

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

Name of Permitted Facility: Cargill Soybean East Plant
Facility Location: 410 C Avenue NE, Cedar Rapids, IA 52401
Air Quality Operating Permit Number: 99-TV-044R3
Expiration Date: June 22, 2022
Permit Renewal Application Deadline: December 23, 2021

EIQ Number: 92-9015
Facility File Number: 57-01-003

Responsible Official

Name: Jeff Johnson
Title: Facility Superintendent
Mailing Address: PO Box 1748, Cedar Rapids, IA 52406
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Permit Contact Person for the Facility

Name: Michaela Papp
Title: EHS Coordinator
Mailing Address: PO Box 1748, Cedar Rapids, IA 52406
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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources



Lori Hanson, Supervisor of Air Operating Permits Section

June 23, 2017

Date

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Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
CE	control equipment
CEM.....	continuous emission monitor
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP	emission point
EU	emission unit
gr./dscf	grains per dry standard cubic foot
gr./100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NAICS.....	North American Industry Classification System
NSPS.....	new source performance standard
ppmv	parts per million by volume
lb./hr	pounds per hour
lb./MMBtu	pounds per million British thermal units
SCC.....	Source Classification Codes
scfm.....	standard cubic feet per minute
SIC.....	Standard Industrial Classification
TPY.....	tons per year
USEPA.....	United States Environmental Protection Agency

Pollutants

PM.....	particulate matter
PM ₁₀	particulate matter ten 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: Cargill Soybean East Plant

Permit Number: 99-TV-004R3

Facility Description: Soybean/Oil Meal (SIC 2075)

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	LCPH Permit Number (ATI/PTO)
001	001	Truck Dump	4876 / 4987
003	003	A-House Bagfilter	6567 / 6477R1
008	008	Flaker Aspiration	6417 / 6256
011	011	Purging of Hexane Vapors	6263 / 6068R1
012	012	Extraction Process	6141 / 6069R1
019	019	Meal Grinding and Sifting	2630 / 2469
020	020	Hull Aspiration	6418 / 6227
021	021	Dehulling Soybeans	2474 / 2367
026	026	Truck Loadout Aspiration	6419 / 6226
030	030	Hull Processing and Cooling	2656 / 2634
034	034	Meal Tank #3 Dust Collector	6420 / 6225
036	036	Meal Tank #5 Dust Collector	6421 / 6224
040	040	Elevator Aspiration	6569 / 6511
041	041	Prep Vacuum Cleaning System	2036 / 1979R1
042	042	Clay Tank Vent	2045 / 1980
043	043	Meal Truck Loadout #1	2327 / 2257R1
044	044	Meal Truck Loadout #2	2326 / 2258R1
049	49.1	Meal Dryer Deck #1	5541 / 5617R1
	49.2	Meal Dryer Deck #2	5541 / 5617R1
	49.3	Meal Dryer Deck #3	5541 / 5617R1
	49.4	Meal Cooler Deck #4	5541 / 5617R1
056	56.1	82,500 lb/hr steam, 99.9 MMBtu/hr Natural Gas fired	5717 / 5618R1
	56.2	82,500 lb/hr steam, 99.9 MMBtu/hr Fuel Oil fired	5717 / 5618R1
057	57	Pellet Mill	6032 / 5890
058	58	Ground Pod Aspiration	6592 / 6478R2
121	121	DT Discharge Conveyor Steam Vent #2	6160 / 6071R2
122	122	DT Discharge Conveyor Steam Vent #3	6161 / 6072R2
125	125	Extraction Feed Conveyor Vent #1	6264 / 6073R1
126	126	Extraction Feed Conveyor Vent #2	6593 / 6479

Emission Point Number	Emission Unit Number	Emission Unit Description	LCPH Permit Number (ATI/PTO)
127	127	Extraction Feed Conveyor Vent #3	6266 / 6075R1
128	128	Conditioner Discharge Vent	6622 / 6480
501	5.1	Grain Dryer Vent #1	6568 / 6481
	501.1	Grain Dryer Bottom Burner	6568 / 6481
	501.2	Grain Dryer Top Burner	6568 / 6481
502	5.2	Grain Dryer Vent #2	6610 / 6482
	501.1	Grain Dryer Bottom Burner	6610 / 6482
	501.2	Grain Dryer Top Burner	6610 / 6482
503	5.3	Grain Dryer Vent #3	6611 / 6483
	501.1	Grain Dryer Bottom Burner	6611 / 6483
	501.2	Grain Dryer Top Burner	6611 / 6483
504	5.4	Grain Dryer Vent #4	6612 / 6484
	501.1	Grain Dryer Bottom Burner	6612 / 6484
	501.2	Grain Dryer Top Burner	6612 / 6484

II. Plant-Wide Conditions

Facility Name: Cargill Soybean East Plant
Permit Number: 99-TV-004R3

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: less than 5 years
Commencing on: June 23, 2017
Ending on: June 22, 2022

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Plant-Wide Emission Limits

The atmospheric emissions from the plant as a whole shall not exceed the following:

The following emission limit sets a facility-wide cap for VOC emissions associated with the soy oil extraction process. This included all permitted point source and non-point source fugitive emissions.

Pollutant: Volatile Organic Compounds (VOC)¹
Emission Limit: 474.49 tons per year, 0.168 gal/ton²
Authority for Requirement: LCPH ATI 6263 / PTO 6068R1
LCPH ATI 6141 / PTO 6069R1
LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2
LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6593 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

¹ This is a facility-wide limit for solvent loss associated with the Solvent Extraction for the Vegetable Oil Production Plant. This limit is based on the design capacity of the plant which is limited to 1,007,400 tons/year of soybeans. The solvent loss limit encompasses all point and fugitive sources of solvent loss. Compliance with the 474.49 tpy limit is determined on a mass balance approach (see Permit Conditions 15 and 16 [of the associated Authority for Requirement permits]).

² This solvent loss ratio limit is based on a 12-month rolling average and becomes effective three years from entry of Consent Decree (February 27, 2006) as negotiated under United States vs. Cargill, Inc. (Paragraph 19 of Consent Decree 05-CV-02037).

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: 0.2 gal/ton³

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1
LCPH ATI 6141 / PTO 6069R1
LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2
LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6593 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

³ Emission limit is based on NESHAP Subpart GGGG 40 CFR §63.2840 for existing conventional soybean processing sources.

Plant-Wide Operating Limits

- A. The maximum VOC content of any solvent shall not exceed 5.6 pounds per gallon.
- B. The maximum solvent usage shall not exceed 169,460 gallons per 12-month rolling total.
- C. The facility shall be limited to a crush rate of 92,000 bushels per day or less based on a 52-week rolling average.
- D. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (LCPH Project Number 1786¹) the owner or operator shall document:
 1. A description of the project (LCPH Project Number 1786¹),
 2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (LCPH Project Number 1786¹), and
 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
- E. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
 1. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified in Condition D.(2) [above].
 2. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
- F. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).
- G. This facility shall meet requirements of 40 CFR 63 §1-16 [NESHAP Subpart A] to comply with LCO 10.9(4).
- H. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the standards of 40 CFR §63.2840 to comply with LCO 10.9(4)"gggg".

- I. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the compliance requirements of 40 CFR §63.2850 through 40 CFR §63.2855 to comply with LCO10.9(4)"gggg".

¹ Note LCPH Project 1786 was completed on December 17, 2012. Calculation of annual emissions pursuant to Condition D.2 above commenced on January 1, 2013 and is expected to cease on December 31, 2017.

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1
LCPH ATI 6141 / PTO 6069R1
LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2
LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6593 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

Plant-Wide Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. Maintain Material Safety Data Sheets (MSDS) of all solvent(s) used in the extraction process.
- B. Record the VOC and VHAP content of the solvent upon each new shipment of solvent to the facility in pounds per gallon.
- C. Record the total solvent usage in gallons on a monthly basis and calculate the 12-month rolling total solvent usage to determine compliance with the operating limit in [Plant-Wide Operating] Condition B.
- D. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate to determine compliance with the operating limit in [Plant-Wide Operating] Condition C.
- E. Per 567 IAC 33.3(18)"f"(1), the owner or operator shall maintain a record of the information required in [Plant-Wide Operating] Condition D of this permit.
- F. Per 567 IAC 33.3(18)"f"(4) and 567 IAC 33.3(18)"f"(5), the owner or operator shall maintain a record containing the information required in [Plant-Wide Operating] Condition E of this permit and that record shall be retained by the owner or operator for a period of ten (10) years after the project (LCPH Project Number 1786) is completed.
- G. Recordkeeping for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2862 and 40 CFR §63.2863.

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1
LCPH ATI 6141 / PTO 6069R1
LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2
LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6593 / PTO 6479

Plant Wide Reporting Requirements

The following information shall be submitted as stated below.

- A. Per 567 IAC 33.3(18)"f"(7)¹, the owner or operator shall submit a report to the Department within sixty (60) days after the end of each year during which records must be generated under [Plant-Wide Operating Condition Monitoring and Recordkeeping] Condition F setting out the unit's annual emissions during the calendar year that preceded submission of the report.
- B. Reporting for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2861.

¹ Per 567 IAC 33.3(18)"f"(7), this report is to be submitted if the annual emissions (in tons per year) from LCPH Project 1786 exceed the baseline actual emissions, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4), by an amount that is "significant," as defined in 567 IAC 33.3(1), for that regulated NSR pollutant, and if such emissions differ from the preconstruction project, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4).

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1
LCPH ATI 6141 / PTO 6069R1
LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2
LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6593 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

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): 20% opacity
Authority for Requirement: LCO 10.7

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"
LCO 10.12(2)

Particulate Matter:

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

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or

amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

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

Fugitive Dust:

Attainment and Unclassified Areas - 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: Cargill Soybean East Plant
Permit Number: 99-TV-044-R3

Emission Point ID Number: 001

Associated Equipment

Associated Emission Unit ID Numbers: 001
Emissions Control Equipment ID Number: 001
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 001
Emission Unit Description: Grain Receiving- Truck Dump
Raw Material/Fuel: Soybean
Rated Capacity: 600 tons/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): 0% (process emissions)

Authority for Requirement: 40 CFR §60.302(b)(2) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 4876 / PTO 4987

Pollutant: Opacity

Emission Limit(s): 0% (fugitive emissions from grain handling operation)

Authority for Requirement: 40 CFR §60.302(c)(2) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 4876 / PTO 4987

Pollutant: Opacity

Emission Limit(s): 5% (fugitive emissions from truck unloading, railcar unloading and loading)

Authority for Requirement: 40 CFR §60.302(c)(1) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 4876 / PTO 4987

Pollutant: Opacity

Emission Limit(s): 10% (from any truck loading station)

Authority for Requirement: 40 CFR §60.302(c)(3) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 4876 / PTO 4987

Pollutant: PM-10

Emission Limit(s): 0.86 lbs/hr, 0.01 gr/scf

Authority for Requirement: LCPH ATI 4876 / PTO 4987

Pollutant: Particulate Matter

Emission Limit(s): 0.86 lbs/hr, 0.01 gr/scf

Authority for Requirement: 40 CFR §60.302(b)(1) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 4876 / PTO 4987

Operational Limits & Requirements

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

Control Device:

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

Authority for Requirement: LCPH ATI 4876 / PTO 4987

NSPS and NESHAP Applicability:

This emission point is subject to the New Source Performance Standards (NSPS) Subpart DD, Standards of Performance for Grain Elevators.

Cargill, Inc. – Cedar Rapids East Facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart A, General Provisions and Subpart GGGG – Solvent Extraction for Vegetable Oil Production.

Authority for Requirement: LCPH ATI 4876 / PTO 4987

Operating Limits:

The owner or operator of this facility shall comply with the operational limits and requirements listed below:

- A. This facility shall comply with the requirements of NSPS Subpart DD by meeting the compliance requirements of 40 CFR §60.300 through §60.304.

Authority for Requirement: LCPH ATI 4876 / PTO 4987

Operating Condition Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. Record daily pressure drop readings.
- B. Record weekly opacity observations.
- C. Recordkeeping for NSPS Subpart DD shall be done according to 40 CFR §60.300 through §60.304.
- D. Record all maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 4876 / PTO 4987

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (ft, from ground): 7.5
Discharge Style: Vertical, unobstructed
Stack Opening (inches, diameter): 17 x 20
Exhaust Temperature (°F): Ambient
Exhaust Flowrate (acfm): 10,000
Authority for Requirement: LCPH ATI 4876 / PTO 4987

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 003

Associated Equipment

Associated Emission Unit ID Numbers: 003
Emissions Control Equipment ID Number: 003
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 003
Emission Unit Description: A-House Bagfilter
Raw Material/Fuel: Soybeans
Rated Capacity: 750 tons/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): 0%^{1,2} (process emissions)
Authority for Requirement: 40 CFR §60.302(b)(2) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)

¹ The emission limit is a six (6) minute average.

² The observation of visible emissions of air contaminants as defined in LCO 10.2 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Opacity
Emission Limit(s): 0% (fugitive emissions)
Authority for Requirement: 40 CFR §60.302(c)(1) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)

Pollutant: Opacity
Emission Limit(s): 20%
Authority for Requirement: LCO 10.9(1)"g"
LCPH 6567 / PTO 6477R1

Pollutant: PM-10
Emission Limit(s): 0.23 lbs/hr
Authority for Requirement: LCPH ATI 6567 / PTO 6477R1

Pollutant: Particulate Matter
 Emission Limit(s): 0.23 lbs/hr, 0.01 gr/dscf
 Authority for Requirement: 40 CFR §60.302(b)(1) Subpart DD
 567 IAC 23.1(2)"ooo"
 LCO 10.9(2)"a"(67)
 LCPH 6567 / PTO 6477R1

Pollutant: Particulate Matter
 Emission Limit(s): 0.1 gr/scf
 Authority for Requirement: LCO 10.9 (1)"g"
 LCPH 6567 / PTO 6477R1

Operational Limits & Requirements

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

Federal Standards

A. New Source Performance Standards (NSPS):

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

EU ID	Subpart	Title	Type	Local Reference (LCO)	Federal Reference (40 CFR)
003	A	General Conditions	NA	10.9(2)	§60.1 - §60.19
	DD	Grain Elevators	NA	10.9(2)"a"(67)	§60.300 - §60.304

Authority for Requirement: 567 IAC 23.1(2)
 LCPH ATI 6567 / PTO 6477R1

Operating Requirements with Associated Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The facility shall be limited to a processing rate of 92,000 bushels per day or less based on a 52-week rolling average.
 - a. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- B. The differential pressure measured across the baghouse, CE 003, shall be maintained between 0.02 inches of water and 8 inches of water column with the exception of unit startup.
 - a. Monitor and record the differential pressure across the control equipment on a weekly basis while the control equipment and emission unit are in operation.
- C. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operation practices.

- a. Monitor and record any maintenance and repair completed on the control equipment.
- D. The owner or operator shall meet the applicable General Provisions requirements of 40 CFR 60 Subpart A to comply with LCO 10.9(2).
- E. The owner or operator shall comply with the notification and recordkeeping provisions in 40 CFR 60.7.
- F. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

Authority for Requirement: LCPH ATI 6567 / PTO 6477R1

Emission Point Characteristics:

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 155

Discharge Style: Vertical, unobstructed

Stack Opening (inches): 31 x 31

Exhaust Temperature (°F): 68

Exhaust Flowrate (scfm): 3,906

Authority for Requirement: LCPH ATI 6567 / PTO 6477R1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes ¹ No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

¹ Facility maintained operation & maintenance plan is required for PM only.

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 008

Associated Equipment

Associated Emission Unit ID Numbers: 008
Emissions Control Equipment ID Number: None
Emissions Control Equipment Description: None

Emission Unit vented through this Emission Point: 008
Emission Unit Description: Flaker Aspiration
Raw Material/Fuel: Soybean
Rated Capacity: 115 tons/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): 20%
Authority for Requirement: LCO 10.7
ATI 6417 / PTO 6256

Pollutant: PM-10
Emission Limit(s): 3.05 lbs/hr
Authority for Requirement: ATI 6417 / PTO 6256

Pollutant: Particulate Matter
Emission Limit(s): 3.05 lbs/hr
Authority for Requirement: ATI 6417 / PTO 6256

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"
ATI 6417 / PTO 6256

Operational Limits & Requirements

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

Control Equipment

An inherent piece of process equipment (cyclone) is installed on this emission unit.

Operating Limits:

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

- A. The facility shall be limited to a processing rate of 92,000 bushels/day or less based on a 52-week rolling average.

Operation parameters delineated at the time of final compliance inspections and testing shall be documented and become incorporated into the conditions of the final Permit to Operate.

Authority for Requirement: LCPH ATI 6417 / PTO 6256

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Calculate and record the total bushels of soybeans crushed on a weekly basis based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 6417 / PTO 6256

Stack Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 100

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 36

Exhaust Temperature (°F): 125

Exhaust Flow Rate (acfm): 14,800

Authority for Requirement: LCPH ATI 6417 / PTO 6256

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 011

Associated Equipment

Associated Emission Unit ID Numbers: 011
Emissions Control Equipment ID Number: None
Emissions Control Equipment Description: None

Emission Unit vented through this Emission Point: 011
Emission Unit Description: Purging of Hexane Vapors
Raw Material/Fuel: Hexane
Rated Capacity: 115 tons/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: VOC¹
Emission Limit(s): 474.49 tpy, 0.168 gal/ton²
Authority for Requirement: LCPH ATI 6263/PTO 6068R1
Consent Decree 05-CV-02037

¹ This is a facility-wide limit for solvent loss associated with the Solvent Extraction for the Vegetable Oil Production Plant. This limit is based on the design capacity of the plant (1,007,400 tons/year). The solvent loss limit encompasses all point and fugitive sources of solvent loss. Compliance with the 474.49 tpy limit is determined on a mass balance approach (see ["Operating Limits" and "Operating Condition Monitoring and Recordkeeping"]).

² This solvent loss ratio limit is based on a 12-month rolling average and becomes effective three years from entry of Consent Decree (February 27, 2006) as negotiated under United States vs. Cargill, Inc. (Paragraph 19 of Consent Decree 05-CV-02037).

Pollutant: HAP (single)
Emission Limit(s): 0.2 gal/ton³
Authority for Requirement: 40 CFR §63.2840 Subpart GGGG
567 IAC 23.1(3)"cg"
LCO 10.9(4)"gggg"
LCPH ATI 6263 / PTO 6068R1

³ Emission limit is based on NESHAP Subpart GGGG 40 CFR §63.2840 for existing conventional soybean processing sources.

Operational Limits & Requirements

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

NSPS and NESHAP Applicability

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart A, General Provisions and Subpart GGGG, Solvent Extraction for Vegetable Oil Production shall apply to this source pursuant to LCO 10.9(4)"gggg" and 567 IAC 23.1(4)"cg".

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1

Operating Limits

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

- A. The maximum VOC content of any solvent shall not exceed 5.6 pounds per gallon.
- B. The maximum solvent usage shall not exceed 169,460 gallons per 12-month rolling total.
- C. The facility shall be limited to a crush rate of 92,000 bushels per day or less based on a 52-week rolling average.
- D. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (LCPH Project Number 1786) the owner or operator shall document:
 - 1. A description of the project (LCPH Project Number 1786),
 - 2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (LCPH Project Number 1786), and
 - 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
- E. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
 - 1. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified in ["Operating Limits"] Condition D.2.
 - 2. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
- F. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).
- G. This facility shall meet requirements of 40 CFR 63 §1-16 [NESHAP Subpart A] to comply with LCO 10.9(4).

- H. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the standards of 40 CFR §63.2840 to comply with LCO 10.9(4)"gggg".
- I. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the compliance requirements of 40 CFR §63.2850 through 40 CFR §63.2855 to comply with LCO 10.9(4)"gggg".

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. A Material Safety Data Sheet (MSDS) of all solvent(s) used in the extraction process.
- B. Record the VOC and VHAP content of the solvent upon each new shipment of solvent to the facility in pounds per gallon.
- C. Record the total solvent usage in gallons on a monthly basis and calculate the 12-month rolling total solvent usage to determine compliance with the operating limit in ["Operating Limits"] Condition D.
- D. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate to determine compliance with the operating limit in ["Operating Limits"] Condition E.
- E. Per 567 IAC 33.3(18)"f"(1), the owner or operator shall maintain a record of the information required in ["Operating Limits"] Condition F of this permit.
- F. Per 567 IAC 33.3(18)"f"(4) and 567 IAC 33.3(18)"f"(5), the owner or operator shall maintain a record containing the information required in ["Operating Limits"] Condition G of this permit and that record shall be retained by the owner or operator for a period of ten (10) years after the project (LCPH Project Number 1786) is completed.
- G. Recordkeeping for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2862 and 40 CFR §63.2863.

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1

Reporting Requirements

The following information shall be submitted as stated below:

- A. Per 567 IAC 33.3(18)"f"(7)¹, the owner or operator shall submit a report to the Department within sixty (60) days after the end of each year during which records must be generated under ["Operating Condition Monitoring and Recordkeeping"] Condition H setting out the unit's annual emissions during the calendar year that preceded submission of the report.
- B. Reporting for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2861.

Authority for Requirement: LCPH ATI 6263 / PTO 6068R1

¹ Per 567 IAC 33.3(18)"f"(7), this report is to be submitted if the annual emissions (in tons per year) from LCPH Project 1786 exceed the baseline actual emissions, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4), by an amount that is "significant," as defined in

567 IAC 33.3(1), for that regulated NSR pollutant, and if such emissions differ from the preconstruction project, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4).

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

- Stack Height, (ft, from ground): 57
- Discharge Style: Horizontal
- Stack Opening, (inches, dia.): 18 x 27
- Exhaust Temperature (°F): 70
- Exhaust Flow Rate (acfm): 300
- Authority for Requirement: LCHP ATI 6263/ PTO 6068R1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

Opacity monitoring is not required at this time.

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 22.108(3)

Emission Point ID Number: 012

Associated Equipment

Associated Emission Unit ID Numbers: 012

Emissions Control Equipment ID Number: 012

Emissions Control Equipment Description: Mineral Oil Scrubber

Emission Unit vented through this Emission Point: 012

Emission Unit Description: Extraction Process

Raw Material/Fuel: Hexane

Rated Capacity: 115 tons/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: VOC¹

Emission Limit(s): 474.49 tpy, 0.168 gal/ton²

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1
Consent Decree 05-CV-02037

¹ This is a facility-wide limit for solvent loss associated with the Solvent Extraction for Vegetable Oil Production Plant. This limit is based on the design capacity of the plant, which is limited to 1,007,400 tons/year of soybeans. The solvent loss limit encompasses all point and fugitive sources of solvent loss. Compliance with the 474.49 tpy limit is determined on a mass balance approach (See ["Operating Limits" and "Operating Condition Monitoring and Recordkeeping"] Conditions).

² This solvent loss ratio limit is based on a 12-month rolling average and becomes effective three years from entry of Consent Decree (February 27, 2006) as negotiated under United States vs. Cargill, Inc. (Paragraph 19 of Consent Decree 05-CV-02037).

Pollutant: HAP (single)

Emission Limit(s): 0.2 gal/ton³

Authority for Requirement: 40 CFR §63.2840 Subpart GGGG
567 IAC 23.1(3)"cg"
LCO 10.9(4)"gggg"
LCPH ATI 6141 / PTO 6069R1

³ Emission limit is based on NESHAP Subpart GGGG 40 CFR §63.2840 for existing conventional soybean processing sources.

Operational Limits & Requirements

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

Control Device

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

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

NSPS and NESHAP Applicability

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart A, General Provisions and Subpart GGGG, Solvent Extraction for Vegetable Oil Production shall apply to this source pursuant to LCO 10.9(4)"gggg" and 567 IAC 23.1(4)"cg".

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

Operating Limits

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

- A. The mineral oil scrubber flow rate shall be maintained at a minimum of 5 gallons per minute at all times while the unit is in operation.
- B. The mineral oil scrubber temperature shall be maintained between 40° F and 100° F.
- C. The maximum VOC content of any solvent shall not exceed 5.6 pounds per gallon.
- D. The maximum solvent usage shall not exceed 169,460 gallons per 12-month rolling total.
- E. The facility shall be limited to a crush rate of 92,000 bushels per day or less based on a 52-week rolling average.
- F. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (LCPH Project Number 1786) the owner or operator shall document:
 1. A description of the project (LCPH Project Number 1786),
 2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (LCPH Project Number 1786), and
 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in

subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.

- G. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
1. 1. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified in Condition 15.F.(2).
 2. 2. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
- H. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).
- I. This facility shall meet requirements of 40 CFR 63 §1-16 [NESHAP Subpart A] to comply with LCO 10.9(4).
- J. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the standards of 40 CFR §63.2840 to comply with LCO 10.9(4)"gggg".
- K. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the compliance requirements of 40 CFR §63.2850 through 40 CFR §63.2855 to comply with LCO 10.9(4)"gggg".

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The mineral oil scrubber shall be equipped with real-time sensors for scrubber oil flow rate and temperature.
- B. Monitor and record scrubber oil flow rate and temperature at least once per day.
- C. Maintain Material Safety Data Sheets (MSDS) of all solvent(s) used in the extraction process.
- D. Record the VOC and VHAP content of the solvent upon each new shipment of solvent to the facility in pounds per gallon.
- E. Record the total solvent usage in gallons on a monthly basis and calculate the 12-month rolling total solvent usage to determine compliance with the operating limit in ["Operating Limits"] Condition D.
- F. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate to determine compliance with the operating limit in ["Operating Limits"] Condition E.
- G. Per 567 IAC 33.3(18)"f"(1), the owner or operator shall maintain a record of the information required in ["Operating Limits"] Condition F of this permit.
- H. Per 567 IAC 33.3(18)"f"(4) and 567 IAC 33.3(18)"f"(5), the owner or operator shall maintain a record containing the information required in ["Operating Limits"] Condition

G of this permit and that record shall be retained by the owner or operator for a period of ten (10) years after the project (LCPH Project Number 1786) is completed.

I. Recordkeeping for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2862 and 40 CFR §63.2863.

J. Record all maintenance and repair completed on the Mineral Oil Scrubber.

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

Reporting Requirements

The following information shall be submitted as stated below.

A. Per 567 IAC 33.3(18)"f"(7)¹, the owner or operator shall submit a report to the Department within sixty (60) days after the end of each year during which records must be generated under ["Operating Condition Monitoring and Recordkeeping"] Condition H setting out the unit's annual emissions during the calendar year that preceded submission of the report.

B. Reporting for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2861.

¹ Per 567 IAC 33.3(18)"f"(7), this report is to be submitted if the annual emissions (in tons per year) from LCPH Project 1786 exceed the baseline actual emissions, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4), by an amount that is "significant," as defined in 567 IAC 33.3(1), for that regulated NSR pollutant, and if such emissions differ from the preconstruction project, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4).

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 60

Discharge Style: Horizontal

Stack Opening, (inches, dia.): 8

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 194

Authority for Requirement: LCPH ATI 6141 / PTO 6069R1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

Opacity monitoring is not required at this time.

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 22.108(3)

Emission Point ID Number: 019

Associated Equipment

Associated Emission Unit ID Numbers: 019
Emissions Control Equipment ID Number: 019
Emissions Control Equipment Description: Fabric Filter

Emission Unit vented through this Emission Point: 019
Emission Unit Description: Meal Grinding and Sifting
Raw Material/Fuel: Soybean
Rated Capacity: 115 tons/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): 20%
Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter
Emission Limit(s): 2.66 lbs./hr
Authority for Requirement: LCPH ATI 2630 / PTO 2469

Operational Limits & Requirements

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

Air flow to the fabric filter shall be limited to 15,500 cfm.
Authority for Requirement: LCPH ATI 2630 / PTO 2469

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 35
Discharge Style: Vertical, unobstructed
Stack Opening, (inches, dia.): 20 x 24
Exhaust Temperature (°F): 70
Exhaust Flow Rate (scfm): 15,500

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 either the

temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Pollutant – Particulate Matter

1st Stack Test to be Completed by – within the first two years of the permit term

Test Method – 40 CFR 60, Appendix A, Method 5

Authority for Requirement – 567 IAC 23.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7).

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes ¹ No

¹ Compliance Assurance Monitoring plan is required for PM only, while PM₁₀ requires a facility-maintained operation and maintenance plan; however, as PM and PM₁₀ are both controlled by the same control equipment, and CAM is more stringent, a facility-maintained operation and maintenance plan for PM₁₀ is not required at this time.

Authority for Requirement: 567 IAC 22.108(3)

CAM Plan for EP-019 Meal Grinding Dust Collector Fabric Filter

I. Background

A. Emissions Unit

Description: Meal Grinding Dust Collector
Identification: EP 019
Facility: Cargill Cedar Rapids Soybean East Plant
Cedar Rapids, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Permit LCPH ATI 2630/ PTO 2469
Opacity emission limit: 20%
Particulate emission limit: 2.66 lbs/hr
Current Monitoring requirements: Stack Testing, weekly opacity readings.

C. Control Technology

Fabric Filter

II. Monitoring Approach

A. Indicator

Daily pressure drop checks will be used as an indicator.

B. Measurement Approach

Pressure drop will be checked daily when operating to ensure that the pressure drop is in the range of 0.2 to 8 inches of water during the material handling operation of the unit.

C. Indicator Range

Pressure drop should be no less than 0.2 inches of water.
Pressure drop should not exceed 8 inches of H₂O.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is six excursions in a six-month reporting period

E. Performance Criteria

Data representativeness: Pressure drop less than 0.2 inches of water or greater than 8 inches of water would indicate decrease in the performance the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status: Records of pressure drop readings will be maintained for five years.

QA/QC practices and criteria:

The facility shall check the pressure drop daily when the emission unit on this emission point is in operation. If a pressure drop less than 0.2 inches of water or greater than 8 inches of water is observed, corrective action will be taken within 8 hours.

Monitoring frequency and data
Collection procedure:

Pressure drop readings shall be conducted daily during a period when the emission unit on this emission point is in operation. Records of the readings shall be maintained for five years.

Emission Point ID Number: 020

Associated Equipment

Associated Emission Unit ID Numbers: 020
Emissions Control Equipment ID Number: 020
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 020
Emission Unit Description: Hull Aspiration
Raw Material/Fuel: Soybean Hulls
Rated Capacity: 115 tons/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): 20%
Authority for Requirement: LCO 10.7
ATI 6418/ PTO 6227

Pollutant: PM-10
Emission Limit(s): 0.54 lbs/hr
Authority for Requirement: LCPH ATI 6418 / PTO 6227

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"
LCPH ATI 6418 / PTO 6227

Pollutant: Particulate Matter
Emission Limit(s): 0.54 lbs/hr
Authority for Requirement: LCPH ATI 6418 / PTO 6227

Operational Limits & Requirements

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

Control Device

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

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

Authority for Requirement: LCPH ATI 6418 / PTO 6227

Operating Limits

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

- A. The facility shall be limited to a processing rate of 92,000 bushels/day or less based on a 52-week rolling average.
- B. The differential pressure measured across the baghouse, CE 020, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- C. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

Authority for Requirement: LCPH ATI 6418 / PTO 6227

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Record any maintenance and repair completed on the control equipment.
- D. Calculate and record the total bushels of soybeans crushed on a weekly basis based on a 52-week rolling average.

Authority for Requirement: LCPH ATI 6418 / PTO 6227

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 45

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 18 x 22

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 12,500

Authority for Requirement: LCPH ATI 6418 / PTO 6227

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall

submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 021

Associated Equipment

Associated Emission Unit ID Numbers: 021
Emissions Control Equipment ID Number: 021
Emissions Control Equipment Description: Fabric Filter

Emission Unit vented through this Emission Point: 021
Emission Unit Description: Dehulling Soybeans
Raw Material/Fuel: Soybean Hulls
Rated Capacity: 2 tons/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): 20%
Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter
Emission Limit(s): 0.86 lbs/hr
Authority for Requirement: LCPH ATI 2474 / PTO 2367

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"

Operational Limits & Requirements

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

Hours of operation: 168 hours per week
Authority for Requirement: LCPH ATI 2474 / PTO 2367

Monitoring Requirements

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

Stack Testing:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 026

Associated Equipment

Associated Emission Unit ID Numbers: 026
Emissions Control Equipment ID Number: 026
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 026
Emission Unit Description: Truck Loadout Aspiration
Raw Material/Fuel: Soybean Hulls
Rated Capacity: 27 tons/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): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 6419 / PTO 6226

Pollutant: PM-10
Emission Limit(s): 2.06 lb/hr
Authority for Requirement: LCPH ATI 6419 / PTO 6226

Pollutant: Particulate Matter
Emission Limit(s): 2.06 lb/hr
Authority for Requirement: LCPH ATI 6419 / PTO 6226

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"
LCPH ATI 6419 / PTO 6226

Operational Limits & Requirements

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

Control Device

A baghouse shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors, and gauges needed to measure the parameters outlined in

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

Authority for Requirement: LCPH ATI 6419 / PTO 6226

Operating Limits

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

- A. The facility shall be limited to a crush rate of 92,000 bushels/day or less based on a 52-week rolling average.
- B. The differential pressure measured across the baghouse, CE 026, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- C. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.
- D. This source shall be limited to 1900 hours of operation per year based on a 12-month rolling total while the crush plant is operating.

Authority for Requirement: LCPH ATI 6419 / PTO 6226

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Record any maintenance and repair completed on the control equipment.
- D. Calculate and record the total bushels of soybeans crushed on a weekly basis based on a 52-week rolling average.
- E. Calculate and record the number of hours the emission unit operates each month while the crush plant is operating and calculate the 12-month rolling totals.

Authority for Requirement: LCPH ATI 6419 / PTO 6226

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 35

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 18 x 18

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 12,000

Authority for Requirement: LCPH ATI 6419 / PTO 6226

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 030

Associated Equipment

Associated Emission Unit ID Numbers: 030
Emissions Control Equipment ID Number: 030
Emissions Control Equipment Description: Fabric Filter

Emission Unit vented through this Emission Point: 030
Emission Unit Description: Hull Processing and Cooling
Raw Material/Fuel: Soybean Meal
Rated Capacity: 25 tons/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): 20%
Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter
Emission Limit(s): 2.4 lbs/hr
Authority for Requirement: LCPH ATI 2656 / PTO 2634

Operational Limits & Requirements

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

The flow rate at this emission point shall be limited at 14,000 cfm.
Authority for Requirement: LCPH ATI 2656 / PTO 2634

Monitoring Requirements

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

Stack Testing:

Pollutant – Particulate Matter
1st Stack Test to be Completed by – within the first two years of the permit term
Test Method – 40 CFR 60, Appendix A, Method 5
Authority for Requirement – 567 IAC 23.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a

continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7).

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes ¹ No

¹ Compliance Assurance Monitoring plan is required for PM only, while PM₁₀ requires a facility-maintained operation and maintenance plan; however, as PM and PM₁₀ are both controlled by the same control equipment, and CAM is more stringent, a facility-maintained operation and maintenance plan is not required at this time.

Authority for Requirement: 567 IAC 22.108(3)

CAM Plan for EP-030 Hull Processing and Cooling Dust Collector Fabric Filter

I. Background

A. Emissions Unit

Description: Hull Processing and Cooling Dust Collector
Identification: EP 030
Facility: Cargill Cedar Rapids Soybean East Plant
Cedar Rapids, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Permit LCPH ATI 2656/ PTO 2634
Opacity emission limit: 20%
Particulate emission limit: 2.4 lbs/hr
Current Monitoring requirements: Stack Testing, weekly opacity readings.

C. Control Technology

Fabric Filter

II. Monitoring Approach

A. Indicator

Daily pressure drop checks will be used as an indicator.

B. Measurement Approach

Pressure drop will be checked daily when operating to ensure that the pressure drop is in the range of 0.02 to 6 inches of water during the material handling operation of the unit.

C. Indicator Range

Pressure drop should be no less than 0.02 inches of water.
Pressure drop should not exceed 6 inches of H₂O.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is six excursions in a six month reporting period

E. Performance Criteria

Data representativeness: Pressure drop less than 0.02 inches of water or greater than 6 inches of water would indicate decrease in the performance the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status: Records of pressure drop readings will be maintained for five years.

QA/QC practices and criteria: The facility shall check the pressure drop daily when the emission unit on this emission point is in operation. If a pressure drop less than 0.02 inches of water or greater than 6 inches of water is observed, corrective action will be taken within 8 hours.

Monitoring frequency and data
Collection procedure:

Pressure drop readings shall be conducted daily during a period when the emission unit on this emission point is in operation. Records of the readings shall be maintained for five years.

Emission Point ID Number: 034

Associated Equipment

Associated Emission Unit ID Numbers: 034
Emissions Control Equipment ID Number: 034
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 034
Emission Unit Description: Meal Tank #3 Dust Collector
Raw Material/Fuel: Soybean Meal
Rated Capacity: 115 tons/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): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 6420 / PTO 6225

Pollutant: PM-10
Emission Limit(s): 0.06 lbs/hr
Authority for Requirement: LCPH ATI 6420 / PTO 6225

Pollutant: Particulate Matter
Emission Limit(s): 0.06 lbs/hr
Authority for Requirement: LCPH ATI 6420 / PTO 6225

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"
LCPH ATI 6420 / PTO 6225

Operational Limits & Requirements

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

Control Equipment

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

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

Authority for Requirement: LCPH ATI 6420 / PTO 6225

Operating Limits

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

- A. The differential pressure measured across the baghouse, CE 034, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- B. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

Authority for Requirement: LCPH ATI 6420 / PTO 6225

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 6420/PTO 6225

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 108

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 10

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 320

Authority for Requirement: LCPH ATI 6420 / PTO 6225

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 036

Associated Equipment

Associated Emission Unit ID Numbers: 036
Emissions Control Equipment ID Number: 036
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 036
Emission Unit Description: Meal Tank #5 Dust Collector
Raw Material/Fuel: Soybean Meal
Rated Capacity: 115 tons/hr (facility crush rate)

Applicable Requirements

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

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

Pollutant: Opacity
Emission Limit(s): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 6421 / PTO 6224

Pollutant: PM-10
Emission Limit(s): 0.06 lbs/hr
Authority for Requirement: LCPH ATI 6421 / PTO 6224

Pollutant: Particulate Matter
Emission Limit(s): 0.06 lbs/hr
Authority for Requirement: LCPH ATI 6421 / PTO 6224

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"
LCPH ATI 6421 / PTO 6224

Operational Limits & Requirements

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

Control Device

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

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

Authority for Requirement: LCPH ATI 6421 / PTO 6224

Operating Limits

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

- A. The differential pressure measured across the baghouse, CE 036, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- B. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

Authority for Requirement: LCPH ATI 6421/PTO 6224

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 6421 / PTO 6224

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 108

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 10

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 320

Authority for Requirement: LCPH ATI 6421 / PTO 6224

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 040

Associated Equipment

Associated Emission Unit ID Numbers: 040
Emissions Control Equipment ID Number: 040
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 040
Emission Unit Description: Elevator Aspiration
Raw Material/Fuel: Soybean
Rated Capacity: 6,000 bushels/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): 0%^{1,2} (process emissions)

Authority for Requirement: 40 CFR §60.302(b)(2) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 6569 / PTO 6511

¹ The emission limit is a six (6) minute average.

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

Pollutant: Opacity

Emission Limit(s): 0% (fugitive emissions from railcar unloading)

Authority for Requirement: 40 CFR §60.302(c)(1) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 6569 / PTO 6511

Pollutant: Opacity

Emission Limit(s): 0% (fugitive emissions from grain handling)

Authority for Requirement: 40 CFR §60.302(c)(2) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 6569 / PTO 6511

Pollutant: Opacity
Emission Limit(s): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 6569 / PTO 6511

Pollutant: PM-10
Emission Limit(s): 0.64 lbs/hr (normal operations with rail receiving)
Authority for Requirement: LCPH ATI 6569 / PTO 6511

Pollutant: PM-10
Emission Limit(s): 0.42 lbs/hr (grain cleaning operations only)
Authority for Requirement: LCPH ATI 6569 / PTO 6511

Pollutant: Particulate Matter
Emission Limit(s): 0.64 lbs/hr (normal operations with rail receiving)
Authority for Requirement: LCPH ATI 6569 / PTO 6511

Pollutant: Particulate Matter
Emission Limit(s): 0.42 lbs/hr (grain cleaning operations only)
Authority for Requirement: LCPH ATI 6569 / PTO 6511

Pollutant: Particulate Matter
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: 40 CFR §60.302(b)(1) Subpart DD
567 IAC 23.1(2)"ooo"
LCO 10.9(2)"a"(67)
LCPH ATI 6569 / PTO 6511

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: LCO 10.9(1)"g"
LCPH ATI 6569 / PTO 6511

Operational Limits & Requirements

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

Control Equipment:

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

Authority for Requirement: LCPH ATI 6569 / PTO 6511

NSPS and NESHAP Applicability

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The New Source Performance Standards (NSPS) 40 CFR 60 Subpart A, General Provisions, and Subpart DD, Standards of Performance for Grain Elevators, shall apply to this emission unit pursuant to LCO 10.9(2)"a"(67) and 567 IAC 23.1(2)"ooo".

Authority for Requirement: LCPH ATI 6569 / PTO 6511

Operating Limits:

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

- A. The facility shall be limited to a processing rate of 92,000 bushels per day or less based on a 52-week rolling average.
- B. The differential pressure measured across the baghouse, CE 040, shall be maintained between 0.2 inches of water and 10 inches of water column with the exception of unit startup.
- C. Rail receiving operations shall be limited to 2,000 hours per year based on a 12-month rolling total.
- D. The control equipment on this unit shall be maintained according to the manufacturer's specifications and good operating practices.
- E. The owner or operator shall meet the applicable General Provisions requirements of 40 CFR 60 Subpart A to comply with LCO 10.9(2).

Authority for Requirement: LCPH ATI 6569 / PTO 6511

Operating Condition Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- C. Record the hours of operation of rail receiving operations each month and calculate the 12-month rolling total.
- D. Monitor and record the differential pressure across the control equipment on a weekly basis while the control equipment and emission units are in operation.
- E. Monitor and record any maintenance and repair completed on the control equipment.

F. The owner or operator shall comply with the notification and recordkeeping provisions in 40 CFR §60.7.

Authority for Requirement: LCPH ATI 6422 / PTO 6223

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 70

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 45

Exhaust Temperature (°F): 68

Exhaust Flow Rate (acfm) – grain cleaning operations only: 16,500

Exhaust Flow Rate (acfm) – normal operations with rail receiving: 25,000

Authority for Requirement: LCPH ATI 6569 / PTO 6511

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Pollutant – Particulate Matter¹

1st Stack Test to be Completed by –within the first two years of permit term

Test Method – 40 CFR 60, Appendix A, Method 5

Authority for Requirement – 567 IAC 22.108(3)

¹ Note stack testing for particulate matter is required only during normal operations (e.g. grain cleaning operations).

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)

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall

note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes ¹ No

¹ Compliance Assurance Monitoring plan is required for PM only, while PM₁₀ requires a facility-maintained operation and maintenance plan; however, as PM and PM₁₀ are both controlled by the same control equipment, and CAM is more stringent, a facility-maintained operation and maintenance plan for PM₁₀ is not required at this time.

Authority for Requirement: 567 IAC 22.108(3)

CAM Plan for EP-040 Grain Dryer Aspirator Fabric Filter

I. Background

A. Emissions Unit

Description: Grain Dryer Aspirator
Identification: EP 040
Facility: Cargill Cedar Rapids Soybean East Plant
Cedar Rapids, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Permit LCPH ATI 6569 / PTO 6511
Opacity emission limit: 0% from process emissions
0% from fugitive emissions from railcar unloading station
0% from fugitive grain handling emissions
PM-10 emission limit: 0.64 lbs/hr, normal operations with rail receiving
0.42 lbs/hr, normal operations
Particulate emission limit: 0.01 gr/dscf, 0.1 gr/scf
0.64 lbs/hr, normal operations with rail receiving
0.42 lbs/hr, normal operations
Current Monitoring requirements: Stack Testing, weekly opacity readings.

II. Monitoring Approach

A. Indicator

Daily pressure drop checks will be used as an indicator.

B. Measurement Approach

Pressure drop will be checked daily when operating to ensure that the pressure drop is in the range of 0.2 inches to 10 inches of water during the material handling operation of the unit.

C. Indicator Range

Pressure drop should be no less than 0.2 inches of water.
Pressure drop should not exceed 10 inches of H₂O.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is six excursions in a six-month reporting period

E. Performance Criteria

Data representativeness: Pressure drop less than 0.25 inches of water or greater than 8 inches of water would indicate decrease in the performance the baghouse and potentially indicate an increase of particulate emissions.

Verification of operational status:	Records of pressure drop readings will be maintained for five years.
QA/QC practices and criteria:	The facility shall check the pressure drop daily when the emission unit on this emission point is in operation. If a pressure drop less than 0.2 inches of water or greater than 10 inches of water is observed, corrective action will be taken within 8 hours.
Monitoring frequency and data Collection procedure:	Pressure drop readings shall be conducted daily during a period when the emission unit on this emission point is in operation. Records of the readings shall be maintained for five years.

Emission Point ID Number: 041

Associated Equipment

Associated Emission Unit ID Numbers: 041
Emissions Control Equipment ID Number: 041
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 041
Emission Unit Description: Prep Vacuum Cleaning System
Raw Material/Fuel: Soybean Meal
Rated Capacity: 0.5 tons/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): 20%
Authority for Requirement: LCO 10.7

Pollutant: PM-10
Emission Limit(s): 0.21 lbs/hr
Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

Pollutant: Particulate Matter
Emission Limit(s): 0.21 lbs/hr
Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"

Operational Limits & Requirements

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

Control Device:

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

Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

Operating Limits:

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

- A. The control equipment on this unit shall be maintained according to the manufacturer’s specification and good operating practices.
- B. This source shall be limited to 366 hours while the crush plant is operating per year based on a 12-month rolling total.

Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

Operating Condition Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record ‘no visible emissions’ observations on a weekly basis only when the emission unit is operating. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Calculate and record the number of hours the emission unit operates each month while the crush plant is operating and calculate the 12-month rolling totals.
- C. Record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

Emission Point Characteristics:

The emission point shall conform to the specifications listed below.

Stack Height (ft, from ground): 30

Discharge Style: Horizontal

Stack Opening (inches, diameter): 6

Exhaust Temperature (°F): 70

Exhaust Flowrate (acfm): 240

Authority for Requirement: LCPH ATI 2036 / PTO 1979R1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 042

Associated Equipment

Associated Emission Unit ID Numbers: 042
Emissions Control Equipment ID Number: 042
Emissions Control Equipment Description: Fabric Filter

Emission Unit vented through this Emission Point: 042
Emission Unit Description: Clay Tank Vent
Raw Material/Fuel: Clay
Rated Capacity: 1.0 ton/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): 20%
Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.3(2)"a"(2)
LCO 10.9(1)"a"

Monitoring Requirements

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

Stack Testing:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as

possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 043

Associated Equipment

Associated Emission Unit ID Numbers: 043
Emissions Control Equipment ID Number: 043
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 043
Emission Unit Description: Meal Truck Loadout #1
Raw Material/Fuel: Soybean Meal
Rated Capacity: 187.5 tons/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): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 2327 / PTO 2257R1

Pollutant: PM-10
Emission Limit(s): 2.25 lbs/hr
Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

Pollutant: Particulate Matter
Emission Limit(s): 2.25 lbs/hr
Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"

Operational Limits & Requirements

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

Control Device:

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

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

Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

Operating Limits:

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

- A. The differential pressure measured across the baghouse, CE 043, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- B. The control equipment on this unit shall be maintained according to the manufacturer’s specification and good operating practices.
- C. This source shall be limited to 4,450 hours per year while the crush plant is operating based on a 12-month rolling total.

Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record ‘no visible emissions’ observations on a weekly basis. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Calculate and record the number of hours the emission unit operates each month while the crush plant is operating and calculate the 12-month rolling totals.
- D. Record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Stack Height (ft, from ground): 40

Discharge Style: Vertical, unobstructed

Stack Opening (inches, diameter): 36

Exhaust Temperature (°F): 70

Exhaust Flowrate (acfm): 21,200

Authority for Requirement: LCPH ATI 2327 / PTO 2257R1

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall

submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 044

Associated Equipment

Associated Emission Unit ID Numbers: 044
Emissions Control Equipment ID Number: 044
Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: 044
Emission Unit Description: Meal Truck Loadout #2
Raw Material/Fuel: Soybean Meal
Rated Capacity: 187.5 tons/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): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 2326 / PTO 2258R1

Pollutant: PM-10
Emission Limit(s): 2.25 lbs/hr
Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

Pollutant: Particulate Matter
Emission Limit(s): 2.25 lbs/hr
Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"

Operational Limits & Requirements

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

Control Device:

A baghouse shall be installed to control particulate matter emissions. The control equipment shall be maintained properly and operated at all times the air pollution source is in operation. All appropriate probes, monitors and gauges needed to measure the parameters outlined in the

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

Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

Operating Limits:

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

- A. The differential pressure measured across the baghouse, CE 044, shall be maintained between 0.25 inches of water and 8 inches of water column with the exception of unit startup.
- B. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.
- C. This source shall be limited to 4,450 hours per year based on a 12-month rolling total while the crush plant is operating.

Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Monitor and record the differential pressure on the baghouse on a weekly basis while the control equipment and emission unit are in operation.
- C. Calculate and record the number of hours the emission unit operates each month while the crush plant is operating and calculate the 12-month rolling totals.
- D. Record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Stack Height (ft, from ground): 40

Discharge Style: Vertical, unobstructed

Stack Opening (inches, diameter): 36

Exhaust Temperature (°F): 70

Exhaust Flowrate (acfm): 21,200

Authority for Requirement: LCPH ATI 2326 / PTO 2258R1

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 either the

temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 049

Table 1. Associated Equipment

EP	EU	EU Description	Raw Material / Fuel	Rated Capacity	CE	CE Description
049	49.1	Meal Dryer Deck #1	Soybeans	115 ton/hr	49A	Cyclone A
049	49.2	Meal Dryer Deck #2	Soybeans	115 ton/hr	49B	Cyclone B
049	49.3	Meal Dryer Deck #3	Soybeans	115 ton/hr	49C	Cyclone C
049	49.4	Meal Cooler Deck #4	Soybeans	115 ton/hr	49D	Cyclone D

Applicable Requirements

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

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

Pollutant: Opacity

Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Pollutant: PM-10

Emission Limit(s): 2.14 lbs/hr

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Pollutant: Particulate Matter

Emission Limit(s): 4.03 lbs/hr

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/scf

Authority for Requirement: 567 IAC 23.4(7)
LCO 10.9(1)"g"

Operational Limits & Requirements

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

Control Device:

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

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Operating Limits:

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

- A. The differential pressure measured across each of the four cyclones, CE 049A-D, shall be between 2 inches of water and 8 inches of water column.
- B. The facility shall be limited to a processing rate of 92,000 bushels per day or less based on a 52-week rolling average.
- C. The control equipment, CE 049A-D, shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Operating Condition Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record “no visible emissions” observations on a weekly basis. An exceedance of ‘no visible emissions’ will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The owner or operator shall monitor and record the differential pressure across each of the four cyclones on a weekly basis while the control equipment and emission units are in operation.
- C. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- D. Monitor and record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 5541 / PTO 5617

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 55

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 60.25

Exhaust Temperature (°F): 125

Exhaust Flow Rate (acfm): 65,000

Authority for Requirement: LCPH ATI 5541 / PTO 5617

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Compliance Assurance Monitoring (CAM) Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

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

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

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: 056

Associated Equipment

Associated Emission Unit ID Numbers: 56.1, 56.2
Continuous Emissions Monitors ID Numbers: 56
Emissions Control Equipment ID Number: None
Emissions Control Equipment Description: None

Emission Unit vented through this Emission Point: 56.1
Emission Unit Description: Boiler
Raw Material/Fuel: Natural Gas
Rated Capacity: 99.9 MMBtu/hr

Emission Unit vented through this Emission Point: 56.2
Emission Unit Description: Boiler
Raw Material/Fuel: Fuel Oil
Rated Capacity: 99.9 MMBtu/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): 20%
Authority for Requirement: LCO 10.7
LCPH ATI 5717 / PTO 5618

Pollutant: PM-10
Emission Limit(s): 2.35 lbs/hr
Authority for Requirement: LCPH ATI 5717 / PTO 5618

Pollutant: Particulate Matter
Emission Limit(s): 2.35 lbs/hr, 0.352 lb/MMBtu
Authority for Requirement: LCPH ATI 5717 / PTO 5618

Pollutant: SO₂
Emission Limit(s): 5.60 lbs/hr
Authority for Requirement: LCPH ATI 5717 / PTO 5618

Pollutant: SO₂
Emission Limit(s): 500 ppm_v
Authority for Requirement: LCO 10.12(2)
LCPH ATI 5717 / PTO 5618

Pollutant: SO₂
Emission Limit(s): 0.32 lb/MMBtu¹
Authority for Requirement: 40 CFR §60.42b(k)(2) Subpart Db

¹ This emission limit applies at all times, including periods of startup, shutdown, or malfunction (§60.42b(g) and §60.44b(h)) and is determined on a 30-day rolling average basis.

Pollutant: NO_x
Emission Limit(s): 6.02 lbs/hr
Authority for Requirement: LCPH ATI 5717 / PTO 5618

Pollutant: NO_x
Emission Limit(s): 0.20 lb/MMBTU, 86 ng/J
Authority for Requirement: 40 CFR §60.44b(a) Subpart Db

Pollutant: CO
Emission Limit(s): 8.39 lbs/hr
Authority for Requirement: LCPH ATI 5717 / PTO 5618

Operational Limits & Requirements

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

NSPS and NESHAP Applicability:

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The New Source Performance Standards (NSPS), 40 CFR 60, Subpart A – General Provisions, and 40 CFR 60, Subpart Db shall apply to this source pursuant to LCO 10.9(2)"a"(55) and 567 IAC 23.1(2)"ccc" (Industrial-Commercial-Institutional Steam Generating Units).

Authority for Requirement: LCPH ATI 5717 / PTO 5618

- B. The National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart DDDDD shall apply to this source (Industrial, Commercial, and Institutional Boilers and Process Heaters).

Authority for Requirement: 40 CFR §63.7485

Operating Limits:

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

- A. The fuel for this boiler is limited to pipeline quality natural gas fuel or No. 2 diesel fuel oil.
- B. Fuel usage for No. 2 diesel fuel oil shall be limited to 3,500,000 gallons per year based on a 12-month rolling total.
- C. C. The owner or operator shall meet the standards of 40 CFR §60.42b through 40 CFR §60.44b [NSPS Subpart Db] to comply with LCO 10.9(2)"a"(55).
- D. D. The owner or operator shall meet the testing and emission monitoring procedures of 40 CFR §60.45b through 40 CFR §60.48b [NSPS Subpart Db] to comply with LCO 10.9(2)(55).
- E. The owner or operator shall meet the requirements of 40 CFR 60 §§ 1-19 [NSPS Subpart A] to comply with LCO 10.9(2).

Operating Condition Monitoring and Recordkeeping:

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day.
- B. The owner or operator shall calculate and record the 12-month rolling total for No. 2 fuel oil.
- C. The owner or operator shall record the boiler steam output on a daily basis.
- D. Initial notification and recordkeeping shall be performed in accordance with 40 CFR §60.7 to comply with LCO 10.9(2)"a"(55).
- E. Monitoring for NSPS Subpart Db shall be done in accordance with 40 CFR §60.47b and §60.48b to comply with LCO 10.9(2)"a"(55).
- F. Recordkeeping for NSPS Subpart Db shall be in done in accordance with 40 CFR §60.49b to comply with LCO 10.9(2)"a"(55).
- G. Maintain fuel supplier certifications of the sulfur content of all fuels burned in accordance with 40 CFR §60.49b(r) to comply with LCO 10.9(2)"a"(55).

Authority for Requirement: LCPH ATI 5717 / PTO 5618

Continuous Emission Monitoring:

Emission monitoring for nitrogen oxides shall be performed in accordance with 40 CFR §60.48b to comply with LCO 10.9(2)"a"(55). Accordingly, the facility being subject to a NO_x standard under 40 CFR §60.44b, shall demonstrated compliance in accordance with either subparagraph A or B:

- A. Install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system; or
- B. If the owner or operator has installed a NO_x emission rate CEMS to meet the requirements of part 75 of this chapter and is continuing to meet the ongoing requirements of part 75 of this chapter, that CEMS may be used to meet the requirements of this section, except that the owner or operator shall also meet the requirements of

§60.49b. Data reported to meet the requirements of §60.49b shall not include data substituted using the missing data procedures in subpart D of part 75 of this chapter, nor shall the data have been bias adjusted according to the procedures of part 75 of this chapter.

The CEMS shall be installed, evaluated, and operated, and data recorded in accordance with 40 CFR §60.48b(a)-(f).

In accordance with 40 CFR §60.48b(b), the facility shall install, calibrate, maintain, and operate a CEMS on EP-056, and record the output of the system for measuring nitrogen oxides (NO_x) emissions discharged to the atmosphere. The system shall be designed to meet 40 CFR 60, Appendix B, Performance Specification 2 (PS2). The specifications of 40 CFR 60, Appendix F, (Quality Assurance Procedures) shall apply.

In accordance with 40 CFR §60.48b(g) the owner or operator of an affected facility that has a heat input capacity of 250 million Btu/hour or less, and which has an annual capacity factor for natural gas having a nitrogen content of greater than 10 percent (0.10) shall comply with the provisions of paragraphs (b), (c), (d), (e)(2), (e)(3), and (f) of 40 CFR §60.48b.

In accordance with 40 CFR §60.48b(j), units that burn only gaseous fuels with potential sulfur dioxide emission rates of 0.32 lb/MMBtu heat input or less are not required to conduct PM emissions monitoring if they maintain fuel supplier certifications of the sulfur content of the fuels burned.

Authority for Requirement: LCPH ATI 5717 / PTO 5618

Reporting Requirements:

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

- A. In accordance with 40 CFR §60.49b(i) a quarterly report containing the information recorded under 40 CFR §60.49b(g) shall be submitted.
- B. In accordance with 40 CFR §60.45b(k) and §60.48b(j)(2), the owner or operator must provide a report containing fuel records of the sulfur content of the fuels burned, as described under §60.49b(r), which shall be submitted on a quarterly basis.

Authority for Requirement: LCPH ATI 5717 / PTO 5618

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 50

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 58

Exhaust Temperature (°F): 220

Exhaust Flow Rate (acfm): 25,000

Authority for Requirement: LCPH ATI 5717 / PTO 5618

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

Monitoring Requirements

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

Continuous Emissions Monitoring:

Pollutant - NO_x

Operational Specifications – 40 CFR §60.48b(a)-(f)

Date of Initial System Calibration and Quality Assurance – March 18, 2010

Ongoing System Calibration/Quality Assurance – 40 CFR 60 Appendix F

Reporting & Record keeping – 40 CFR 60 Appendix A and B

Authority for Requirement – 40 CFR §60.48b Subpart Db

LCPH ATI 5717 / PTO 5618

Stack Testing:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 057

Associated Equipment

Associated Emission Unit ID Numbers: 057
Emissions Control Equipment ID Number: 057
Emissions Control Equipment Description: Cyclone

Emission Unit vented through this Emission Point: 057
Emission Unit Description: Pellet Mill
Raw Material/Fuel: Soybean Pellets
Rated Capacity: 15 tons/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): 20%¹
Authority for Requirement: LCPH ATI 6032 / PTO 5890

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

Pollutant: PM-10
Emission Limit(s): 0.35 lbs/hr
Authority for Requirement: LCPH ATI 6032 / PTO 5890

Pollutant: Particulate Matter
Emission Limit(s): 0.69 lbs/hr
Authority for Requirement: LCPH ATI 6032 / PTO 5890

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: LCO 10.9(1)"a"

Operational Limits & Requirements

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

Control Device:

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

Operating Limits:

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

- A. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 6032 / PTO 5890

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The owner or operator shall record all maintenance completed on the control device.

Authority for Requirement: LCPH ATI 6032 / PTO 5890

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 60

Discharge Style: Vertical, unobstructed

Stack Opening, (inches, dia.): 24

Exhaust Temperature (°F): 70

Exhaust Flow Rate (acfm): 6,000

Authority for Requirement: LCPH ATI 6032 / PTO 5890

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 058

Associated Equipment

Associated Emission Unit ID Numbers: 058

Emissions Control Equipment ID Number: 058

Emissions Control Equipment Description: Baghouse (KICE)

Emission Unit vented through this Emission Point: 058

Emission Unit Description: Ground Pod Aspiration

Raw Material/Fuel: Soybeans

Rated Capacity: 92,000 bushels per day

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

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

¹ The observation of visible emissions of air contaminants as defined in LCO 10.2 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.20 lbs/hr

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

Pollutant: Particulate Matter

Emission Limit(s): 0.20 lbs/hr

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/scf

Authority for Requirement: LCO 10.9(1)"g"

Operational Limits & Requirements

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

Control Device:

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

Authority for Requirement: LCPH ATI 6592 / PTO 6478

Operating Limits:

Operating limits for this emission unit shall be:

- A. The facility shall be limited to a processing rate of 92,000 bushels per day or less, based on a 52-week rolling average.
- B. The differential pressure measured across the baghouse, CE 058, shall be maintained between 0.2 inches of water and 10 inches of water column with the exception of unit startup.
- C. The control equipment on this unit shall be maintained according to the manufacturer's specifications and good operating practices.

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- C. Monitor and record the differential pressure across the control equipment on a weekly basis while the control equipment and emission unit are in operation.
- D. Monitor and record any maintenance and repair completed on the control equipment.

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 10

Discharge Style: Horizontal

Stack Opening, (inches, dia.): 10

Exhaust Temperature (°F): 68

Exhaust Flow Rate (acfm): 2,330

Authority for Requirement: LCPH ATI 6592 / PTO 6478R2

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 121, 122

Table 2. Associated Equipment

EP	EU	EU Description	Raw Material / Fuel	Rated Capacity	CE	CE Description
121	121	DT Discharge Conveyor Steam Vent #2	Hexane	115 tons/hr	None	None
122	122	DT Discharge Conveyor Steam Vent #3	Hexane	115 tons/hr	None	None

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.

Table 3. Emission Limits – VOC

EP/EU	Pollutant	Emission Limit(s)	Authority for Requirement
121	VOC	474.49 tpy ¹	LCPH ATI 6160 / PTO 6071R2
		0.168 gal/ton ²	CD 05-CV-02037 LCPH ATI 6160 / PTO 6071R2
	HAP	0.2 gal/ton ³	40 CFR §63.2840 LCPH ATI 6160 / PTO 6071R2
122	VOC	474.49 tpy ¹	LCPH ATI 6161 / PTO 6072R2
		0.168 gal/ton ²	CD 05-CV-02037 LCPH ATI 6161 / PTO 6072R2
	HAP	0.2 gal/ton ³	40 CFR §63.2840 LCPH ATI 6161 / PTO 6072R2

¹ This is a facility-wide limit for solvent loss associated with the Solvent Extraction for Vegetable Oil Production Plant. This limit is based on the design capacity of the plant (1,007,400 tpy). The solvent loss limit encompasses all point and fugitive sources of solvent loss. Compliance with the 474.49 tpy limit is determined on a mass balance approach (See ["Operating Requirements with Associated Monitoring and Recordkeeping"]).

² This solvent loss ratio limit is based on a 12-month rolling average and becomes effective three years from entry of the Consent Decree (February 27, 2006), as negotiated under United States v. Cargill, Inc. (Paragraph 19 of Consent Decree 05-CV-02037).

³ Emission limit is based on Table 1 to NESHAP Subpart GGGG (40 CFR §63.2840) for existing conventional soybean processing sources.

Operational Limits & Requirements

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

Federal Standards

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

The following subparts apply to this facility:

EU ID	Subpart	Title	Type	Local Reference (LCO)	Federal Reference (40 CFR)
121	A	General Conditions	NA	10.9(4)"a"	§63.1 – §63.15
122	GGGG	NESHAP: Solvent Extraction for Vegetable Oil Production	Soybean	10.9(4)"gggg"	§63.2830 – §63.2872

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

Authority for Requirement: LCPH ATI 6160 / PTO 6071R2
LCPH ATI 6161 / PTO 6072R2

Operating Requirements with Associated Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by [LCPH ATI 6160 / PTO 6071R2 and LCPH ATI 6161 / PTO 6072R2] shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum VOC content of any solvent shall not exceed 5.6 pounds per gallon. The owner or operator shall maintain Safety Data Sheets (SDS) for all solvent(s) used in the extraction process.
- B. The maximum solvent usage shall not exceed 169,460 gallons per 12-month rolling total. The owner or operator shall monitor and record the total solvent usage in gallons on a monthly basis and calculate the 12-month rolling total solvent usage.
- C. The facility shall be limited to a crush rate of 92,000 bushels per day or less, based on a 52-week rolling average. The owner or operator shall monitor and record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- D. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of LCPH Project #1786, the owner or operator shall document:
 - 1. A description of LCPH Project #1786;
 - 2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the LCPH Project #1786; and
 - 3. A description of the applicability test used to determine that LCPH Project #1786 is not a major modification for any NSR regulated pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis, if applicable.
- E. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:

1. Monitor the emissions of any regulated NSR pollutant that could increase as a result of LCPH Project #1786 that is emitted by any emission unit identified in Condition 5.D.2 [of LCPH ATI 6160 / PTO 6071R2 and LCPH ATI 6161 / PTO 6072R2].
 2. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations, and maintain a record of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at such emission unit(s) (for the purposes of this requirement, 'regular' shall be determined by the Department on a case-by-case basis).
 3. Maintain a written record containing the information required in Condition 5.E [of LCPH ATI 6160 / PTO 6071R2 and LCPH ATI 6161 / PTO 6072R2].
- F. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(1)"f" available for review upon request for inspection by the Department or the general public, pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).
- G. Per 567 IAC 33.3(18)"f"(4) and (5), the owner or operator shall maintain a record containing the information required in Condition 5.E [of LCPH ATI 6160 / PTO 6071R2 and LCPH ATI 6161 / PTO 6072R2] and that record shall be retained by the owner or operator for a period of ten (10) years after LCPH Project #1786 is completed.
- H. The owner or operator shall comply with the requirements of NESHAP Subpart A (40 CFR §63.1 through §63.15) to comply with LCO 10.9(4)"a".
- I. The owner or operator shall comply with the requirements of NESHAP Subpart GGGG (40 CFR §63.2830 through §63.2872) to comply with LCO 10.9(4)"gggg".
- J. The owner or operator shall comply with the recordkeeping requirements of NESHAP Subpart GGGG (40 CFR §63.2862 and 40 CFR §63.2863) to comply with LCO 10.9(4)"gggg".

The following reports shall be submitted as stated:

- A. Per 567 IAC 33.3(18)"f"(7)¹, the owner or operator shall submit a report to the Department within sixty (60) days after the end of each year during which records must be generated under Condition 5.G [of LCPH ATI 6160 / PTO 6071R2 and LCPH ATI 6161 / PTO 6072R2] setting out the unit's annual emissions during the calendar year that preceded submission of the report.
- B. The owner or operator shall comply with the reporting requirements of NESHAP Subpart GGGG (40 CFR §63.2861) to comply with LCO 10.9(4)"gggg".

¹ Per 567 IAC 33.3(18)"f"(7), this report is to be submitted if the annual emissions (in tons per year) from LCPH Project 1786 exceed the baseline actual emissions, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4), by an amount that is "significant," as defined in 567 IAC 33.3(1), for that regulated NSR pollutant, and if such emissions differ from the preconstruction project, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4).

Authority for Requirement: LCPH ATI 6160 / PTO 6071R2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 4.

EP/EU	ATI/PTO #	Stack Height (ft, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temperature °F	Exhaust Flowrate (acfm)
121	6160 / 6071R2	95	Vertical, obstructed	6	230	Natural Draft
122	6161 / 6072R2	85	Vertical, obstructed	6	230	Natural Draft

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

Opacity monitoring is not required at this time.

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 22.108(3)

Emission Point ID Number: 125, 126, 127

Table 5. Associated Equipment

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
125	125	Extraction Feed Conveyor Vent #1	Hexane	Facility crush rate capacity is 92,000 Bu Soybeans/Day or 115 tons/hr
126	126	Extraction Feed Conveyor Vent #2	Hexane	
127	127	Extraction Feed Conveyor Vent #3	Hexane	

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.

Table 6. Emission Limits – VOC

EP/EU	Pollutant	Emission Limit(s)	Authority for Requirement
125	VOC	474.49 tpy ¹	LCPH ATI 6264 / PTO 6073R1
		0.168 gal/ton ²	CD 05-CV-02037, LCPH ATI 6264 / PTO 6073R1
	HAP	0.2 gal/ton ³	40 CFR §63.2840 LCPH ATI 6264 / PTO 6073R1
126	PM	0.1 gr/dscf	LCO 10.9(1)"a"
	VOC	474.49 tpy ¹	LCPH ATI 6537 / PTO 6479
		0.168 gal/ton ²	CD 05-CV-02037, LCPH ATI 6537 / PTO 6479
	HAP	0.2 gal/ton ³	40 CFR §63.2840 LCPH ATI 6537 / PTO 6479
Opacity	20% ⁴	LCPH ATI 6537 / PTO 6479	
127	VOC	474.49 tpy ¹	LCPH ATI 6266 / PTO 6075R1
		0.168 gal/ton ²	CD 05-CV-0203, LCPH ATI 6266 / PTO 6075R1
	HAP	0.2 gal/ton ³	40 CFR §63.2840 LCPH ATI 6266 / PTO 6075R1

¹ This is a facility-wide limit for solvent loss associated with the Solvent Extraction for Vegetable Oil Production Plants. This limit is based on the design capacity of the plant (1,007,400 tons per year). The solvent loss limit encompasses all point and fugitive sources of solvent loss. Compliance with the 474.49 tpy limit is determined on a mass balance approach (see ["Operating Limits" and "Operating Condition Monitoring and Recordkeeping"] of EP 011 and EP 012).

² This solvent loss ratio limit is based on a 12-month rolling average and becomes effective three years from entry of Consent Decree (February 27, 2006) as negotiated under United States vs. Cargill, Inc.(paragraph 19 of Consent Decree 05-CV-02037).

³ Emission limit is based on NESHAP Subpart GGGG 40 CFR §63.2840 for existing conventional soybean processing sources.

⁴ The observation of visible emissions of air contaminants as defined in LCO 10.2 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

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

NSPS and NESHAP Applicability

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart A, General Provisions and Subpart GGGG – Solvent Extraction for Vegetable Oil Production shall apply to this source pursuant to LCO 10.9(4)"gggg" and 567 IAC 23.1(4)"cg".

Authority for Requirement: LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6537 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

Operating Limits

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

- A. The maximum VOC content of any solvent shall not exceed 5.6 pounds per gallon.
- B. The maximum solvent usage shall not exceed 169,460 gallons per 12-month rolling total.
- C. The facility shall be limited to a crush rate of 92,000 bushels per day or less based on a 52-week rolling average.
- D. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (LCPH Project Number 1786) the owner or operator shall document:
 - 1. A description of the project (LCPH Project Number 1786),
 - 2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (LCPH Project Number 1786), and
 - 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
- E. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:

1. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified in ["Operating Limit" Condition D.2].
 2. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at such emission units (for the purposes of this requirement, "regular" shall be determined by the Department on a case-by-case basis).
 3. Maintain a written record containing the information required in this subparagraph.
- F. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).
- G. This facility shall meet requirements of 40 CFR 63 §1-16 [NESHAP Subpart A] to comply with LCO 10.9(4).
- H. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the standards of 40 CFR §63.2840 to comply with LCO 10.9(4)"gggg".
- I. This facility shall comply with the requirements of NESHAP Subpart GGGG by meeting the compliance requirements of 40 CFR §63.2850 through 40 CFR §63.2855 to comply with LCO 10.9(4)"gggg".

Authority for Requirement: LCPH ATI 6264 / PTO 6073R1
 LCPH ATI 6537 / PTO 6479
 LCPH ATI 6266 / PTO 6075R1

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. Maintain Material Safety Data Sheets (MSDS) of all solvent(s) used in the extraction process.
- B. Record the VOC and VHAP content of the solvent upon each new shipment of solvent to the facility in pounds per gallon.
- C. Record the total solvent usage in gallons on a monthly basis and calculate the 12-month rolling total solvent usage to determine compliance with the operating limit in ["Operating Limits" Condition B].
- D. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate to determine compliance with the operating limit in ["Operating Limits" Condition C] .
- E. Per 567 IAC 33.3(18)"f"(1), the owner or operator shall maintain a record of the information required in ["Operating Limits" Condition D].

F. Per 567 IAC 33.3(18)"f"(4) and 567 IAC 33.3(18)"f"(5), the owner or operator shall maintain a record containing the information required in ["Operating Limits" Condition E] and that record shall be retained by the owner or operator for a period of ten (10) years after the project (LCPH Project Number 1786) is completed.

G. Recordkeeping for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2862 and 40 CFR §63.2863.

Authority for Requirement: LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6537 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

H. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

Authority for Requirement: LCPH ATI 6537 / PTO 6479

Reporting Requirements

The following information shall be submitted as stated below.

A. Per 567 IAC 33.3(18)"f"(7)¹, the owner or operator shall submit a report to the Department within sixty (60) days after the end of each year during which records must be generated under ["Operating Condition Monitoring and Recordkeeping" Condition F] setting out the unit's annual emissions during the calendar year that preceded the submission of the report.

B. Reporting for NESHAP Subpart GGGG shall be done according to 40 CFR §63.2861.

¹ Per 567 IAC 33.3(18)"f"(7), this report is to be submitted if the annual emissions (in tons per year) from LCPH Project 1786 exceed the baseline actual emissions, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4), by an amount that is "significant," as defined in 567 IAC 33.3(1), for that regulated NSR pollutant, and if such emissions differ from the preconstruction project, as documented and maintained pursuant to 567 IAC 33.3(18)"f"(4).

Authority for Requirement: LCPH ATI 6264 / PTO 6073R1
LCPH ATI 6537 / PTO 6479
LCPH ATI 6266 / PTO 6075R1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 7. – Emission Point Characteristics

EP / EU	ATI / PTO #	Stack Height (ft, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temperature °F	Exhaust Flowrate (acfm)
125	6264 / 6073R1	8.5	Vertical, obstructed	32 x 36	230	Natural Draft – approximately 100 acfm
126	6537 / 6497	9.5	Vertical, obstructed	72 x 60	230	Natural Draft 100 cfm
127	6266 / 6075R1	13.2	Vertical, obstructed	32 x 36	230	Natural Draft

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

Opacity monitoring is not required at this time.

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 22.108(3)

Emission Point ID Number: 128

Associated Equipment

Associated Emission Unit ID Numbers: 128
Emissions Control Equipment ID Number: None
Emissions Control Equipment Description: None

Emission Unit vented through this Emission Point: 128
Emission Unit Description: Conditioner Discharge Vent
Raw Material/Fuel: Soybeans
Rated Capacity: 92,000 bushels per day

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
Authority for Requirement: LCPH ATI 6622 / PTO 6480

¹ The observation of visible emissions of air contaminants as defined in LCO 10.2 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10
Emission Limit(s): 0.086 lbs/hr
Authority for Requirement: LCPH ATI 6622 / PTO 6480

Pollutant: Particulate Matter
Emission Limit(s): 0.086 lbs/hr
Authority for Requirement: LCPH ATI 6622 / PTO 6480

Pollutant: Particulate Matter
Emission Limit(s): 0.1 gr/scf
Authority for Requirement: LCO 10.9(1)"g"

Operational Limits & Requirements

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

Operating Limits:

Operating limits for this emission unit shall be:

- A. There are no operating limits for this source.

Authority for Requirement: LCPH ATI 6622 / PTO 6480

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

Authority for Requirement: LCPH ATI 6622 / PTO 6480

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from ground): 30

Discharge Style: Vertical, obstructed

Stack Opening, (inches, dia.): 36

Exhaust Temperature (°F): 100

Exhaust Flow Rate (acfm): 100

Authority for Requirement: LCPH ATI 6622 / PTO 6480

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation

attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(3)

Emission Point ID Number: 501, 502, 503, 504

Table 8. Associated Equipment

EP	EU	EU Description	Raw Material / Fuel	Rated Capacity	CE	CE Description
501	5.1	Grain Dryer Vent #1	Soybeans	6,000 bu/hr	None	None
	501.1	Grain Dryer Bottom Burner	Natural Gas	20 MMBtu/hr	None	None
	501.2	Grain Dryer Top Burner	Natural Gas	24.2 MMBtu/hr	None	None
502	5.2	Grain Dryer Vent #2	Soybeans	6,000 bu/hr	None	None
	501.1	Grain Dryer Bottom Burner	Natural Gas	20 MMBtu/hr	None	None
	501.2	Grain Dryer Top Burner	Natural Gas	24.2 MMBtu/hr	None	None
503	5.3	Grain Dryer Vent #3	Soybeans	6,000 bu/hr	None	None
	501.1	Grain Dryer Bottom Burner	Natural Gas	20 MMBtu/hr	None	None
	501.2	Grain Dryer Top Burner	Natural Gas	24.2 MMBtu/hr	None	None
504	5.4	Grain Dryer Vent #4	Soybeans	6,000 bu/hr	None	None
	501.1	Grain Dryer Bottom Burner	Natural Gas	20 MMBtu/hr	None	None
	501.2	Grain Dryer Top Burner	Natural gas	24.2 MMBtu/hr	None	None

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.

Table 9. Emission Limits.

EP	EU	Opacity	Particulate Matter	PM-10	Authority for Requirement
501 502 503 504	5.1, 5.2 5.3, 5.4 501.1 501.2	0% ^{1,2}			40 CFR §60.302(a)(2) 567 IAC 23.1(2)"ooo" LCO 10.9(2)"a"(67)

EP	EU	Opacity	Particulate Matter	PM-10	Authority for Requirement
501	5.1, 5.2				LCPH ATI 6568 / PTO 6481
502	5.3, 5.4		8.96 lb/hr	6.27 lb/hr	LCPH ATI 6610 / PTO 6482
503	501.1				LCPH ATI 6611 / PTO 6483
504	501.2				LCPH ATI 6612 / PTO 6484

Table 10. General Emission Limits.

EP	EU	Pollutant	Emission Limit(s)	Authority for Requirement
501	5.1, 5.2,	Opacity	40%	567 IAC 23.3(2)"d"
			20%	LCO 10.7
502	5.3, 5.4,	Particulate Matter	0.1 gr/scf ³	567 IAC 23.4(7)
503	501.1,			LCO 10.9(1)"g"
504	501.2	SO ₂	500 ppm	567 IAC 23.3(3)"e" LCO 10.12(2)

¹ The emission limit is a six (6) minute average.

² The observation of visible emissions of air contaminants as defined in LCO 10.2 will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the visible emissions. If visible emissions continue after the corrections, Linn County may require additional proof to demonstrate compliance (e.g., stack testing).

³ Standard is expressed as the average of 3 runs.

Operational Limits & Requirements

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

NSPS and NESHAP Applicability:

In general, the federal standards of performance for new stationary sources (new source performance standards) shall be applicable as specified in LCO 10.9(2) and 567 IAC 23.1(2). The federal standards for hazardous air pollutants (national emission standards for hazardous air pollutants) shall be applicable as specified in LCO 10.9(3) and 567 IAC 23.1(3). The federal standards for hazardous air pollutants for source categories (national emission standards for hazardous air pollutants for source categories) shall be applicable as specified in LCO 10.9(4) and 567 IAC 23.1(4).

- A. The New Source Performance Standards (NSPS) Subpart A, General Provisions, and Subpart DD, New Source Performance Standards for Grain Elevators, shall apply to this source pursuant to LCO 10.9(2)"a"(67) and 567 IAC 23.1(2)"ooo".

Authority for Requirement: LCPH ATI 6568 / PTO 6481
LCPH ATI 6610 / PTO 6482
LCPH ATI 6611 / PTO 6483
LCPH ATI 6612 / PTO 6484

Operating Limits:

Operating limits for this emission unit shall be:

- A. The owner or operator shall meet the applicable General Provisions requirements of 40 CFR 60 Subpart A to comply with LCO 10.9(2).
- B. Per 40 CFR §60.302, the owner or operator shall not cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:
 - 1. Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
- C. The facility shall be limited to a processing rate of 92,000 bushels per day or less, based on a 52-week rolling average.
- D. Fuel use for this source shall be limited to natural gas fuel only.

Authority for Requirement: LCPH ATI 6568 / PTO 6481
LCPH ATI 6610 / PTO 6482
LCPH ATI 6611 / PTO 6483
LCPH ATI 6612 / PTO 6484

Operating Condition Monitoring and Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Linn County Air Quality Division and other federal or state air pollution regulatory agencies and their authorized representatives. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall comply with the notification and recordkeeping provisions in 40 CFR §60.7.
- B. Record the total bushels of soybeans crushed on a weekly basis and calculate the 52-week rolling average rate.
- C. The owner or operator shall maintain a record of the type of fuel used (i.e., a fuel bill).
- D. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.

Authority for Requirement: LCPH ATI 6568 / PTO 6481
LCPH ATI 6610 / PTO 6482
LCPH ATI 6611 / PTO 6483
LCPH ATI 6612 / PTO 6484

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Table 11.

EP	EU	Stack Height (ft, from ground)	Discharge Style	Stack Opening (inches)	Exhaust Temp. (°F)	Exhaust Flowrate (acfm)	Authority for Requirement
501	5.1 501.1 501.2	127	Vertical, unobstructed	33 x 66	110	41,260	LCPH ATI 6568 / PTO 6481
502	5.2 501.1 501.2	127	Vertical, unobstructed	33 x 66	110	38,440	LCPH ATI 6610 / PTO 6482
503	5.3 501.1 501.2	127	Vertical, unobstructed	33 x 66	110	38,400	LCPH ATI 6611 / PTO 6483
504	5.4 501.1 501.2	127	Vertical, unobstructed	33 x 66	110	39,260	LCPH ATI 6612 / PTO 6484

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 either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request 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:

Stack testing is not required at this time.

Opacity Monitoring:

The facility shall check weekly for visible emissions during a period when the emission unit on this emission point is handling material and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. If weather conditions prevent the observer from conducting a visible emission observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emission readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Observations shall be done to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity > 0% is observed via the Method 9 observation, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions.

Authority for Requirement: 567 IAC 22.108(14)

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 22.108(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 22.

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 22.108(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 22.105 (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 22.108 (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 22.108 (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 22.108 (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 22.108(15)"c"*

G2. Permit Expiration

1. Except as provided in rule 567—22.104(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—22.105(455B). *567 IAC 22.116(2)*

2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Windsor Heights, Iowa 50324, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permits, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

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 22.107 (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 22.108 (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 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms

from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.

6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.

7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.

8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (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 22.108 (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 24.2(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 22.108(4), 567 IAC 22.108(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 22;
 - b. Compliance test methods specified in 567 Chapter 25; or
 - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 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 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later

than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. **Written Reporting of Excess Emissions.** A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

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

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 22.108(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 22.108(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 22.
- 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—22.140(455B) through 567 - 22.144(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 22.110(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 22.110(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 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(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 22.110(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 22.108(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 - 22.113(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 22.107(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 22.107(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 22.112(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 22, 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 22.111-567 IAC 22.113*

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 22.108(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 substance 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 22.108(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 22.108(17)"a"*, *567 IAC 22.108(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 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 22.114(3)*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit;
or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

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

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

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

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

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (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 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (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 22.111(1). *567 IAC 22.111 (1)"d"*

G29. Disclaimer

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

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

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Windsor Heights, IA 50324
(515) 725-9545

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 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the

occurrence of an emergency due to the effects of these contaminants on the health of persons. 567
IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
U.S. EPA Region 7
Air Permits and Compliance Branch
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Windsor Heights, IA 50324
(515) 725-9500

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

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

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

Field Office 3

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

Field Office 4

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

Field Office 5

7900 Hickman Road, Suite #200
Windsor Heights, IA 50324
(515) 725-0268

Field Office 6

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

Polk County Public Works Dept.

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

Linn County Public Health

Air Quality Branch
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

Appendix A: Consent Decree

United States v. Cargill, Inc. Consent Decree 05-CV-02037, February 27, 2006

A link to the full text of this Consent Decree can be found below:

<https://www.epa.gov/sites/production/files/documents/cargill-cd.pdf>

Appendix B: Applicable Federal Requirements

New Source Performance Standards:

40 CFR Part 60 Subpart A – *General Provisions*

A link to the current final rule can be found below:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=5d1bcb3eb7424a61bd8435009580e3ff&mc=true&node=sp40.7.60.a&rgn=div6>

40 CFR Part 60 Subpart Db – *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*

A link to the current final rule can be found below:

http://www.ecfr.gov/cgi-bin/text-idx?SID=5d1bcb3eb7424a61bd8435009580e3ff&mc=true&node=sp40.7.60.d_0b&rgn=div6

40 CFR Subpart DD – *Standards of Performance for Grain Elevators*

A link to the current final rule can be found below:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=5d1bcb3eb7424a61bd8435009580e3ff&mc=true&node=sp40.7.60.dd&rgn=div6>

National Emission Standards for Hazardous Air Pollutants:

40 CFR Part 63 Subpart GGGG – *National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production*

A link to the current final rule can be found below:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=5d1bcb3eb7424a61bd8435009580e3ff&mc=true&node=sp40.14.63.gggg&rgn=div6>

40 CFR Part 63 Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

A link to the current final rule can be found below:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=5d1bcb3eb7424a61bd8435009580e3ff&mc=true&node=sp40.15.63.ddddd&rgn=div6>