to prevent visible emissions of dust from Ground Pile 2 from crossing the property line.
    a. Record any precautions taken to reduce visible emissions from Ground Pile 2, including, but not limited to, the use of loadout socks, grain oiling or wetting, or reduced drop heights.

Authority for Requirement: DNR Construction Permit 21-A-262

Monitoring Requirements

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

Agency Approved Operation & 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: EP-HP1

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-HP1	Hull cooler	CE-HP1: Cyclone	Pellets	30 ton/hr	97-A-396-S2

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 0%
Authority for Requirement: DNR Construction Permit 97-A-396-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.002 gr/dscf, 0.27 lb/hr, 1.20 ton/yr
Authority for Requirement: DNR Construction Permit 97-A-396-S2

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf, 0.27 lb/hr, 1.20 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-396-S2
567 IAC 23.4(7)

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

There are no applicable requirements at this time.

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 100
Stack Opening, (inches, dia.): 30
Exhaust Flow Rate (scfm): 18,500
Exhaust Temperature (°F): 140
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 97-A-396-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may

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

Monitoring Requirements

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

Weekly:

Visible emissions shall be observed on a weekly basis to ensure that none when the emission unit on this emission point is at or near full capacity. 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 (>0 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake 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.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

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

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

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.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Numbers: EP-MF1, EP-ML1, EP-ML2, EP-ML3

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-MF1	EU-MF1	Meal Finishing	CE-MF1: Baghouse	Meal	235 ton/hr	97-A-393-P4
EP-ML1	EU-ML1	Meal Truck/Rail Loading	CE-ML1: Baghouse		750 ton/hr	97-A-394-S1
EP-ML2	EU-ML2	Meal Rail Loading	CE-ML2: Baghouse		500 ton/hr	97-A-417-S1
EP-ML3	EU-ML3	Meal Storage	CE-ML3: Bag Filter		750 ton/hr Design Capacity, 350 ton/hr Bottleneck Capacity	97-A-392-P4

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-MF1	Opacity	40%(1)	567 IAC 23.3(2)"d"	97-A-393-P4
	Particulate Matter (PM10)	0.002 gr/dscf 0.51 lb/hr 2.25 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 0.51 lb/hr 2.25 tpy	567 IAC 23.4(7)	
EP-ML1, EP-ML2	Opacity	0%	567 IAC 23.3(2)"d"	97-A-394-S1 97-A-417-S1
	Particulate Matter (PM10)	0.002 gr/dscf 0.50 lb/hr 2.19 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 0.50 lb/hr 2.19 tpy	567 IAC 23.4(7)	
EP-ML3	Opacity	0%	567 IAC 23.3(2)"d"	97-A-392-P4
	Particulate Matter (PM10)	0.002 gr/dscf 0.21 lb/hr 0.9 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 0.21 lb/hr 0.9 tpy	567 IAC 23.4(7)	

[1] 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).

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

EP-MF1:

1. The owner or operator shall operate, inspect, and maintain the control equipment covered by this permit in accordance with a facility-maintained Operation and Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment covered by this permit. At a minimum, this record shall include the date that any inspection and/or maintenance was performed; any issues identified during inspection and maintenance activities; the date each issue was resolved; and the identification of the staff member performing the inspection and maintenance activities.

EP-ML3:

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment. This record shall include, but is not limited to:
        i. The date and time any inspection and/or maintenance was performed on the control equipment;
        ii. Any issues identified during the inspection;
        iii. Any issues addressed during the maintenance activities; and,
        iv. Identification of the staff member performing the maintenance or inspection.

EP-MF1 and EP-ML3:

1. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of project 21-007,
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
2. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

3. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
    b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
4. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 5.D for a period of ten (10) years after the project 21-007 is completed.
5. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permit 97-A-393-P4, 97-A-392-P4

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-MF1	80	Vertical Unobstructed	32	28,000	Ambient	97-A-393-P4
EP-ML1	83		60	31,000		97-A-394-S1
EP-ML2	83		60	31,000		97-A-417-S1
EP-ML3	90		24	5,500		97-A-392-P4

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

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

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐
See Appendix A.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Numbers: EP-R1, EP-R2

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EP-R1	EU-R1	High Pressure Boiler 1	Natural Gas #2 Fuel Oil	13.5 MMBtu/hr 93 gal/hr	97-A-390-P2
EP-R2	EU-R2	High Pressure Boiler 2	Natural Gas #2 Fuel Oil	13.5 MMBtu/hr 93 gal/hr	97-A-416-P2

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 20 %
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2
567 IAC 23.1(2)"lll"
40 CFR Part 60 Subpart Dc

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.19 lb/hr, 0.83 ton/yr
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.19 lb/hr, 0.83 ton/yr, 0.6 lb/MMBtu
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2
567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 1.34 ton/yr, 2.5 lb/MMBtu
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2
567 IAC 23.3(3)"b"(2)

Pollutant: Sulfur Dioxide (SO_2) – When burning Natural Gas
Emission Limit(s): 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): 1.73 lb/hr, 5.98 ton/yr, 130 ppm
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.34 lb/hr, 1.48 ton/yr
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

Pollutant: Carbon Monoxide (CO)
Emission Limit(s): 1.35 lb/hr, 5.91 ton/yr
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

National Emission Standards for Hazardous Air Pollutants (NESHAP):
These boilers are subject to the requirements of 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Authority for Requirement: 40 CFR 63 Subpart DDDDD

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Process throughput:
1. The sulfur content of fuel oil combusted in this boiler shall not exceed 0.05 percent by weight.
2. The amount of fuel oil combusted in the entire plant shall not exceed 10,674,202 gallons per 12-month period rolled monthly.
3. This unit is restricted to the combustion of natural gas or #2 fuel oil only.

Reporting & Record keeping:
1. Record the sulfur content of any fuel oil combusted in this boiler, in weight percent.
2. Record the amount of fuel oil combusted in this boiler, in gallons. Calculate and record monthly and 12-month rolling totals.

Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 40
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate (scfm): 2,580
Exhaust Temperature (°F): 625
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 97-A-390-P2, 97-A-416-P2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may

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

Monitoring Requirements

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

Weekly:

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >20%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & 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 Numbers: EP-R5, EP-R6, EP-R7

Associated Equipment

Emission Point	Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EP-R5	EU-R5	Clay Storage Tank	CE-R5: Filter	Clay	20 ton/hr	97-A-378-S2
EP-R6	EU-R6	Meal Handling	CE-R6: Baghouse	Meal	112.8 ton/hr	97-A-409-P5
EP-R7	EU-R7	Silica Storage Tank	CE-R7: Filter	Silica Aquagel	20 ton/hr	97-A-410-S2

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

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

Emission Point	Pollutant	Limit(s)	Authority	Construction Permit
EP-R5, EP-R7	Opacity	0%	567 IAC 23.3(2)"d"	97-A-378-S2 97-A-410-S2
	Particulate Matter (PM10)	0.002 gr/dscf 0.013 lb/hr 0.06 tpy	-	
	Particulate Matter (PM)	0.1 gr/dscf 0.013 lb/hr 0.06 tpy	567 IAC 23.3(2)"a"	
EP-R6	Opacity	0%	567 IAC 23.3(2)"d"	97-A-409-P5
	Particulate Matter (PM10)	0.002 gr/dscf 0.094 lb/hr 0.41 tpy	-	
	Particulate Matter (PM)	0.002 gr/dscf 0.094 lb/hr 0.41 tpy 0.1 gr/dscf	567 IAC 23.4(7)	

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Required for R6

1. The owner or operator shall inspect and maintain the control equipment in accordance with a Facility Maintained Operation & Maintenance Plan.
    a. The owner or operator shall keep a record of all maintenance and inspection activities performed on the control equipment. This record shall include, but is not limited to:

i. The date and time any inspection and/or maintenance was performed on the control equipment;
ii. Any issues identified during the inspection;
iii. Any issues addressed during the maintenance activities; and,
iv. Identification of the staff member performing the maintenance or inspection.

2. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of project 21-007 the owner or operator shall document and maintain a record of the following:
    a. A description of project 21-007,
    b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by project 21-007, and
    c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of *"projected actual emissions"* in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
3. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).
4. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
    a. Monitor the emission of PM, PM10 and PM2.5 that is emitted by any emissions unit affected by project 21-007.
    b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
5. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing the information required in condition 4 for a period of ten (10) years after the project 21-007 is completed.
6. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 24.107(6).

Authority for Requirement: DNR Construction Permits 97-A-409-P5

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-R5	64	Vertical Obstructed	4	766	Ambient	97-A-378-S2
EP-R6	72	Vertical Unobstructed	16	5,500		97-A-409-P5

Emission Point	Stack Height (ft)	Discharge Style	Stack Opening (inches, dia)	Exhaust Flow Rate (scfm)	Exhaust Temp. (ºF)	Construction Permit
EP-R7	64	Vertical Obstructed	4	766		97-A-410-S2

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

Monitoring Requirements

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

Weekly: (Required for R5, R6, R7)

The facility shall check for visible emissions weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. The visible emissions evaluation shall be conducted by an employee familiar with the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Emissions from the unit 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 the Method 9 observation reveals an opacity >0%, 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 daylight portion of the day. Daylight shall be defined as any time between one (1) hour after sunrise and one (1) hour before sunset. 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.

Agency Approved Operation & Maintenance Plan Required? **Yes** ☐ **No** ☒

Facility Maintained Operation & Maintenance Plan Required? **Yes** ☒ **No** ☐
(Required for CE-R5, CE-R7)

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☐ **No** ☒
Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-R9

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-R9	Hydrogen Plant	Natural Gas	0.02 mmcf/hr	97-A-391

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 20%
Authority for Requirement: DNR Construction Permit 97-A-391
567 IAC 23.3(2)"d

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.21 lb/hr, 0.90 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.6 lb/MMBtu, 0.21 lb/hr, 0.90 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391
567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 2.5 lb/MMBtu, 0.04 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391
567 IAC 23.3(3)"b"(2)

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): 2.1 lb/hr, 9.2 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391

Pollutant: Volatile Organic Compounds (VOC's)
Emission Limit(s): 0.025 lb/hr, 0.11 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391

Pollutant: Carbon Monoxide (CO)
Emission Limit(s): 0.53 lb/hr, 2.3 tons/yr
Authority for Requirement: DNR Construction Permit 97-A-391

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Process Throughput:
1. This burner may be fired by natural gas only.

Authority for Requirement: DNR Construction Permit 97-A-391

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 6
Exhaust Flow Rate (acfm): 6,200
Exhaust Temperature (°F): 330
Discharge Style: NA
Authority for Requirement: DNR Construction Permit 97-A-391

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

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

Agency Approved Operation & 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)

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.

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. 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 the appropriate DNR Field office. *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 the appropriate DNR Field office. *567 IAC 24.108 (5)*

G6. Annual Fees

1. The permittee is required under subrule 567 IAC 30.4(2) 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.

    a. 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.

    b. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.

    c. The fee shall be submitted annually by July 1 with forms specified by the department.

    d. 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.

    e. 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.

    g. 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".

2. The permittee is required under subrule 567 IAC 30.4(3) to pay an annual base fee based on the fee schedule approved by the commission and posted on the department’s website. Beginning July 1, 2026, Title V operating base fees will be paid on July 1 of each year.

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"*

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"*

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 21.8(1)*

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; and
    f. The operating conditions as existing at the time of sampling or measurement.
    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 21; or

c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

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)*

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 21.10(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 21.10(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)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The facility at the time was being properly operated;

c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and

d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 24.108(16)*

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)*

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.

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.

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 22.1(2) or to meet the parameters established in 567 IAC 22.1(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)*

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 567 IAC 23.2. *567 IAC 23.2 <u>except</u> 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

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. Exceedences 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(1)*

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(2)*

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(3)*

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 24.3(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 (42 days) 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:

STACK TEST REVIEW COORDINATOR
IOWA DNR, AIR QUALITY BUREAU
6200 PARK AVE
SUITE 200
DES MOINES, IA 50321
(515) 343-6589

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.
567 IAC 21.10(7)"a", 567 IAC 21.10(9)

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
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 AVE
SUITE 200
DES MOINES, IA 50321
(515) 313-8325

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1
1101 Commercial Court, Suite 10
Manchester, IA 52057
(563) 927-2640

Field Office 2
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3
1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4
1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5
6200 Park Ave
Suite 200
Des Moines, IA 50321
(515) 725-0268

Field Office 6
1023 West Madison Street
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Works Dept.
Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health
Air Quality Branch
1020 6th Street SE
Cedar Rapids, IA 52401
(319) 892-6000

V. Appendix A: CAM

Compliance Assurance Monitoring (CAM) Plan
BR1, BR2, MF1, ML1, ML2, ML3

1 Indicators to Be Monitored and Their Measurement

Based on the requirements of the current Title V Operating Permit, Bunge has selected monitoring parameters that as data currently being collected at the facility.

All the PSEUs at Bunge fall in the "small" category, because their pre-control device potential to emit is greater than the major source thresholds, but post-control device potential to emit is less than the major source thresholds.

Bunge has selected differential pressure (dP) as the indicator to be monitored. The dP indicators are selected because a properly operating filter or baghouse will exhibit a differential pressure reading within the accepted range. Pressure drop will be checked daily to ensure readings are withing the allowable range. Readings between 0.25" – 10" of H2O indicate normal operation of the unit.

2 Proposed Indicator Ranges

Pressure drop readings on a correctly operating baghouse typically fall between 0.25" – 10" H2O. This range is consistent with readings that Bunge has observed in its operation of the subject PSEU's with baghouses/fabric filters.

3 Performance Criteria

3.1 Specifications for obtaining representative data

For dP measurements, observations are typically made at the same time during each day. The plant processes operate continuously. Therefore, taking measurements at the same time or at varying times will not affect whether a representative snapshot of dP is obtained. The only periods during which dP measurements are not appropriate occur during a scheduled plant shutdown or when a process is not operating.

3.2 Quality assurance and control procedures

The Supervisor of each affected department at the facility will review the data collection sheets when completed by a plant employee. The EHS Manager will review the data monthly. The dP data sheets will then be filed in the appropriate department files.

If a pressure drop reading not within the 0.25" – 10" of H2O is observed, corrective action will be taken within 8 hours.

3.3 Monitoring frequency

Bunge will collect the dP data daily.

3.4 Data collection procedure

A log sheet for each department is used in the past to collect dP data. The Department Supervisor or a person he/she designates will collect the dP data. Each person will be trained on how to collect the data.

Data shall be maintained for five years.

3.5 Data averaging period

There is no requirement for averaging dP readings. One measurement will be taken daily and recorded on a log sheet as observed or measured.

4 Justification for the Proposed Monitoring Indicators

The basis for our selection of monitoring indicators is the current Bunge Title V Operating Permit.

For PSEU's with baghouses, it is recommended that either a bag leak detection signal be installed or pressure drop readings be monitored to meet the intent of CAM. Bunge does not have bag leak detection instrumentation on the small PSEU's. However, there is a magnehelic gauge to monitor the pressure drop on each of the affected PSEU baghouses and filters. Therefore, Bunge shall use the existing equipment to perform the monitoring.

Also, since all of the PSEU's at Bunge are considered "small", it is not necessary to install COMs units.

5 Historical Monitoring Data

Bunge has performed a number of emission tests on the majority of the PSEU control devices. The emission test results have all been filed with the IDNR. In accordance with Bunge's existing Title V Operating Permit, dP logs are available.

6 Implementation Plan

The implementation of CAM at Bunge is currently in place using the monitoring indicators documented in Table 3. Bunge currently records dP observations. This would continue under the procedures detailed in the current Title V Operating Permit.

Under the current CAM plan, Bunge does not need no install any additional equipment to begin implementing the CAM plan.

Appendix B: NSPS and NESHAP Web Links

40 CFR 60 Subpart A: General Provisions
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-A

40 CFR 60 Subpart DD: Standards of Performance for Grain Elevators
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-DD

40 CFR 63 Subpart A: General Provisions
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-A

40 CFR 63 Subpart GGGG: National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-GGGG

40 CFR 63 Subpart ZZZZ: National Emissions 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

40 CFR 63 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-DDDDD