Iowa Department of Natural Resources
Title V Operating Permit

Name of Permitted Facility: ConAgra Foods Packaged Foods, LLC
Facility Location: 2701 Midport Blvd, Waterloo, IA 50703
Air Quality Operating Permit Number: 21-TV-002R1-M001
Expiration Date: 11/12/2031

Permit Renewal Application Deadline: 5/12/2031

EIQ Number: 92-6996
Facility File Number: 07-01-107

Responsible Official
Name: William Garcia Jr.
Title: Plant Manager
Mailing Address: 2701 Midport Blvd, Waterloo, IA 50703
Phone #: 319-287-3300

Permit Contact Person for the Facility
Name: Ellyn Perkins
Title: EHS Specialist
Mailing Address: 2701 Midport Blvd, Waterloo, IA 50703
Phone #: 319-287-3428

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

11/24/2026

Corey McCoid, Supervisor of Air Operating Permits Section — Date

Table of Contents

I. Facility Description and Equipment List **4**

II. Plant - Wide Conditions **6**

III. Emission Point Specific Conditions **8**

IV. General Conditions **47**

G1. Duty to Comply
G2. Permit Expiration
G3. Certification Requirement for Title V Related Documents
G4. Annual Compliance Certification
G5. Semi-Annual Monitoring Report
G6. Annual Fee
G7. Inspection of Premises, Records, Equipment, Methods and Discharges
G8. Duty to Provide Information
G9. General Maintenance and Repair Duties
G10. Recordkeeping Requirements for Compliance Monitoring
G11. Evidence used in establishing that a violation has or is occurring.
G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification
G13. Hazardous Release
G14. Excess Emissions and Excess Emissions Reporting Requirements
G15. Permit Deviation Reporting Requirements
G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations
G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification
G18. Duty to Modify a Title V Permit
G19. Duty to Obtain Construction Permits
G20. Asbestos
G21. Open Burning
G22. Acid Rain (Title IV) Emissions Allowances
G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements
G24. Permit Reopenings
G25. Permit Shield
G26. Severability
G27. Property Rights
G28. Transferability
G29. Disclaimer
G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification
G31. Prevention of Air Pollution Emergency Episodes
G32. Contacts List

V. Appendices: A: NSPS and NESHAP Web Links **58**

B: CAM Plans **59**

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
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
NESHAP .....National Emission Standards for Hazardous Air Pollutants
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

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: ConAgra Foods Packaged Foods, LLC
Permit Number: 21-TV-002R1-M001

Facility Description: Food manufacturing, Snack Products, Salted and Roasted Nuts and Seeds (SIC 2099, 2068)

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
EP-1	BLR-1	Steam Boiler #1	97-A-338-S1
EP-2	BLR-2	Steam Boiler #2	97-A-339-S1
EF-106	EU-106	Fugitive Flavor Dispensing	N/A
EP-5	EU-5	Fuel Oil Storage Tank	97-A-342
EP-6	EU-6	Vegetable Oil Storage Tank	97-A-343
EP-7	EU-7	Bulk Starch Storage Tank Unit T100	08-A-326
EP-8	EU-8	Bulk Starch Storage Tank Unit T200	08-A-327
EP-9	EU-9	Bulk Starch Storage Unit T300	08-A-328
EP-10	EU-10	Bulk Sugar Storage Unit	09-A-143
EP-11	EU-11	Raw Seed Receiving and Cleaning	16-A-050-S1
EP-12	EU-12	Pumpkin Seed Cleaning	16-A-051-S1
EP-13	EU-13	Post Roast Cleaning	16-A-052-S1
EP-15	EU-15	Seed Packaging	16-A-053-S1
EP-16	EU-16	Seed Roaster #1	16-A-054-S4
EP-17	EU-17	Seed Roaster #2	16-A-055-S5
EP-18	EU 18	Seed Roaster #3	16-A-056-S4
EF-222	Cleaning Tower	Cleaning Tower Building	18-A-228
EF-223	Cleaning Tower	Cleaning Tower Building	18-A-229

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU-101	Boiler Room – Salt Delivery
EU-102	S1 Dry Ingredient Room
EU-103	S2 Dry Ingredient Room
EU-104	S1 Pudding Cup Forming
EU-105	S2 Pudding Cup Forming
EU-201	Waste Collection Vacuum
EU-4800	Seeds – Salt Delivery
EU-4850	Seeds – Salt Delivery
EU-106	Haul Roads
WH-01	Water Heater – Mezzanine above packaging
WH-02	Water Heater Fryer Room

Insignificant Emission Unit Number	Insignificant Emission Unit Description
Fry Boiler	Boiler - Fryer Room
MUA 104	Roof Top Post Roast Tower
MUA 105	Roof Top Post Roast Tower
MUA 102	Roof Top Post Roast Tower
RTU-9605	Roof Top Post Roast Tower
MUA-101	Roof Top Above West Warehouse
MUA-103	Roof Top Above West Warehouse
MUA-107	Roof Top Above Packaging
MUA-108	Roof Top Above East Warehouse
MUA-106	Receiving Bay
RTU-9604	Roof Top Above Offices
RTU-9609	Roof Top Unit – Seeds West
RTU-9610	Roof Top Unit – Seeds East
RTU-09603	Roof Top Above Packaging
Dock 15/16	Dock Door Heater
Dock 17/18	Dock Door Heater
Dock 19/20	Dock Door Heater
Raw Tower 1	Raw Tower Upper Deck
Raw Tower 2	Raw Tower Upper Deck
T1100	Palm Oil and Sunflower Oil (Nitrogen Blanket)
T1200	Maltitol
T2000	Milk
T2100	Milk
T3000	Liquid Sugar
T3100	Liquid Sugar
CIP-1	Acid Tank
CIP-2	Caustic Tank
CIP-3	Chlorinated Caustic Tank

II. Plant-Wide Conditions

Facility Name: ConAgra Foods Packaged Foods, LLC
Permit Number: 21-TV-002R1-M001

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
Commencing on: 11/13/2026
Ending on: 11/12/2031

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 the equation provided in 23.3(2)"a"(2) 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 - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of

visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

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

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

III. Emission Point-Specific Conditions

Facility Name: ConAgra Foods Packaged Foods, LLC
Permit Number: 21-TV-002R1-M001

Emission Point ID Number: EP-1

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
BLR-1	Steam Boiler #1	Natural Gas or Distillate Oil	51.5 MMBtu/hr or 49.1 MMBtu/hr	97-A-338-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): 20%[(1)(2)]
Authority for Requirement: DNR Construction Permit 97-A-338-S1
567 IAC 23.1(2)"III"
40 CFR 60.43c(c)

[(1)]As required by NSPS subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and specified in §60.43c(c), the owner or operator of an affected facility that combusts oil and has a heat capacity of 30 MMBtu/hr or greater shall cause to be discharged into the atmosphere form that affected facility any gases that exhibit greater than 20% opacity (6-minute average) except for one 6-minute period of not more that 27% opacity.
[(2)] If visible emissions are observed, the owner/operator shall 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): 0.73 lb/hr
Authority for Requirement: DNR Construction Permit 97-A-338-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.73 lb/hr, 0.6 lb/MMBtu
Authority for Requirement: DNR Construction Permit 97-A-338-S1
567 IAC 23.3(2)"b"(3)

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 2.58 lb/hr; 500 ppmv; 2.5 lb/MMBtu
Authority for Requirement: DNR Construction Permit 97-A-338-S1
567 IAC 23.3(3)"e"
567 IAC 23.3(3)"b"

NSPS/NESHAP Applicability
This equipment is subject to the following federal regulations:

New Source Performance Standards (NSPS) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subpart Dc).

Authority for Requirement: DNR Construction Permit 97-A-338-S1
40 CFR 60 Subpart Dc

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.

A. The owner or operator shall inspect and maintain the boiler according to manufacturer's recommendations.
B. The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the boiler.
C. The owner or operator shall only combust natural gas or distillate oil (i.e. #1 or #2 fuel oil) in this boiler.
D. The maximum sulfur content of the distillate oil (i.e. #1 or #2 fuel oil) combusted in this boiler shall not exceed 0.05 % (by weight).
E. The permit holder, owner and operator of the facility shall maintain records on the premises to show the supplier certification of the sulfur content of the diesel fuel used in this boiler.
F. The total heat input of all fuel combusted at the facility (07-01-107) shall not exceed 1,200,000 MMBtu per rolling 12-month period.
G. Monthly, the owner and operator shall calculate, record, and maintain records of the amounts of each type of fuel combusted at the facility (07-01-107), and record a rolling twelve-month total.
H. Monthly, the owner and operator shall record and maintain records of the total heat input combusted at the facility (07-01-107), and record a rolling twelve-month total.
I. The owner or operator must keep all applicable records and submit all reports required by NSPS subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as specified in §60.48c.

Authority for Requirement: DNR Construction Permit 97-A-338-S1
567 IAC 23.3(2)"b"(3)
567 IAC 23.1(2)"lll"
40 CFR 60.48c

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

Stack Height, (ft, from the ground): 40
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 12,250
Exhaust Temperature (°F): 600
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 97-A-338-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-2

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
BLR-2	Steam Boiler #2	Natural Gas or Distillate Oil	51.5 MMBtu/hr or 49.1 MMBtu/hr	97-A-339-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): 20%[(1)(2)]
Authority for Requirement: DNR Construction Permit 97-A-339-S1
567 IAC 23.1(2)"III"
40 CFR 60.43c(c)

[(1)] As required by NSPS subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and specified in §60.43c(c), the owner or operator of an affected facility that combusts oil and has a heat capacity of 30 MMBtu/hr or greater shall cause to be discharged into the atmosphere form that affected facility any gases that exhibit greater than 20% opacity (6-minute average) except for one 6-minute period of not more that 27%opacity.
[(2)] If visible emissions are observed, the owner/operator shall 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): 0.73 lb/hr
Authority for Requirement: DNR Construction Permit 97-A-339-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.73 lb/hr, 0.6 lb/MMBtu
Authority for Requirement: DNR Construction Permit 97-A-339-S1
567 IAC 23.3(2)"b"(3)

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 2.58 lb/hr; 500 ppmv; 2.5 lb/MMBtu
Authority for Requirement: DNR Construction Permit 97-A-339-S1
567 IAC 23.3(3)"e"
567 IAC 23.3(3)"b"

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.

A. The owner or operator shall inspect and maintain the boiler according to manufacturer's recommendations.
B. The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the boiler.
C. The owner or operator shall only combust natural gas or distillate oil (i.e. #1 or #2 fuel oil) in this boiler.
D. The maximum sulfur content of the distillate oil (i.e. #1 or #2 fuel oil) combusted in this boiler shall not

exceed 0.05 % (by weight).

E. The permit holder, owner and operator of the facility shall maintain records on the premises to show the supplier certification of the sulfur content of the diesel fuel used in this boiler.
F. The total heat input of all fuel combusted at the facility (07-01-107) shall not exceed 1,200,000 MMBtu per rolling 12-month period.
G. Monthly, the owner and operator shall calculate, record, and maintain records of the amounts of each type of fuel combusted at the facility (07-01-107), and record a rolling twelve-month total.
H. Monthly, the owner and operator shall record and maintain records of the total heat input combusted at the facility (07-01-107), and record a rolling twelve-month total.
I. The owner or operator must keep all applicable records and submit all reports required by NSPS subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as specified in §60.48c.

Authority for Requirement: DNR Construction Permit 97-A-339-S1
567 IAC 23.3(2)"b"(3)
567 IAC 23.1(2)"lll"
40 CFR 60.48c

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 40
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 12,250
Exhaust Temperature (°F): 600
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 97-A-339-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: EF-106

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-106	Fugitive Flavor Dispensing	Liquid Flavorings	N/A	N/A

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.

None at this time.

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.

None at this time.

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-5

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-5	Fuel Oil Storage Tank	Fuel Oil	19,907 gallons	97-A-342

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.

None at this time.

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.

A. Maintain records on the premises to show the dimension of the storage vessel and an analysis showing the capacity of the storage vessel administered under DNR construction permit 97-A-342
B. Keep records for the life of the vessel

Authority for Requirement: DNR Construction Permit 97-A-342

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

Stack Height, (ft, from the ground): 31
Stack Opening, (feet, dia.): 0.83
Exhaust Flow Rate (scfm): Breather vent
Exhaust Temperature (°F): Ambient
Discharge Style: Vertical, unobstructed
Authority for Requirement: DNR Construction Permit 97-A-342

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-6

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-6	Vegetable Oil Storage Tank	CE-6: Nitrogen Blanket	Vegetable Oil	40,000 gallons	97-A-343

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.

None at this time.

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.

A. Maintain records on the premises to show the dimension of the storage vessel and an analysis showing the capacity of the storage vessel administered under DNR permit 97-A-343
B. Keep records for the life of the vessel

Authority for Requirement: DNR Construction Permit 97-A-343

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

Stack Height, (ft, from the ground): 38.6
Stack Opening, (feet, dia.): 0.33
Exhaust Flow Rate (scfm): Nitrogen-blanketed
Exhaust Temperature (°F): 160
Discharge Style: N/A
Authority for Requirement: DNR Construction Permit 97-A-343

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-7

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-7	Bulk Starch Storage Unit T100	CE-7: Cartridge Filter	Bulk Starch	3,000 cubic feet	08-A-326

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 08-A-326
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of 10% 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): 1.0 lb/hr
Authority for Requirement: DNR Construction Permit 08-A-326

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 08-A-326
567 IAC 23.3(2)"a"

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.

A. The cartridge filters shall be in place and operational at all times
Authority for Requirement: DNR Construction Permit 08-A-326

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

Stack Height, (ft, from the ground): 52
Stack Opening, (inches, dia.): 9
Exhaust Flow Rate (scfm): 1,860
Exhaust Temperature (°F): Ambient
Discharge Style: Horizontal
Authority for Requirement: DNR Construction Permit 08-A-326

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** ☐
Plan Required for PM

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The 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 Number: EP-8

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-8	Bulk Starch Storage Unit T200	CE-8: Cartridge Filter	Bulk Starch	3,000 cubic feet	08-A-327

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 08-A-327
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of 10% 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): 1.0 lb/hr
Authority for Requirement: DNR Construction Permit 08-A-327

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 08-A-327
567 IAC 23.3(2)"a"

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.

A. The cartridge filters shall be in place and operational at all times
Authority for Requirement: DNR Construction Permit 08-A-327

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

Stack Height, (ft, from the ground): 52
Stack Opening, (inches, dia.): 9
Exhaust Flow Rate (scfm): 1,860
Exhaust Temperature (°F): Ambient
Discharge Style: Horizontal
Authority for Requirement: DNR Construction Permit 08-A-327

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** ☐
Plan Required for PM

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The 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 Number: EP-9

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-9	Bulk Starch Storage Unit T300	CE-9: Cartridge Filter	Bulk Storage	3,000 cubic feet	08-A-328

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 08-A-328
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of 10% 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): 1.0 lb/hr
Authority for Requirement: DNR Construction Permit 08-A-328

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 08-A-328
567 IAC 23.3(2)"a"

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.

A. The cartridge filters shall be in place and operational at all times
Authority for Requirement: DNR Construction Permit 08-A-328

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

Stack Height, (ft, from the ground): 52
Stack Opening, (inches, dia.): 9
Exhaust Flow Rate (scfm): 1,860
Exhaust Temperature (°F): Ambient
Discharge Style: Horizontal
Authority for Requirement: DNR Construction Permit 08-A-328

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** ☐
Plan Required for PM

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The 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 Number: EP-10

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-10	Bulk Sugar Storage Unit	CE-10: Baghouse	Bulk Sugar	75 cubic ft	09-A-143

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 09-A-143
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of 10% 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): 0.17 lb/hr
Authority for Requirement: DNR Construction Permit 09-A-143

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 09-A-143
567 IAC 23.3(2)"a"

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.

A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
B. The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: DNR Construction Permit 09-A-143

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

Stack Height, (ft, from the ground): 20
Stack Opening, (inches, dia.): 8
Exhaust Flow Rate (scfm): 2,000
Exhaust Temperature (°F): 100
Discharge Style: Horizontal
Authority for Requirement: DNR Construction Permit 09-A-143

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** ☐
Plan Required for PM

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.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The 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 Number: EP-11

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-11	Raw Seed Receiving and Cleaning	CE-11: Cartridge Filter with Secondary HEPA Filter	Raw Seeds	See Table Seeds 1	16-A-050-S1

Table: SEEDS 1

Emission Unit ID	Emission Unit Description	Maximum Rated Capacity
CV-1015.00	Vibrating Conveyor Hood	2,250 bu/hr Receiving, 1,400 bu/hr Cleaning
EB-1025.00, 2045.00	Bucket Elevators	2,266 bu/hr, 285 bu/hr
CD-1030.00	Cup Elevator Conveyor	2,250 bu/hr
BN-2000.00 & BN-2005.00	Cleaner Bins Conveyor	2800 ft^3
CN-2010.00	Mega Cleaner	1,400 bu/hr
EC-2015.00	Continuous Cup Elevator Conveyor	1,400 bu/hr
BN-2020.00	Surge Bin to Destoner	240 ft^3
DS-2025.00, 2030.00	Destoners	1,400 bu/hr
BN-2035.00	Surge Bin to Color Sorter	192 ft^3
EC-3000.00	Continuous Cup Elevator Conveyor	1,400 bu/hr
CD-3005.00	Drag Conveyor	2,000 bu/hr
BN-3040.00 to 3095.00	12 Bulk Storage Bins	1,400 bu/hr

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 16-A-050-S1
567 IAC 23.3(2)"d"

(1) If visible emissions are observed, the owner/operator shall 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 ($PM_{2.5}$)
Emission Limit(s): 0.29 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-050-S1

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.64 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-050-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 1.46 lb/hr, 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-050-S1
567 IAC 23.3(2)"a"

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.

A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
   (1) The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the control equipment.
   (2) The permittee shall maintain a record of all inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the control equipment.
B. The differential pressure drop across the dry filters shall be maintained between 0.30 and 6.5 inches water column except during periods of filter replacement.
   (1) The permittee shall record the pressure drop across the dry filters, in inches water column, at least once per hour and average the results daily. This requirement shall not apply on the days that the dry filters or associated emission units are not in operation.
C. The permittee shall maintain a record any corrective action taken for which data show a deviation from the operating limits, including the date and time of the deviations, the time corrective action was initiated and completed, and the corrective action taken.

Authority for Requirement: DNR Construction Permit 16-A-050-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 16.7
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate (scfm): 34,000
Exhaust Temperature (°F): 70
Discharge Style: Vents Inside Building
Authority for Requirement: DNR Construction Permit 16-A-050-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-12

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-12	Pumpkin Seed Cleaning	CE-12: Cartridge filter with Secondary HEPA filter	Raw Seeds	See Table Seeds 2	16-A-051-S1

Table: SEEDS 2

Emission Unit ID	Emission Unit Description	Maximum Rated Capacity
VF-2150.00	Vibrating Feeder	500 bu/hr
EB-2110.00	Bucket Elevator	950 bu/hr
BN-2115.00	Cleaner Bin	1300 ft^3
CN-2120.00	Cleaner	500 bu/hr
EC-2125.00	Continuous Cup Elevator	480 bu/hr
BN-2130.00	Surge Bin	144 ft^3
DS-2135.00	Destoner	500 bu/hr
EC-2140.00	Continuous Cup Elevator	480 bu/hr
CD-4010.00	Drag Conveyor	500 bu/hr

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 16-A-051-S1
567 IAC 23.3(2)"d"

(1) If visible emissions are observed, the owner/operator shall 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 ($PM_{2.5}$)
Emission Limit(s): 0.15 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-051-S1

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.32 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-051-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.73 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-051-S1
567 IAC 23.3(2)"a"

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.

A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's

recommendations.

(1) The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the control equipment.

(2) The permittee shall maintain a record of all inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the control equipment.

B. The differential pressure drop across the dry filters shall be maintained between 0.30 and 6.5 inches water column except during periods of filter replacement.

(1) The permittee shall record the pressure drop across the dry filters, in inches water column, at least once per hour and average the results daily. This requirement shall not apply on the days that the dry filters or associated emission units are not in operation.

C. The permittee shall maintain a record any corrective action taken for which data show a deviation from the operating limits, including the date and time of the deviations, the time corrective action was initiated and completed, and the corrective action taken.

Authority for Requirement: DNR Construction Permit 16-A-050-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 25.8
Stack Opening, (inches, dia.): 36
Exhaust Flow Rate (scfm): 17,000
Exhaust Temperature (°F): 70
Discharge Style: Vents Inside Building
Authority for Requirement: DNR Construction Permit 16-A-051-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-13

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-13	Post Roast Cleaning	CE-13: Cartridge Filter	Roasted Sunflower and Pumpkin Seeds	See Table Seeds 3	16-A-052-S1

Table: SEEDS 3

Emission Unit ID	Emission Unit Description	Maximum Rated Capacity
EU 13A		
CD-3100.00, 3105.00, 3110.00, 3115.00, 4000.00, 4005.00, 4010.00	Drag Conveyors	500 bu/hr
EB-2210.00, 3120.00, 3125.00	Bucket Elevators	106 bu/hr, 950 bu/hr, 950 bu/hr
EQ-2200.00	Green Seed Tote Dump	350 bu/hr
BN-4100.00, 4300.00, 4500.00	Surge Bins	288 ft^3
EU 13B		
VF-5015.00, 5215.00, 5415.00	Vibrating Feeders	350 bu/hr
EC-6000.00, 6200.00, 6400.00	Continuous Cup Elevators	400 bu/hr
CCC-6030.00, 6230.00, 6430.00	Continuous Cup Conveyors	560 bu/hr
CD-6015.00, 6215.00, 6415.00	Drag Conveyors	500 bu/hr
BN-4105.00, 4305.00, 4505.00	Surge Bins	288 ft^3
EU 13C		
BN-6035.00, 6235.00, 6435.00	Cleaner Bins	578 ft^3
BN-7600.00, 7605.00, 7610.00, 7615.00, 7620.00, 7625.00, 7630.00, 7635.00, 7640.00, 7645.00	Bulk Storage Bins	17 bu/hr
CN-6040.00, 6240.00, 6440.00	Fine Cleaners	500 bu/hr
EC-7000.00, 7200.00, 7400.00	Continuous Cup Elevators	480 bu/hr

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 16-A-052-S1
567 IAC 23.3(2)"d"

[(1)]If visible emissions are observed, the owner/operator shall 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 ($PM_{2.5}$)
Emission Limit(s): 0.48 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-052-S1

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.55 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-052-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 1.76 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-052-S1
567 IAC 23.3(2)"a"

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.

A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
   (1) The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the control equipment.
   (2) The permittee shall maintain a record of all inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the control equipment.
B. The average hourly production rate of this unit (EU 13) shall not exceed 800 bushels per hour (bu/hr) calculated on a daily basis.
   (1) The facility shall calculate and record the average hourly production rate (bu/hr) of this unit:
      (a) The facility shall record the amount of product produced by EU 13, in bushels, on a daily basis;
      (b) The facility shall record the hours of operation for EU 13, on a daily basis. The hours of operation for the process is defined as the amount of time that the baghouse operates;
      (c) The facility shall calculate and record on a daily basis the average hourly production rate (bu/hr) for EU 13 based on the daily amount of product produced and daily hours of operation.
C. The differential pressure drop across the dry filters shall be maintained between 0.30 and 6.5 inches water column except during periods of filter replacement.
   (1) The permittee shall record the pressure drop across the dry filters, in inches water column, at least once per hour and average the results daily. This requirement shall not apply on the days that the dry filters or associated emission units are not in operation.
D. The permittee shall maintain a record any corrective action taken for which data show a deviation from the operating limits, including the date and time of the deviations, the time corrective action was initiated and completed, and the corrective action taken.

Authority for Requirement: DNR Construction Permit 16-A-052-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 25
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 33,000
Exhaust Temperature (°F): 70
Discharge Style: Vertical unobstructed
Authority for Requirement: DNR Construction Permit 16-A-052-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-15

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-15	Seed Packaging	CE-15: Cartridge Filter	Roasted Seeds	See Table Seeds 4	16-A-053-S1

Table: SEEDS 4

Emission Unit ID	Emission Unit Description	Maximum Rated Capacity
CCC-8000.00, 8005.00, 8025.00, 8030.00, 8035.00	Continuous Cup Conveyors	680 bu/hr, 560 bu/hr, 680 bu/hr, 560 bu/hr, 560 bu/hr
BN-8100.00, 8105.00, 8110.00, 8115.00, 8120.00, 8125.00, 8130.00, 8135.00, 8140.00, 8145.00	Surge Bins	39 ft^3
BN-8275.00, 8280.00, 8285.00	Surge Bins	17.9 ft^3, 26.3 ft^3, 29.6 ft^3
BN-8310.00, 8340.00, 8370.00, 8400.00	Surge Bins	41 ft^3
TR-8300.00, 8330.00, 8360.00	Seasoning Units	150 bu/hr
BG-8200.00, 8205.00, 8210.00, 8215.00, 8220.00, 8225.00, 8230.00, 8235.00, 8240.00, 8245.00	Baggers	95.5 bu/hr

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 16-A-053-S1
567 IAC 23.3(2)"d"

(1) If visible emissions are observed, the owner/operator shall 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 ($PM_{2.5}$)
Emission Limit(s): 0.49 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-053-S1

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.53 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-053-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 1.51 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-053-S1
567 IAC 23.3(2)"a"

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.

A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
   (1) The owner or operator shall maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the control equipment.
   (2) The permittee shall maintain a record of all inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the control equipment.

B. The average hourly production rate of this unit (EU 15) shall not exceed 800 bushels per hour (bu/hr) calculated on a daily basis.
   (1) The facility shall calculate and record the average hourly production rate (bu/hr) of this unit:
      (a) The facility shall record the amount of product produced by EU 15, in bushels, on a daily basis;
      (b) The facility shall record the hours of operation for EU 15, on a daily basis. The hours of operation for the process is defined as the amount of time that the baghouse operates;
      (c) The facility shall calculate and record on a daily basis the average hourly production rate (bu/hr) for EU 15 based on the daily amount of product produced and daily hours of operation.

C. The differential pressure drop across the dry filters shall be maintained between 0.30 and 6.5 inches water column except during periods of filter replacement.
   (1) The permittee shall record the pressure drop across the dry filters, in inches water column, at least once per hour and average the results daily. This requirement shall not apply on the days that the dry filters or associated emission units are not in operation.

D. The permittee shall maintain a record any corrective action taken for which data show a deviation from the operating limits, including the date and time of the deviations, the time corrective action was initiated and completed, and the corrective action taken.

Authority for Requirement: DNR Construction Permit 16-A-053-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 25
Stack Opening, (inches, dia.): 42
Exhaust Flow Rate (scfm): 29,000
Exhaust Temperature (°F): 70
Discharge Style: Vertical unobstructed
Authority for Requirement: DNR Construction Permit 16-A-053-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-16

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-16	Seed Roaster #1	CE-16: Venturi Scrubber	Raw Seeds, Natural Gas	350 bu/hr; 20 MMBtu/hr	16-A-054-S4

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 16-A-054-S4
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of "no visible emissions (No VE)" 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): 0.80 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-054-S4

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 7.79 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-054-S4

Pollutant: Particulate Matter (PM)
Emission Limit(s): 7.79 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-054-S4
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 500 ppmv
Authority for Requirement: DNR Construction Permit 16-A-054-S4
567 IAC 23.3(3)"e"

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.

General Requirements

A. The owner or operator shall:
   (1) Operate and maintain the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and maintenance schedule.
   (2) Maintain a copy of the manufacturer's specifications and instructions that ensures proper operation and maintenance of the Roaster and Venturi Scrubber.
   (3) Maintain a record of all inspections and maintenance conducted on the equipment. This record shall include, but is not limited to:

(a) The date any inspection and/or maintenance was performed on the control equipment.
(b) Any issues identified during the inspection.
(c) Any issues addressed during the maintenance activities.

(4) Develop and implement a startup and shutdown plan for the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and recommendations. The plan shall include procedures to minimize emissions during startup and shutdown.

(5) Maintain a copy of the startup and shutdown plan.

(6) Maintain a record of each start up and shutdown event. This record shall include, but is not limited to:
(a) The date.
(b) The beginning and end startup time.
(c) The beginning and end shutdown time.

Fuel Combustion

B. The owner or operator shall only combust natural gas or propane in the Seed Roaster #1.

C. The total heat input of all fuel combusted at the facility (07-01-107) shall not exceed 1,200,000 MMBtu per rolling 12-month period. The owner or operator shall maintain the following records for each month of operation:
(1) The types of fuel combusted at the facility (Plant Number 07-01-107);
(2) The amount of each fuel combusted at the facility (Plant Number 07-01-107);
(3) The calculations of the heat input for each individual fuel combusted at the facility (Plant Number 07-01-107) and the combined total heat input of all fuels combusted at the facility (Plant Number 07-01-107); and
(4) The combined total rolling twelve (12) month heat input for the facility (Plant Number 07-01-107)

Throughput

D. For each day of operation for Seed Roaster #1, the owner or operator shall maintain a record of:
(1) The date;
(2) The total bushels roasted in Seed Roaster #1;
(3) The hours of operation for Seed Roaster #1; and
(4) The daily average throughput for Seed Roaster #1.

Control and Monitoring Equipment Requirements

E. The owner or operator shall operate the Venturi Scrubber at all times when Seed Roaster #1 is in operation.

F. The owner or operator shall:
(1) Properly install, operate, and maintain equipment to monitor the pressure drop across the Venturi Scrubber, the scrubbant flow rate, and the conductivity of the scrubbant. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
(2) Maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the monitoring devices.
(3) Maintain a record of all calibrations, inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the monitoring devices.

G. The daily average pressure drop across the scrubber [in pounds per square inch (psi)] during normal operation (excluding periods of startup and shutdown) shall be maintained above 0.415 psi. The owner or operator shall:
(1) Measure and record the pressure drop across the Venturi Scrubber (in psi) at least once per hour during normal operation and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

H. The daily average scrubbant flow rate shall be maintained above 166.5 gallons per minute (gal/minute). The owner or operator shall:
   (1) Measure and record the scrubber water flow rate (in gal/min) at least once per hour and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

I. The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%. The owner or operator shall:
   (1) Measure and record the conductivity of the scrubbant at least once per hour and average the results daily. The permittee shall develop a correlation between the conductivity and solids content of the scrubbant and convert all daily conductivity averages to solids content of the scrubbant. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

J. If any of the pressure drop, scrubbant flow rate, or conductivity daily averages fall out of the range specified above, the owner or operator shall document the following:
   (1) The deviation: The specific date and time the excursion occurred.
   (2) Corrective action: The measures taken to resolve the issue and the timing of those actions.
   (3) Resolution: The time the parameter returned to the compliant range.

Authority for Requirement: DNR Construction Permit 16-A-054-S4

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 100
Stack Opening, (inches, dia.): 54
Exhaust Flow Rate (scfm): 24,700
Exhaust Temperature (°F): 110
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 16-A-054-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.

Stack Testing [(1),(2),(3),(4)]

Pollutant – PM_{10}
Periodic Stack Test to be Completed – Once every five years
Test Method – 40 CFR 51, Appendix M, 201A with 202
Authority for Requirement: DNR Construction Permit 16-A-054-S4

[(1)] If the throughput rate of the emission unit exceeds 280 bushels/hr (daily average) prior to the next scheduled periodic stack test, the owner or operator shall conduct a compliance test within 90 days of the date that the emission unit exceeds the 280 bushels/hr (daily average) rate. Please see Condition 5. of this permit for the recordkeeping related to this throughput rate.
[(2)] The owner or operator shall perform either representative periodic stack testing for EP 16 (Seed Roaster #1; EU 16) or EP 18 (Seed Roaster #3; EU 18) or periodic stack testing on both emission points.
[(3)] If the owner or operator elects to perform representative stack testing, it shall be conducted on one of the following emission points: EP 16 (Seed Roaster #1; EU 16) or EP 18 (Seed Roaster #3; EU 18). The representative compliance test results shall be considered characteristic of both listed emission points.
[(4)] Periodic stack testing shall be done once every five years. The most recent compliance test was completed on June 24, 2025.

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)

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

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

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐
Required for PM and PM_{10}. See Appendix B.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-17

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-17	Seed Roaster #2	CE-17: Venturi Scrubber	Raw Seeds, Natural Gas	350 bu/hr; 20 MMBtu/hr	16-A-055-S5

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 16-A-055-S5
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of "no visible emissions (No VE)" 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): 0.80 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-055-S5

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 6.14 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-055-S5

Pollutant: Particulate Matter (PM)
Emission Limit(s): 6.14 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-055-S5
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 500 ppmv
Authority for Requirement: DNR Construction Permit 16-A-055-S5
567 IAC 23.3(3)"e"

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.

General Requirements

A. The owner or operator shall:
   (1) Operate and maintain the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and maintenance schedule.
   (2) Maintain a copy of the manufacturer's specifications and instructions that ensures proper operation and maintenance of the Roaster and Venturi Scrubber.
   (3) Maintain a record of all inspections and maintenance conducted on the equipment. This record shall include, but is not limited to:

(a) The date any inspection and/or maintenance was performed on the control equipment.
(b) Any issues identified during the inspection.
(c) Any issues addressed during the maintenance activities.

(4) Develop and implement a startup and shutdown plan for the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and recommendations. The plan shall include procedures to minimize emissions during startup and shutdown.

(5) Maintain a copy of the startup and shutdown plan.

(6) Maintain a record of each start up and shutdown event. This record shall include, but is not limited to:
(a) The date.
(b) The beginning and end startup time.
(c) The beginning and end shutdown time.

Fuel Combustion

B. The owner or operator shall only combust natural gas or propane in the Seed Roaster #2.

C. The total heat input of all fuel combusted at the facility (07-01-107) shall not exceed 1,200,000 MMBtu per rolling 12-month period. The owner or operator shall maintain the following records for each month of operation:
(1) The types of fuel combusted at the facility (Plant Number 07-01-107);
(2) The amount of each fuel combusted at the facility (Plant Number 07-01-107);
(3) The calculations of the heat input for each individual fuel combusted at the facility (Plant Number 07-01-107) and the combined total heat input of all fuels combusted at the facility (Plant Number 07-01-107); and
(4) The combined total rolling twelve (12) month heat input for the facility (Plant Number 07-01-107)

Throughput

D. For each day of operation for Seed Roaster #2, the owner or operator shall maintain a record of:
(1) The date;
(2) The total bushels roasted in Seed Roaster #2;
(3) The hours of operation for Seed Roaster #2; and
(4) The daily average throughput for Seed Roaster #2.

Control and Monitoring Equipment Requirements

E. The owner or operator shall operate the Venturi Scrubber at all times when Seed Roaster #2 is in operation.

F. The owner or operator shall:
(1) Properly install, operate, and maintain equipment to monitor the pressure drop across the Venturi Scrubber, the scrubbant flow rate, and the conductivity of the scrubbant. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
(2) Maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the monitoring devices.
(3) Maintain a record of all calibrations, inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the monitoring devices.

G. The daily average pressure drop across the scrubber [in pounds per square inch (psi)] during normal operation (excluding periods of startup and shutdown) shall be maintained above 0.415 psi. The owner or operator shall:
(1) Measure and record the pressure drop across the Venturi Scrubber (in psi) at least once per hour during normal operation and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

H. The daily average scrubbant flow rate shall be maintained above 131.0 gallons per minute (gal/minute). The owner or operator shall:
   (1) Measure and record the scrubber water flow rate (in gal/min) at least once per hour and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

I. The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%. The owner or operator shall:
   (1) Measure and record the conductivity of the scrubbant at least once per hour and average the results daily. The permittee shall develop a correlation between the conductivity and solids content of the scrubbant and convert all daily conductivity averages to solids content of the scrubbant. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

J. If any of the pressure drop, scrubbant flow rate, or conductivity daily averages fall out of the range specified above, the owner or operator shall document the following:
   (1) The deviation: The specific date and time the excursion occurred.
   (2) Corrective action: The measures taken to resolve the issue and the timing of those actions.
   (3) Resolution: The time the parameter returned to the compliant range.

Authority for Requirement: DNR Construction Permit 16-A-055-S5

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): 22,800
Exhaust Temperature (°F): 110
Discharge Style: Unobstructed Vertical
Authority for Requirement: DNR Construction Permit 16-A-055-S5

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 [(1),(2)]

Pollutant – PM_{10}
Periodic Stack Test to be Completed – Once every five years.
Test Method – 40 CFR 51, Appendix M, 201A with 202
Authority for Requirement: DNR Construction Permit 16-A-055-S5

[(1)] If the throughput rate of the emission unit exceeds 280 bushels/hr (daily average) prior to the next scheduled periodic stack test, the owner or operator shall conduct a compliance test within 90 days of the date that the emission unit exceeds the 280 bushels/hr (daily average) rate. Please see Condition 5 of this permit for the recordkeeping related to this throughput rate.
[(2)] Periodic stack testing shall be done once every five years. The most recent compliance test was completed on June 25, 2025.

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)

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

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

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐
Required for PM and PM_{10}. See Appendix B.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-18

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-18	Seed Roaster #3	CE-18: Venturi Scrubber	Raw Seeds, Natural Gas	350 bu/hr; 20 MMBtu/hr	16-A-056-S4

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 16-A-056-S4
567 IAC 23.3(2)"d"

[(1)] An exceedance of the indicator opacity of "no visible emissions (No VE)" 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): 0.80 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-056-S4

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 7.79 lb/hr
Authority for Requirement: DNR Construction Permit 16-A-056-S4

Pollutant: Particulate Matter (PM)
Emission Limit(s): 7.79 lb/hr; 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 16-A-056-S4
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO_2)
Emission Limit(s): 500 ppmv
Authority for Requirement: DNR Construction Permit 16-A-056-S4
567 IAC 23.3(3)"e"

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.

General Requirements

A. The owner or operator shall:
   (1) Operate and maintain the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and maintenance schedule.
   (2) Maintain a copy of the manufacturer's specifications and instructions that ensures proper operation and maintenance of the Roaster and Venturi Scrubber.
   (3) Maintain a record of all inspections and maintenance conducted on the equipment. This record shall include, but is not limited to:

(a) The date any inspection and/or maintenance was performed on the control equipment.
(b) Any issues identified during the inspection.
(c) Any issues addressed during the maintenance activities.

(4) Develop and implement a startup and shutdown plan for the Roaster and Venturi Scrubber in accordance with the manufacturer's specifications and recommendations. The plan shall include procedures to minimize emissions during startup and shutdown.

(5) Maintain a copy of the startup and shutdown plan.

(6) Maintain a record of each start up and shutdown event. This record shall include, but is not limited to:
(a) The date.
(b) The beginning and end startup time.
(c) The beginning and end shutdown time.

Fuel Combustion

B. The owner or operator shall only combust natural gas or propane in the Seed Roaster #3.

C. The total heat input of all fuel combusted at the facility (07-01-107) shall not exceed 1,200,000 MMBtu per rolling 12-month period. The owner or operator shall maintain the following records for each month of operation:
(1) The types of fuel combusted at the facility (Plant Number 07-01-107);
(2) The amount of each fuel combusted at the facility (Plant Number 07-01-107);
(3) The calculations of the heat input for each individual fuel combusted at the facility (Plant Number 07-01-107) and the combined total heat input of all fuels combusted at the facility (Plant Number 07-01-107); and
(4) The combined total rolling twelve (12) month heat input for the facility (Plant Number 07-01-107)

Throughput

D. For each day of operation for Seed Roaster #3, the owner or operator shall maintain a record of:
(1) The date;
(2) The total bushels roasted in Seed Roaster #3;
(3) The hours of operation for Seed Roaster #3; and
(4) The daily average throughput for Seed Roaster #3.

Control and Monitoring Equipment Requirements

E. The owner or operator shall operate the Venturi Scrubber at all times when Seed Roaster #3 is in operation.

F. The owner or operator shall:
(1) Properly install, operate, and maintain equipment to monitor the pressure drop across the Venturi Scrubber, the scrubbant flow rate, and the conductivity of the scrubbant. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
(2) Maintain a copy of the manufacture's specifications and instructions that ensure proper operation and maintenance of the monitoring devices.
(3) Maintain a record of all calibrations, inspections, maintenance, and repair and any action resulting from the inspection and maintenance of the monitoring devices.

G. The daily average pressure drop across the scrubber [in pounds per square inch (psi)] during normal operation (excluding periods of startup and shutdown) shall be maintained above 0.415 psi. The owner or operator shall:
(1) Measure and record the pressure drop across the Venturi Scrubber (in psi) at least once per hour during normal operation and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

H. The daily average scrubbant flow rate shall be maintained above 166.5 gallons per minute (gal/minute). The owner or operator shall:
   (1) Measure and record the scrubber water flow rate (in gal/min) at least once per hour and average the results daily. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

I. The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%. The owner or operator shall:
   (1) Measure and record the conductivity of the scrubbant at least once per hour and average the results daily. The permittee shall develop a correlation between the conductivity and solids content of the scrubbant and convert all daily conductivity averages to solids content of the scrubbant. This requirement shall not apply on the days that the Venturi Scrubber is not in operation.

J. If any of the pressure drop, scrubbant flow rate, or conductivity daily averages fall out of the range specified above, the owner or operator shall document the following:
   (1) The deviation: The specific date and time the excursion occurred.
   (2) Corrective action: The measures taken to resolve the issue and the timing of those actions.
   (3) Resolution: The time the parameter returned to the compliant range.

Authority for Requirement: DNR Construction Permit 16-A-056-S4

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 100
Stack Opening, (inches, dia.): 54
Exhaust Flow Rate (scfm): 24,700
Exhaust Temperature (°F): 110
Discharge Style: Unobstructed vertical
Authority for Requirement: DNR Construction Permit 16-A-056-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.

Stack Testing [(1),(2),(3),(4)]

Pollutant – PM_{10}
Periodic Stack Test to be Completed – Once every five years
Test Method – 40 CFR 51, Appendix M, 201A with 202
Authority for Requirement: DNR Construction Permit 16-A-056-S4

[(1)] If the throughput rate of the emission unit exceeds 280 bushels/hr (daily average) prior to the next scheduled periodic stack test, the owner or operator shall conduct a compliance test within 90 days of the date that the emission unit exceeds the 280 bushels/hr (daily average) rate. Please see Condition 5. of this permit for the recordkeeping related to this throughput rate.
[(2)] The owner or operator shall perform either representative periodic stack testing for EP 16 (Seed Roaster #1; EU 16) or EP 18 (Seed Roaster #3; EU 18) or periodic stack testing on both emission points.
[(3)] If the owner or operator elects to perform representative stack testing, it shall be conducted on one of the following emission points: EP 16 (Seed Roaster #1; EU 16) or EP 18 (Seed Roaster #3; EU 18). The representative compliance test results shall be considered characteristic of both listed emission points.

(4) Periodic stack testing shall be done once every five years. The most recent compliance test was a representative test completed at EP 16 on June 24, 2025.

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)

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

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

Compliance Assurance Monitoring (CAM) Plan Required? **Yes** ☒ **No** ☐
Required for PM and PM_{10}. See Appendix B.

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EF-222 & EF-223

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EP-11	Cleaning Tower Buildings	Exhaust internal venting sources	NA	18-A-228 18-A-229
EP-12				

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): 40%[(1)]
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229
567 IAC 23.3(2)"d"

[(1)] If visible emissions are observed, the owner/operator shall 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 ($PM_{2.5}$)
Emission Limit(s): 0.22 lb/hr
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.48 lb/hr
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229
567 IAC 23.3(2)"a"

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.

None at this time
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229

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

Stack Height, (ft, from the ground): 75.5
Stack Opening, (inches, dia.): 52.5
Exhaust Flow Rate (scfm): 14,210
Exhaust Temperature (°F): Ambient
Discharge Style: Vertical Obstructed
Authority for Requirement: DNR Construction Permit 18-A-228, 18-A-229

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. 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.

    f. 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

Any permittee manufacturing, storing, handling, transporting, or disposing of a hazardous substance shall report a hazardous condition to the department at (515) 725-8694 and either the local police department or the office

of the sheriff of the county where the hazardous condition occurred. The initial report shall be made as soon as possible but not later than six hours after the onset or discovery of the hazardous condition. This initial report must be followed up with a written report as indicated in 567 IAC 105.5(2). *567 IAC Chapter 105-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 24.108(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 except 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*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 24.114*
5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 24.114*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
    a. Such applicable requirements are included and are specifically identified in the permit; or
    b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 24.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 24.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 24.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 24.111(1). *567 IAC 24.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department’s request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks (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 21 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 21.14*

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 shall be directed to the supervisor at the appropriate field office or local program. The current address and phone number is:

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

Appendix A: NSPS and NESHAP Web Links

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

40 CFR Part 60 Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Dc

Appendix B: CAM Plan

EP-16 CAM Plan
Seed Roaster #1 CAM Monitoring Approach Criteria
Title V Renewal
ConAgra Foods Packaged Foods, LLC

Emission Unit Designation:	**Pollutant and Limit:**	**Indicator #1:**	**Indicator #2:**	**Indicator #2:**
EU-16 Seed Roaster #1	PM & PM_{10} (7.79 lb/hr)	Pressure Drop	Scrubbant Flow Rate	Scrubbant Solids Content
GENERAL CRITERIA Monitoring device or measure used to obtain data:		Pressure Gauge	Flow Meter	Conductivity Meter
Establish the appropriate indicator range or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		The daily average pressure drop across the scrubber [in pounds per square inch ("psi")] shall be maintained above 0.415 psi.	The daily average scrubbant flow rate shall be maintained above 166.5 gallons per minute.	The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%.
PERFORMANCE CRITERIA Provide the specifications for obtaining representative data, such as detector location and installation specifications:		Pressure gauge installed across the scrubber to measure pressure drop.	Flowmeter installed to measure in the scrubbant feed line to measure flow rate.	Conductivity meter installed in the scrubbant feed line to measure conductivity.
Provide verification procedures, including manufacturer's recommendations, to confirm the operational status of the monitoring:		The gauge is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.
Provide quality assurance and quality control (qa/qc) practices that are adequate to ensure the continuing validity of the data, considering manufacturer's recommendations:		The gauge is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.
Provide the monitoring frequency:		Data recorded at least once per hour.	Data recorded at least once per hour.	Data recorded at least once per hour.
Provide the data collection procedures that will be used:		Data automatically logged.	Data automatically logged.	Data automatically logged.
Provide the data averaging period for the purpose of determining whether an excursion or exceedance has occurred:		Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.
RATIONALE FOR INDICATORS AND THE MONITORING APPROACH				
		Requirement established under Construction Permit 16-A-054-S4	Requirement established under Construction Permit 16-A-054-S4	Requirement established under Construction Permit 16-A-054-S4
RATIONALE FOR INDICATORS RANGES				
		Requirement established under Construction Permit 16-A-054-S4	Requirement established under Construction Permit 16-A-054-S4	Requirement established under Construction Permit 16-A-054-S4

EP-17 CAM Plan

Seed Roaster #2 CAM Monitoring Approach Criteria

Title V Renewal

ConAgra Foods Packaged Foods, LLC

Emission Unit Designation:	**Pollutant and Limit:**	**Indicator #1:**	**Indicator #2:**	**Indicator #2:**
EU-17 Seed Roaster #2	PM & PM_{10} (6.14 lb/hr)	Pressure Drop	Scrubbant Flow Rate	Scrubbant Solids Content
GENERAL CRITERIA				
Monitoring device or measure used to obtain data:		Pressure Gauge	Flow Meter	Conductivity Meter
Establish the appropriate indicator range or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		The daily average pressure drop across the scrubber [in pounds per square inch ("psi")] shall be maintained above 0.415 psi.	The daily average scrubbant flow rate shall be maintained above 131.0 gallons per minute.	The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%.
PERFORMANCE CRITERIA				
Provide the specifications for obtaining representative data, such as detector location and installation specifications:		Pressure gauge installed across the scrubber to measure pressure drop.	Flowmeter installed to measure in the scrubbant feed line to measure flow rate.	Conductivity meter installed in the scrubbant feed line to measure conductivity.
Provide verification procedures, including manufacturer's recommendations, to confirm the operational status of the monitoring:		The gauge is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.
Provide quality assurance and quality control (qa/qc) practices that are adequate to ensure the continuing validity of the data, considering manufacturer's recommendations:		The gauge is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.
Provide the monitoring frequency:		Data recorded at least once per hour.	Data recorded at least once per hour.	Data recorded at least once per hour.
Provide the data collection procedures that will be used:		Data automatically logged.	Data automatically logged.	Data automatically logged.
Provide the data averaging period for the purpose of determining whether an excursion or exceedance has occurred:		Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.
RATIONALE FOR INDICATORS AND THE MONITORING APPROACH				
		Requirement established under construction permit 16-A-055-S5	Requirement established under construction permit 16-A-055-S5	Requirement established under construction permit 16-A-055-S5
RATIONALE FOR INDICATORS RANGES				
		Requirement established under Construction Permit 16-A-055-S5	Requirement established under Construction Permit 16-A-055-S5	Requirement established under Construction Permit 16-A-055-S5

EP-18 CAM Plan

Seed Roaster #3 CAM Monitoring Approach Criteria

Title V Renewal

ConAgra Foods Packaged Foods, LLC

Emission Unit Designation:	**Pollutant and Limit:**	**Indicator #1:**	**Indicator #2:**	**Indicator #2:**
EU-18 Seed Roaster #3	PM & PM_{10} (7.79 lb/hr)	Pressure Drop	Scrubbant Flow Rate	Scrubbant Solids Content
GENERAL CRITERIA				
Monitoring device or measure used to obtain data:		Pressure Gauge	Flow Meter	Conductivity Meter
Establish the appropriate indicator range or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		The daily average pressure drop across the scrubber [in pounds per square inch ("psi")] shall be maintained above 0.415 psi.	The daily average scrubbant flow rate shall be maintained above 166.5 gallons per minute.	The daily average solids content of the scrubbant, as measured by conductivity, shall be maintained below 10%.
PERFORMANCE CRITERIA				
Provide the specifications for obtaining representative data, such as detector location and installation specifications:		Pressure gauge installed across the scrubber to measure pressure drop.	Flowmeter installed to measure in the scrubbant feed line to measure flow rate.	Conductivity meter installed in the scrubbant feed line to measure conductivity.
Provide verification procedures, including manufacturer's recommendations, to confirm the operational status of the monitoring:		The gauge is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.	The meter is installed and calibrated in accordance with the manufacturer's recommendation.
Provide quality assurance and quality control (qa/qc) practices that are adequate to ensure the continuing validity of the data, considering manufacturer's recommendations:		The gauge is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.	The meter is maintained in accordance with the manufacturer's written specifications.
Provide the monitoring frequency:		Data recorded at least once per hour.	Data recorded at least once per hour.	Data recorded at least once per hour.
Provide the data collection procedures that will be used:		Data automatically logged.	Data automatically logged.	Data automatically logged.
Provide the data averaging period for the purpose of determining whether an excursion or exceedance has occurred:		Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.	Daily average during each day in which the roaster operates.
RATIONALE FOR INDICATORS AND THE MONITORING APPROACH				
		Requirement established under Construction Permit 16-A-056-S4	Requirement established under Construction Permit 16-A-056-S4	Requirement established under Construction Permit 16-A-056-S4
RATIONALE FOR INDICATORS RANGES				
		Requirement established under Construction Permit 16-A-056-S4	Requirement established under Construction Permit 16-A-056-S4	Requirement established under Construction Permit 16-A-056-S4