

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

**Name of Permitted Facility:** Vantage Corn Processors, LLC

**Facility Location:** 1425 60<sup>th</sup> Avenue SW  
Cedar Rapids, IA 52404

**Air Quality Operating Permit Number:** 08-TV-007R2

**Expiration Date:** Month, Day, Year

**Permit Renewal Application Deadline:** Month, Day, Year

**EIQ Number:** 92-9080

**Facility File Number:** 57-01-246

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**Responsible Official**

**Name:** Brian Mullins

**Title:** Plant Manager

**Mailing Address:** 1350 Waconia Avenue SW, Cedar Rapids, IA 52404

**Phone #:** (319) 398-0721

**Permit Contact Person for the Facility**

**Name:** Angeline Chung

**Title:** Environmental Manager

**Mailing Address:** 1350 Waconia Avenue SW, Cedar Rapids, IA 52404

**Phone #:** (319) 398-0632

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 24 and is issued subject to the terms and conditions contained in this permit.

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

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Marnie Stein, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

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

## Pollutants

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

## I. Facility Description and Equipment List

Facility Name: Vantage Corn Processors, LLC

Permit Number: 08-TV-007R2

Facility Description: Corn Dry Milling Plant (SIC 2869, NAICS 325193)

**Table 1 – Equipment List**

| Emission Point # | Emission Unit #                      | Emission Unit Description         | DNR Permit # | LCPH Permit # |
|------------------|--------------------------------------|-----------------------------------|--------------|---------------|
| 400              | 400A                                 | #3 Truck Scale                    | 07-A-533-P1  | 7346 / 7007   |
|                  | 400C                                 | Truck Dump Receiving Drag #3      |              |               |
|                  | 400E                                 | #2 Rail Dump                      |              |               |
|                  | 400F                                 | #2 Rail Dump Transfer Drag        |              |               |
|                  | 400G                                 | #2 Rail Receiving Drag            |              |               |
|                  | 400H                                 | #3 Bucket Leg                     |              |               |
|                  | 400I                                 | #2 Reclaim Conveyor               |              |               |
|                  | 400J                                 | #3 Headhouse Top Loading Conveyor |              |               |
|                  | 400L                                 | #2 Silo Storage Bin               |              |               |
|                  | 400M                                 | #4 Silo Storage Bin               |              |               |
|                  | 400P                                 | Bulk Weigh Scale                  |              |               |
|                  | 401B                                 | #2 Truck Scale                    |              |               |
|                  | 401D                                 | Truck Dump Receiving Drag #2      |              |               |
|                  | 401H                                 | #5 Bucket Leg                     |              |               |
|                  | 401I                                 | Rail Transfer Conveyor            |              |               |
|                  | 401K                                 | #2 Bucket Leg                     |              |               |
|                  | 401P                                 | Surge Bin                         |              |               |
|                  | 401Q                                 | Bulk Weigh Scale Belt             |              |               |
|                  | 401W                                 | #1 Fines Storage Bin              |              |               |
| 401X             | Cracked Corn & Fines Conveyor        |                                   |              |               |
| 401Y             | Cracked Corn & Fines Weigh Belt      |                                   |              |               |
| 401Z             | Cracked Corn & Fines Bucket Elevator |                                   |              |               |
| 401              | 401A                                 | #1 Truck Scale                    | 07-A-534-P1  | 7347 / 7008   |
|                  | 401B                                 | #2 Truck Scale                    |              |               |
|                  | 401C                                 | Truck Dump Receiving Drag #1      |              |               |
|                  | 401D                                 | Truck Dump Receiving Drag #2      |              |               |
|                  | 401E                                 | #1 Rail Dump                      |              |               |
|                  | 401F                                 | #1 Rail Dump Transfer Drag        |              |               |
|                  | 401G                                 | #1 Rail Receiving Drag            |              |               |
|                  | 401H                                 | #5 Bucket Leg                     |              |               |
|                  | 401I                                 | Rail Transfer Conveyor            |              |               |
|                  | 401J                                 | #1 Bucket Leg                     |              |               |
|                  | 401K                                 | #2 Bucket Leg                     |              |               |
|                  | 401L                                 | #4 Bucket Leg                     |              |               |
|                  | 401M                                 | #1 Reclaim Conveyor               |              |               |
|                  | 401N                                 | #2 Headhouse Top Loading Conveyor |              |               |
|                  | 401O                                 | #1 Headhouse Top Loading Conveyor |              |               |
|                  | 401P                                 | Surge Bin                         |              |               |
|                  | 401Q                                 | Bulk Weigh Scale Belt             |              |               |
| 401S             | #1 Silo Storage Bin                  |                                   |              |               |
| 401T             | #3 Silo Storage Bin                  |                                   |              |               |

| <b>Emission Point #</b> | <b>Emission Unit #</b>  | <b>Emission Unit Description</b>      | <b>DNR Permit #</b> | <b>LCPH Permit #</b> |
|-------------------------|-------------------------|---------------------------------------|---------------------|----------------------|
| 401                     | 401U                    | #5 Silo Storage Bin                   | 07-A-534-P1         | 7347 / 7008          |
|                         | 401W                    | #1 Fines Storage Bin                  |                     |                      |
|                         | 401X                    | Cracked Corn & Fines Conveyor         |                     |                      |
|                         | 401Y                    | Cracked Corn & Fines Weigh Belt       |                     |                      |
|                         | 401Z                    | Cracked Corn & Fines Bucket Elevator  |                     |                      |
|                         | 400P                    | Bulk Weigh Scale Belt                 |                     |                      |
| 403                     | 403A                    | Hammermill #1                         | 07-A-535-P3         | 7543 / 7362          |
|                         | 403B                    | Hammermill #2                         |                     |                      |
|                         | 403C                    | Hammermill #3                         |                     |                      |
|                         | 403D                    | Hammermill #4                         |                     |                      |
|                         | 403F                    | Hammermill #5                         |                     |                      |
|                         | 403G                    | Hammermill #6                         |                     |                      |
|                         | 403H                    | Hammermill #7                         |                     |                      |
|                         | 403I                    | Elevator to Mill Corn Belt Conveyor A |                     |                      |
|                         | 403J                    | Elevator to Mill Corn Belt Conveyor B |                     |                      |
|                         | 403M                    | Rotex Scalper A                       |                     |                      |
|                         | 403N                    | Rotex Scalper B                       |                     |                      |
|                         | 403O                    | Mill Storage Hopper A                 |                     |                      |
|                         | 403P                    | Mill Storage Hopper B                 |                     |                      |
|                         | 403Q                    | Mill Flour Drag A                     |                     |                      |
| 403R                    | Mill Flour Drag B       |                                       |                     |                      |
| 403S                    | Mill Blender A          |                                       |                     |                      |
| 403T                    | Mill Blender B          |                                       |                     |                      |
| 410                     | 410                     | Equalization Tank                     | 09-A-382-P          | 7349 / 7010          |
| 411                     | 411                     | WWTP Aeration Tank                    | 07-A-539-P-S1       | 7350 / 7011          |
| 412                     | 412A                    | WWTP Anaerobic Digester #1            | 07-A-540-P3         | 7351 / 7012          |
|                         | 412B                    | WWTP Anaerobic Digester #2            |                     |                      |
|                         | 412C                    | WWTP Anaerobic Digester #3            |                     |                      |
| 413                     | 413                     | Membrane Filtration Tank #1           | 09-A-383-P          | 7352 / 7013          |
| 414                     | 414                     | Membrane Filtration Tank #2           | 09-A-384-P          | 7353 / 7013          |
| 415                     | 415                     | Membrane Filtration Tank #3           | 09-A-385-P          | 7354 / 7014          |
| 416                     | 416                     | Membrane Filtration Tank #4           | 09-A-386-P          | 7355 / 7016          |
| 419                     | 419                     | B Starch Tank                         | --                  | 7398 / 7195          |
| 420                     | 420N                    | Dry Slurry Mix Tank #1                | 07-A-541-P2         | 7356 / 7017          |
|                         | 420O                    | Dry Slurry Mix Tank #2                |                     |                      |
|                         | 420P                    | Pre-Cook Tank #1                      |                     |                      |
|                         | 420Q                    | Pre-Cook Tank #2                      |                     |                      |
|                         | 420R                    | Barometric Condenser #1               |                     |                      |
|                         | 420S                    | Barometric Condenser #2               |                     |                      |
|                         | 420T                    | Liquefaction Tank #1                  |                     |                      |
|                         | 420U                    | Liquefaction Tank #2                  |                     |                      |
|                         | 420V                    | Liquefaction Tank #3                  |                     |                      |
|                         | 420W                    | Liquefaction Tank #4                  |                     |                      |
|                         | 420Z                    | Lique faction Tank #7                 |                     |                      |
|                         | 420AA                   | Liquefaction Tank #8                  |                     |                      |
|                         | 420BB                   | Liquefaction Tank #9                  |                     |                      |
|                         | 420CC                   | Liquefaction Tank #10                 |                     |                      |
|                         | 420DD                   | Distillation and dehydration          |                     |                      |
|                         | 420EE                   | Nitrogen Stripper                     |                     |                      |
| 420FF                   | Stillage Evaporation #1 |                                       |                     |                      |

| Emission Point # | Emission Unit # | Emission Unit Description            | DNR Permit # | LCPH Permit # |
|------------------|-----------------|--------------------------------------|--------------|---------------|
| 420              | 420GG           | Stillage Evaporation #2              | 07-A-541-P2  | 7356 / 7017   |
|                  | 420HH           | Stillage Evaporation #3              |              |               |
|                  | 42II            | Stillage Evaporation #4              |              |               |
|                  | 420JJ           | Decanter Feed Tank                   |              |               |
|                  | 420KK           | Centrate Tank                        |              |               |
|                  | 420LL           | Condensed Distillers Tank            |              |               |
|                  | 420MM           | Evaporator Feed Tank #1              |              |               |
|                  | 420NN           | Evaporator Feed Tank #2              |              |               |
|                  | 420OO           | Evaporation Product Tank             |              |               |
|                  | 420PP           | Evaporator Condensate Tank           |              |               |
|                  | 420RR           | Process Water Tank                   |              |               |
|                  | 420SS           | Waste Transfer Tank                  |              |               |
|                  | 420TT           | Yeast Propagator #1                  |              |               |
|                  | 420UU           | Yeast Propagator #2                  |              |               |
|                  | 420VV           | Yeast Propagator #3                  |              |               |
|                  | 420XX           | Fermenter #1                         |              |               |
|                  | 420YY           | Fermenter #2                         |              |               |
|                  | 420ZZ           | Fermenter #3                         |              |               |
|                  | 420AAA          | Fermenter #4                         |              |               |
|                  | 420BBB          | Fermenter #5                         |              |               |
|                  | 420CCC          | Fermenter #6                         |              |               |
|                  | 420DDD          | Fermenter #7                         |              |               |
|                  | 420EEE          | Fermenter #8                         |              |               |
|                  | 420FFF          | Fermenter #9                         |              |               |
|                  | 420GGG          | Fermenter #10                        |              |               |
|                  | 420HHH          | Fermenter #11                        |              |               |
| 420III           | Fermenter #12   |                                      |              |               |
| 420JJJ           | Fermenter #13   |                                      |              |               |
| 420KKK           | Fermenter #14   |                                      |              |               |
| 420LLL           | Fermenter #15   |                                      |              |               |
| 420MMM           | Fermenter #16   |                                      |              |               |
| 420TTT           | Fermenter #23   |                                      |              |               |
| 420UUU           | Fermenter #24   |                                      |              |               |
| 420VVV           | Beerwell #1     |                                      |              |               |
| 420WWW           | Beerwell #2     |                                      |              |               |
| 422              | 422             | DDGS Cooler #1                       | 07-A-543-P4  | 7357 / 7018   |
| 423              | 423             | DDGS Cooler #2                       | 07-A-544-P4  | 7359 / 7020   |
| 425              | 425             | Indirect-Fired DDGS Dryer #1         | 07-A-546-P1  | 7358 / 7019   |
| 426              | 426             | Indirect-Fired DDGS Dryer #2         | 07-A-547-P1  | 7360 / 7021   |
| 427              | 427             | Indirect-Fired DDGS Dryer #3         | 07-A-548-P1  | 7361 / 7022   |
| 428              | 428             | Indirect-Fired DDGS Dryer #4         | 07-A-549-P1  | 7362 / 7023   |
| 429              | 429             | Indirect-Fired DDGS Dryer #5         | 07-A-550-P1  | 7363 / 7024   |
| 440              | 440             | Alcohol Process Day Tank #1          | 07-A-560-P   | 7364 / 7025   |
| 441              | 441             | Alcohol Process Day Tank #2          | 07-A-561-P   | 7365 / 7026   |
| 442              | 442             | Alcohol Process Quality Control Tank | 07-A-562-P   | 7366 / 7027   |
| 443              | 443             | Alcohol Process Reclaim Tank         | 07-A-563-P   | 7368 / 7032   |
| 444              | 444             | Alcohol Storage Tank #1              | 07-A-564-P1  | 7369 / 7033   |
| 445              | 445             | Alcohol Storage Tank #2              | 07-A-565-P1  | 7370 / 7034   |
| 447              | 447             | Denaturant Storage Tank              | 07-A-567-P1  | 7371 / 7035   |
| 448              | 448             | Corrosion Inhibitor Storage Tank     | 07-A-568-P   | 7372 / 7036   |

| <b>Emission Point #</b> | <b>Emission Unit #</b> | <b>Emission Unit Description</b>          | <b>DNR Permit #</b> | <b>LCPH Permit #</b> |
|-------------------------|------------------------|---|---------------------|----------------------|
| 449                     | 449                    | 190° Alcohol Process Tank                 | 07-A-569-P          | 7373 / 7037          |
| 450                     | 450A                   | Alcohol Loadout Spout #1                  | 07-A-570-P2         | 7374 / 7038R1        |
|                         | 450B                   | Alcohol Loadout Spout #2                  |                     |                      |
|                         | 450C                   | Alcohol Loadout Spout #3                  |                     |                      |
|                         | 450D                   | Alcohol Loadout Spout #4                  |                     |                      |
|                         | 450E                   | Alcohol Loadout Spout #5                  |                     |                      |
|                         | 450F                   | Alcohol Loadout Spout #6                  |                     |                      |
|                         | 450G                   | Alcohol Loadout Spout #7                  |                     |                      |
|                         | 450H                   | Alcohol Loadout Spout #8                  |                     |                      |
| 451                     | 450A                   | Alcohol Loadout Spout #1                  | 07-A-571-P2         | 7375 / 7039R1        |
|                         | 450B                   | Alcohol Loadout Spout #2                  |                     |                      |
|                         | 450C                   | Alcohol Loadout Spout #3                  |                     |                      |
|                         | 450D                   | Alcohol Loadout Spout #4                  |                     |                      |
|                         | 450E                   | Alcohol Loadout Spout #5                  |                     |                      |
|                         | 450F                   | Alcohol Loadout Spout #6                  |                     |                      |
|                         | 450G                   | Alcohol Loadout Spout #7                  |                     |                      |
|                         | 450H                   | Alcohol Loadout Spout #8                  |                     |                      |
| 452                     | 452                    | Fire Pump Engine #1                       | 07-A-572-P1         | 7376 / 7040          |
| 453                     | 453                    | Fire Pump Engine #2                       | 07-A-573-P1         | 7377 / 7041          |
| 454                     | 454                    | Fire Pump Engine #3                       | 07-A-574-P1         | 7378 / 7042          |
| 455                     | 455                    | Fire Pump Engine #4                       | 07-A-575-P1         | 7379 / 7043          |
| 457                     | 457                    | Emergency Generator #2                    | 07-A-577-P          | 7380 / 7044          |
| 478                     | 478                    | DDGS Flat Storage Ventilation             | --                  | 7391 / 7055          |
|                         | 478A                   | DDGS Rail Loading Shuttle Drag Conveyor   |                     |                      |
| 479                     | 479                    | Sulfuric Acid Storage Tank                | 07-A-582-P          | 7381 / 7045          |
| 481                     | 481G                   | DDGS Feed Elevator #2                     | 07-A-584-P2         | 7382 / 7046          |
|                         | 481H                   | DDGS Flat Storage Reclaim L Path Conveyor |                     |                      |
|                         | 481I                   | DDGS Bulkweigher Feed Elevator #2         |                     |                      |
|                         | 481J                   | DDGS Truck Loading Shuttle Drag Conveyor  |                     |                      |
| 482                     | 482                    | DDGS Silo #1                              | 07-A-585-P2         | 7383 / 7047          |
| 485                     | 485                    | 30% Condensed Distillers Solubles Loadout | 07-A-588-P          | 7384 / 7048          |
| 486                     | 486A                   | Cooling Tower Cell #1                     | 07-A-589-P1         | 7385 / 7049          |
|                         | 486B                   | Cooling Tower Cell #2                     |                     |                      |
|                         | 486C                   | Cooling Tower Cell #3                     |                     |                      |
|                         | 486D                   | Cooling Tower Cell #4                     |                     |                      |
|                         | 486E                   | Cooling Tower Cell #5                     |                     |                      |
|                         | 486F                   | Cooling Tower Cell #6                     |                     |                      |
|                         | 486G                   | Cooling Tower Cell #7                     |                     |                      |
|                         | 486H                   | Cooling Tower Cell #8                     |                     |                      |
|                         | 486I                   | Cooling Tower Cell #9                     |                     |                      |
| 495                     | 495                    | Dry Grind Unleaded Fuel Tank              | 09-A-387-P1         | 7386 / 7050          |
| 496                     | 496                    | Dry Grind Diesel Fuel Tank                | 09-A-388-P1         | 7387 / 7051          |
| 497                     | 497A                   | Cooled DDGS Belt Conveyor #1              | 07-A-590-P2         | 7388 / 7052          |
|                         | 497B                   | DDGS Incline Drag Conveyor #1             |                     |                      |
|                         | 497C                   | DDGS Flat Storage Piling Drag Conveyor    |                     |                      |
|                         | 497D                   | DDGS Silo #1 Recirculation Drag Conveyor  |                     |                      |
|                         | 497E                   | DDGS Silo #1 Laidig Conveyor              |                     |                      |
|                         | 497I                   | DDGS Bulkweigher Feed Elevator            |                     |                      |
|                         | 497J                   | DDGS Silo Feed Elevator                   |                     |                      |
|                         | 497K                   | DDGS Bulkweigh Scale #1                   |                     |                      |



| <b>Emission Point #</b> | <b>Emission Unit #</b> | <b>Emission Unit Description</b>         | <b>DNR Permit #</b> | <b>LCPH Permit #</b> |
|-------------------------|------------------------|--|---------------------|----------------------|
| 497                     | 497L                   | DDGS Bulkweigh Scale #2                  | 07-A-590-P2         | 7388 / 7052          |
|                         | 497M                   | DDGS Bulkweigher Discharge Drag Conv. #1 |                     |                      |
|                         | 497N                   | DDGS Bulkweigher Discharge Drag Conv. #2 |                     |                      |
|                         | 497O                   | DDGS Silo #1 Laidig Conveyor             |                     |                      |
|                         | 497P                   | DDGS Silo #1 Reclaim Drag Conveyor       |                     |                      |
| 498                     | 498                    | Dry Mill Haul Roads                      | 07-A-591-P1         | 7389 / 7053          |
| 499                     | 499                    | Dry Mill VOC Emissions from Equip. Leaks | 07-A-592-P          | 7390 / 7054          |

**Table 2 – Insignificant Activities Equipment List**

| <b>Emission Point #</b> | <b>Emission Unit #</b> | <b>Emission Unit Description</b> | <b>LCPH Permit #</b> |
|-------------------------|------------------------|----------------------------------|----------------------|
| --                      | DMS                    | DM CT Sulfuric Acid Tank         | --                   |

**Table 3 – Fugitive Insignificant Activities List**

| <b>Emission Unit #</b> | <b>Emission Unit Description</b> |
|------------------------|----------------------------------|
| F1A-DM                 | Straight Trucks – Receiving      |
| F1B-DM                 | Hopper Trucks – Receiving        |
| F2-DM                  | Railcars – Receiving             |

## II. Plant-Wide Conditions

Facility Name: Vantage Corn Processors, LLC  
Permit Number: 08-TV-007R2

Permit conditions are established in accordance with 567 Iowa Administrative Code (IAC) rule 24.108.

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### Permit Duration

The term of this permit is: less than 5 years  
Commencing on: Month Day, Year  
Ending on: Month Day, Year

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

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### Emission Limits

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

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

### Particulate Matter:

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

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

### Particulate Matter:

No person shall permit, cause, suffer or allow the emission of particulate matter into the atmosphere in any one hour from any emission point from any process equipment at a rate in excess of that specified in Table 10-62-1 for the process weight rate allocated to such emission point. In any case, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard

cubic foot of exhaust gas or Table 10-62-1 of [LCCO Sec. 10-62(a)], whichever would result in the lowest allowable emission rate.

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

The emission standards specified in [LCCO Sec. 10-62] shall apply and those specified in section 10-61, [LCCO Sec. 10-62] and Table 10-62-1 shall not apply to each process of the types listed in the [LCCO Sec. 10-62(a)(2)-(14)], with the following exception: whenever the compliance status, history of operations, ambient air quality in the vicinity, or the type of control equipment utilized, would warrant maximum control. The air pollution control officer shall enforce 0.1 grains per dry standard cubic foot of exhaust gas, section 10-61, or [LCCO Sec. 10-62], whichever would result in the lowest achievable emission rate.

Authority for Requirement: LCCO Sec. 10-62(a)(1)

Fugitive Dust:

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

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

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

**Regulatory Authority**

This facility is located in Linn County, Iowa. Linn County Public Health, under agreement with the Iowa Department of Natural Resources (IDNR), is the primary regulatory agency in Linn County. This Title V

permit is issued by the Iowa Department of Natural Resources, however, required contacts and information submittals referred to in this permit as required by "the Department" should continue to be directed to the Linn County Public Health office. This will include such items as stack test notification, stack test results submittal, oral and written excess emission reports, and reports and records required in the Linn County construction permits. Information specifically required by the Title V permit such as the annual EIQ and fees, annual compliance certification, semi-annual monitoring report and any Title V forms submitted for updates, modifications, renewals, etc. must be submitted to the Iowa DNR. Stack test notifications and test results for tests required as periodic monitoring in the Title V permit shall be submitted to Linn County Public Health. Stack test protocols and test results conducted as required by a PSD permit shall be submitted to the IDNR and Linn County Public Health Air Quality Division.

Authority for Requirement: 567 IAC 22.108

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

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

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

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

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

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

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#### **Compliance Plan**

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

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

Authority for Requirement: 567 IAC 24.108(15)

### III. Emission Point-Specific Conditions

Facility Name: Vantage Corn Processors, LLC  
 Permit Number: 08-TV-007R2

#### Receiving & Grind

Emission Point ID Number: 400, 401

Table 4. Associated Equipment

| SEP  | EU                                   | EU Description                      | Raw Material | Rated Capacity | CE ID | CE Description |
|------|--------------------------------------|-------------------------------------|--------------|----------------|-------|----------------|
| 400  | 400A                                 | #3 Truck Scale                      | Corn         | 20,000 bph     | 400   | Baghouse       |
|      | 400C                                 | Truck Dump Receiving Drag #3        | Corn         | 30,000 bph     |       |                |
|      | 400E                                 | #2 Rail Dump                        | Corn         | 30,000 bph     |       |                |
|      | 400F                                 | #2 Rail Dump Transfer Drag          | Corn         | 30,000 bph     |       |                |
|      | 400G                                 | #2 Rail Receiving Drag              | Corn         | 30,000 bph     |       |                |
|      | 400H                                 | #3 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 400I                                 | #2 Reclaim Conveyor                 | Corn         | 30,000 bph     |       |                |
|      | 400J                                 | #3 Headhouse Top Loading Conveyor   | Corn         | 30,000 bph     |       |                |
|      | 400L                                 | #2 Silo Storage Bin                 | Corn         | 486,000 bu     |       |                |
|      | 400M                                 | #4 Silo Storage Bin                 | Corn         | 486,000 bu     |       |                |
|      | 400P                                 | Bulk Weigh Scale Belt               | Corn         | 30,000 bph     |       |                |
|      | 401B                                 | #2 Truck Scale                      | Corn         | 20,000 bph     |       |                |
|      | 401D                                 | Truck Dump Receiving Drag #2        | Corn         | 30,000 bph     |       |                |
|      | 401H                                 | #5 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401I                                 | Rail Transfer Conveyor              | Corn         | 30,000 bph     |       |                |
|      | 401K                                 | #2 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401P                                 | Surge Bin                           | Corn         | 10,000 bph     |       |                |
|      | 401Q                                 | Bulk Weigh Scale Belt               | Corn         | 30,000 bph     |       |                |
|      | 401W                                 | #1 Fines Storage Bin                | Corn         | 15,000 bph     |       |                |
|      | 401X                                 | Cracked Corn & Fines Screw Conveyor | Corn         | 15,000 bph     |       |                |
| 401Y | Cracked Corn & Fines Weigh Scale     | Corn                                | 15,000 bph   |                |       |                |
| 401Z | Cracked Corn & Fines Bucket Elevator | Corn                                | 15,000 bph   |                |       |                |
| 401  | 401A                                 | #1 Truck Scale                      | Corn         | 20,000 bph     | 401   | Baghouse       |
|      | 401B                                 | #2 Truck Scale                      | Corn         | 20,000 bph     |       |                |
|      | 401C                                 | Truck Dump Receiving Drag #1        | Corn         | 30,000 bph     |       |                |
|      | 401D                                 | Truck Dump Receiving Drag #2        | Corn         | 30,000 bph     |       |                |
|      | 401E                                 | #1 Rail Dump                        | Corn         | 30,000 bph     |       |                |
|      | 401F                                 | #1 Rail Dump Transfer Drag          | Corn         | 30,000 bph     |       |                |
|      | 401G                                 | #1 Rail Receiving Drag              | Corn         | 30,000 bph     |       |                |
|      | 401H                                 | #5 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401I                                 | Rail Transfer Conveyor              | Corn         | 30,000 bph     |       |                |
|      | 401J                                 | #1 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401K                                 | #2 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401L                                 | #4 Bucket Leg                       | Corn         | 30,000 bph     |       |                |
|      | 401M                                 | #1 Reclaim Conveyor                 | Corn         | 30,000 bph     |       |                |
|      | 401N                                 | #2 Headhouse Top Loading Conveyor   | Corn         | 30,000 bph     |       |                |
|      | 401O                                 | #1 Headhouse Top Loading Conveyor   | Corn         | 30,000 bph     |       |                |
|      | 401P                                 | Surge Bin                           | Corn         | 10,000 bph     |       |                |
| 401Q | Bulk Weigh Scale Belt                | Corn                                | 30,000 bph   |                |       |                |

| SEP | EU   | EU Description                       | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|------|--------------------------------------|--------------|----------------|-------|----------------|
| 401 | 401S | #1 Silo Storage Bin                  | Corn         | 486,000 bu     | 401   | Baghouse       |
|     | 401T | #3 Silo Storage Bin                  | Corn         | 486,000 bu     |       |                |
|     | 401U | #5 Silo Storage Bin                  | Corn         | 486,000 bu     |       |                |
|     | 401W | #1 Fines Storage Bin                 | Corn         | 45,000 bu      |       |                |
|     | 401X | Cracked Corn & Fines Screw Conveyor  | Corn         | 15,000 bph     |       |                |
|     | 401Y | Cracked Corn & Fines Weigh Belt      | Corn         | 15,000 bph     |       |                |
|     | 401Z | Cracked Corn & Fines Bucket Elevator | Corn         | 15,000 bph     |       |                |
|     | 400P | Bulk Weigh Scale Belt                | Corn         | 30,000 bph     |       |                |

### Applicable Requirements

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

**Table 5. PSD Emission Limits**

| EP         | Pollutant                                 | Emission Limit(s)            | Reference/Basis | Authority for Requirement  |
|------------|---|------------------------------|-----------------|--|
| 400<br>401 | Opacity                                   | 0% <sup>1,2</sup>            | BACT            | PSD Permit #07-A-533-P1<br>LCPH ATI 7346 / PTO 7007<br>PSD Permit #07-A-534-P1<br>LCPH ATI 7347 / PTO 7008 |
|            | PM / PM <sub>10</sub> / PM <sub>2.5</sub> | 0.004 gr/dscf <sup>3,4</sup> |                 |  |

<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of this emission point will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> Standard is expressed as a six-minute average and applies at all times, except during periods of startup, shutdown, and malfunction.

<sup>4</sup> The emission limit is expressed as the average of three (3) runs.

**Table 6. NSPS Emission Limits**

| EP         | Pollutant | Emission Limit(s)                                | Reference/Basis      | Authority for Requirement  |
|------------|-----------|--|----------------------|--|
| 400<br>401 | Opacity   | 0% when handling grain <sup>1</sup>              | 40 CFR §60.302(c)(2) | PSD Permit #07-A-533-P1<br>LCPH ATI 7346 / PTO 7007<br>PSD Permit #07-A-534-P1<br>LCPH ATI 7347 / PTO 7008 |
|            |           | 5% when unloading truck and/or rail <sup>1</sup> | 40 CFR §60.302(c)(1) |  |
|            | PM        | 0.01 gr/dscf <sup>2</sup>                        | 40 CFR §60.302(b)(1) |  |

<sup>1</sup> Standard is expressed as a six-minute average and applies at all times, except during periods of startup, shutdown, and malfunction.

<sup>2</sup> The emission limit is expressed as the average of three (3) runs.

**Table 7. Other Emission Limits**

| EP         | Pollutant | Emission Limit(s) | Reference/Basis    | Authority for Requirement                          |
|------------|-----------|-------------------|--------------------|--|
| 400<br>401 | Opacity   | 40%               | 567 IAC 23.3(2)"d" | PSD Permit #07-A-533-P1<br>PSD Permit #07-A-534-P1 |

| EP         | Pollutant             | Emission Limit(s)       | Reference/Basis                                | Authority for Requirement                            |
|------------|-----------------------|-------------------------|--|--|
| 400<br>401 | Opacity               | 20%                     | LCCO Sec. 10-60(a)                             | LCPH ATI 7346 / PTO 7007<br>LCPH ATI 7347 / PTO 7008 |
| 400<br>401 | PM                    | 0.1 gr/dscf             | 567 IAC 23.3(2)"a"(2)<br>LCCO Sec. 10-62(a)(1) | PSD Permit #07-A-533-P1<br>LCPH ATI 7346 / PTO 7007  |
|            | PM / PM <sub>10</sub> | 2.09 lb/hr <sup>1</sup> | NAAQS / Synthetic<br>minor limit               | PSD Permit #07-A-534-P1<br>LCPH ATI 7347 / PTO 7008  |

<sup>1</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>.

### **Operating Limits and Requirements**

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

#### **Federal Standards**

A. New Source Performance Standards (NSPS):

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

**Table 8. NSPS Subpart Summary**

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

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

Authority for Requirement:      40 CFR Part 60, Subpart DD  
    567 IAC 23.1(2)"ooo"  
    LCCO Sec. 10-62(b)(67)  
    PSD Permit #07-A-533-P1      |      LCPH ATI 7346 / PTO 7007  
    PSD Permit #07-A-534-P1      |      LCPH ATI 7347 / PTO 7008

#### **Operating Limits**

- A. All grain unloading activities, including both truck and rail unloading, shall be conducted within an enclosure. During truck unloading, the enclosure shall be closed via means of a door on both the entrance and exit of the unloading bay and a wall that extends at least 5 feet above the height of both doors that separates one bay from another. During rail unloading, the enclosure shall be enclosed via a physical barrier which totally covers any opening. If plastic strips are used to cover the rail enclosure openings, the plastic strips shall be replaced periodically when they become warped or damaged and are no longer providing an effective enclosure.
- B. All grain unloading from hopper bottom trucks and railcars shall use a "choke flow" method to minimize fugitive dust emissions.



- C. The differential pressure measured across the control equipment (CE-400, CE-401) shall be maintained between 0.5 inches of water column and 6 inches of water column, with the exception of unit startup.
- D. The control equipment on this unit shall be maintained according to the manufacturer's specification and good operating practices.

Authority for Requirement: PSD Permit #07-A-533-P1 | LCPH ATI 7346 / PTO 7007  
 PSD Permit #07-A-534-P1 | LCPH ATI 7347 / PTO 7008

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The owner or operator shall properly operate and maintain equipment to continuously monitor the baghouse pressure drop. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, or per written facility-specific operation and maintenance plan.
- C. The owner or operator shall collect and record the differential pressure, in inches of H<sub>2</sub>O, on a continuous basis. The requirement shall not apply on the days that the baghouse or the equipment that the baghouse controls is not in operation.
- D. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and monitoring devices.
- E. The owner or operator shall maintain a record of the range of baghouse pressure drop observed during the last successful compliance test for reference.

Authority for Requirement: PSD Permit #07-A-533-P1 | LCPH ATI 7346 / PTO 7007  
 PSD Permit #07-A-534-P1 | LCPH ATI 7347 / PTO 7008

**Compliance Plan**

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

**Description**

PSD Permits #07-A-533-P1 and #07-A-534-P1 do not accurately reflect the emission units associated with the permitted emission points. The local construction permits incorporate the requirements of the PSD permits by reference, but accurately captures the associated equipment. This change needs to be addressed in PSD permit modifications for each of the associated permits listed above.

**Condition**

The permittee shall apply for PSD permit modifications from the DNR within six (6) months of the issuance of this permit. These points will be in compliance at the time the construction permits are issued to accurately reflect the emission units venting through the permitted emission points. A summary of all Emission Points subject to a Compliance Plan is located in Appendix D of this operating permit.

Authority for Requirement: 567 IAC 22.108(15)

**Emission Point Characteristics**

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

**Table 9. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 400 | 150                               | V               | 54                           | Amb.      | 61,000          | PSD Permit #07-A-533-P1<br>LCPH ATI 7346 / PTO 7007 |
| 401 | 150                               | V               | 54                           | Amb.      | 61,000          | PSD Permit #07-A-534-P1<br>LCPH ATI 7347 / PTO 7008 |

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

**Monitoring Requirements**

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

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by PSD Permits #07-A-533-P1 and #07-A-534-P1.

**Emission Point ID Number: 403**

**Table 10. Associated Equipment**

| SEP  | EU             | EU Description                        | Raw Material | Rated Capacity | CE ID | CE Description |
|------|----------------|---------------------------------------|--------------|----------------|-------|----------------|
| 403  | 403A           | Hammermill #1                         | Corn         | 2,500 bph      | 403A  | Baghouse       |
|      | 403B           | Hammermill #2                         | Corn         | 2,500 bph      |       |                |
|      | 403C           | Hammermill #3                         | Corn         | 2,500 bph      |       |                |
|      | 403D           | Hammermill #4                         | Corn         | 2,500 bph      |       |                |
|      | 403F           | Hammermill #5                         | Corn         | 2,500 bph      | 403B  | Baghouse       |
|      | 403G           | Hammermill #6                         | Corn         | 2,500 bph      |       |                |
|      | 403H           | Hammermill #7                         | Corn         | 2,500 bph      |       |                |
|      | 403I           | Elevator to Mill Corn Belt Conveyor A | Corn         | 20,000 bph     | 403C  | Baghouse       |
|      | 403J           | Elevator to Mill Corn Belt Conveyor B | Corn         | 20,000 bph     |       |                |
|      | 403M           | Rotex Scalper A                       | Corn         | 20,000 bph     |       |                |
|      | 403N           | Rotex Scalper B                       | Corn         | 20,000 bph     |       |                |
|      | 403O           | Mill Storage Hopper A                 | Corn         | 2,860 bph      |       |                |
|      | 403P           | Mill Storage Hopper B                 | Corn         | 2,860 bph      |       |                |
|      | 403Q           | Mill Flour Drag A                     | Corn         | 20,000 bph     |       |                |
|      | 403R           | Mill Flour Drag B                     | Corn         | 20,000 bph     |       |                |
|      | 403S           | Mill Blender A                        | Corn         | 20,000 bph     | 403C  | Baghouse       |
| 403T | Mill Blender B | Corn                                  | 20,000 bph   |                |       |                |

**Applicable Requirements**

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

**Table 11. PSD Emission Limits**

| EP  | Pollutant                                 | Emission Limit(s)          | Reference/Basis | Authority for Requirement                           |
|-----|---|----------------------------|-----------------|---|
| 403 | Opacity                                   | 0% <sup>1,2</sup>          | BACT            | PSD Permit #07-A-535-P3<br>LCPH ATI 7543 / PTO 7362 |
|     | PM / PM <sub>10</sub> / PM <sub>2.5</sub> | 0.004 gr/dscf <sup>3</sup> |                 |   |

<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of 0% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after corrections, the Department may require additional proof to demonstrate (e.g., stack testing).

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

**Table 12. Other Emission Limits**

| EP  | Pollutant        | Emission Limit(s)       | Reference/Basis                                | Authority for Requirement                           |
|-----|------------------|-------------------------|--|---|
| 403 | Opacity          | 40% <sup>1</sup>        | 567 IAC 23.3(2)"d"                             | PSD Permit #07-A-535-P3<br>LCPH ATI 7543 / PTO 7362 |
|     |                  | 20% <sup>1,2</sup>      | LCCO Sec. 10-60(a)                             |   |
|     | PM               | 0.1 gr/dscf             | 567 IAC 23.3(2)"a"(2)<br>LCCO Sec. 10-62(a)(1) |   |
|     | PM <sub>10</sub> | 3.78 lb/hr <sup>3</sup> | NAAQS  |   |

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<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of 0% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>.

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## **Operating Limits and Requirements**

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

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly conduct an EPA Method 9 evaluation to determine compliance with the opacity limit.
- B. The pressure drop across the baghouses (CE-403A, CE-403B, and CE-403C) shall be maintained between 0.3 and 5.0 inches of water column. The owner or operator shall monitor and record the pressure drop across the baghouses (CE-403A, CE-403B, and CE-403C) on a weekly basis.
- C. Each baghouse shall be maintained according to the manufacturer's specifications and/or good operating practices. The owner or operator shall record the date and description of all maintenance performed on the control devices.
- D. The BAE for PM<sub>2.5</sub> for Project 15-370 are 1.4 tpy. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (Project Number 15-370), the owner or operator shall document and maintain a record of the following information:
  1. A description of the project (Project Number 15-370);
  2. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (Project Number 15-370); and
  3. A description of the applicability test used to determine that the project (Project Number 15-370) 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 567 IAC 33.3(1), an explanation describing why such amount was excluded, and any netting calculations, 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 the project (Project Number 15-370) and 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 ten (10) years following resumption of regular operations and maintain a record of regular operations after the change.
- F. Per 567 IAC 33.3(18)"f"(5), the owner or operator shall retain a written record containing information required in Condition E [above] for a period of ten (10) years after the project (Project Number 15-370) is completed.

- G. 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).
- H. The owner or operator shall determine the actual emissions for the project (Project Number 15-370) and record the value of the actual emissions minus the BAE from the project on a monthly basis.
- I. Actual emissions minus the BAE from the project shall not exceed the PSD significant levels. If these limits are exceeded during the ten (10) year review period, the owner or operator shall submit a report pursuant to 567 IAC 33.3(18)"f"(7).
- J. The facility is allowed to exclude those emissions following this change that could have been accommodated during the consecutive 24-month period used to establish BAE and are unrelated to this project (i.e., increased utilization due to demand growth). The facility shall be required to include a justification for any emissions excluded due to demand growth.

Authority for Requirement: PSD Permit #07-A-534-P3  
LCPH ATI 7543 / PTO 7362

**Emission Point Characteristics**

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

**Table 13. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 403 | 130                               | V               | 72                           | Amb.      | 110,000         | PSD Permit #07-A-535-P3<br>LCPH ATI 7543 / PTO 7362 |

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

**Monitoring Requirements**

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

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> emissions; however, as PM and PM<sub>10</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix B, CAM Plans, for the complete compliance assurance monitoring plan.

## Wastewater Treatment

Emission Point ID Number: 410, 411, 413, 414, 415, 416

Table 14. Associated Equipment

| SEP | EU  | EU Description              | Raw Material | Rated Capacity                                   | CE ID | CE Description |
|-----|-----|-----------------------------|--------------|--|-------|----------------|
| 410 | 410 | Equalization Tank           | Wastewater   | 3,000 gpm  | None  | None           |
| 411 | 411 | WWTP Aeration Tank          | Wastewater   | 1,500,000 gallons<br>600,000 ft <sup>3</sup> /hr | None  | None           |
| 413 | 413 | Membrane Filtration Tank #1 | Wastewater   | 36,000 gallons                                   | None  | None           |
| 414 | 414 | Membrane Filtration Tank #2 | Wastewater   | 36,000 gallons                                   | None  | None           |
| 415 | 415 | Membrane Filtration Tank #3 | Wastewater   | 36,000 gallons                                   | None  | None           |
| 416 | 416 | Membrane Filtration Tank #4 | Wastewater   | 36,000 gallons                                   | None  | None           |

### Applicable Requirements

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

Table 15. Emission Limits

| EP  | Pollutant        | Emission Limit(s)                | Reference/Basis           | Authority for Requirement |
|-----|------------------|----------------------------------|---------------------------|---------------------------|
| 410 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #09-A-382-P    |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPH ATI 7349 / PTO 7010  |
| 411 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #07-A-539-P-S1 |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPHA TI 7350 / PTO 7011  |
| 413 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #09-A-383-P    |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPH ATI 7352 / PTO 7013  |
| 414 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #09-A-384-P    |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPH ATI 7353 / PTO 7014  |
| 415 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #09-A-385-P    |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPH ATI 7354 / PTO 7015  |
| 416 | VOC              | 20 ppm <sub>vd</sub>             | BACT                      | PSD Permit #09-A-386-P    |
|     | H <sub>2</sub> S | 5 ppm <sub>vd</sub> <sup>1</sup> | PSD synthetic minor limit | LCPH ATI 7355 / PTO 7016  |

<sup>1</sup> Limit requested by the facility to keep the project (06-298) minor for PSD for hydrogen sulfide, total reduced sulfur, and reduced sulfur compounds. The averaging time is based on the methodology used for sampling in 'Operating Condition Monitoring.'

### Operating Limits and Requirements

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

#### Federal Standards

A. New Source Performance Standards (NESHAP):

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

**Table 16. NESHAP Subpart Summary**

| EU ID                        | Subpart        | Title  | Type             | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|------------------------------|----------------|--|------------------|-----------------------------|----------------------------|
| 410, 411, 413, 414, 415, 416 | A <sup>1</sup> | General Conditions                           | NA               | 10-62(d)                    | §63.1 – §63.16             |
|                              | FFFF           | Miscellaneous Organic Chemical Manufacturing | Ethanol dry mill | 10-62(d)(84)                | §63.2430 – §63.2550        |

<sup>1</sup> Not all of the general provisions in Subpart A are applicable to sources subject to the requirements of Subpart FFFF. See Table 12 to Subpart FFFF of 40 CFR Part 63 for a detailed listing of which general provisions are applicable.

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

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)  
 PSD Permit #07-A-382-P | LCPH ATI 7349 / PTO 7010  
 PSD Permit #07-A-539-P-S1 | LCPH ATI 7350 / PTO 7011  
 PSD Permit #09-A-383-P | LCPH ATI 7352 / PTO 7013  
 PSD Permit #09-A-384-P | LCPH ATI 7353 / PTO 7014  
 PSD Permit #09-A-385-P | LCPH ATI 7354 / PTO 7015  
 PSD Permit #09-A-386-P | LCPH ATI 7355 / PTO 7016

**Operating Limits**

- A. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550).
- B. The facility shall comply with all applicable requirements for each wastewater stream and liquid stream in open systems according to the provisions in 40 CFR §63.2485.

Authority for Requirement: PSD Permit #07-A-382-P | LCPH ATI 7349 / PTO 7010  
 PSD Permit #07-A-539-P-S1 | LCPH ATI 7350 / PTO 7011  
 PSD Permit #09-A-383-P | LCPH ATI 7352 / PTO 7013  
 PSD Permit #09-A-384-P | LCPH ATI 7353 / PTO 7014  
 PSD Permit #09-A-385-P | LCPH ATI 7354 / PTO 7015  
 PSD Permit #09-A-386-P | LCPH ATI 7355 / PTO 7016

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Record monthly the total amount of wastewater processed through the aeration tank each month in gallons. Calculate VOC and Hydrogen Sulfide (H<sub>2</sub>S) emissions on a monthly basis and record the 12-month rolling total using EPA's WATER9 model, or the most recent update to this model.
- B. Record the VOC and H<sub>2</sub>S concentration determined using the EPA's WATER9 model, or the most recent update of this model.



- C. In order to determine the concentration of H<sub>2</sub>S and VOC for input into the model, [VCP] shall complete liquid sampling to establish a baseline value. Sampling for H<sub>2</sub>S and VOC concentrations in the wastewater shall be taken from the inlet to the WWTP Aeration Tank and shall either be completed continuously for 30 days or once a week for 6 months to establish a baseline. Sampling shall be conducted under representative process unit and treatment unit operating conditions, in accordance with 40 CFR §63.145(a)(3) and (4). Wastewater samples shall be collected using sampling procedures which minimize the loss of organic compounds during the sample collection and analysis, and maintain sample integrity per 40 CFR §63.144(b)(5)(ii). The method shall be an analytical method which has that compound as a target analyte. Samples may be grab samples or composite samples. Samples shall be taken at approximately equally spaced time intervals over a 1-hour period. Each 1-hour period constitutes a run, and the performance test shall consist of 3 runs.
- D. This emission unit is subject to all applicable recordkeeping, notification, and reporting requirements as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525).

|                            |                           |  |                          |
|----------------------------|---------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-382-P    |  | LCPH ATI 7349 / PTO 7010 |
|                            | PSD Permit #07-A-539-P-S1 |  | LCPH ATI 7350 / PTO 7011 |
|                            | PSD Permit #09-A-383-P    |  | LCPH ATI 7352 / PTO 7013 |
|                            | PSD Permit #09-A-384-P    |  | LCPH ATI 7353 / PTO 7014 |
|                            | PSD Permit #09-A-385-P    |  | LCPH ATI 7354 / PTO 7015 |
|                            | PSD Permit #09-A-386-P    |  | LCPH ATI 7355 / PTO 7016 |

**Emission Point Characteristics**

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

**Table 17. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style      | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm)  | Authority for Requirement                             |
|-----|-----------------------------------|----------------------|------------------------------|-----------|------------------|---|
| 410 | 28                                | Downward, goose neck | 18                           | 95        | Breathing losses | PSD Permit #09-A-382-P<br>LCPH ATI 7349 / PTO 7010    |
| 411 | 32                                | V                    | 1,104                        | 100       | 5,000            | PSD Permit #07-A-539-P-S1<br>LCPH ATI 7350 / PTO 7011 |
| 413 | 15                                | V                    | 444 x 120                    | 90        | 1,000            | PSD Permit #09-A-383-P<br>LCPH ATI 7352 / PTO 7013    |
| 414 | 15                                | V                    | 444 x 120                    | 90        | 1,000            | PSD Permit #09-A-384-P<br>LCPH ATI 7353 / PTO 7014    |
| 415 | 15                                | V                    | 444 x 120                    | 90        | 1,000            | PSD Permit #09-A-385-P<br>LCPH ATI 7354 / PTO 7015    |
| 416 | 15                                | V                    | 444 x 120                    | 90        | 1,000            | PSD Permit #09-A-386-P<br>LCPH ATI 7355 / PTO 7016    |

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

discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

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**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)

**Emission Point ID Number: 412**

**Table 18. Associated Equipment**

| SEP | EU   | EU Description        | Raw Material       | Rated Capacity       | CE ID        | CE Description   |
|-----|------|-----------------------|--------------------|----------------------|--------------|--|
| 412 | 412A | Anaerobic Digester #1 | Wastewater, biogas | 365,500 gallons      | 412B<br>412C | 65.55 MMBtu/hr<br>Open Flare<br>Merichem H <sub>2</sub> S<br>Biogas Scrubber |
|     | 412B | Anaerobic Digester #2 | Wastewater, biogas | 365,500 gallons      |              |  |
|     | 412C | Anaerobic Digester #3 | Wastewater, biogas | 2,066 m <sup>3</sup> |              |  |

**Applicable Requirements**

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

**Table 19. PSD Emission Limits**

| EP  | Pollutant             | Emission Limit(s)                                      | Reference/Basis | Authority for Requirement                             |
|-----|-----------------------|--|-----------------|---|
| 412 | Opacity               | 0% <sup>1</sup>  | BACT            | PSD Permit #07-A-540-P3<br>LCPH ATI 7351 / PTO 7012R1 |
|     | PM / PM <sub>10</sub> | 0.0075 lb/MMBtu <sup>2</sup>                           |                 |   |
|     | SO <sub>2</sub>       | 0.023 lb/MMBtu <sup>2</sup>                            |                 |   |
|     | NO <sub>x</sub>       | 0.10 lb/MMBtu <sup>2</sup>                             |                 |   |
|     | CO                    | 0.20 lb/MMBtu <sup>2</sup>                             |                 |   |
|     | VOC                   | 98% reduction <sup>3</sup> and 0.36 lb/hr <sup>4</sup> |                 |   |
|     | H <sub>2</sub> S      | See Note <sup>5</sup>                                  |                 |   |

<sup>1</sup> Standard expressed as a six (6) minute average.

<sup>2</sup> The emission limit is expressed as the average of three (3) runs.

<sup>3</sup> The percent reduction limit applies across the open flare, CE412B.

<sup>4</sup> The pound per hour limit is the limit from the exhaust of the open flare, CE412B.

<sup>5</sup> A limit of 200 ppm, 24-hour rolling average, has been established for the outlet of the Merichem H<sub>2</sub>S Scrubber (CE412C). This limit does not correspond to the outlet of this emission point. Limit was requested by the facility as the basis of the SO<sub>2</sub> BACT for all of the equipment able to combust the biogas from the anaerobic digesters.

**Table 20. Other Emission Limits**

| EP  | Pollutant        | Emission Limit(s)       | Reference/Basis                                | Authority for Requirement                             |
|-----|------------------|-------------------------|--|---|
| 412 | Opacity          | 40%                     | 567 IAC 23.3(2)"d"                             | PSD Permit #07-A-540-P3<br>LCPH ATI 7351 / PTO 7012R1 |
|     |                  | 20%                     | LCCO Sec. 10-60(a)                             |   |
|     | PM               | 0.1 gr/dscf             | 567 IAC 23.3(2)"a"(2)<br>LCCO Sec. 10-62(a)(1) |   |
|     | SO <sub>2</sub>  | 500 ppm <sub>v</sub>    | 567 IAC 23.3(3)"e"<br>LCCO Sec. 10-65(a)(2)    |   |
|     | PM <sub>10</sub> | 0.49 lb/hr <sup>1</sup> | NAAQS  |   |
|     | SO <sub>2</sub>  | 1.50 lb/hr              |  |   |
|     | NO <sub>x</sub>  | 6.56 lb/hr              |  |   |
|     | CO               | 13.13 lb/hr             |  |   |

<sup>1</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is

established to limit emissions below levels that predict exceedances of the annual NAAQS for NO<sub>x</sub>. The limit for CO emissions is established to limit emissions below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

**Operating Limits and Requirements**

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

**Federal Standards**

A. New Source Performance Standards (NESHAP):

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

**Table 21. NESHAP Subpart Summary**

| EU ID | Subpart | Title                  | Type             | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------|---------|------------------------|------------------|-----------------------------|----------------------------|
| 412A  | A       | General Conditions     | NA               | 10-62(d)                    | §63.1 – §63.16             |
| 412B  | FFFF    | Miscellaneous Organic  | Ethanol dry mill | 10-62(d)(84)                | §63.2430 – §63.2550        |
| 412C  |         | Chemical Manufacturing |                  |                             |                            |

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

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(8)  
 PSD Permit #07-A-540-P3 | LCPH ATI 7351 / PTO 7012R1

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. These emission units (EU-412A, EU-412B, EU-412C) are subject to all applicable operating limits and recordkeeping, notification, and reporting requirements set forth in NESHAP Subparts A (40 CFR §63.1 through §63.15) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550).
- B. The facility shall comply with all applicable requirements for each wastewater stream and liquid stream in open systems according to the provisions in 40 CFR §63.2485.
- C. The flare shall be designed and operated to meet the minimum requirements of 40 CFR §60.18(b) through §60.18(f).
- D. The anaerobic digesters (EU-412A, EU-412B, EU-412C) shall be controlled by the Merichem H<sub>2</sub>S Scrubber (CE-412C) and either the open flare (CE-412B) or by sending the biogas to the natural gas header to be used in the regenerative thermal oxidizer (CE-420B), the DDGS Dryer Combustion Chamber (CE-425, CE-426, CE-427, CE-428, and/or CE-429), or the Alcohol Loadout Flares (CE-450 and CE-451). The anaerobic digesters will at no time operate uncontrolled.
- E. The owner or operator shall properly operate and maintain equipment to monitor the pH for the Merichem H<sub>2</sub>S Scrubber (CE-412C). The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and operating manuals or per written facility-specific operation and maintenance plan.

- F. The owner or operator shall collect and record the pH of the Merichem H<sub>2</sub>S Scrubber (CE-412C), in standard units, continuously. This requirement does not apply on the days that the equipment the scrubber controls are not in operation.
- G. The exhaust of the Merichem H<sub>2</sub>S Scrubber (CE-412C) shall contain less than 200 parts per million (ppm) H<sub>2</sub>S per 24-hour rolling average. The facility shall monitor H<sub>2</sub>S concentration from the outlet of the scrubber using a CEM (see [the Continuous Emission Monitoring section]).
- H. The owner or operator shall maintain the Merichem H<sub>2</sub>S Scrubber (CE-412C) according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance performed on the control equipment.

Authority for Requirement: PSD Permit #07-A-540-P3 | LCPH ATI 7351 / PTO 7012R1

**Emission Point Characteristics**

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

**Table 22. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                             |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 412 | 45                                | V               | 8                            | 1,500     | 1,500           | PSD Permit #07-A-540-P3<br>LCPH ATI 7351 / PTO 7012R1 |

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

**Monitoring Requirements**

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

**Continuous Emission Monitoring**

The owner or operator shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring hydrogen sulfide emissions discharged from the Merichem Biogas Scrubber (CE-412C). The output shall be reported as parts per million and calculated as a 24-hour rolling average.

The system shall be designed to meet the requirements of 40 CFR Part 60, Appendix B - Performance Specification 7 (PS7). The system shall be monitored according to the specifications of 40 CFR Part 60, Appendix F - Quality Assurance Procedures. The requirements in Appendix F shall be supplemented with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit.

The CEMS shall be operated and data recorded during all periods of operation of the anaerobic digester except for CEMS breakdown and repairs. Data shall be recorded during calibration checks and zero and span adjustments.

Authority for Requirement: PSD Permit #07-A-540-P3 | LCPH ATI 7351 / PTO 7012R1

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

## Starch

Emission Point ID Number: 419

Table 23. Associated Equipment

| EP  | EU  | EU Description | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|-----|----------------|--------------|----------------|-------|----------------|
| 419 | 419 | B Starch Tank  | Starch       | 85,000 gallons | None  | None           |

### Applicable Requirements

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

Table 24. Emission Limits

| EP  | Pollutant | Emission Limit(s)                              | Reference/Basis | Authority for Requirement |
|-----|-----------|--|-----------------|---------------------------|
| 419 | VOC       | 0.12 lb/hr                                     | Requested limit | LCPH ATI 7398 / PTO 7195  |
|     |           | 500 ppm <sub>v</sub> (as ethanol) <sup>1</sup> |                 |                           |

<sup>1</sup> The emission limit is based on an engineering estimate of 500 ppm<sub>v</sub> ethanol, which is an estimate of ancillary fermentation that may occur during transport and storage of B Starch, and on a 30-day rolling average of 10 truckloads per day (equivalent to 1,217 operational hours per year).

### Operating Limits and Requirements

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

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The B Starch Tank (EU-419) shall be limited to fill volume of 50,000 gallons per day, based on a 30-day rolling average. The owner or operator shall record the date and volume of delivery for each B Starch Tank fill event and calculate the 30-day rolling average in gallons per day.

Authority for Requirement: LCPH ATI 7398 / PTO 7195

### Emission Point Characteristics

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

Table 25. Stack Characteristics

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---------------------------|
| 419 | 60                                | Horizontal      | 6                            | 90        | 32              | LCPH ATI 7398 / PTO 7195  |

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

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**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)



## Fermentation

Emission Point ID Number: 420

Table 26. SEP-420 Associated Equipment

| EU <sup>1</sup> | EU Description             | Raw Material | Rated Capacity  | FFFF Applies | CE ID        | CE Description                  |
|-----------------|----------------------------|--------------|-----------------|--------------|--------------|---------------------------------|
| 420N            | Dry Slurry Mix Tank #1     | Distillate   | 15,000 gallons  | Yes          | 420B         | RTO                             |
| 420O            | Dry Slurry Mix Tank #2     | Distillate   | 15,000 gallons  | Yes          |              |                                 |
| 420P            | Pre-Cook Tank #1           | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420Q            | Pre-Cook Tank #2           | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420R            | Barometric Condenser #1    | Distillate   | 8,000 gallons   | Yes          |              |                                 |
| 420S            | Barometric Condenser #2    | Distillate   | 8,000 gallons   | Yes          |              |                                 |
| 420T            | Liquefaction Tank #1       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420U            | Liquefaction Tank #2       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420V            | Liquefaction Tank #3       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420W            | Liquefaction Tank #4       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420Z            | Liquefaction Tank #7       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420AA           | Liquefaction Tank #8       | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420BB           | Liquefaction Tank#9        | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420CC           | Liquefaction Tank #10      | Distillate   | 85,000 gallons  | Yes          |              |                                 |
| 420DD           | Distillation & Dehydration | Distillate   | 50,000 gph      | Yes          | 420B         | RTO                             |
| 420EE           | Nitrogen Stripper          | Distillate   | 50,000 gph      | Yes          | 420C         | Dist. Scrubber                  |
| 420FF           | Stillage Evaporation #1    | Distillate   | 114,000 gallons | Yes          | 420B         | RTO                             |
| 420GG           | Stillage Evaporation #2    | Distillate   | 114,000 gallons | Yes          |              |                                 |
| 420HH           | Stillage Evaporation #3    | Distillate   | 114,000 gallons | Yes          |              |                                 |
| 420II           | Stillage Evaporation #4    | Distillate   | 114,000 gallons | Yes          |              |                                 |
| 420JJ           | Decanter Feed Tank         | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420KK           | Centrate Tank              | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420LL           | Condensed Distillers Tank  | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420MM           | Evaporator Feed Tank #1    | Distillate   | 400,000 gallons | Yes          |              |                                 |
| 420NN           | Evaporator Feed Tank #2    | Distillate   | 400,000 gallons | Yes          |              |                                 |
| 420OO           | Evaporator Product Tank    | Distillate   | 30,000 gallons  | Yes          |              |                                 |
| 420PP           | Evaporator Condensate Tank | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420RR           | Process Water Tank         | Distillate   | 50,000 gallons  | Yes          |              |                                 |
| 420SS           | Wastewater Transfer Tank   | Distillate   | 100,000 gallons | Yes          |              |                                 |
| 420TT           | Yeast Propagator #1        | Distillate   | 117,500 gallons | Yes          |              |                                 |
| 420UU           | Yeast Propagator #2        | Distillate   | 117,500 gallons | Yes          |              |                                 |
| 420VV           | Yeast Propagator #3        | Distillate   | 117,500 gallons | Yes          |              |                                 |
| 420XX           | Fermenter #1               | Distillate   | 850,000 gallons | Yes          | 420A<br>420B | CO <sub>2</sub> Scrubber<br>RTO |
| 420YY           | Fermenter #2               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420ZZ           | Fermenter #3               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420AAA          | Fermenter #4               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420BBB          | Fermenter #5               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420CCC          | Fermenter #6               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420DDD          | Fermenter #7               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420EEE          | Fermenter #8               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420FFF          | Fermenter #9               | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420GGG          | Fermenter #10              | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420HHH          | Fermenter #11              | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420III          | Fermenter #12              | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420JJJ          | Fermenter #13              | Distillate   | 850,000 gallons | Yes          |              |                                 |

| EU <sup>1</sup> | EU Description | Raw Material | Rated Capacity  | FFFF Applies | CE ID        | CE Description                  |
|-----------------|----------------|--------------|-----------------|--------------|--------------|---------------------------------|
| 420KKK          | Fermenter #14  | Distillate   | 850,000 gallons | Yes          | 420A<br>420B | CO <sub>2</sub> Scrubber<br>RTO |
| 420LLL          | Fermenter #15  | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420MMM          | Fermenter #16  | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420TTT          | Fermenter #23  | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420UUU          | Fermenter #24  | Distillate   | 850,000 gallons | Yes          |              |                                 |
| 420VVV          | Beerwell #1    | Distillate   | 420,000 gph     | Yes          |              |                                 |
| 420WWW          | Beerwell #2    | Distillate   | 420,000 gph     | Yes          |              |                                 |

<sup>1</sup> All emission units are associated with SEP420.

### Applicable Requirements

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

**Table 27. PSD Emission Limits**

| EP                    | Pollutant             | Emission Limit(s)  | Reference/Basis | Authority for Requirement                           |
|-----------------------|-----------------------|--|-----------------|---|
| 420                   | Opacity               | 0% <sup>1</sup>  | BACT            | PSD Permit #07-A-541-P2<br>LCPH ATI 7356 / PTO 7017 |
|                       | PM / PM <sub>10</sub> | 0.003 gr/dscf <sup>2</sup>                                       |                 |   |
|                       | PM <sub>10</sub>      | 2.69 tpy <sup>3</sup>  |                 |   |
|                       | SO <sub>2</sub>       | 90% reduction <sup>2,4</sup> or 10 ppm <sub>v</sub> <sup>2</sup> |                 |   |
|                       |                       | 9.59 tpy <sup>3</sup>  |                 |   |
|                       | NO <sub>x</sub>       | 1.8 lb/hr <sup>2</sup> and 6.3 ppm <sub>v</sub> <sup>2,5</sup>   |                 |   |
|                       |                       | 7.73 tpy <sup>3</sup>  |                 |   |
|                       | VOC                   | 98% reduction <sup>2,6</sup> or 3.35 lb/hr <sup>2,7</sup>        |                 |   |
|                       |                       | 14.70 tpy <sup>3</sup>   |                 |   |
|                       | CO                    | 1.8 lb/hr <sup>2</sup> and 10.3 ppm <sub>v</sub> <sup>2,5</sup>  |                 |   |
| 6.49 tpy <sup>3</sup> |                       |  |                 |   |

<sup>1</sup> Standard is expressed as a six (6) minute average.

<sup>2</sup> The emission limit is expressed as the average of three (3) runs.

<sup>3</sup> Ton per year limits correlate to an annual production limit of 420,000,000 gallons of denatured ethanol 12-month rolling total.

<sup>4</sup> The percent reduction limit applies across the CO<sub>2</sub> Scrubber (CE420A) and the Distillation NCG Scrubber (CE420C). The 10 ppm<sub>v</sub> concentration limit is the limit from the exhaust of the RTO (CE420B).

<sup>5</sup> The NO<sub>x</sub> and CO standards apply at all times, except during periods of startup, shutdown, or malfunction. During periods of startup, shutdown, or malfunction, an emission limit of 18.9 ppm<sub>v</sub> applies for NO<sub>x</sub> and a limit of 41.3 ppm<sub>v</sub> applies for CO.

<sup>6</sup> The percent reduction limit applies across the RTO (CE420B)

<sup>7</sup> The pound per hour limit is the limit from the exhaust of the RTO (CE420B)

**Table 28. NESHAP Emission Limits**

| EP  | Pollutant   | Emission Limit(s)   | Reference/Basis | Authority for Requirement                           |
|-----|-------------|---|-----------------|---|
| 420 | Organic HAP | ≥ 98% reduction <sup>1</sup> or ≤ 20ppm <sub>v</sub> <sup>1,2</sup> | 40 CFR §63.2430 | PSD Permit #07-A-541-P2<br>LCPH ATI 7356 / PTO 7017 |

<sup>1</sup> The emission limit is expressed as the average of three (3) runs.

<sup>2</sup> Per Table 1 to NESHAP Subpart FFFF of [40 CFR] Part 63, reduce emissions of total organic HAP by  $\geq 98\%$ , by weight, or to an outlet concentration of  $\leq 20$  ppm<sub>v</sub> as organic HAP or TOC by venting emissions through a closed-vent system of any combination of control devices, except a flare.

**Table 29. Other Emission Limits**

| EP  | Pollutant        | Emission Limit(s)       | Reference/Basis                             | Authority for Requirement                           |
|-----|------------------|-------------------------|---|---|
| 420 | Opacity          | 40% <sup>1,2</sup>      | 567 IAC 23.3(2)"d"                          | PSD Permit #07-A-541-P2<br>LCPH ATI 7356 / PTO 7017 |
|     | PM               | 0.1 gr/dscf             | 567 IAC 23.4(7)<br>LCCO Sec. 10-62(a)(7)    |   |
|     | SO <sub>2</sub>  | 500 ppm <sub>v</sub>    | 567 IAC 23.3(3)"e"<br>LCCO Sec. 10-65(a)(2) |   |
|     | PM <sub>10</sub> | 1.52 lb/hr <sup>3</sup> | NAAQS                                       |   |
|     | SO <sub>2</sub>  | 5.90 lb/hr <sup>3</sup> |   |   |
|     | NO <sub>x</sub>  | 1.80 lb/hr <sup>3</sup> |   |   |
|     | CO               | 1.80 lb/hr <sup>3</sup> |   |   |
|     | Opacity          | 20% <sup>1,2</sup>      | LCCO Sec. 10-60(a)                          |   |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity [of 20%] will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS and increment for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is established to limit emissions below levels that predict exceedances of the annual NAAQS and increment for NO<sub>x</sub>. The limit for CO emissions is established to limit emissions below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

### **Operating Limits and Requirements**

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

#### **Federal Standards**

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

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

**Table 30. NESHAP Subpart Summary**

| EU ID         | Subpart | Title  | Type                 | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|---------------|---------|--|----------------------|-----------------------------|----------------------------|
| N through WWW | A       | General Conditions                           | NA                   | 10-62(d)                    | §63.1 – §63.16             |
|               | FFFF    | Miscellaneous Organic Chemical Manufacturing | Ethanol fermentation | 10-62(d)(84)                | §63.2430 – §63.2550        |

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

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
567 IAC 23.1(4)"cf"  
LCCO Sec. 10-62(d)(84)  
PSD Permit #07-A-541-P2 | LCPH ATI 7356 / PTO 7017

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The [VCP] Ethanol Dry Mill located at Plant Number [57-01-246] shall not produce more than 420,000,000 gallons of denatured ethanol per rolling 12-month period. Record monthly, the amount of denatured ethanol produced at the [VCP] Ethanol Dry Mill located at Plant Number [57-01-246] in gallons. Calculate and record 12-month rolling totals.
- B. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and the monitoring devices.
- C. The Regenerative Thermal Oxidizer (CE420B), CO<sub>2</sub> Scrubber (CE420A), and the Distillation NCG Scrubber (CE420C) shall be operated at all times the equipment each device controls is in operation.
- D. The CO<sub>2</sub> Scrubber (CE420A) scrubbant flow rate and the Distillation NCG Scrubber (CE420C) scrubbant shall be maintained at or above the average flow rate, measured in gallons per hour, during the most recent performance test that demonstrates compliance with the permitted emission limits. Records of the average scrubbant flow rate observed for each scrubber during the last successful compliance test will be maintained for reference.
- E. The owner or operator shall properly operate and maintain equipment to continuously monitor and record the scrubbant flow rate for the CO<sub>2</sub> Scrubber and the Distillation NCG Scrubber. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, or per written facility-specific operation and maintenance plan. This requirement shall not apply on the days that the scrubbers, or the equipment the scrubbers control, are not in operation.
- F. The CO<sub>2</sub> Scrubber (CE420A) scrubbant pH shall be maintained at a minimum pH of 3.5, three-hour rolling average. The owner or operator shall properly operate and maintain equipment to continuously monitor and record the scrubbant pH, in standard units, for the CO<sub>2</sub> Scrubber. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, or per written facility-specific operating and maintenance plan. This requirement shall not apply on the days that the CO<sub>2</sub> Scrubber or the equipment that the CO<sub>2</sub> Scrubber controls is not in operation.
- G. The Regenerative Thermal Oxidizer shall only combust natural gas, including natural gas mixed with biogas from the wastewater treatment plant, process off-gasses, and combustion air.
- H. The Regenerative Thermal Oxidizer shall maintain a temperature (3-hour average) during operation of no lower than 50 degrees Fahrenheit of the average temperature of the oxidizer recorded during the most recent performance test which demonstrated compliance with the emission limits.
- I. The owner or operator shall keep three-hour block records of the operating temperature of the thermal oxidizer, and record all three-hour periods (during actual operations) during which the average temperature of the thermal oxidizer is more than 50 degrees Fahrenheit below the

average temperature of the oxidizer during its most recent performance test which demonstrated compliance with the emission limits.

- J. The owner or operator shall keep records of the frequency and amount of time the thermal oxidizer malfunctions and estimate the emissions emitted during these malfunctions.
- K. These emission units, as detailed in [Table 26], are subject to all applicable operating limits set forth in NESHAP Subpart A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550).
- L. Per 40 CFR §63.2450, for the closed vent system and Regenerative Thermal Oxidizer, the facility shall meet the requirements of [40 CFR §63.982(b)] and the requirements referenced therein.
- M. Per 40 CFR §63.2455 and 40 CFR §63.2460, the facility shall meet all of the applicable operating requirements in Table[s] 1 and 2 of NESHAP Subpart FFFF.
- N. The facility must develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR §63.6(e). Per 40 CFR §63.2525(j), the SSMP is not required to included Group 2 emission points, unless those emission points are used in an emissions average, and for equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment.
- O. The owner or operator shall furnish the Department with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in [Table 27], [Table 28], and [Table 29]. In addition, the facility shall detail all revisions made to the affected emission units and provide a startup, shutdown, and malfunction plan for the emission unit and control device. This information shall be submitted to the Department at least 30 days in advance of construction of any control equipment.
- P. These emission units, as detailed in [Table 26], are subject to all applicable recordkeeping, notification, and reporting requirements as set forth in NESHAP Subpart A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2515, 40 CFR §2520, and 40 CFR §63.2525).

Authority for Requirement: PSD Permit #07-A-541-P2 | LCPH ATI 7356 / PTO 7017

**Emission Point Characteristics**

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

**Table 31. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 420 | 100                               | V               | 60                           | 190       | 63,850          | PSD Permit #07-A-541-P2<br>LCPH ATI 7356 / PTO 7017 |

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

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**Monitoring Requirements**

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

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

<sup>2</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by PSD Permits #07-A-541-P2 and ATI 7356 / PTO 7017.

## DDGS Cooling & Drying

Emission Point ID Number: 422, 423

Table 32. Associated Equipment

| SEP | EU  | EU Description | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|-----|----------------|--------------|----------------|-------|----------------|
| 422 | 422 | DDGS Cooler #1 | DDGS         | 140 tph        | 422   | Baghouse       |
| 423 | 423 | DDGS Cooler #2 | DDGS         | 140 tph        | 423   | Baghouse       |

### Applicable Requirements

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

Table 33. PSD Emission Limits

| SEP | Pollutant                                 | Emission Limit(s)  | Reference/Basis | Authority for Requirement  |
|-----|---|--|-----------------|--|
| 422 | Opacity                                   | 0% <sup>1,2</sup>  | BACT            | PSD Permit #07-A-543-P4<br>LCPH ATI 7357 / PTO 7018<br>PSD Permit #07-A-544-P4<br>LCPH ATI 7359 / PTO 7020 |
|     | PM / PM <sub>10</sub> / PM <sub>2.5</sub> | 0.004 gr/dscf <sup>3</sup>   |                 |  |
| 423 | SO <sub>2</sub>                           | 10 ppm <sub>vd</sub> <sup>3</sup>                                  |                 |  |
|     | VOC                                       | 45 ppm <sub>vd</sub> <sup>3,4</sup> or 0.216 lb/ton <sup>3,4</sup> |                 |  |

<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of this emission point will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

<sup>4</sup> This is a combined limit for DDGS Coolers 1 & 2.

Table 34. Other Emission Limits

| SEP        | Pollutant               | Emission Limit(s)       | Reference/Basis                             | Authority for Requirement  |
|------------|-------------------------|-------------------------|---|--|
| 422<br>423 | Opacity                 | 40% <sup>1,2</sup>      | 567 IAC 23.3(2)"d"                          | PSD Permit #07-A-543-P4<br>LCPH ATI 7357 / PTO 7018<br>PSD Permit #07-A-544-P4<br>LCPH ATI 7359 / PTO 7020 |
|            | PM                      | 0.1 gr/dscf             | 567 IAC 23.4(7)<br>LCCO Sec. 10-62(a)(7)    |  |
|            | SO <sub>2</sub>         | 500 ppm <sub>v</sub>    | 567 IAC 23.3(3)"e"<br>LCCO Sec. 10-65(a)(2) |  |
|            | PM <sub>10</sub>        | 1.54 lb/hr <sup>3</sup> | NAAQS                                       |  |
|            | SO <sub>2</sub>         | 4.68 lb/hr <sup>3</sup> |   |  |
|            | Acetaldehyde            | 0.64 lb/hr <sup>4</sup> | Synthetic minor for<br>112(g)               |  |
|            | Acrolein                | 0.98 lb/hr <sup>4</sup> |   |  |
|            | Formaldehyde            | 1.06 lb/hr <sup>4</sup> |   |  |
|            | Methanol                | 1.08 lb/hr <sup>4</sup> |   |  |
| Total HAP  | 2.48 lb/hr <sup>4</sup> |                         |   |  |
|            | Opacity                 | 20% <sup>1,2</sup>      | LCCO Sec. 10-60(a)                          | LCPH ATI 7357 / PTO 7018<br>LCPH ATI 7359 / PTO 7020   |

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<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of this emission point will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS and increment for SO<sub>2</sub>.

<sup>4</sup> HAP emission limits established to limit potential emission from the DDGS feed line below the "major source" threshold for the purposes of 112(g) as defined in 40 CFR §63.41. Emission limit is combined total for DDGS Coolers #1 & #2.

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## **Operating Limits and Requirements**

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

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall monitor and record 'no visible emissions' observations on a weekly basis. An exceedance of 'no visible emissions' will require the owner/operator to promptly investigate the emission unit, make corrections to operations or equipment associated with the exceedance, and record the corrective action taken.
- B. The differential pressure measured across the control equipment, CE422 [CE423], shall be maintained between 0.1" and 12" of water column with the exception of unit startup. The owner or operator shall collect and record the baghouse pressure drop, in inches of water, on a continuous basis. This requirement shall not apply on the days the baghouse or equipment that the baghouse control is not in operation.
- C. The owner or operator shall maintain a record of the range of baghouse pressure drop observed during the last successful compliance test for reference.
- D. The owner or operator shall properly operate and maintain equipment to continuously monitor the baghouse pressure drop. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and the monitoring devices.
- E. The owner or operator shall record monthly the total amount of DDGS processed in the coolers, EU422 and EU423. Calculate and record VOC emissions from the coolers in tons on a monthly basis and record the 12-month rolling total.

Authority for Requirement: PSD Permit #07-A-543-P4  
LCPH ATI 7357 / PTO 7018  
PSD Permit #07-A-544-P4  
LCPH ATI 7359 / PTO 7020



**Emission Point Characteristics**

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

**Table 35. Stack Characteristics**

| SEP | Stack Height<br>(feet, above<br>ground) | Discharge<br>Style | Stack<br>Opening<br>(inches, dia.) | Temp<br>(°F) | Flowrate<br>(scfm) | Authority for Requirement                           |
|-----|---|--------------------|------------------------------------|--------------|--------------------|---|
| 422 | 100                                     | V                  | 48                                 | 153          | 46,940             | PSD Permit #07-A-543-P4<br>LCPH ATI 7357 / PTO 7018 |
| 423 | 100                                     | V                  | 48                                 | 153          | 49,940             | PSD Permit #07-A-544-P4<br>LCPHA TI 7359 / PTO 7020 |

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

**Monitoring Requirements**

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

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

<sup>1</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by PSD Permits #07-A-543-P4 and #07-A-544-P4 and LCPH ATI 7357 / PTO 7018 and ATI 7359 / PTO 7020.

**Emission Point ID Number: 425, 426, 427, 428, 429**

**Table 36. Associated Equipment**

| EP  | EU  | EU Description               | Raw Material | Rated Capacity          | CE ID        | CE Description   |
|-----|-----|------------------------------|--------------|-------------------------|--------------|--|
| 425 | 425 | Indirect-Fired DDGS Dryer #1 | DDGS         | 63 tph<br>95.5 MMBtu/hr | 425A<br>425B | Low NO <sub>x</sub> with FGR<br>Dryer Combustion Chamber |
| 426 | 426 | Indirect-Fired DDGS Dryer #2 | DDGS         | 63 tph<br>95.5 MMBtu/hr | 426A<br>426B | Low NO <sub>x</sub> with FGR<br>Dryer Combustion Chamber |
| 427 | 427 | Indirect-Fired DDGS Dryer #3 | DDGS         | 63 tph<br>95.5 MMBtu/hr | 427A<br>427B | Low NO <sub>x</sub> with FGR<br>Dryer Combustion Chamber |
| 428 | 428 | Indirect-Fired DDGS Dryer #4 | DDGS         | 63 tph<br>95.5 MMBtu/hr | 428A<br>428B | Low NO <sub>x</sub> with FGR<br>Dryer Combustion Chamber |
| 429 | 429 | Indirect-Fired DDGS Dryer #5 | DDGS         | 63 tph<br>95.5 MMBtu/hr | 429A<br>429B | Low NO <sub>x</sub> with FGR<br>Dryer Combustion Chamber |

**Applicable Requirements**

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

**Table 37. PSD Emission Limits**

| SEP | Pollutant             | Emission Limit(s)   | Reference /Basis | Authority for Requirement  |
|-----|-----------------------|---|------------------|--|
| 425 | Opacity               | 0% <sup>1,2</sup>   | BACT             | PSD Permit #07-A-546-P1   LCPH ATI 7358 / PTO 7019<br>PSD Permit #07-A-547-P1   LCPH ATI 7360 / PTO 7021<br>PSD Permit #07-A-548-P1   LCPH ATI 7361 / PTO 7022<br>PSD Permit #07-A-549-P1   LCPH ATI 7362 / PTO 7023<br>PSD Permit #07-A-550-P1   LCPH ATI 7363 / PTO 7024 |
|     | PM / PM <sub>10</sub> | 0.015 gr/dscf <sup>1</sup>                                    |                  |  |
| 426 | SO <sub>2</sub>       | 6.0 ppm <sub>vd</sub> <sup>1</sup>                            |                  |  |
| 427 | NO <sub>x</sub>       | 0.04 lb/MMBtu <sup>1</sup>                                    |                  |  |
| 428 | VOC                   | 98% reduction <sup>1,3</sup><br>and 3.16 lb/hr <sup>1,4</sup> |                  |  |
| 429 |                       |   |                  |  |
|     | CO                    | 0.10 lb/MMBtu <sup>1</sup>                                    |                  |  |

<sup>1</sup> The emission limit is expressed as the average of three (3) runs.

<sup>2</sup> The emission limit is based on a six (6) minute average.

<sup>3</sup> The percent reduction limit applies to the dryer process gas bleed stream (i.e., the gas in direct contact with the DDGS being dried in the dryer which is routed to the combustion chamber for VOC control). It is to be determined based on the measurement of the mass of VOC in the process gas exiting the dryer process loop and the mass of VOC in the flue gas exiting the dryer combustion chamber. The mass of VOC in the gas exiting the chamber may be adjusted downward to account for VOC produced by the combustion of the fuel gas in the combustion chamber.

<sup>4</sup> The pound per hour limit is the limit from the exhaust of the dryer combustion chamber (CE425B, CE426B, CE427B, CE428B, and CE429B).

**Table 38. NSPS Emission Limits**

| SEP        | Pollutant | Emission Limit(s)          | Reference/Basis | Authority for Requirement  |
|------------|-----------|----------------------------|-----------------|--|
| 425<br>426 | PM        | 0.03 lb/MMBtu <sup>1</sup> | 40 CFR §60.43c  | PSD Permit #07-A-546-P1<br>LCPH ATI 7358 / PTO 7019<br>PSD Permit #07-A-547-P1<br>LCPH ATI 7360 / PTO 7021 |

| SEP               | Pollutant | Emission Limit(s)          | Reference/Basis | Authority for Requirement   |
|-------------------|-----------|----------------------------|-----------------|---|
| 427<br>428<br>429 | PM        | 0.03 lb/MMBtu <sup>1</sup> | 40 CFR §60.43c  | PSD Permit #07-A-548-P1<br>LCPH ATI 7361 / PTO 7022<br>PSD Permit #07-A-549-P1<br>LCPH ATI 7362 / PTO 7023<br>PSD Permit #07-A-550-P1<br>LCPH ATI 7363 / PTO 7024 |

<sup>1</sup> The emission limit is expressed as the average of three (3) runs and applies at all times, except during startup, shutdown, or malfunction.

**Table 39. Other Emission Limits**

| SEP                             | Pollutant        | Emission Limit(s)          | Reference/Basis                          | Authority for Requirement  |
|---------------------------------|------------------|----------------------------|--|--|
| 425<br>426<br>427<br>428<br>429 | Opacity          | 40% <sup>1,2</sup>         | 567 IAC 23.3(2)"d"                       | PSD Permit #07-A-546-P1<br>LCPH ATI 7358 / PTO 7019  |
|                                 | PM               | 0.6 lb/MMBtu               | 567 IAC 23.3(2)"b"(2)                    | PSD Permit #07-A-547-P1  |
|                                 | SO <sub>2</sub>  | 500 ppm <sub>v</sub>       | 567 IAC 23.3(3)"e"<br>LCCO Sec. 65(a)(2) | LCPH ATI 7360 / PTO 7021<br>PSD Permit #07-A-548-P1  |
|                                 | PM <sub>10</sub> | 3.29 lb/hr <sup>3,4</sup>  | NAAQS                                    | LCPH ATI 7361 / PTO 7022   |
|                                 | SO <sub>2</sub>  | 1.01 lb/hr <sup>3,4</sup>  |  | PSD Permit #07-A-549-P1  |
|                                 | NO <sub>x</sub>  | 3.75 lb/hr <sup>3,4</sup>  |  | LCPH ATI 7362 / PTO 7023   |
|                                 | CO               | 10.31 lb/hr <sup>3,4</sup> |  | PSD Permit #07-A-550-P1<br>LCPH ATI 7363 / PTO 7024  |
|                                 | Opacity          | 20% <sup>1,2</sup>         | LCCO Sec. 10-60(a)                       | LCPH ATI 7358 / PTO 7019<br>LCPH ATI 7360 / PTO 7021<br>LCPH ATI 7361 / PTO 7022<br>LCPH ATI 7362 / PTO 7023<br>LCPH ATI 7363 / PTO 7024 |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> An exceedance of the [indicator opacity] will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

<sup>4</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>. The limit for SO<sub>2</sub> is established to limit emission below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS and increment for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is established to limit emissions below levels that predict exceedances of the annual NAAQS and increment for NO<sub>x</sub>. The limit for CO emissions are established to limit emission below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

### **Operating Limits and Requirements**

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

#### **Federal Standards**

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

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

**Table 40. NSPS Subpart Summary**

| EU ID       | Subpart | Title   | Type          | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------------|---------|---|---------------|-----------------------------|----------------------------|
| 425—<br>429 | A       | General Conditions  | NA            | 10-62(b)                    | §60.1 – §60.19             |
|             | Dc      | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units | 95.5 MMBtu/hr | 10-62(b)(64)                | §60.40c – §60.48c          |

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

**B. New Source Performance Standards (NESHAP):**

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

**Table 41. NESHAP Subpart Summary**

| EU ID       | Subpart | Title   | Type          | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------------|---------|---|---------------|-----------------------------|----------------------------|
| 425—<br>429 | A       | General Conditions  | NA            | 10-62(d)                    | §63.1 – §63.16             |
|             | DDDDD   | Industrial, Commercial, and Institutional Boilers and Process Heaters | 95.5 MMBtu/hr | 10-62(d)(108)               | §63.7480 – §63.7575        |

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

Authority for Requirement:      40 CFR Part 60, Subpart Dc  
    567 IAC 23.1(2)"lll"  
    LCCO Sec. 10-62(b)(64)  
    40 CFR Part 63, Subpart DDDDD  
    567 IAC 23.1(4)"dd"  
    LCCO Sec. 10-62(d)(108)  
    PSD Permit #07-A-546-P1      |      LCPH ATI 7358 / PTO 7019  
    PSD Permit #07-A-547-P1      |      LCPH ATI 7360 / PTO 7021  
    PSD Permit #07-A-548-P1      |      LCPH ATI 7361 / PTO 7022  
    PSD Permit #07-A-549-P1      |      LCPH ATI 7362 / PTO 7023  
    PSD Permit #07-A-550-P1      |      LCPH ATI 7363 / PTO 7024

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. DDGS Dryers #1, #2, #3, #4, and #5 (collectively referred to as the DDGS Dryers) shall not operate at less than 35% load (i.e., operate while firing less than 35% of the maximum firing rate of the dryer). The owner or operator shall collect and record the amount of fuel fired in the burners, in % of the possible fuel fired, continuously the DDGS Dryers. This requirement shall not apply on the days that the dryers are not in operation.

- B. The owner or operator shall maintain and operate the DDGS Dryers according to the provisions in 40 CFR §63.6(e). The owner or operator shall maintain a record of all inspections/maintenance, and any action resulting from the inspection/maintenance of the control equipment and monitoring equipment.
- C. The owner or operator shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) for the DDGS Dryers according to the provisions in 40 CFR §63.6(e).
- D. The DDGS Dryers shall only combust natural gas, including natural gas mixed with biogas from the wastewater treatment plant, process off-gases, and combustion air. The owner or operator shall maintain records of monthly fuel used by the DDGS Dryers, including the type of fuel and amount, according to 40 CFR §60.48c, 40 CFR §63.7555, and 40 CFR §63.7560.
- E. The combustion chamber of the DDGS Dryers shall maintain a temperature (3-hour average), measured at the exit of the combustion chamber, during operation of no more than 50 degrees Fahrenheit below the average temperature measured at this location during the most recent performance test that demonstrated compliance with the emission limits. The owner or operator shall keep hourly records of the operating temperature of the dryers' combustion chambers and record all periods (during actual operation) where the 3-hour average temperature is more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test which demonstrated compliance with the emission limits.
- F. The owner or operator shall maintain a record of the average temperature of the dryers' combustion chambers observed during the most recent performance test which demonstrated compliance with the emission limits for reference.
- G. The owner or operator shall follow the reporting requirements of 40 CFR §60.48c and 40 CFR §63.7550.
- H. Per 40 CFR §60.48c(j), reports required under this subpart shall be submitted for each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. The reports shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certification submitted represent all of the fuel combusted during the reporting period and fuel supplier certifications.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-546-P1 |  | LCPH ATI 7358 / PTO 7019 |
|                            | PSD Permit #07-A-547-P1 |  | LCPH ATI 7360 / PTO 7021 |
|                            | PSD Permit #07-A-548-P1 |  | LCPH ATI 7361 / PTO 7022 |
|                            | PSD Permit #07-A-549-P1 |  | LCPH ATI 7362 / PTO 7023 |
|                            | PSD Permit #07-A-550-P1 |  | LCPH ATI 7363 / PTO 7024 |

**Emission Point Characteristics**

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

**Table 42. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 425 | 180                               | V               | 42                           | 450       | 22,740          | PSD Permit #07-A-546-P1<br>LCPH ATI 7358 / PTO 7019 |
| 426 | 180                               | V               | 42                           | 450       | 22,740          | PSD Permit #07-A-547-P1<br>LCPH ATI 7360 / PTO 7021 |
| 427 | 180                               | V               | 42                           | 450       | 22,740          | PSD Permit #07-A-548-P1<br>LCPH ATI 7361 / PTO 7022 |

| SEP | Stack Height<br>(feet, above<br>ground) | Discharge<br>Style | Stack<br>Opening<br>(inches, dia.) | Temp<br>(°F) | Flowrate<br>(scfm) | Authority for Requirement                           |
|-----|---|--------------------|------------------------------------|--------------|--------------------|---|
| 428 | 180                                     | V                  | 42                                 | 450          | 22,740             | PSD Permit #07-A-549-P1<br>LCPH ATI 7362 / PTO 7023 |
| 429 | 180                                     | V                  | 42                                 | 450          | 22,740             | PSD Permit #07-A-550-P1<br>LCPH ATI 7363 / PTO 7024 |

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

### **Monitoring Requirements**

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

#### **Stack Testing**

These emission points are subject to the stack testing requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

#### **Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring requirements are fulfilled by CAM-equivalent monitoring required by PSD Permits #07-A-546-P1, #07-A-547-P1, #07-A-548-P1, #07-A-549-P1, and #07-A-550-P1; and LCPH ATI 7358 / PTO 7019, ATI 7360 / PTO 7021, ATI 7361 / PTO 7022, ATI 7362 / PTO 7023, and ATI 7363 / PTO 7024.

## Alcohol Process

Emission Point ID Number: 440, 441, 442, 443, 444, 445, 447, 448, 449

Table 43. Associated Equipment

| FEP | EU  | EU Description                       | Raw Material        | Rated Capacity    | CE ID | CE Description         |
|-----|-----|--------------------------------------|---------------------|-------------------|-------|------------------------|
| 440 | 440 | Alcohol Process Day Tank #1          | 200° Ethanol        | 500,000 gallons   | 440   | Internal Floating Roof |
| 441 | 441 | Alcohol Process Day Tank #2          | 200 ° Ethanol       | 500,000 gallons   | 441   | Internal Floating Roof |
| 442 | 442 | Alcohol Process Quality Control Tank | Denatured Ethanol   | 500,000 gallons   | 442   | Internal Floating Roof |
| 443 | 443 | Alcohol Process Reclaim Tank         | Denatured Ethanol   | 500,000 gallons   | 443   | Internal Floating Roof |
| 444 | 444 | Alcohol Storage Tank #1              | Denatured Ethanol   | 2,117,000 gallons | 444   | Internal Floating Roof |
| 445 | 445 | Alcohol Storage Tank #2              | Denatured Ethanol   | 2,117,000 gallons | 445   | Internal Floating Roof |
| 447 | 447 | Denaturant Storage Tank              | Denaturant          | 500,000 gallons   | 447   | Internal Floating Roof |
| 448 | 448 | Corrosion Inhibitor Storage Tank     | Corrosion Inhibitor | 8,500 gallons     | None  | None                   |
| 449 | 449 | 190° Alcohol Process Tank            | 190° Ethanol        | 100,000 gallons   | 449   | Internal Floating Roof |

### Applicable Requirements

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

Table 44. PSD Emission Limits

| FEP        | Pollutant | Emission Limit(s) | Reference /Basis | Authority for Requirement  |
|------------|-----------|-------------------|------------------|--|
| 440<br>441 | VOC       | 1.14 tpy          | BACT             | PSD Permit #07-A-560-P   LCPH ATI 7364 / PTO 7025<br>PSD Permit #07-A-561-P   LCPH ATI 7365 / PTO 7026   |
| 442<br>443 | VOC       | 1.22 tpy          | BACT             | PSD Permit #07-A-562-P   LCPH ATI 7366 / PTO 7027<br>PSD Permit #07-A-563-P   LCPH ATI 7368 / PTO 7032   |
| 444<br>445 | VOC       | 1.26 tpy          | BACT             | PSD Permit #07-A-564-P1   LCPH ATI 7369 / PTO 7033<br>PSD Permit #07-A-565-P1   LCPH ATI 7370 / PTO 7034 |
| 447        | VOC       | 0.607 tpy         | BACT             | PSD Permit #07-A-567-P1   LCPH ATI 7371 / PTO 7035   |
| 448        | VOC       | 0.85 tpy          | BACT             | PSD Permit #07-A-568-P   LCPH ATI 7372 / PTO 7036  |
| 449        | VOC       | 3.18 tpy          | BACT             | PSD Permit #07-A-569-P   LCPH ATI 7373 / PTO 7037  |

### Operating Limits and Requirements

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

**Federal Standards**

A. New Source Performance Standards (NSPS):

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

**Table 45. NSPS Subpart Summary**

| EU ID               | Subpart | Title  | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|---------------------|---------|--|-----------------------------|----------------------------|
| 440—445, 447, & 449 | A       | General Conditions   | 10-62(b)                    | §60.1 – §60.19             |
|                     | Kb      | Standards of Performance for Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984 | 10-62(b)(56)                | §60.110b – §60.117b        |

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

B. New Source Performance Standards (NESHAP):

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

**Table 46. NESHAP Subpart Summary**

| EU ID            | Subpart | Title  | Type                 | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|------------------|---------|--|----------------------|-----------------------------|----------------------------|
| 440—445, 447—449 | A       | General Conditions                           | NA                   | 10-62(d)                    | §63.1 – §63.16             |
|                  | FFFF    | Miscellaneous Organic Chemical Manufacturing | Ethanol Fermentation | 10-62(d)(84)                | §63.2430 – §63.2550        |

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

|                            |                              |                          |
|----------------------------|------------------------------|--------------------------|
| Authority for Requirement: | 40 CFR Part 60, Subpart Kb   |                          |
|                            | 567 IAC 23.1(2)"ddd"         |                          |
|                            | LCCO Sec. 10-62(b)(56)       |                          |
|                            | 40 CFR Part 63, Subpart FFFF |                          |
|                            | 567 IAC 23.1(4)"cf"          |                          |
|                            | LCCO Sec. 10-62(d)(84)       |                          |
|                            | PSD Permit #07-A-560-P       | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P       | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P       | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P       | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1      | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1      | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1      | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-568-P       | LCPH ATI 7372 / PTO 7036 |
|                            | PSD Permit #07-A-569-P       | LCPH ATI 7373 / PTO 7037 |



440, 441, 442, 443, 444, 445, 447, 449

After the compliance dates specified in 40 CFR §63.2445, compliance with the provisions of NESHAP Subpart FFFF for any storage tank that is assigned to an MCPU and that is controlled with a floating roof can be demonstrated by demonstrating compliance with the provisions of 40 [CFR Part 60,] Subpart Kb. Alternatively, compliance with NSPS Subpart Kb may be demonstrated by complying only with the requirements for Group 1 storage tanks in NESHAP Subpart FFFF.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P  |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P  |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-569-P  |  | LCPH ATI 7373 / PTO 7037 |

440, 441, 449

These emission units were initially determined to be a surge control vessel that does not meet the Group 1 storage tank thresholds. Final grouping determination and compliance status determined these tanks to be "exempt" from NESHAP Subpart FFFF requirements. This determination was documented in [VCP's] November 18, 2010 NOCS, as the maximum true vapor pressure of Total HAP at storage temperature is < 6.9 kPa<sup>1</sup>.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-569-P |  | LCPH ATI 7373 / PTO 7037 |

This emission unit has initially been determined to be a surge control vessel that does not meet the Group 1 storage tank thresholds. Final grouping determination and compliance status will be determined once the facility is constructed<sup>2</sup>.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-562-P |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P |  | LCPH ATI 7368 / PTO 7032 |

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<sup>1</sup> PSD Permits #07-A-560-P, #07-A-561-P, and #07-A-569-P initially stated FEPs 440, 441, and 449 did not meet the Group 1 storage tank thresholds; however, these permits required "final determination and compliance status [to] be determined once the facility is constructed." [VCP] submitted this determination in their November 18, 2010 Notification of Compliance Summary (NOCS), in which they confirmed their initial determination of "exempt" status.

<sup>2</sup> PSD Permits #07-A-562-P and #07-A-563-P initially stated FEPs 442 and 443 met the Group 1 storage tank thresholds; however, those permits required "final determination and compliance status [to] be determined once the facility is constructed." [VCP] did not include FEPs 440 and 443 in their November 18, 2010 NOCS. It is assumed that the initial determination is correct and these are Group 1 storage tanks for the purposes of NESHAP Subpart FFFF.

## Operating Limits

440, 441, 442, 443, 444, 445, 447, 448, 449

- A. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550).

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P  |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P  |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-568-P  |  | LCPH ATI 7372 / PTO 7036 |
|                            | PSD Permit #07-A-569-P  |  | LCPH ATI 7373 / PTO 7037 |

440, 441, 442, 443, 444, 445, 447, 449

- B. This emission unit is subject to all applicable operating limits set forth in NSPS Subparts A (40 CFR §60.1 through 40 CFR §60.19) and Kb (40 CFR §60.110b through 40 CFR §60.117b).
- C. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P  |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P  |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-569-P  |  | LCPH ATI 7373 / PTO 7037 |

440, 441, 449

- D. This emission unit and control device shall be designed and operated to meet the requirements of 40 CFR §60.112b(a)(1), as required by the best available control technology (BACT) analysis.
- E. The facility shall comply with all applicable requirements for this emission unit, according to the provisions in 40 CFR §63.2450.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-569-P |  | LCPH ATI 7373 / PTO 7037 |

442, 443, 444, 445, 447

- F. The tank shall be designed and operated to meet the requirements for an internal floating roof in 40 CFR §63.1062 through 40 CFR §63.1063 and 40 CFR §60.112b, as required by the best available control technology (BACT) analysis.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |

442, 443

G. The facility shall comply with all applicable requirements for this emission unit, according to the provisions in 40 CFR §63.2450 and 40 CFR §60.112b.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-562-P |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P |  | LCPH ATI 7368 / PTO 7032 |

444, 445, 447

H. The facility shall comply with all applicable requirements for the storage tank according to the provisions in 40 CFR §63.2470 and 40 CFR §60.112b.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |

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I. The facility shall comply with all applicable requirements for the storage tank, according to the provisions in 40 CFR §63.2470.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-568-P |  | LCPH ATI 7372 / PTO 7036 |
|----------------------------|------------------------|--|--------------------------|

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

440, 441, 442, 443, 444, 445, 447, 448, 449

A. Record monthly the total amounts of [200° ethanol (FEP440, FEP441), denatured ethanol (FEP442, FEP443, FEP444, FEP445), denaturant (FEP447), corrosion inhibitor (FEP448), and 190° ethanol (FEP449)] processed through [each individual] emission unit each month, in gallons. Calculate VOC emissions, both working and breathing losses, from each tank, in tons, on a monthly basis, and record the 12-month rolling total.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P  |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P  |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-568-P  |  | LCPH ATI 7372 / PTO 7036 |
|                            | PSD Permit #07-A-569-P  |  | LCPH ATI 7373 / PTO 7037 |

440, 441, 442, 443, 444, 445, 447, 449

B. The owner or operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control device.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P  |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P  |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-562-P  |  | LCPH ATI 7366 / PTO 7027 |
|                            | PSD Permit #07-A-563-P  |  | LCPH ATI 7368 / PTO 7032 |
|                            | PSD Permit #07-A-564-P1 |  | LCPH ATI 7369 / PTO 7033 |
|                            | PSD Permit #07-A-565-P1 |  | LCPH ATI 7370 / PTO 7034 |
|                            | PSD Permit #07-A-567-P1 |  | LCPH ATI 7371 / PTO 7035 |
|                            | PSD Permit #07-A-569-P  |  | LCPH ATI 7373 / PTO 7037 |

440, 441, 449

C. The owner or operator of this tank shall follow the testing and observation procedures of 40 CFR §60.113b(a), as required by the best available control technology (BACT) analysis.

D. This emission unit is subject to all applicable recordkeeping, notification, and reporting requirements, as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525), and NSPS Subparts A (40 CFR §60.1 through 40 CFR §60.19) and Kb (40 CFR §60.115b and 40 CFR §60.116b).

Reporting and recordkeeping shall include keeping the following records:

1. Certification that the internal floating roof meets the specifications of 40 CFR §60.112b(a)(1) and 40 CFR §60.113(a)(1).
2. A record of each inspection performed as required by 40 CFR §113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall include the date of the inspection and the observed condition of each component of the control equipment (seals, internal floating roof, fittings, etc.). If an inspection finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects as listed in 40 CFR §60.113b(a)(3)(ii), the record shall include the reason the tank did not meet the specifications of 40 CFR §60.112b(a)(1) and 40 CFR §60.113b(a)(3) and a description of the repairs made.

|                            |                        |  |                          |
|----------------------------|------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-560-P |  | LCPH ATI 7364 / PTO 7025 |
|                            | PSD Permit #07-A-561-P |  | LCPH ATI 7365 / PTO 7026 |
|                            | PSD Permit #07-A-569-P |  | LCPH ATI 7373 / PTO 7037 |

442, 443, 444, 445, 447

E. This emission unit is subject to all applicable recordkeeping, notification, and reporting requirements, as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15), FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525), and WW (40 CFR §63.1065 and 40 CFR §63.1066); and NSPS Subparts A (40 CFR §60.1 through 40 CFR §60.19) and Kb (40 CFR §60.115b and 40 CFR §60.116b). Reporting and recordkeeping shall include keeping the following records:

1. A record of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored.
2. Certification that the internal floating roof meets the specifications of 40 CFR §60.112b(a)(1) and 40 CFR §60.113(a)(1) or 40 CFR §63.1062 and 40 CFR §63.1063.
3. A record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall include the date of the inspection and the observed condition of each component of the control equipment (seals, internal floating roof,

etc.). If an inspection finds control equipment defects, the record shall include the reason the tank did not meet the specifications and a description of the repairs made.

Authority for Requirement: PSD Permit #07-A-562-P | LCPH ATI 7366 / PTO 7027  
 PSD Permit #07-A-563-P | LCPH ATI 7368 / PTO 7032  
 PSD Permit #07-A-564-P1 | LCPH ATI 7369 / PTO 7033  
 PSD Permit #07-A-565-P1 | LCPH ATI 7370 / PTO 7034  
 PSD Permit #07-A-567-P1 | LCPH ATI 7371 / PTO 7035

442, 443

F. The owner or operator of this tank shall follow the testing and observation procedures of 40 CFR §60.113b(a) and repair requirements of 40 CFR §63.1063, as required by the best available control technology (BACT) analysis.

Authority for Requirement: PSD Permit #07-A-562-P | LCPH ATI 7366 / PTO 7027  
 PSD Permit #07-A-563-P | LCPH ATI 7368 / PTO 7032

444, 445, 447

G. The owner or operator of this tank shall follow the testing and observation procedures of 40 CFR §60.113b(a) and the inspection and repair requirements of 40 CFR §63.1063, as required by the BACT analysis.

Authority for Requirement: PSD Permit #07-A-564-P1 | LCPH ATI 7369 / PTO 7033  
 PSD Permit #07-A-565-P1 | LCPH ATI 7370 / PTO 7034  
 PSD Permit #07-A-567-P1 | LCPH ATI 7371 / PTO 7035

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H. This emission unit is subject to all applicable recordkeeping, notification, and reporting requirements, as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525).

Authority for Requirement: PSD Permit #07-A-568-P | LCPH ATI 7372 / PTO 7036

**Emission Point Characteristics**

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

**Table 47. Stack Characteristics**

| FEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm)  | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|------------------|---|
| 440 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 90        | Breathing losses | PSD Permit #07-A-560-P<br>LCPH ATI 7365 / PTO 7026  |
| 441 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 90        | Breathing losses | PSD Permit #07-A-561-P<br>LCPH ATI 7365 / PTO 7026  |
| 442 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 80        | Breathing losses | PSD Permit #07-A-562-P<br>LCPH ATI 7366 / PTO 7027  |
| 443 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 80        | Breathing losses | PSD Permit #07-A-563-P<br>LCPH ATI 7368 / PTO 7032  |
| 444 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 80        | Breathing losses | PSD Permit #07-A-564-P1<br>LCPH ATI 7369 / PTO 7033 |

| FEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm)  | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|------------------|---|
| 445 | 48                                | Horizontal      | 10 x 24 (4 vents)            | 80        | Breathing losses | PSD Permit #07-A-565-P1<br>LCPH ATI 7370 / PTO 7034 |
| 447 | 48                                | Horizontal      | 10 x 24 (4 vents)            | Amb.      | Breathing losses | PSD Permit #07-A-567-P1<br>LCPH ATI 7371 / PTO 7035 |
| 448 | 14                                | V, obstructed   | 3                            | Amb.      | Breathing losses | PSD Permit #07-A-568-P<br>LCPH ATI 7372 / PTO 7036  |
| 449 | 36                                | Horizontal      | 10 x 24 (4 vents)            | 170       | Breathing losses | PSD Permit #07-A-569-P<br>LCPH ATI 7373 / PTO 7037  |

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

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**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)

**Emission Point ID Number: 450, 451**

**Table 48. Associated Equipment**

| SEP        | EU   | EU Description           | Raw Material | Rated Capacity | CE ID      | CE Description                   |
|------------|------|--------------------------|--------------|----------------|------------|----------------------------------|
| 450<br>451 | 450A | Alcohol Loadout Spout #1 | Ethanol      | 60,000 gph     | 450<br>451 | Enclosed Flare<br>Enclosed Flare |
|            | 450B | Alcohol Loadout Spout #2 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450C | Alcohol Loadout Spout #3 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450D | Alcohol Loadout Spout #4 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450E | Alcohol Loadout Spout #5 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450F | Alcohol Loadout Spout #6 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450G | Alcohol Loadout Spout #7 | Ethanol      | 60,000 gph     |            |                                  |
|            | 450H | Alcohol Loadout Spout #8 | Ethanol      | 60,000 gph     |            |                                  |

**Applicable Requirements**

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

**Table 49. PSD Emission Limits**

| EP                       | Pollutant                | Emission Limit(s)   | Reference/Basis | Authority for Requirement  |
|--------------------------|--------------------------|---|-----------------|--|
| 450<br>451               | Opacity                  | 0% <sup>1, 2</sup>  | BACT            | PSD Permit #07-A-570-P2<br>LCPH ATI 7374 / PTO 7038<br>PSD Permit #07-A-571-P2<br>LCPH ATI 7375 / PTO 7039 |
|                          | PM / PM <sub>10</sub>    | 0.0075 lb/MMBtu <sup>3</sup>                                |                 |  |
|                          |                          | 0.36 tpy <sup>4,5</sup>                                     |                 |  |
|                          | SO <sub>2</sub>          | 0.0025 lb/MMBtu <sup>3</sup>                                |                 |  |
|                          |                          | 0.07 tpy <sup>4,5</sup>                                     |                 |  |
|                          | NO <sub>x</sub>          | 4 mg/L <sup>3</sup>   |                 |  |
|                          |                          | 12.56 tpy <sup>4,5</sup>                                    |                 |  |
|                          | VOC                      | 98% reduction <sup>3,6</sup> and 10.17 lb/hr <sup>3,7</sup> |                 |  |
| 10.86 tpy <sup>4,5</sup> |                          |   |                 |  |
| CO                       | 10 mg/L <sup>3</sup>     |   |                 |  |
|                          | 31.39 tpy <sup>4,5</sup> |   |                 |  |

<sup>1</sup> Standard is expressed as a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity of 0% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> Standard is expressed as the average of 3 test runs.

<sup>4</sup> The emission limit is based on a 12-month rolling total.

<sup>5</sup> Ton per year limits are the sum of emissions from SEPs 450 and 451 and correlate to an alcohol loadout limit of 752,325,000 gallons per year total from both emission points.

<sup>6</sup> The percent reduction limit applies across the enclosed flare, CE450 [and CE451].

<sup>7</sup> The pound per hour limit is from the exhaust of the enclosed flare, CE450 [and CE451].

**Table 50. Other Emission Limits**

| EP         | Pollutant          | Emission Limit(s)        | Reference/Basis  | Authority for Requirement  |
|------------|--------------------|--------------------------|--|--|
| 450<br>451 | Opacity            | 40% <sup>1, 2</sup>      | 567 IAC 23.3(2)"d"                                       | PSD Permit #07-A-570-P2<br>LCPH ATI 7375 / PTO 7038R1<br>PSD Permit #07-A-571-P2<br>LCPH ATI 7375 / PTO 7039R1 |
|            | PM                 | 0.1 gr/dscf              | 567 IAC 23.3(2)<br>LCCO Sec. 10-62(a)                    |  |
|            | SO <sub>2</sub>    | 500 ppm <sub>v</sub>     | 567 IAC 23.3(3)<br>LCCO Sec. 10-65(a)(2)                 |  |
|            | PM <sub>10</sub>   | 0.10 lb/hr <sup>3</sup>  | NAAQS  |  |
|            | SO <sub>2</sub>    | 0.10 lb/hr <sup>3</sup>  |  |  |
|            | NO <sub>x</sub>    | 12.02 lb/hr <sup>3</sup> |  |  |
|            | CO                 | 30.01 lb/hr <sup>3</sup> |  |  |
| Opacity    | 20% <sup>1,2</sup> | LCCO Sec. 10-60(a)       | LCPH ATI 7374 / PTO 7038R1<br>LCPH ATI 7375 / PTO 7039R1 |  |

<sup>1</sup> The emission limit is based on a six minute average.

<sup>2</sup> An exceedance of the indicator opacity [of 20%] will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment and the annual increment for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS and increment for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is established to limit emissions below levels that predict exceedances of the annual NAAQS and increment for NO<sub>x</sub>. The limit for CO emissions is established to limit emissions below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

**Operating Limits and Requirements**

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

**Federal Standards**

A. New Source Performance Standards (NSPS):

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

**Table 51. NSPS Subpart Summary**

| EU ID         | Subpart | Title  | Type                       | State Reference (567 IAC) | Federal Reference (40 CFR) |
|---------------|---------|--|----------------------------|---------------------------|----------------------------|
| 450A—<br>450H | A       | General Conditions   | NA                         | 23.1(2)                   | §60.1 – §60.19             |
|               | VV      | Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry | Constructed before 11/7/06 | 23.1(2)"nn"               | §60.480 – §60.489          |

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

B. New Source Performance Standards (NESHAP):

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



**Table 52. NESHAP Subpart Summary**

| EU ID | Subpart | Title  | Type    | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------|---------|--|---------|-----------------------------|----------------------------|
| 450A— | A       | General Conditions                           | NA      | 23.1(4)                     | §63.1 – §63.16             |
| 450H  | FFFF    | Miscellaneous Organic Chemical Manufacturing | Ethanol | 23.1(4)"cf"                 | §63.2430 – §63.2550        |

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

Authority for Requirement: 40 CFR Part 60, Subpart VV  
 567 IAC 23.1(2)"nn"  
 LCCO Sec. 10-62(b)(40)  
 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)  
 PSD Permit #07-A-570-P2 | LCPH ATI 7374 / PTO 7038R1  
 PSD Permit #07-A-571-P2 | LCPH ATI 7375 / PTO 7039R1

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The total amount of non-denatured and denatured ethanol loaded out through Alcohol Loadout Spouts #1 through #8 (EU450A through EU450H) shall not exceed 752,325,000 gallons per 12-month rolling periods.
  - 1. The owner or operator shall record in gallons the total amount of non-denatured ethanol loaded out through these emission units each month.
  - 2. The owner or operator shall record in gallons the total amount of denatured ethanol loaded out through these emission units each month.
  - 3. The owner or operator shall sum the monthly totals of non-denatured and denatured ethanol loaded out through these emission units for the most recent 12-month period (rolling 12-month total).
- B. The enclosed flare [(CE450 or CE451)] shall only control loadout vapors from the loading of up to 6,000 gallons per minute of ethanol. If more than 6,000 gallons per minute of ethanol are being loaded at any one time, the additional loadout vapors shall be vented to the second enclosed flare [(CE451 or CE450)].
  - 1. The owner or operator shall continuously record the gallons per minute of ethanol loaded out and how many gallons per minute of ethanol were vented to each emission point.
- C. The facility shall not switch-load (i.e., fill railcars with non-denatured or denatured ethanol when the previous load was gasoline) at Alcohol Loadout Spouts #1 through #8 (EU450A through EU450H). Only dedicated railcars shall be used for alcohol loadout at this emission point.
- D. The inflatable hatch seal on the vapor recovery system shall be visually inspected for any defect and to ensure that it is properly seated on the railcar hatch opening prior to each hookup. Inflatable hatch seals that are damaged shall be removed from service until they are repaired or replaced.

- E. Alcohol Loadout Spouts #1 through #8 (EU450A through EU450H) are subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 through §63.16) and FFFF (40 CFR §63.2430 through §63.2550). Specifically, the facility shall comply with all applicable requirements for each transfer rack according to the provisions in [40 CFR §63.2475.]
  - 1. The owner or operator shall comply with all applicable recordkeeping, notification, and reporting requirements set forth in NESHAP Subpart A (40 CFR §63.1 through §63.15) and FFFF (40 CFR §63.2515, §63.2520, and §63.2525).
- F. The enclosed flares (CE450 and CE451) shall be designed to operated to meet the minimum requirements of 40 CFR §60.18(b) through §60.18(f).
  - 1. The owner or operator shall monitor the presence of the pilot flame and other parameters of the flare according to the provisions of 40 CFR §60.18.
- G. The applicable standards of NSPS Subparts A (40 CFR §60.1 through §60.19) and VV (40 CFR §60.480 through §60.489) shall be followed.
  - 1. The owner or operator shall comply with all applicable recordkeeping and reporting standards of NSPS Subpart VV (40 CFR §60.486 and §60.487).
- H. The auxiliary fuel used in the flare is limited to natural gas, biogas, or propane.
- I. The Alcohol Loadout Spouts #1 through #8 (EU450A through EU450H) shall either be vented through EP450 and it's associated control equipment, or through EP451 and it's accompanying control equipment, or through a combination of these two emission points. The Alcohol Loadout Spouts shall at no time operate uncontrolled.
- J. The control equipment and monitoring device shall be maintained according to the manufacturer's specifications or good operating practices. The owner or operator shall record the date and description of all inspections and maintenance and any action resulting from the inspection and maintenance of the control equipment and monitoring device.

Authority for Requirement: PSD Permit #07-A-570-P2 | LCPH ATI 7374 / PTO 7038R1  
 PSD Permit #07-A-571-P2 | LCPH ATI 7375 / PTO 7039R1

**Emission Point Characteristics**

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

**Table 53. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                             |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 450 | 30                                | V               | 96                           | 1,800     | 12,500          | PSD Permit #07-A-570-P2<br>LCPH ATI 7374 / PTO 7038R1 |
| 451 | 30                                | V               | 96                           | 1,800     | 12,500          | PSD Permit #07-A-571-P2<br>LCPH ATI 7375 / PTO 7039R1 |

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

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**Monitoring Requirements**

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

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

## Utilities

**Emission Point ID Number: 452, 453, 454, 455, 457**

**Table 54. Associated Equipment**

| SEP | EU  | EU Description         | Raw Material | Rated Capacity   | CE ID | CE Description |
|-----|-----|------------------------|--------------|------------------|-------|----------------|
| 452 | 452 | Fire Pump Engine #1    | Diesel       | 460-hp, 22.5 gph | None  | None           |
| 453 | 453 | Fire Pump Engine #2    | Diesel       | 460-hp, 22.5 gph | None  | None           |
| 454 | 454 | Fire Pump Engine #3    | Diesel       | 460-hp, 22.5 gph | None  | None           |
| 455 | 455 | Fire Pump Engine #4    | Diesel       | 460-hp, 22.5 gph | None  | None           |
| 457 | 457 | Emergency Generator #2 | Diesel       | 1,500 kW         | None  | None           |

### Applicable Requirements

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

**Table 55. PSD Emission Limits**

| SEP                   | Pollutant             | Emission Limit(s)            | Reference /Basis | Authority for Requirement                            |
|-----------------------|-----------------------|------------------------------|------------------|--|
| 452                   | Opacity               | 5% <sup>1</sup>              | BACT             | PSD Permit #07-A-572-P1   LCPH ATI 7376 / PTO 7040R1 |
| 453                   | PM / PM <sub>10</sub> | 0.15 g/bhp-hr <sup>2</sup>   |                  | PSD Permit #07-A-573-P1   LCPH ATI 7377 / PTO 7041R1 |
| 454                   | SO <sub>2</sub>       | 0.17 g/bhp-hr <sup>2,3</sup> |                  | PSD Permit #07-A-574-P1   LCPH ATI 7378 / PTO 7042R1 |
| 455                   | CO                    | 2.6 g/bhp-hr <sup>2</sup>    |                  | PSD Permit #07-A-575-P1   LCPH ATI 7379 / PTO 7043R1 |
| 457                   | CO                    | 2.6 g/bhp-hr <sup>2</sup>    |                  | PSD Permit #07-A-577-P   LCPH ATI 7380 / PTO 7044    |
| 452                   | PM / PM <sub>10</sub> | 0.04 tpy <sup>4</sup>        | BACT             | PSD Permit #07-A-572-P1   LCPH ATI 7376 / PTO 7040R1 |
| 452                   | SO <sub>2</sub>       | 0.04 tpy <sup>4</sup>        |                  | PSD Permit #07-A-573-P1   LCPH ATI 7377 / PTO 7041R1 |
| 453                   | NO <sub>x</sub>       | 0.71 tpy <sup>4</sup>        |                  | PSD Permit #07-A-574-P1   LCPH ATI 7378 / PTO 7042R1 |
| 454                   | VOC                   | 0.2 g/bhp-hr <sup>2</sup>    |                  | PSD Permit #07-A-575-P1   LCPH ATI 7379 / PTO 7043R1 |
| 455                   | VOC                   | 0.05 tpy <sup>4</sup>        |                  | PSD Permit #07-A-575-P1   LCPH ATI 7379 / PTO 7043R1 |
|                       | CO                    | 0.66 tpy <sup>4</sup>        |                  |  |
| 457                   | PM / PM <sub>10</sub> | 0.17 tpy <sup>4</sup>        | BACT             | PSD Permit #07-A-577-P   LCPH ATI 7380 / PTO 7044    |
|                       | SO <sub>2</sub>       | 0.18 tpy <sup>4</sup>        |                  |  |
|                       | NO <sub>x</sub>       | 4.5 g/bhp-hr <sup>2</sup>    |                  |  |
|                       |                       | 5.29 tpy <sup>4</sup>        |                  |  |
|                       | VOC                   | 0.3 g/bhp-hr <sup>2</sup>    |                  |  |
| 0.33 tpy <sup>4</sup> |                       |                              |                  |  |
| CO                    | 2.88 tpy <sup>4</sup> |                              |                  |  |

<sup>1</sup> Standard is expressed as a six-minute average and applies only during normal operation. A standard of 20% opacity applies during times of start-up, shutdown, and malfunction.

<sup>2</sup> Standard is expressed as the average of three (3) test runs.

<sup>3</sup> Standard corresponds to the use of diesel fuel containing no more than 0.05% by weight sulfur.

<sup>4</sup> Ton per year limits correlate to an operating limit of 500 hours per year.

**Table 56. NSPS & NESHAP Emission Limits**

| SEP                                 | Pollutant                           | Emission Limit(s)   | Reference/Basis      | Authority for Requirement  |
|-------------------------------------|-------------------------------------|---|----------------------|--|
| 452<br>453                          | Opacity                             | 20% <sup>1</sup>  | 40 CFR §89.113(a)(1) | PSD Permit #07-A-572-P1<br>LCPH ATI 7376 / PTO 7040R1<br>PSD Permit #07-A-573-P1<br>LCPH ATI 7377 / PTO 7041R1 |
|                                     |                                     | 15% <sup>2</sup>  | 40 CFR §89.113(a)(2) |  |
|                                     |                                     | 50% <sup>3</sup>  | 40 CFR §89.113(a)(3) |  |
| 454<br>455                          | PM                                  | 0.20 g/kW-hr  | 40 CFR §60.4202(d)   | PSD Permit #07-A-574-P1<br>LCPH ATI 7378 / PTO 7042R1<br>PSD Permit #07-A-575-P1<br>LCPH ATI 7379 / PTO 7043R1 |
| NMHC <sup>4</sup> + NO <sub>x</sub> | 4.0 g/kW-hr                         |   |                      |  |
| CO                                  | 3.5 g/kW-hr                         |   |                      |  |
| 457                                 | PM                                  | 0.15 g/bhp-hr <sup>5</sup>  | 40 CFR §60.4202(d)   | PSD Permit #07-A-577-P1<br>LCPH ATI 7380 / PTO 7044  |
|                                     | NMHC <sup>4</sup> + NO <sub>x</sub> | 4.8 g/bhp-hr <sup>5</sup>   |                      |  |
|                                     | CO                                  | 2.6 g/bhp-hr <sup>5</sup>   |                      |  |
|                                     | Fuel Sulfur Req. beg 10/1/07        | Max 500 ppm Sulfur and Min Cetane Index=40 or Max Aromatic content = 35% <sub>vol</sub> | 40 CFR §80.510(a)    |  |
|                                     | Fuel Sulfur Req. beg 10/1/10        | Max 15 ppm Sulfur and Min Cetane Index=40 or Max Aromatic content = 35% <sub>vol</sub>  | 40 CFR §80.510(b)    |  |

<sup>1</sup> Emission limit applies while in acceleration mode.  
<sup>2</sup> Emission limit applies while in lugging mode.  
<sup>3</sup> Emission limit applies to peaks while in acceleration or lugging modes.  
<sup>4</sup> Non-methane hydrocarbons.  
<sup>5</sup> Standard is expressed as the average of three (3) runs.

**Table 57. Other Emission Limits**

| SEP                             | Pollutant        | Emission Limit(s)                           | Reference/Basis       | Authority for Requirement  |
|---------------------------------|------------------|---|-----------------------|--|
| 452<br>453<br>454<br>455        | Opacity          | 40% <sup>1,2</sup>                          | 567 IAC 23.3(2)"d"    | PSD Permit #07-A-572-P1<br>LCPH ATI 7376 / PTO 7040R1<br>PSD Permit #07-A-573-P1<br>LCPH ATI 7377 / PTO 7041R1<br>PSD Permit #07-A-574-P1<br>LCPH ATI 7378 / PTO 7042R1<br>PSD Permit #07-A-575-P1<br>LCPH ATI 7379 / PTO 7043R1 |
|                                 | SO <sub>2</sub>  | 2.5 lb/MMBtu                                | 567 IAC 23.3(3)"b"(2) |  |
|                                 | PM <sub>10</sub> | 0.18 lb/hr <sup>3</sup>                     | NAAQS                 |  |
|                                 | SO <sub>2</sub>  | 0.20 lb/hr <sup>3</sup>                     |                       |  |
|                                 | NO <sub>x</sub>  | 3.33 lb/hr <sup>3</sup>                     |                       |  |
|                                 | CO               | 3.10 lb/hr <sup>3</sup>                     |                       |  |
| 457                             | Opacity          | 40% <sup>1,2</sup>                          | 567 IAC 23.3(2)"d"    | PSD Permit #07-A-577-P<br>LCPH ATI 7380 / PTO 7044   |
|                                 | SO <sub>2</sub>  | 2.5 lb/MMBtu                                | 567 IAC 23.3(3)"b"(2) |  |
|                                 | PM <sub>10</sub> | 0.67 lb/hr <sup>3,4</sup>                   | NAAQS                 |  |
|                                 | SO <sub>2</sub>  | 0.73 lb/hr <sup>3,4</sup>                   |                       |  |
|                                 | NO <sub>x</sub>  | 21.17 lb/hr <sup>3,4</sup>                  |                       |  |
|                                 | CO               | 11.53 lb/hr <sup>3,4</sup>                  |                       |  |
| 452<br>453<br>454<br>455<br>457 | Opacity          | 20% <sup>Error! Bookmark not defined.</sup> | LCCO Sec. 10-60(a)    | LCPH ATI 7376 / PTO 7040R1<br>LCPH ATI 7377 / PTO 7041R1<br>LCPH ATI 7378 / PTO 7042R1<br>LCPH ATI 7379 / PTO 7043R1<br>LCPH ATI 7380 / PTO 7044   |
| SO <sub>2</sub>                 | 1.5 lb/MMBtu     | LCCO Sec. 10-65(a)(1)"b"                    |                       |  |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

<sup>4</sup> The limit for PM<sub>10</sub> emissions is established to limit emission below levels that predict exceedances of the 24-hour NAAQS for PM<sub>10</sub>. The limit for SO<sub>2</sub> emissions is established to limit emissions below levels that predict exceedances of the 3-hour, 24-hour, and annual NAAQS for SO<sub>2</sub>. The limit for NO<sub>x</sub> emissions is established to limit emissions below levels that predict exceedances of the annual NAAQS for NO<sub>x</sub>. The limit for CO emissions is established to limit emissions below levels that predict exceedances of the 1-hour and 8-hour NAAQS for CO.

## **Operating Limits and Requirements**

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

### **Federal Standards**

452, 453, 454, 455

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

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

**Table 58. NSPS Subpart Summary**

| <b>EU ID</b>      | <b>Subpart</b> | <b>Title</b>   | <b>Type</b>         | <b>Local Reference (LCCO Sec.)</b> | <b>Federal Reference (40 CFR)</b> |
|-------------------|----------------|--|---------------------|------------------------------------|-----------------------------------|
| 452               | A              | General Conditions   | NA                  | 10-62(b)                           | §60.1 – §60.19                    |
| 453<br>454<br>455 | III            | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines | Emergency fire pump | 10-62(b)(77)                       | §60.4200 – §60.4219               |

- i. In accordance with 40 CFR §60.4211(c), the engine must be certified by its manufacturer to comply with the emission standards for emergency engines from §60.4205(c) and §60.4202(d). The emission standards that the engine must be certified by the manufacturer to meet are [included in Table 57].
- ii. In accordance with 40 CFR §60.4211(c), the owner or operator must comply with the required NSPS emission standards by purchasing an engine certified by its manufacturer to meet the applicable emission standards for the same model year and engine power. The engine must be installed and configured to the manufacturer's specifications. Provided these requirements are satisfied, no further demonstration of compliance with the emission standards from 40 CFR §60.4205(c) and §60.4202(d) is required. However, if the engine is not installed, configured, operated, and maintained according to the manufacturer's emission-related instructions, a compliance demonstration is required in accordance with 40 CFR §60.4211(g).

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

#### B. New Source Performance Standards (NESHAP):

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

**Table 59. NESHAP Subpart Summary**

| EU ID | Subpart | Title  | Type                    | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------|---------|--|-------------------------|-----------------------------|----------------------------|
| 452   | A       | General Conditions                                   | NA                      | 10-62(d)                    | §63.1 – §63.16             |
| 453   | ZZZZ    | Stationary Reciprocating Internal Combustion Engines | New emergency fire pump | 10-62(d)(104)               | §63.6580 – §63.6675        |
| 454   |         |  |                         |                             |                            |
| 455   |         |  |                         |                             |                            |

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

Authority for Requirement: PSD Permit #07-A-572-P1 | LCPH ATI 7376 / PTO 7040R1  
 PSD Permit #07-A-573-P1 | LCPH ATI 7377 / PTO 7041R1  
 PSD Permit #07-A-574-P1 | LCPH ATI 7378 / PTO 7042R1  
 PSD Permit #07-A-575-P1 | LCPH ATI 7379 / PTO 7043R1

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This emission unit is subject to the New Source Performance Standards (NSPS) Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR §60.4200 through 40 CFR §60.4219) and to NSPS Subpart A - General Provisions (40 CFR §60.1 through 40 CFR §60.19) and is also subject to the requirements of 567 IAC 23.1(2)"yyy".

This emission unit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines (40 CFR §63.6580 through 40 CFR §63.6675) and to NESHAP Subpart A - General Provisions (40 CFR §63.1 through 40 CFR §63.15) and is also subject to the requirements of 567 IAC 23.1(4)"cz". This generator is considered an Emergency Stationary Reciprocating Internal Combustion Engine (RICE) and is only subject to the initial notification requirements of 40 CFR §63.6645(c). By NESHAP definition, Emergency Stationary RICE may operate only 50 hours per year in non-emergency situations.

Failure to include any NSPS or NESHAP requirements as a part of this permit does not relieve the permittee from the requirement to comply with all applicable NSPS or NESHAP requirements.

Authority for Requirement: PSD Permit #07-A-577-P1 | LCPH ATI 7380 / PTO 7044

452, 453, 454, 455

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Fire Pump Engine[s] #1 (EU452) [#2 (EU453), #3 (EU454), and #4 (EU455)] is limited to operating a maximum of 500 hours in any rolling 12-month period.
- B. This engine is limited to operate as an emergency stationary internal combustion engine, as defined in 40 CFR §60.4219, and in accordance with 40 CFR §4211(f).
  - 1. There is no time limit on the use of the engine in emergency situations provided that the annual hourly limit established in Condition [A] is not exceeded. In accordance with 40 CFR

- §60.4211(f)(2), the engine is limited to operate a maximum of 100 hours per year for maintenance checks and readiness testing.
2. In accordance with 40 CFR §60.4211(f)(3), the engine is also allowed to operate up to 50 hours per year in non-emergency situations, but the 50 hours are counted toward the 100 hours provided for maintenance and testing. The 50 hours per year for non-emergency operation cannot be used for peak shaving or non-emergency demand response or to generate income for the facility to supply power to the electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity.
- C. In accordance with 40 CFR §60.4209(a), the engine shall be equipped with a non-resettable hour meter.
  - D. The owner or operator shall maintain the following monthly records:
    1. The number of hours that the engine operated for maintenance checks and readiness testing;
    2. The number of hours that the engine operated for allowed non-emergency operations;
    3. The total number of hours that the engine operated; and
    4. The rolling 12-month total amount of hours that the engine operated.
  - E. The owner or operator shall maintain the following annual records:
    1. The number of hours that the engine operated for maintenance checks and readiness testing;
    2. The number of hours that the engine operated for allowed non-emergency operations; and
    3. The total number of hours that the engine operated for maintenance checks, readiness testing, and allowed non-emergency operations.
  - F. In accordance with 40 CFR §60.4207(b), the diesel fuel oil burned in this engine shall meet the following specifications from 40 CFR §80.510(b) for nonroad diesel fuel:

**Table 60. Sulfur Content Limits from 40 CFR §89.510(b)**

| Parameter   | Limit                      |
|---|----------------------------|
| Sulfur (S) content                                  | 15 ppm (0.0015%) by weight |
| Minimum cetane index or<br>Maximum aromatic content | 40<br>35% (by volume)      |

- The owner or operator of the engine shall comply with these requirements listed above by one of the following methods:
1. Have the fuel supplier certify that the fuel delivered meets the definition of nonroad diesel fuel, as defined in 40 CFR §80.510(b);
  2. Obtain fuel analysis from the supplier showing the sulfur content and cetane index or aromatic content of the fuel delivered; or
  3. Perform an analysis of the fuel to determine the sulfur content and cetane index or aromatic content of the fuel received.
- G. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR §60.4211(g).
  - H. In accordance with 40 CFR §60.4211(a), this engine shall be operated and maintained in accordance with the manufacturer's emission-related written instructions. The owner or operator may only change emission-related engine settings that are permitted by the manufacturer.
  - I. Per 40 CFR §60.4207, owners and operators of pre-2011 model year diesel generators subject to NSPS Subpart III may petition the Administrator for approval to use remaining non-compliant fuel that does not meet the fuel requirements of 40 CFR §80.510(a) or §80.510(b) beyond the dates required, for the purpose of using up existing fuel inventories.



- J. The owner or operator of Fire Pump[s] #1 (EU452), [#2 (EU453), #3 (EU454), and #4 (EU455)] shall follow the monitoring requirements of 40 CFR §60.4209.
- K. The owner or operator of Fire Pump[s] #1 (EU452), [#2 (EU453), #3 (EU454), and #4 (EU455)] shall follow the compliance requirements of 40 CFR §60.4211.
- L. The owner or operator for Fire Pump[s] #1 (EU452), [#2 (EU453), #3 (EU454), and #4 (EU455)] shall follow the notification, reporting, and recordkeeping requirements of 40 CFR §4214(b).

|                            |                         |  |                            |
|----------------------------|-------------------------|--|----------------------------|
| Authority for Requirement: | PSD Permit #07-A-572-P1 |  | LCPH ATI 7376 / PTO 7040R1 |
|                            | PSD Permit #07-A-573-P1 |  | LCPH ATI 7377 / PTO 7041R1 |
|                            | PSD Permit #07-A-574-P1 |  | LCPH ATI 7378 / PTO 7042R1 |
|                            | PSD Permit #07-A-575-P1 |  | LCPH ATI 7379 / PTO 7043R1 |

457

**Operating Limits**

- A. Emergency Generator #2, EU457, shall operate only in emergency situations or for routine maintenance and testing.
- B. Emergency Generator #2, EU457, shall not operate more than 500 hours per rolling 12-month period.
- C. Per 40 CFR §60.4211, emergency stationary internal combustion engine (ICE) may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine for a maximum of 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year.
- D. Emergency Generator #2, EU457, shall be limited to using diesel fuel with a maximum sulfur content not to exceed 0.05% by weight.
- E. Beginning October 1, 2007, diesel fuel fired in Emergency Generator #2 shall be limited to a maximum sulfur content of 500 ppm and a minimum cetane index of 40 or a maximum aromatic content of 30%, by volume, per 40 CFR §80.510(a).
- F. Beginning October 1, 2010, diesel fuel fired in Emergency Generator #2 shall be limited to a maximum sulfur content of 15 ppm and a minimum cetane index of 40 or a maximum aromatic content of 30%, by volume, per 40 CFR §80.510(b).
- G. Per 40 CFR §60.4207, owners and operators of pre-2011 model year diesel generators subject to NSPS Subpart IIII (40 CFR §60.4200 through 40 CFR §60.4219) may petition the Administrator for approval to use remaining non-compliant fuel that does not meet the fuel requirements of 40 CFR §80.510(a) or 40 CFR §80.510(b) beyond the dates required, for the purpose of using up existing fuel inventories.

|                            |                         |  |                          |
|----------------------------|-------------------------|--|--------------------------|
| Authority for Requirement: | PSD Permit #07-A-577-P1 |  | LCPH ATI 7380 / PTO 7044 |
|----------------------------|-------------------------|--|--------------------------|

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator of Emergency Generator #2, EU457, shall install a non-resettable hour meter prior to startup of the engine, per 40 CFR §60.4209.
- B. Record each month the total hours of operation for Emergency Generator #2, EU457, and the reason the Fire Pump was operated. Calculate and record rolling 12-month totals.
- C. Maintain records of the sulfur content of the fuel oil utilized in Emergency Generator #2 EU457.
- D. The owner or operator of Emergency Generator #2, EU457, shall follow the monitoring requirements of 40 CFR §60.4209.
- E. The owner or operator of Emergency Generator #2, EU457, shall follow the compliance requirements of 40 CFR §60.4211.
- F. The owner or operator of Emergency Generator #2, EU457, shall follow the notification, reporting, and recordkeeping requirements of 40 CFR §60.4214(b).

Authority for Requirement: PSD Permit #07-A-577-P1 | LCPH ATI 7380 / PTO 7040

**Emission Point Characteristics**

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

**Table 61. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                             |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 452 | 25                                | V               | 10                           | 955       | 1,460           | PSD Permit #07-A-572-P1<br>LCPH ATI 7376 / PTO 7040R1 |
| 453 | 25                                | V               | 10                           | 955       | 1,460           | PSD Permit #07-A-573-P1<br>LCPH ATI 7377 / PTO 7041R1 |
| 454 | 25                                | V               | 10                           | 955       | 1,460           | PSD Permit #07-A-574-P1<br>LCPH ATI 7378 / PTO 7042R1 |
| 455 | 25                                | V               | 10                           | 955       | 1,460           | PSD Permit #07-A-575-P1<br>LCPH ATI 7379 / PTO 7043R1 |
| 457 | 45                                | V               | 12                           | 764       | 4,790           | PSD Permit #07-A-577-P1<br>LCPHA TI 7380 / 7044       |

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

**Monitoring Requirements**

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 486**

**Table 62. Associated Equipment**

| SEP | EU   | EU Description        | Raw Material | Rated Capacity | CE ID | CE Description    |
|-----|------|-----------------------|--------------|----------------|-------|-------------------|
| 486 | 486A | Cooling Tower Cell #1 | Wastewater   | 15,000 gpm     | 486   | Drift Eliminators |
|     | 486B | Cooling Tower Cell #2 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486C | Cooling Tower Cell #3 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486D | Cooling Tower Cell #4 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486E | Cooling Tower Cell #5 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486F | Cooling Tower Cell #6 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486G | Cooling Tower Cell #7 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486H | Cooling Tower Cell #8 | Wastewater   | 15,000 gpm     |       |                   |
|     | 486I | Cooling Tower Cell #9 | Wastewater   | 15,000 gpm     |       |                   |

**Applicable Requirements**

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

**Table 63. PSD Emission Limits**

| SEP | Pollutant             | Emission Limit(s)    | Reference/Basis | Authority for Requirement                             |
|-----|-----------------------|----------------------|-----------------|---|
| 486 | Opacity               | 0% <sup>1</sup>      | BACT            | PSD Permit #07-A-589-P1<br>LCPH ATI 7385 / PTO 7049R1 |
|     | PM / PM <sub>10</sub> | 0.0005% <sup>2</sup> |                 |   |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> This is the required control efficiency of the drift eliminator in gallons of drift per gallon of cooling water flow.

**Table 64. Other Emission Limits**

| SEP | Pollutant        | Emission Limit(s)         | Reference/Basis                       | Authority for Requirement                             |
|-----|------------------|---------------------------|---------------------------------------|---|
| 486 | Opacity          | 40% <sup>1,2</sup>        | 567 IAC 23.3(2)"d"                    | PSD Permit #07-A-589-P1<br>LCPH ATI 7385 / PTO 7049R1 |
|     | PM               | 0.1 gr/dscf               | 567 IAC 23.3(2)<br>LCCO Sec. 10-62(a) |   |
|     | PM <sub>10</sub> | 1.69 lb/hr <sup>3,4</sup> | NAAQS                                 |   |
|     | Opacity          | 20% <sup>1,2</sup>        | LCCO Sec. 10-60(a)                    |   |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>.

<sup>4</sup> Emission limit represents the sum of all nine cooling tower cells.

**Operating Limits and Requirements**

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

**Federal Standards**

A. New Source Performance Standards (NESHAP):

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

**Table 65. NESHAP Subpart Summary**

| EU ID         | Subpart | Title  | Type                 | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|---------------|---------|--|----------------------|-----------------------------|----------------------------|
| 486A—<br>486I | A       | General Conditions                           | NA                   | 10-62(d)                    | §63.1 – §63.16             |
|               | FFFF    | Miscellaneous Organic Chemical Manufacturing | Ethanol fermentation | 10-62(d)(84)                | §63.2430 – §63.2550        |

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

Authority for Requirement: 40 CFR Part 63, Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)  
 PSD Permit #07-A-589-P1 | LCPH ATI 7385 / PTO 7049R1

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall maintain the cooling tower drift eliminators (CE486) according to the manufacturer's specifications, instructions, and maintenance schedule. The owner or operator shall record the date and description of all inspections, maintenance, and resulting actions completed on the drift eliminators.
- B. The owner or operator shall maintain a record of the manufacturer's drift loss guarantee for the cooling tower drift eliminators (CE486).
- C. The total dissolved solids concentration in the cooling tower cells (EUs 486A through 486I) circulating water shall not exceed 4,500 mg/L (4,500 parts per million, by weight). The owner or operator shall monitor and record the TDS in the circulating water at least once per calendar month while these emission units are in operation.
- D. Chromium-based or VOC-containing water treatment chemicals shall not be used in these emission units.
- E. These emission units are subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2430 through 40 CFR §2550). Specifically, the owner or operator shall comply with all applicable requirements for each heat exchange system according to the provisions in 40 CFR §63.2490.
- F. These emission units are subject to all applicable recordkeeping, notification, and reporting requirements as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR §63.15) and FFFF (40 CFR §63.2515, §63.2515, §63.2520, and §63.2525).
- G. The owner or operator shall furnish the Department with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in [Table 81 and 82]. In addition, the facility shall detail all revisions made to the affected emission

units. This information shall be submitted to the Department at least 30 days in advance of construction of any control equipment.

Authority for Requirement: PSD Permit #07-A-589-P1 | LCPH ATI 7385 / PTO 7049R1

**Emission Point Characteristics**

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

**Table 66. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm)          | Authority for Requirement                             |
|-----|-----------------------------------|-----------------|------------------------------|-----------|--------------------------|---|
| 486 | 59 each (9 cells)                 | V               | 408 each (9 cells)           | 80        | 1,472,222 each (9 cells) | PSD Permit #07-A-589-P1<br>LCPH ATI 7385 / PTO 7049R1 |

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

**Monitoring Requirements**

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 495, 496**

**Table 67. Associated Equipment**

| SEP | EU  | EU Description               | Raw Material  | Rated Capacity | CE ID | CE Description |
|-----|-----|------------------------------|---------------|----------------|-------|----------------|
| 495 | 495 | Dry Grind Unleaded Fuel Tank | Unleaded Fuel | 2,000 gal.     | None  | None           |
| 496 | 496 | Dry Grind Diesel Fuel Tank   | Diesel Fuel   | 10,000 gal.    | None  | None           |

**Applicable Requirements**

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

**Table 68. PSD Emission Limits**

| SEP        | Pollutant | Emission Limit(s)                   | Reference/Basis | Authority for Requirement  |
|------------|-----------|-------------------------------------|-----------------|--|
| 495<br>496 | VOC       | Work practice standard <sup>1</sup> | BACT            | PSD Permit #09-A-387-P1<br>LCPH ATI 7386 / PTO 7050<br>PSD Permit #09-A-388-P1<br>LCPH ATI 7387 / PTO 7051 |

<sup>1</sup> Fixed roof tank must be constructed with submerged fill pipe and may only be used to store gasoline (EU495) or distillate fuel oil (EU496).

**Operating Limits and Requirements**

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

**Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Fixed roof tank must be constructed with a submerged fill pipe and may only be used to store distillate fuel oil.

Authority for Requirement: PSD Permit #09-A-388-P1 | LCPH ATI 7387 / PTO 7051

**Emission Point Characteristics**

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

**Table 69. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm)  | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|------------------|---|
| 495 | 15                                | V, obstructed   | 2                            | Amb.      | Breathing losses | PSD Permit #09-A-387-P1<br>LCPH ATI 7386 / PTO 7050 |
| 496 | 15                                | V, obstructed   | 2                            | Amb.      | Breathing losses | PSD Permit #09-A-388-P1<br>LCPH ATI 7387 / PTO 7051 |

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

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**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)

## DDGS Storage

**Emission Point ID Number: 478**

**Table 70. Associated Equipment**

| EP  | EU   | EU Description                          | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|------|---|--------------|----------------|-------|----------------|
| 478 | 478  | DDGS Flat Storage Ventilation           | DDGS         | 400 tph        | 478   | Baghouse       |
|     | 478A | DDGS Rail Loading Shuttle Drag Conveyor | DDGS         | 400 tph        |       |                |

### Applicable Requirements

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

**Table 71. Emission Limits**

| EP  | Pollutant             | Emission Limit(s)       | Reference/Basis       | Authority for Requirement |
|-----|-----------------------|-------------------------|-----------------------|---------------------------|
| 478 | Opacity               | 40% <sup>1</sup> ,      | 567 IAC 23.3(3)"d"    | 567 IAC 23.3(3)"d"        |
|     | PM                    | 0.1 gr/dscf             | 567 IAC 23.4(7)       | 567 IAC 23.4(7)           |
|     | Opacity               | 20% <sup>1,2</sup>      | LCCO Sec. 10-60(a)    | LCPH ATI 7391 / PTO 7055  |
|     | PM                    | 0.1 gr/dscf             | LCCO Sec. 10-62(a)(7) |                           |
|     | PM / PM <sub>10</sub> | 1.03 lb/hr <sup>3</sup> | Requested limit       |                           |
|     | VOC                   | 3.58 lb/hr <sup>3</sup> |                       |                           |
|     | Acetaldehyde          | 0.83 lb/hr <sup>3</sup> |                       |                           |
|     | Acrolein              | 0.62 lb/hr <sup>3</sup> |                       |                           |
|     | Formaldehyde          | 0.59 lb/hr <sup>3</sup> |                       |                           |
|     | Methanol              | 0.60 lb/hr <sup>3</sup> |                       |                           |
|     | Total HAP             | 1.73 lb/hr <sup>3</sup> |                       |                           |

<sup>1</sup> The emission limit is based on a six (6) minute average.

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

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

### Operating Limits and Requirements

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

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The control equipment shall be maintained according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance and repair completed on the control equipment.



- B. The differential pressure across the control equipment shall be maintained between 0.5 and 8.0 inches of water column. The owner or operator shall monitor and record the differential pressure across the control equipment on a weekly basis.
- C. The owner or operator shall operate and maintain the DDGS Flat Feed Storage and Reclaim Building in a manner to minimize particular particulate emissions. At a minimum, this shall include keeping all doors and windows closed while material is being transferred or stored within the building. The owner or operator shall maintain a record of all actions taken to minimize emissions of particulate matter from the Flat Feed Storage and Reclaim Building.
- D. The owner or operator shall observe the Flat Feed Storage and Reclaim Building at least once per day from all four sides of the building to ensure there are no visible emissions from operations occurring within the building.
- E. 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 7391 / PTO 7055

**Emission Point Characteristics**

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

**Table 72. Stack Characteristics**

| EP  | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---------------------------|
| 478 | 140                               | V               | 52                           | Amb.      | 30,000          | LCPH ATI 7391 / PTO 7055  |

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

**Monitoring Requirements**

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

**Stack Testing**

These emission points are subject to the stack testing requirements in Appendix E of this permit.

Authority for Requirement: 567 IAC 24.108(3)

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Compliance Assurance Monitoring is required for PM emissions and a facility operations and maintenance plan is required for PM<sub>10</sub> and PM<sub>2.5</sub> emissions; however, as PM, PM<sub>10</sub>, and PM<sub>2.5</sub> are controlled by the same equipment, and CAM is more stringent, the facility operation and maintenance plan requirement has been waived. Refer to Appendix B, CAM Plans, for the complete compliance assurance monitoring plan.

**Emission Point ID Number: 482**

**Table 73. Associated Equipment**

| SEP | EU  | EU Description | Raw Material | Rated Capacity          | CE ID | CE Description |
|-----|-----|----------------|--------------|-------------------------|-------|----------------|
| 482 | 482 | DDGS Silo #1   | DDGS         | 215,400 ft <sup>3</sup> | 482   | Baghouse       |

**Applicable Requirements**

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

**Table 74. PSD Emission Limits**

| SEP | Pollutant             | Emission Limit(s)   | Reference/Basis | Authority for Requirement                           |
|-----|-----------------------|---|-----------------|---|
| 482 | Opacity               | 0% <sup>1</sup>   | BACT            | PSD Permit #07-A-585-P2<br>LCPH ATI 7383 / PTO 7047 |
|     | PM / PM <sub>10</sub> | 0.004 gr/dscf   |                 |   |
|     | VOC                   | 20 ppm <sub>vd</sub> <sup>2</sup> and 0.47 lb/hr <sup>3</sup> |                 |   |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> Concentration standard is expressed as VOC as ethanol.

<sup>3</sup> Pound per hour standard is expressed as the total of individual VOC compounds.

**Table 75. Other Emission Limits**

| SEP     | Pollutant          | Emission Limit(s)         | Reference/Basis                          | Authority for Requirement                           |
|---------|--------------------|---------------------------|--|---|
| 482     | Opacity            | 40% <sup>1,2</sup>        | 567 IAC 23.3(2)"d"                       | PSD Permit #07-A-585-P2<br>LCPH ATI 7383 / PTO 7047 |
|         | PM                 | 0.1 gr/dscf               | 567 IAC 23.4(7)<br>LCCO Sec. 10-62(a)(7) |   |
|         | PM <sub>10</sub>   | 0.12 lb/hr <sup>3,4</sup> | NAAQS                                    |   |
|         | Acetaldehyde       | 0.02 lb/hr <sup>3,5</sup> | Synthetic minor for 112(g)               |   |
|         | Acrolein           | 0.02 lb/hr <sup>3,5</sup> |  |   |
|         | Formaldehyde       | 0.02 lb/hr <sup>3,5</sup> |  |   |
|         | Methanol           | 0.02 lb/hr <sup>3,5</sup> |  |   |
|         | Total HAP          | 0.04 lb/hr <sup>3,5</sup> |  |   |
| Opacity | 20% <sup>1,2</sup> | LCCO Sec. 10-60(a)        | LCPH ATI 7383 / PTO 7047                 |   |

<sup>1</sup> The emission limit is based on a six (6) minute average.

<sup>2</sup> An exceedance of the indicator opacity will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>3</sup> The emission limit is expressed as the average of three (3) runs.

<sup>4</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>.

<sup>5</sup> HAP emission limits established to limit potential emission from the DDGS feed line below the 'major source' threshold for the purposes of 112(g), as defined in 40 CFR §63.41.

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### **Operating Limits and Requirements**

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

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

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The normal differential pressure across the baghouse (CE482) shall be maintained between 0.2" and 6.0" of water column. The owner or operator shall monitor and record the differential pressure across the baghouse on a continuous basis. This requirement shall not apply when the baghouse or equipment the baghouse controls is not in operation.
- B. The owner or operator shall properly operate and maintain equipment to continuously monitor the differential pressure across the baghouse. The monitoring device(s) and any recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, operating manuals, or per written facility-specific operation and maintenance plan.
- C. The owner or operator shall maintain a record of the range of differential pressures across the baghouse observed during the most recent successful compliance test for reference.
- D. The control equipment on this unit shall be operated according to the manufacturer's specifications and good operating practices. The owner or operator shall record the date and description of all maintenance completed on the control equipment and associated monitoring devices.

Authority for Requirement: PSD Permit #07-A-585-P2 | LCPH ATI 7383 / PTO 7047

### **Emission Point Characteristics**

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

**Table 76. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 482 | 125                               | V               | 14                           | 75        | 3,500           | PSD Permit #07-A-585-P2<br>LCPH ATI 7383 / PTO 7047 |

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

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**Monitoring Requirements**

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

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

## Sulfuric Acid Storage

Emission Point ID Number: 479

Table 77. Associated Equipment

| SEP | EU  | EU Description             | Raw Material  | Rated Capacity | CE ID | CE Description |
|-----|-----|----------------------------|---------------|----------------|-------|----------------|
| 479 | 479 | Sulfuric Acid Storage Tank | Sulfuric Acid | 43,620 gal.    | None  | None           |

### Applicable Requirements

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

Table 78. PSD Emission Limits

| EP  | Pollutant             | Emission Limit(s)                   | Reference/Basis | Authority for Requirement                          |
|-----|-----------------------|-------------------------------------|-----------------|--|
| 479 | Opacity               | 0% <sup>1</sup>                     | BACT            | PSD Permit #07-A-582-P<br>LCPH ATI 7381 / PTO 7045 |
|     | PM / PM <sub>10</sub> | Work Practice Standard <sup>2</sup> |                 |  |

<sup>1</sup> Standard is expressed as a six (6) minute average.

<sup>2</sup> BACT limits for PM and PM<sub>10</sub> are expressed in the form of a work practice standard as opposed to an emission limit. See [the 'Operating Limits' section below] for work practice requirements.

Table 79. Other Emission Limits

| EP  | Pollutant | Emission Limit(s) | Reference/Basis                       | Authority for Requirement                          |
|-----|-----------|-------------------|---------------------------------------|--|
| 479 | Opacity   | 40%               | 567 IAC 23.3(2)"d"                    | PSD Permit #07-A-582-P<br>LCPH ATI 7381 / PTO 7045 |
|     | PM        | 0.1 gr/dscf       | 567 IAC 23.3(2)<br>LCCO Sec. 10-62(a) |  |
|     | Opacity   | 20%               | LCCO Sec. 10-60(a)                    | LCPH ATI 7381 / PTO 7045                           |

### Operating Limits and Requirements

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

#### Operating Limits

- A. The owner or operator shall fill, operate, and maintain the Sulfuric Acid Storage Tank in a manner to minimize sulfuric acid emissions. At a minimum, the owner or operator shall fill the tank using submerged loading.

Authority for Requirement: PSD Permit #07-A-582-P | LCPH ATI 7381 / PTO 7045

#### Operating Condition Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. The owner or operator shall maintain a record of all actions taken to minimize emissions of sulfuric acid from the Sulfuric Acid Storage Tank.

Authority for Requirement: PSD Permit #07-A-582-P | LCPH ATI 7381 / PTO 7045

**Emission Point Characteristics**

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

**Table 80. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (scfm) | Authority for Requirement                          |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|--|
| 479 | 2                                 | Horizontal      | 3                            | 68        | 100             | PSD Permit #07-A-582-P<br>LCPH ATI 7381 / PTO 7045 |

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

**Monitoring Requirements**

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

## Dry Feed Conveying

Emission Point ID Number: 481, 497

Table 81. Associated Equipment

| SEP | EU   | EU Description                             | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|------|--|--------------|----------------|-------|----------------|
| 481 | 481G | DDGS Feed Elevator 2                       | DDGS         | 200 tph        | 481   | Baghouse       |
|     | 481H | DDGS Flat Storage Reclaim L Path Conveyor  | DDGS         | 200 tph        |       |                |
|     | 481I | DDGS Bulkweigher Feed Elevator 2           | DDGS         | 200 tph        |       |                |
|     | 481J | DDGS Truck Loading Shuttling Drag Conveyor | DDGS         | 400 tph        |       |                |
| 497 | 497A | Cooled DDGS Belt Conveyor #1               | DDGS         | 175 tph        | 497   | Baghouse       |
|     | 497B | DDGS Incline Drag Conveyor #1              | DDGS         | 175 tph        |       |                |
|     | 497C | DDGS Flat Storage Piling Drag Conveyor     | DDGS         | 175 tph        |       |                |
|     | 497D | DDGS Silo #1 Recirculation Drag Conveyor   | DDGS         | 175 tph        |       |                |
|     | 497E | DDGS Silo #1 Laidig Conveyor               | DDGS         | 400 tph        |       |                |
|     | 497I | DDGS Bulkweigher Feed Elevator             | DDGS         | 400 tph        |       |                |
|     | 497J | DDGS Silo Feed Elevator                    | DDGS         | 175 tph        |       |                |
|     | 497K | DDGS Bulkweigh Scale #1                    | DDGS         | 400 tph        |       |                |
|     | 497L | DDGS Bulkweigh Scale #2                    | DDGS         | 400 tph        |       |                |
|     | 497M | DDGS Bulkweigher Discharge Drag Conv. #1   | DDGS         | 400 tph        |       |                |
|     | 497N | DDGS Bulkweigher Discharge Drag Conv. #2   | DDGS         | 400 tph        |       |                |
|     | 497O | DDGS Silo #1 Laidig Conveyor               | DDGS         | 400 tph        |       |                |
|     | 497P | DDGS Silo #1 Reclaim Drag Conveyor         | DDGS         | 400 tph        |       |                |

### Applicable Requirements

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

Table 82. PSD Emission Limits

| EP         | Pollutant             | Emission Limit(s)   | Reference/Basis | Authority for Requirement  |
|------------|-----------------------|---|-----------------|--|
| 481<br>497 | Opacity               | 0% <sup>1</sup>   | BACT            | PSD Permit #07-A-584-P2<br>LCPH ATI 7382 / PTO 7046<br>PSD Permit #07-A-590-P2<br>LCPH ATI 7388 / PTO 7052 |
|            | PM / PM <sub>10</sub> | 0.004 gr/dscf <sup>2</sup>                                    |                 |  |
| 481        | VOC                   | 20 ppm <sub>vd</sub> <sup>3</sup> and 2.86 lb/hr <sup>4</sup> | BACT            | PSD Permit #07-A-584-P2<br>LCPH ATI 7382 / PTO 7046  |
| 497        | VOC                   | 20 ppm <sub>vd</sub> <sup>3</sup> and 1.15 lb/hr <sup>4</sup> | BACT            | PSD Permit #07-A-584-P2<br>LCPH ATI 7388 / PTO 7052  |

<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> The emission limit is expressed as the average of three (3) runs.

<sup>3</sup> Concentration standard is expressed as VOC as ethanol.

<sup>4</sup> Pound per hour standard is expressed as the total of individual VOC compounds.



**Table 83. Other Emission Limits**

| EP         | Pollutant        | Emission Limit(s)          | Reference/Basis                          | Authority for Requirement                            |
|------------|------------------|----------------------------|--|--|
| 481<br>497 | Opacity          | 40% <sup>1</sup>           | 567 IAC 23.3(2)"d"                       | PSD Permit #07-A-584-P2<br>LCPH ATI 7382 / PTO 7046  |
|            | PM               | 0.1 gr/dscf                | 567 IAC 23.4(7)<br>LCCO Sec. 10-62(a)(7) |  |
|            | Opacity          | 20% <sup>1</sup>           | LCCO Sec. 10-60(a)                       | LCPH ATI 7382 / PTO 7046<br>LCPH ATI 7388 / PTO 7052 |
| 481        | PM <sub>10</sub> | 0.686 lb/hr <sup>2,3</sup> | NAAQS                                    | PSD Permit #07-A-584-P2<br>LCPH ATI 7382 / PTO 7046  |
|            | Acetaldehyde     | 0.33 lb/hr <sup>2,4</sup>  | Synthetic minor for 112(g)               |  |
|            | Acrolein         | 0.25 lb/hr <sup>2,4</sup>  |  |  |
|            | Formaldehyde     | 0.24 lb/hr <sup>2,4</sup>  |  |  |
|            | Methanol         | 0.24 lb/hr <sup>2,4</sup>  |  |  |
|            | Total HAP        | 0.70 lb/hr <sup>2,4</sup>  |  |  |
| 497        | PM <sub>10</sub> | 0.27 lb/hr <sup>2,3</sup>  | NAAQS                                    | PSD Permit #07-A-590-P2<br>LCPH ATI 7388 / PTO 7052  |
|            | Acetaldehyde     | 0.13 lb/hr <sup>2,4</sup>  | Synthetic minor for 112(g)               |  |
|            | Acrolein         | 0.10 lb/hr <sup>2,4</sup>  |  |  |
|            | Formaldehyde     | 0.09 lb/hr <sup>2,4</sup>  |  |  |
|            | Methanol         | 0.10 lb/hr <sup>2,4</sup>  |  |  |
|            | Total HAP        | 0.28 lb/hr <sup>2,4</sup>  |  |  |

<sup>1</sup> The emission limit is a six (6) minute average.

<sup>2</sup> The emission limit is expressed as the average of three (3) runs.

<sup>3</sup> The limit for PM<sub>10</sub> emissions is established to limit emissions below levels that predict exceedances of the 24-hour NAAQS, the 24-hour increment, and the annual increment for PM<sub>10</sub>.

<sup>4</sup> HAP emission limits established to limit potential emission from the DDGS feed line below the 'major source' threshold for the purposes of 112(g), as defined in 40 CFR §63.41.

**Operating Limits and Requirements**

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

**Operating Limits**

- A. The baghouse, [CE481, CE497], pressure drop shall be maintained within the operating range specified by the manufacturer.
- B. The owner or operator shall furnish the Department with final detailed plans and specifications for all emission control equipment selected by the owner to meet the emission limits contained in [Tables 70 and 71]. In addition, the facility shall detail all revisions made to the affected emission units. This information shall be submitted to the Department at least 30 days in advance of construction of any control equipment.

Authority for Requirement: PSD Permit #07-A-584-P2 | LCPH ATI 7382 / PTO 7046  
 PSD Permit #07-A-590-P2 | LCPH ATI 7388 / PTO 7052

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. The owner or operator shall properly operate and maintain equipment to continuously monitor the baghouse pressure drop. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, or per written facility-specific operation and maintenance plan.
- B. The owner or operator shall collect and record the differential pressure, in inches of water column, on a continuous basis. The requirement shall not apply on the days that the baghouse or the equipment that the baghouse controls is not in operation.
- C. The owner and operator shall maintain a record of all inspections/maintenance and any action resulting from the inspection/maintenance of the control equipment and the monitoring devices.
- D. The owner or operator shall maintain a record of the range of baghouse pressure drop observed during the last successful compliance test for reference.

Authority for Requirement: PSD Permit #07-A-584-P2 | LCPH ATI 7382 / PTO 7046  
 PSD Permit #07-A-590-P2 | LCPH ATI 7388 / PTO 7052

**Emission Point Characteristics**

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

**Table 84. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 481 | 140                               | V               | 32                           | 75        | 20,000          | PSD Permit #07-A-584-P2<br>LCPH ATI 7382 / PTO 7046 |
| 497 | 53                                | V               | 20                           | 70        | 8,000           | PSD Permit #07-A-590-P2<br>LCPH ATI 7388 / PTO 7052 |

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

**Monitoring Requirements**

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

**Opacity Monitoring**

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

Authority for Requirement: 567 IAC 24.108(3)

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

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<sup>1</sup> Facility-maintained operation & maintenance plan requirements have been waived due to CAM-equivalent monitoring required by PSD Permits #07-A-584-P2 and #07-A-590-P2

## Loadout

Emission Point ID Number: 485

Table 85. Associated Equipment

| SEP | EU  | EU Description                            | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|-----|---|--------------|----------------|-------|----------------|
| 485 | 485 | 30% Condensed Distillers Solubles Loadout | 30% CDS      | 30,000 gal.    | None  | None           |

### Applicable Requirements

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

Table 86. PSD Emission Limits

| SEP | Pollutant | Emission Limit(s)       | Reference/Basis | Authority for Requirement                          |
|-----|-----------|-------------------------|-----------------|--|
| 485 | VOC       | 0.0025 tpy <sup>1</sup> | BACT            | PSD Permit #07-A-588-P<br>LCPH ATI 7384 / PTO 7048 |

<sup>1</sup> Standard is expressed as a 12-month rolling total.

### Operating Limits and Requirements

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

#### Operating Limits

- A. The 30% CDS Loadout shall not load out more than 7,300,000 gallons of 30% condensed distillers solubles per 12-month rolling period.
- B. Only 30% condensed distillers solubles may be loaded out from this emission unit.
- C. The owner or operator shall fill and operate the 30% CDS Loadout in a manner to minimize VOC emissions.

Authority for Requirement: PSD Permit #07-A-588-P | LCPH ATI 7384 / PTO 7048

#### Operating Condition Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Record monthly, the total amount of 30% condensed distillers solubles loaded out through this emission unit each month in gallons. Calculate and record the 12-month rolling totals.
- B. The owner or operator shall maintain a record of all actions taken to minimize emissions of VOC from the 30% CDS Loadout.

Authority for Requirement: PSD Permit #07-A-588-P | LCPH ATI 7384 / PTO 7048

**Emission Point Characteristics**

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

**Table 87. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                          |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|--|
| 485 | 15                                | V               | 24                           | 110       | Displacement    | PSD Permit #07-A-588-P<br>LCPH ATI 7384 / PTO 7048 |

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

**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)

## Fugitive Sources

Emission Point ID Number: 498

Table 88. Associated Equipment

| SEP | EU  | EU Description      | Raw Material | Rated Capacity | CE ID | CE Description |
|-----|-----|---------------------|--------------|----------------|-------|----------------|
| 498 | 498 | Dry Mill Haul Roads | Tank Truck   | N/A            | None  | None           |

### Applicable Requirements

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

Table 89. Emission Limits

| SEP | Pollutant             | Emission Limit(s)                   | Reference/Basis | Authority for Requirement                           |
|-----|-----------------------|-------------------------------------|-----------------|---|
| 498 | Opacity               | No Visible Emissions <sup>1</sup>   | BACT            | PSD Permit #07-A-591-P1<br>LCPH ATI 7389 / PTO 7053 |
|     | PM / PM <sub>10</sub> | Work Practice Standard <sup>2</sup> |                 |   |

<sup>1</sup> No visible emissions shall be observed beyond the lot line of the property.

<sup>2</sup> BACT limits for PM and PM<sub>10</sub> are expressed in the form of work practice standards, as opposed to an emission limit. See 'Operating Limits' for work practice requirements.

### Operating Limits and Requirements

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

#### Operating Limits

- A. All the haul roads at the dry mill shall be paved.
- B. All spills on the haul road surface shall be cleaned up as soon as possible after the spill occurs.
- C. Fugitive emissions of paved haul roads shall be controlled by either daily water flushing followed by vacuum sweeping or by obtaining a vacuum sweeper that can meet a minimum of 80% overall control of emissions and completing daily sweeping.
  1. Sweeping and watering need not occur on any day that the haul road is not in use.
  2. Sweeping and watering need not occur when a rain gauge located at the facility indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hour time period.
  3. Sweeping and watering will not be required on calendar days where the daily high temperature is below 35 degrees F.
  4. If a facility has applied salt or sand for worker or driver safety, the facility is not required to sweep or wash until the road has returned to driving conditions that no longer require the use of salt or sand.
- D. The haul road surface silt loading shall not exceed 0.5 g/m<sup>2</sup>.

Authority for Requirement: PSD Permit #07-A-591-P1 | LCPH ATI 7389 / PTO 7053

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Record the frequency of cleaning performed on the haul roads. The facility shall keep a written record of any deviations from [Condition C of the 'Operating Limits' section above] due to either suspended use of the haul road or weather conditions.
- B. Record the type of cleaning (i.e., vacuum sweeping, washing, etc.) performed on the haul roads for each cleaning event.

Authority for Requirement: PSD Permit #07-A-591-P1 | LCPH ATI 7389 / PTO 7053

**Emission Point Characteristics**

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

**Table 90. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                           |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|---|
| 498 | N/A                               | N/A             | N/A                          | Amb.      | N/A             | PSD Permit #07-A-591-P1<br>LCPH ATI 7389 / PTO 7053 |

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

**Monitoring Requirements**

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

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

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: 499**

**Table 91. Associated Equipment**

| SEP | EU  | EU Description                              | Raw Material    | Rated Capacity | CE ID | CE Description |
|-----|-----|---|-----------------|----------------|-------|----------------|
| 499 | 499 | Dry Mill VOC Emissions from Equipment Leaks | Equipment Leaks | N/A            | None  | None           |

**Applicable Requirements**

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

**Table 92. PSD Emission Limits**

| SEP | Pollutant | Emission Limit(s)      | Reference/Basis | Authority for Requirement                          |
|-----|-----------|------------------------|-----------------|--|
| 499 | VOC       | 47.67 tpy <sup>1</sup> | BACT            | PSD Permit #07-A-592-P<br>LCPH ATI 7390 / PTO 7054 |

<sup>1</sup> Standard is expressed as a 12-month rolling total.

**Operating Limits and Requirements**

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

**Federal Standards**

A. New Source Performance Standards (NSPS):

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

**Table 93. NSPS Subpart Summary**

| EU ID | Subpart | Title  | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------|---------|--|-----------------------------|----------------------------|
| 499   | A       | General Conditions   | 10-62(b)                    | §60.1 – §60.19             |
|       | VV      | Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry | 10-62(b)(40)                | §60.480 – §60.489          |

After the compliance date specified in 40 CFR §63.2445, compliance with NSPS Subpart VV may be demonstrated by complying only with the requirements in NESHAP Subpart FFFF. If this method of compliance is used, all total organic compounds must be considered, minus methane and ethane, in such equipment for purposes of compliance with NESHAP Subpart FFFF, as if they were organic HAP.

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

B. New Source Performance Standards (NESHAP):

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



**Table 94. NESHAP Subpart Summary**

| EU ID | Subpart | Title  | Type                 | Local Reference (LCCO Sec.) | Federal Reference (40 CFR) |
|-------|---------|--|----------------------|-----------------------------|----------------------------|
| 499   | A       | General Conditions                           | NA                   | 10-62(d)                    | §63.1 – §63.16             |
|       | FFFF    | Miscellaneous Organic Chemical Manufacturing | Ethanol Fermentation | 10-62(d)(84)                | §63.2430 – §63.2550        |

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

Authority for Requirement: NSPS Subpart VV  
 567 IAC 23.1(2)"nn"  
 LCCO Sec. 10-62(b)(40)  
 NESHAP Subpart FFFF  
 567 IAC 23.1(4)"cf"  
 LCCO Sec. 10-62(d)(84)  
 PSD Permit #07-A-592-P | LCPH ATI 7390 / PTO 7054

**Operating Limits**

- A. The component count shall be documented as to the number and types of components used. Components include, but are not limited to, valves, pumps, compressor seals, flanges, etc. Equipment subject to the regulations noted in [the 'Federal Standards' section above] shall be identified. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, by designation of process unit or affected facility per 40 CFR Part 65 Subpart F and UU.
- B. The components that are in organic HAP service, as defined in 40 CFR §63.2550, and that are part of the MCPU are subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR [§63.16]) and FFFF (40 CFR §63.2430 through 40 CFR §63.2550). Specifically, the owner or operator shall comply with all applicable requirements for equipment leaks according to the provisions in 40 CFR §63.2480. As specified in 40 CFR §63.2480, the facility must comply with the requirements of 40 CFR Part 63, Subpart UU and the requirements referenced therein; or 40 CFR Part 65, Subpart F.
- C. The owner or operator shall follow the standards of NSPS Subpart VV (40 CFR §60.480 through 40 CFR §60.489) for the purposes of BACT.

Authority for Requirement: PSD Permit #07-A-592-P | LCPH ATI 7390 / PTO 7054

**Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- A. Calculate and record the VOC emissions based on the documented component count. Emission factors shall be based on EPA document 453/R-95-017 titled Protocol for Equipment Leak Emission Estimates. The facility will use the following methodology to calculate VOC emissions.
  - 1. Determine the component count for the [Vantage Corn Processors] ethanol dry mill. This count shall be updated with each modification to that section of the facility.

2. On a monthly basis, take a minimum of five samples of liquid from five different locations within each section of the plant (i.e., fermentation, distillation, storage tanks, etc.) and determine the organic content of each sample. If 100% organic content is used, monthly sampling is not required. The average organic content of the streams in each section shall be determined and used in the calculations of emissions. If after one year of sampling, the average of each month's samples shows less than a 2% variation over the twelve months, the average of the 60 samples may be used in future calculations and sampling may be ended.
    - i. VOC content sampling shall be completed following the procedures in 40 CFR §60.485(d).
  3. From each month's leak detection tracking information, determine the following for each component type:
    - i. The fraction of sources that were repaired the previous month that were found to be leaking this month.
    - ii. The fraction of sources that were successfully repaired after being found to leaking in the previous month's monitoring.
    - iii. The fraction of sources that were found to not be leaking during the previous month's monitoring, which were found to be leaking during this month's monitoring.
  4. Using the information collected in (c.) above, determine the control efficiency of the leak detection and repair program as outlined in EPA's document 453/R-95-017 titled Protocol for Equipment Leak Emission Estimates (page 5-54 through 5-57). Control efficiencies listed in table 5.2 (page 5-9) may be assumed for those components listed. If these control efficiencies are assumed, the information required by (c.) above need not be recorded for that component type.
  5. Using the information collected above, determine the VOC emissions over the previous month from each section of the facility using the calculation methods outlined in EPA's document 453/R-95-017 titled Protocol for Equipment Leak Emission Estimates (page 2-11).
- B. At the end of each month, record the total VOC emissions over the previous month from the facility by adding the emissions totals for each section if the dry mill as determined in [Condition A.1]. Calculate and record 12-month rolling totals.
- C. The owner or operator shall follow the recordkeeping and reporting standards of Subpart VV, 40 CFR §60.486 and 40 CFR §60.487 for purposes of BACT.
- D. This emission unit is subject to all applicable recordkeeping, notification, and reporting requirements as set forth in NESHAP Subparts A (40 CFR §63.1 through 40 CFR [§63.16]) and FFFF (40 CFR §63.2515, 40 CFR §63.2520, and 40 CFR §63.2525).

Authority for Requirement: PSD Permit #07-A-592-P | LCPH ATI 7390 / PTO 7054

**Emission Point Characteristics**

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

**Table 95. Stack Characteristics**

| SEP | Stack Height (feet, above ground) | Discharge Style | Stack Opening (inches, dia.) | Temp (°F) | Flowrate (acfm) | Authority for Requirement                          |
|-----|-----------------------------------|-----------------|------------------------------|-----------|-----------------|--|
| 499 | N/A                               | N/A             | N/A                          | Amb.      | N/A             | PSD Permit #07-A-592-P<br>LCPH ATI 7390 / PTO 7054 |

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

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**Monitoring Requirements**

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

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

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

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

Authority for Requirement:      567 IAC 24.108(3)

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

### G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 24.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 24.105(2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 24.108(1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 24.108(14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 24.108(9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 24.108(15)"c"*

### G2. Permit Expiration

1. Except as provided in rule 567—24.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—24.105(455B). *567 IAC 24.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 24.105(2). *567 IAC 24.105*

### G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications

shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 24.107(4)*

#### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 24.108(15)"e"*

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with *567 IAC 24.107(4)*. The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 24.108 (5)*

#### **G6. Annual Fee**

1. The permittee is required under subrule *567 IAC 24.106* to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in *567 IAC 24.115(1)"d"*.

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

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

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 24.108 (15)"b"*

### **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 24.108 (9)"e"*

### **G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 21.8(1)*

### **G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance

records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 24.108(4), 567 IAC 24.108(12)*

### **G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 24;
  - b. Compliance test methods specified in 567 Chapter 21; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule.  
*567 IAC 21.5(1)-567 IAC 21.5(2)*

### **G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit.  
*567 IAC 24.108(6)*

### **G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in *567 IAC 131.2(2), 567 IAC Chapter 131-State Only*

### **G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process

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

2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 21.10(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 21.10(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

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

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

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.



- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 21.7(1)-567 IAC 21.7(4)*

### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 24.108(5)"b"*

### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

### **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 24.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—24.140(455B) through 567 - 24.144(455B));
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade
    - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how

the emissions increases and decreases will comply with the terms and conditions of the Title V permit.

- vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change.  
*567 IAC 24.110(1)*
2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 24.110(2)*
  3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 24.110(1). *567 IAC 24.110(3)*
  4. The permit shield provided in subrule 24.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 24.110(4)*
  5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 24.108(11)*

#### **G18. Duty to Modify a Title V Permit**

1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that does any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - iii. Require more frequent monitoring or reporting by the permittee; or
    - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
  - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
  - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
2. Minor Title V Permit Modification.
  - a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
    - i. Do not violate any applicable requirement;
    - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
    - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;

- iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification under rule 567 - 24.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - ii. The permittee's suggested draft permit;
  - iii. Certification by a responsible official, pursuant to 567 IAC 24.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 24.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 24.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 24, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 24.111-567 IAC 24.113*

**G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule

567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon.  
*567 IAC 22.1(1)*

### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (*567 IAC 23.1(3)"a"*); training fires and controlled burning of a demolished building (*567 IAC 23.2*).

### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2.  
*567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 24.108(7)*

### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
  4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
  5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR Part 82*

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 24.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
  - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 24.108(17)"a", 567 IAC 24.108(17)"b"*
3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;

- b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 24.114*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 24.114*
  5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 24.114*

## **G25. Permit Shield**

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
  - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 24.108 (18)*

## **G26. Severability**

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

## **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege.

*567 IAC 24.108(9)"d"*

## **G28. Transferability**

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

## **G29. Disclaimer**

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

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

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks (42 days) of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

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

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau  
6200 Park Ave  
Suite 200  
Des Moines, IA 50321  
(515) 343-6589

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

**G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

**G32. Contacts List**

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

Iowa Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

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

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
6200 Park Ave, Suite 200  
Des Moines, IA 50321  
(515) 313-8325

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

**Field Office 1**

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

**Field Office 2**

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

**Field Office 3**

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

**Field Office 4**

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

**Field Office 5**

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

**Field Office 6**

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

**Polk County Public Works Dept.**

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

**Linn County Public Health**

Air Quality Branch  
1020 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000



## Appendix A: 567 IAC Crosswalk

Table 96. Crosswalk Chapters List

| Previous Chapter #<br>(Prior to 5/15/2024) | Current Chapter # | Previous Title & Description<br>(Prior to 5/15/2024) | Current Title & Description                                | Action Taken   |
|--|-------------------|--|--|--|
| 20   | 20 (Reserved)     | Scope of Title – Definitions                         | N/A  | <b>Definitions moved</b> to Ch. 21, 22, & 23<br><b>Rescinded</b> Ch. 20 (Reserved)   |
| 21   | 21                | Compliance   | Compliance, Excess Emissions, and Measurement of Emissions | <b>Kept and Combined</b> with rules from Ch. 24, 25, 26, & 29.   |
| 22   | 22                | Controlling Pollution-Permits                        | Controlling Air Pollution – Construction Permitting        | <b>Kept construction permit rules and combined</b> with Ch. 20 (definitions) and Ch. 28 (NAAQS)<br><b>Moved operating permit rules</b> to Ch. 24 |
| 22.100 – 22.300(12)                        | (New) 24          | N/A  | Operating Permits  | <b>Moved operating permit rules</b> from Ch. 22 to Ch. 24  |
| 23   | 23                | Emission Standards                                   | Air Emission Standards                                     | <b>Kept</b>  |
| 24   | (New) 21          | Excess Emissions                                     | Compliance, Excess Emissions, and Measurement of Emissions | <b>Moved rules and combined</b> with Ch. 21<br><b>Moved TV rules</b> here (to Ch. 24)  |
| 25   | (New) 21          | Emissions Measurement                                | Compliance, Excess Emissions, and Measurement of Emissions | <b>Moved rules and combined</b> with Ch. 21<br><b>Rescinded</b> Ch. 25 (Reserved)  |
| 26   | (New) 21          | Emergency Air Pollution Episodes                     | Compliance, Excess Emissions, and Measurement of Emissions | <b>Moved rules and combined</b> with Ch. 21<br><b>Rescinded</b> Ch. 26 (Reserved)  |
| 27   | 27                | Local Program Acceptance                             | Local Program Acceptance                                   | <b>Kept</b>  |
| 28   | 22                | NAAQS  | N/A  | <b>Moved rules and combined</b> with Ch. 22<br><b>Rescinded</b> Ch. 28 (Reserved)  |
| 29   | (New) 21          | Opacity Qualifications                               | Compliance, Excess Emissions, and Measurement of Emissions | <b>Moved rules and combined</b> with Ch. 21<br><b>Rescinded</b> Ch. 29 (Reserved)  |
| 30   | 30                | Fees   | Fees   | <b>Kept</b>  |
| 31   | 31                | Nonattainment Areas                                  | Nonattainment New Source Review                            | <b>Kept</b>  |

| Previous Chapter #<br>(Prior to 5/15/2024) | Current Chapter # | Previous Title & Description<br>(Prior to 5/15/2024)   | Current Title & Description   | Action Taken                       |
|--|-------------------|--|---|------------------------------------|
| 32   | N/A               | AFO Field Study  | N/A   | <b>Rescinded</b> Ch. 32 (Reserved) |
| 33   | 33                | Special regulations and construction permit requirements for major stationary sources—Prevention of Significant Deterioration (PSD) of air quality | Construction permit requirements for major stationary sources—Prevention of Significant Deterioration (PSD) | <b>Kept</b>                        |
| 34   | N/A               | Emission Trading-CAIR-CAMR   | N/A   | <b>Rescinded</b> Ch. 34 (Reserved) |
| 35   | N/A               | Grant Assistance Programs  | N/A   | <b>Rescinded</b> Ch 35 (Reserved)  |

**Table 97. Crosswalk Rules List**

| Previous Chapter #<br>(Prior to 5/15/2024) | Current Chapter # | Previous Title & Description<br>(Prior to 5/15/2024)               | Current Title & Description   | Action Taken   |
|--|-------------------|--|---|--|
| <b>Chapter 20</b>                          |                   |  |   |  |
| 20   | 20 (Reserved)     | Scope of Title - Definitions                                       | N/A   | <b>Definitions moved</b> to Ch. 21, 22 and 23<br><b>Rescinded</b> Ch. 20. (Reserved) |
| 20.1                                       | N/A               | Scope of title   | N/A   |  |
| 20.2                                       | Ch. 21, 22, 23    | Definitions  | Definitions   | See beginning of Ch. 21, 22, and 23  |
| 20.3                                       | N/A               | Air quality forms generally  | N/A   |  |
| <b>Chapter 21</b>                          |                   |  |   |  |
| <b>21</b>                                  | <b>21</b>         | <b>Compliance</b>  | <b>Compliance, Excess Emissions, and Measurement of Emissions</b>           | <b>Kept and combined</b> with rules from Chapters 24, 25, 26, and 29.                |
| 21.1                                       | 21.1              | Compliance Schedule  | Definitions and compliance requirements                                     | Added definitions from Ch. 21, some language updated                                 |
| 21.2                                       | 21.2              | Variances  | Variances   | Some language updated  |
| 21.3                                       | 21.3              | Emission reduction program   | Reserved  | Reserved   |
| 21.4                                       | 21.4              | Circumvention of rules   | Circumvention of rules  | Minor language updated   |
| 21.5                                       | 21.5              | Evidence used in establishing that a violation has or is occurring | Evidence used in establishing that a violation has occurred or is occurring | 21.5(2) Reserved, some language updated  |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b> | <b>Current Title &amp; Description</b>                      | <b>Action Taken</b>                                 |
|--|--------------------------|--|---|---|
| 21.6   | 21.6                     | Temporary electricity generation for disaster situations         | Temporary electricity generation for disaster situations    | Minor language updated                              |
| 24.1   | 21.7                     | Excess emission reporting  | Excess emission reporting                                   | Moved from Ch. 24, some language updated            |
| 24.2   | 21.8                     | Maintenance and repair requirements                              | Maintenance and repair requirements                         | Moved from Ch. 24, some language updated            |
| N/A  | 21.9                     | N/A  | Compliance with other requirements                          | New language  |
| 25.1   | 21.10                    | Testing and sampling of new and existing equipment               | Testing and sampling of new and existing equipment          | Moved from Ch. 25, some language updated            |
| 25.2   | 21.11                    | Continuous emission monitoring under the acid rain program       | Continuous emission monitoring under the acid rain program  | Moved from Ch. 25, some language updated            |
| 25.3   | N/A                      | Mercury emissions testing and monitoring                         | N/A   | Rescinded. Except 25.3(5)                           |
| 25.3(5)  | 21.12                    | Affected sources subject to Section 112(g)                       | Affected sources subject to Section 112(g)                  | Moved from Ch. 25, some language updated            |
| 29.1   | 21.13                    | Methodology and qualified observer                               | Methodology and qualified observer                          | Moved from Ch. 29, some language updated            |
| 26.1   | 21.14                    | Prevention of air pollution emergency episodes - General         | Prevention of air pollution emergency episodes              | Moved from Ch. 26, some language updated            |
| 26.2   | 21.15                    | Episode criteria   | Episode criteria  | Moved from Ch. 26, some language updated            |
| 26.3   | 21.16                    | Preplanned abatement strategies                                  | Preplanned abatement strategies                             | Moved from Ch. 26, some language updated            |
| 26.4   | 21.17                    | Actions taken during episodes                                    | Actions taken during episodes                               | Moved from Ch. 26, some language updated            |
| Ch 26 Table III                                    | Table I                  | Abatement strategies emission reduction actions alert level      | Abatement strategies emission reduction actions alert level | Moved from Ch. 26, reference federal appendix table |

| Previous Chapter #<br>(Prior to 5/15/2024) | Current Chapter # | Previous Title & Description<br>(Prior to 5/15/2024)   | Current Title & Description  | Action Taken   |
|--|-------------------|--|--|--|
| Ch 26 Table IV                             | Table II          | Abatement strategies<br>emission reduction actions<br>warning level  | Abatement strategies<br>emission reduction actions<br>warning level                            | Moved from Ch. 26, reference federal<br>appendix table   |
| <b>Chapter 22</b>                          |                   |  |  |  |
| 22   | 22                | <b>Controlling Pollution-Permits</b>   | <b>Controlling Air Pollution -<br/>Construction Permitting</b>                                 | <b>Kept construction permit rules and<br/>combined</b> with Ch. 20 (definitions) and<br>Ch. 28 (NAAQS).<br><br><b>Moved operating permit rules</b> to Chapter<br>24. |
| 22.1                                       | 22.1              | Permits required for new or<br>existing stationary sources   | Definitions and permit<br>requirements for new or<br>existing stationary sources               | Added definitions from Ch. 20, some<br>language updated  |
| 22.2                                       | 22.2              | Processing permit<br>applications  | Processing permit<br>applications  |  |
| 22.3                                       | 22.3              | Issuing permits  | Issuing permits  |  |
| 22.4                                       | 22.4              | Special requirements for<br>major stationary sources<br>located in areas designated<br>attainment or unclassified<br>(PSD) | Major stationary sources<br>located in areas designated<br>attainment or unclassified<br>(PSD) |  |
| 22.5                                       | 22.5              | Special requirements for<br>nonattainment areas  | Major stationary sources<br>located in areas designated<br>Nonattainment                       |  |
| 22.7                                       | 22.7              | Alternative emission control<br>program  | Alternative emission control<br>program  |  |
| 22.8                                       | 22.8              | Permit by rule   | Permit by rule   |  |
| 22.9                                       | 22.9              | Special requirements for<br>visibility protection  | Special requirements for<br>visibility protection  | A lot of language updated or removed   |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>  | <b>Current Title &amp; Description</b>  | <b>Action Taken</b>   |
|--|--------------------------|---|---|---|
| 22.10  | 22.10                    | Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment | Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment |   |
| 28.1   | 22.11                    | Ambient air quality standards - Statewide standards   | Ambient air quality standards   | Moved from Ch. 28, minor language updated   |
| 22.12 to 22.99                                     | N/A                      | Reserved  | N/A   | Removed   |
| <b>22.100 - 22.300(12)</b>                         | <b>(New) 24</b>          | N/A   | <b>Operating Permits</b>  | <b>Moved operating permit rules</b> from Ch. 22 to Ch. 24.  |
| 22.100   | 24.100                   | Definitions for Title V operating permits   | Definitions for Title V operating permits   | Moved from Ch. 22, some language updated, many 40 CFR 70 definitions adopted by reference                         |
| 22.101   | 24.101                   | Applicability of Title V operating permit requirements  | Applicability of Title V operating permit requirements  | Moved from Ch. 22, some language updated to correct punctuation and remove old dates                              |
| 22.102   | 24.102                   | Source category exemptions  | Source category exemptions  | Moved from Ch. 22, some language updated to correct punctuation   |
| 22.103   | 24.103                   | Insignificant activities  | Insignificant activities  | Moved from Ch. 22, some language updated to correct typos and remove old dates                                    |
| 22.104   | 24.104                   | Requirement to have a Title V permit  | Requirement to have a Title V permit  | Moved from Ch. 22, some language updated no changes to rule text  |
| 22.105   | 24.105                   | Title V permit applications   | Title V permit applications   | Moved from Ch. 22, updated language to address electronic submissions and remove past application due dates       |
| 22.106   | 24.106                   | Annual Title V emissions inventory  | Annual Title V emissions inventory  | Moved from Ch. 22, no changes to rule text  |
| 22.107   | 24.107                   | Title V permit processing procedures  | Title V permit processing procedures  | Moved from Ch. 22, some language updated to update locations of public records and remove old CFR amendment dates |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>         | <b>Current Title &amp; Description</b>                                   | <b>Action Taken</b>   |
|--|--------------------------|--|--|---|
| 22.108   | 24.108                   | Permit content   | Permit content   | Moved from Ch. 22, some language updated to correct punctuation, remove old dates, and adopt 40 CFR 70 rules by reference |
| 22.109   | 24.109                   | General permits  | General permits  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference   |
| 22.110   | 24.110                   | Changes allowed without a Title V permit revision (off-permit revisions) | Changes allowed without a Title V permit revision (off-permit revisions) | Moved from Ch. 22, some language updated to remove redundant language   |
| 22.111   | 24.111                   | Administrative amendments to Title V permits                             | Administrative amendments to Title V permits                             | Moved from Ch. 22, no changes to rule text  |
| 22.112   | 24.112                   | Minor Title V permit modifications                                       | Minor Title V permit modifications                                       | Moved from Ch. 22, no changes to rule text  |
| 22.113   | 24.113                   | Significant Title V permit modifications                                 | Significant Title V permit modifications                                 | Moved from Ch. 22, no changes to rule text  |
| 22.114   | 24.114                   | Title V permit reopenings  | Title V permit re-openings   | Moved from Ch. 22 to Ch. 24, some language updated to adopt 40 CFR 70 rules by reference                                  |
| 22.115   | 24.115                   | Suspension, termination, and revocation of Title V permits               | Suspension, termination, and revocation of Title V permits               | Moved from Ch. 22, no changes to rule text  |
| 22.116   | 24.116                   | Title V permit renewals  | Title V permit renewals  | Moved from Ch. 22, no changes to rule text  |
| 22.117-22.119                                      | 24.117-24.119            | Reserved   | Reserved   | Moved from Ch. 22, no changes to rule text  |
| 22.120   | 24.120                   | Acid rain program—definitions  | Acid rain program—definitions  | Moved from Ch. 22, some language updated to remove old CFR amendment dates and address electronic submissions             |
| 22.121   | 24.121                   | Measurements, abbreviations, and acronyms                                | Reserved   | Moved from Ch. 22, no changes to rule text  |
| 22.122   | 24.122                   | Applicability  | Applicability  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference   |
| 22.123   | 24.123                   | Acid rain exemptions   | Acid rain exemptions   | Moved from Ch. 22, some language updated to correct punctuation   |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>             | <b>Current Title &amp; Description</b>                                       | <b>Action Taken</b>  |
|--|--------------------------|--|--|--|
| 22.124   | 24.124                   | Retired units exemption  | Reserved   | Moved from Ch. 22, no changes to rule text                                 |
| 22.125   | 24.125                   | Standard requirements  | Standard requirements  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.126   | 24.126                   | Designated representative—submissions  | Designated representative—submissions  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.127   | 24.127                   | Designated representative—objections   | Designated representative—objections   | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.128   | 24.128                   | Acid rain applications—requirement to apply                                  | Acid rain applications—requirement to apply                                  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.130   | 24.130                   | Acid rain permit application shield and binding effect of permit application | Acid rain permit application shield and binding effect of permit application | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.131   | 24.131                   | Acid rain compliance plan and compliance options—general                     | Acid rain compliance plan and compliance options—general                     | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.132   | 24.132                   | Repowering extensions  | Reserved   | Moved from Ch. 22, no changes to rule text                                 |
| 22.133   | 24.133                   | Acid rain permit contents—general  | Acid rain permit contents—general  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.134   | 24.134                   | Acid rain permit shield  | Acid rain permit shield  | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference  |
| 22.135   | 24.135                   | Acid rain permit issuance procedures—general                                 | Acid rain permit issuance procedures—general                                 | Moved from Ch. 22, no changes to rule text                                 |
| 22.136   | 24.136                   | Acid rain permit issuance procedures—completeness                            | Acid rain permit issuance procedures—completeness                            | Moved from Ch. 22, no changes to rule text                                 |
| 22.137   | 24.137                   | Acid rain permit issuance procedures—statement of basis                      | Acid rain permit issuance procedures—statement of basis                      | Moved from Ch. 22, no changes to rule text                                 |
| 22.138   | 24.138                   | Issuance of acid rain permits  | Issuance of acid rain permits  | Moved from Ch. 22, some language updated to remove old dates and deadlines |
| 22.139   | 24.139                   | Acid rain permit appeal procedures   | Acid rain permit appeal procedures   | Moved from Ch. 22, no changes to rule text                                 |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b> | <b>Current Title &amp; Description</b> | <b>Action Taken</b>  |
|--|--------------------------|--|--|--|
| 22.140   | 24.140                   | Permit revisions—general   | Permit revisions—general               | Moved from Ch. 22, some language updated to remove old dates                         |
| 22.141   | 24.141                   | Permit modifications   | Permit modifications                   | Moved from Ch. 22, no changes to rule text   |
| 22.142   | 24.142                   | Fast-track modifications   | Fast-track modifications               | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference            |
| 22.143   | 24.143                   | Administrative permit amendment                                  | Administrative permit amendment        | Moved from Ch. 22, some language updated to remove fax option                        |
| 22.144   | 24.144                   | Automatic permit amendment                                       | Automatic permit amendment             | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference            |
| 22.145   | 24.145                   | Permit reopenings  | Permit re-openings                     | Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference            |
| 22.146   | 24.146                   | Compliance certification—annual report                           | Compliance certification—annual report | Moved from Ch. 22, no changes to rule text   |
| 22.147   | 24.147                   | Compliance certification—units with repowering extension plans   | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.148   | 24.148                   | Sulfur dioxide opt-ins   | Sulfur dioxide opt-ins                 | Moved from Ch. 22, some language updated to update the 40 CFR Part 74 amendment date |
| 22.149 - 22.199                                    | 24.149 - 24.299          | Reserved   | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.200   | 24.200 - 24.299          | Definitions for voluntary operating permits                      | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.201   | 24.200 - 24.299          | Eligibility for voluntary operating permits                      | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.203   | 24.200 - 24.299          | Voluntary operating permit applications                          | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.204   | 24.200 - 24.299          | Voluntary operating permit fees                                  | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.205   | 24.200 - 24.299          | Voluntary operating permit processing procedures                 | Reserved                               | Moved from Ch. 22, no changes to rule text   |
| 22.206   | 24.200 - 24.299          | Permit content   | Reserved                               | Moved from Ch. 22, no changes to rule text   |



| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>       | <b>Current Title &amp; Description</b>                            | <b>Action Taken</b>   |
|--|--------------------------|--|---|---|
| 22.207   | 24.200 - 24.299          | Relation to construction permits                                       | Reserved  | Moved from Ch. 22, no changes to rule text  |
| 22.208   | 24.200 - 24.299          | Suspension, termination, and revocation of voluntary operating permits | Reserved  | Moved from Ch. 22, no changes to rule text  |
| 22.209   | 24.200 - 24.299          | Change of ownership for facilities with voluntary operating permits    | Reserved  | Moved from Ch. 22, no changes to rule text  |
| 22.210 - 22.299                                    | 24.200 - 24.299          | Reserved   | Reserved  | Moved from Ch. 22, no changes to rule text  |
| <b>Chapter 23</b>                                  |                          |  |   |   |
| <b>23</b>  | <b>23</b>                | <b>Emission Standards</b>  | <b>Air Emission Standards</b>                                     | <b>Kept</b>   |
| 23.1   | 23.1                     | Emission standards   | Emission standards  | Kept, language updated, tables used   |
| 23.2   | 23.2                     | Open burning   | Open burning  | Kept, some language updated   |
| 23.3   | 23.3                     | Specific contaminants  | Specific contaminants   | Kept, some language updated   |
| 23.4   | 23.4                     | Specific processes   | Specific processes  | Kept, some language updated   |
| 23.5   | 23.5                     | Anaerobic lagoons  | Anaerobic lagoons   | Kept, some language updated   |
| 23.6   | 23.6                     | Alternative emission limits (the “bubble concept”)                     | Reserved  | Removed   |
| <b>Chapter 24</b>                                  |                          |  |   |   |
| <b>24</b>  | <b>(New) 21</b>          | <b>Excess Emissions</b>  | <b>Compliance, Excess Emissions, and Measurement of Emissions</b> | <b>Moved rules and combined</b> with Ch. 21.<br><br><b>Moved operating permit rules</b> here (to Ch. 24). |
| 24.1   | 21.7                     | Excess emission reporting  | Excess emission reporting   | Moved from Ch. 24, some language updated  |
| 24.2   | 21.8                     | Maintenance and repair requirements                                    | Maintenance and repair requirements                               | Moved from Ch. 24, some language updated  |
| <b>Chapter 25</b>                                  |                          |  |   |   |
| <b>25</b>  | <b>(New) 21</b>          | <b>Emissions Measurement</b>   | <b>Compliance, Excess Emissions, and Measurement of Emissions</b> | <b>Moved rules and combined</b> with Ch. 21.<br><br><b>Rescinded</b> Ch. 25. (Reserved)                   |
| 25.1   | 21.10                    | Testing and sampling of new and existing equipment                     | Testing and sampling of new and existing equipment                | Moved from Ch. 25, some language updated  |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b> | <b>Current Title &amp; Description</b>                            | <b>Action Taken</b>   |
|--|--------------------------|--|---|---|
| 25.2   | 21.11                    | Continuous emission monitoring under the acid rain program       | Continuous emission monitoring under the acid rain program        | Moved from Ch. 25, some language updated  |
| 25.3   |                          | Mercury emissions testing and monitoring                         | N/A   | Rescinded. Except 25.3(5)   |
| 25.3(5)  | 21.12                    | Affected sources subject to Section 112(g)                       | Affected sources subject to Section 112(g)                        | Moved from Ch. 25, some language updated  |
| <b>Chapter 26</b>                                  |                          |  |   |   |
| <b>26</b>  | <b>(New) 21</b>          | <b>Emergency Air Pollution Episodes</b>                          | <b>Compliance, Excess Emissions, and Measurement of Emissions</b> | <b>Moved rules and combined</b> with Ch. 21.<br><b>Rescinded</b> Ch. 26. (Reserved) |
| 26.1   | 21.14                    | Prevention of air pollution emergency episodes - General         | Prevention of air pollution emergency episodes                    | Moved from Ch. 26, some language updated  |
| 26.2   | 21.15                    | Episode criteria   | Episode criteria  | Moved from Ch. 26, some language updated  |
| 26.3   | 21.16                    | Preplanned abatement strategies                                  | Preplanned abatement strategies                                   | Moved from Ch. 26, some language updated  |
| 26.4   | 21.17                    | Actions taken during episodes                                    | Actions taken during episodes                                     | Moved from Ch. 26, some language updated  |
| Ch 26<br>Table III                                 | Table I                  | Abatement strategies emission reduction actions alert level      | Abatement strategies emission reduction actions alert level       | Moved from Ch. 26, reference federal appendix table                                 |
| Ch 26<br>Table IV                                  | Table II                 | Abatement strategies emission reduction actions warning level    | Abatement strategies emission reduction actions warning level     | Moved from Ch. 26, reference federal appendix table                                 |
| Ch 26<br>Table V                                   | Table III                | Abatement strategies emission reduction actions emergency level  | Abatement strategies emission reduction actions emergency level   | Moved from Ch. 26, reference federal appendix table                                 |
| <b>Chapter 27</b>                                  |                          |  |   |   |
| <b>27</b>  | <b>27</b>                | <b>Local Program Acceptance</b>                                  | <b>Local Program Acceptance</b>                                   | <b>Kept</b>   |
| 27.1   | 27.1                     | General  | General   | Kept, some language updated   |
| 27.2   | 27.2                     | Certificate of acceptance  | Certificate of acceptance   | Kept, some language updated   |
| 27.3   | 27.3                     | Ordinance or regulations   | Ordinance or regulations  | Kept, some language updated   |

| Previous Chapter #<br>(Prior to 5/15/2024) | Current Chapter # | Previous Title & Description<br>(Prior to 5/15/2024)                | Current Title & Description   | Action Taken   |
|--|-------------------|---|---|--|
| 27.4                                       | 27.4              | Administrative organization   | Administrative organization   | Kept, some language updated  |
| 27.5                                       | 27.5              | Program activities  | Program activities  | Kept, some language updated  |
| <b>Chapter 28</b>                          |                   |   |   |  |
| <b>28</b>                                  | <b>22</b>         | <b>NAAQS</b>  | <b>N/A</b>  | <b>Moved rules and combined</b> with Ch. 22.<br><b>Rescinded</b> Ch. 28. (Reserved)      |
| 28.1                                       | 22.11             | Ambient air quality standards - Statewide standards                 | Ambient air quality standards                                       | <b>Moved from Ch. 28</b> , minor language updated<br><b>Rescinded</b> Ch. 28. (Reserved) |
| <b>Chapter 29</b>                          |                   |   |   |  |
| <b>29</b>                                  | <b>(New) 21</b>   | <b>Opacity Qualifications</b>                                       | <b>Compliance, Excess Emissions, and Measurement of Emissions</b>   | <b>Moved rules and combined</b> with Ch. 21.<br><b>Rescinded</b> Ch. 29. (Reserved)      |
| 29.1                                       | 21.13             | Methodology and qualified observer                                  | Methodology and qualified observer                                  | Moved from Ch. 29, some language updated   |
| <b>Chapter 30</b>                          |                   |   |   |  |
| <b>30</b>                                  | <b>30</b>         | <b>Fees</b>   | <b>Fee</b>  | <b>Kept</b>  |
| 30.1                                       | 30.1              | Purpose   | Purpose   | Kept, language updated   |
| 30.2                                       | 30.2              | Fees associated with new source review applications                 | Fees associated with new source review applications                 | Kept, some language updated  |
| 30.3                                       | 30.3              | Fees associated with asbestos demolition or renovation notification | Fees associated with asbestos demolition or renovation notification | Kept, some language updated  |
| 30.4                                       | 30.4              | Fees associated with Title V operating permits                      | Fees associated with Title V operating permits                      | Kept, some language updated  |
| 30.5                                       | 30.5              | Fee advisory groups   | Fee advisory groups   | Kept, language updated   |
| 30.6                                       | 30.6              | Process to establish or adjust fees and notification of fee rates   | Process to establish or adjust fees and notification of fee rates   | Kept, some language updated  |
| 30.7                                       | 30.7              | Fee revenue   | Reserved  | Language removed   |
| <b>Chapter 31</b>                          |                   |   |   |  |
| <b>31</b>                                  | <b>31</b>         | <b>Nonattainment Areas</b>  | <b>Nonattainment New Source Review</b>                              | <b>Kept</b>  |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>   | <b>Current Title &amp; Description</b>   | <b>Action Taken</b>                       |
|--|--------------------------|--|--|---|
| 31.1   | 31.1                     | Permit requirements relating to nonattainment areas  | Permit requirements relating to nonattainment areas                                    | Kept, some language updated               |
| 31.2   | 31.2                     | Conformity of general federal actions to the Iowa state implementation plan or federal implementation plan - Rescinded | Reserved   | Language removed                          |
| 31.3   | 31.3                     | Nonattainment new source review requirements for areas designated nonattainment on or after May 18, 1998               | Nonattainment new source review (NNSR) requirements for areas designated nonattainment | Kept, some language updated               |
| 31.4   | 31.4                     | Preconstruction review permit program  | Preconstruction review permit program  | Kept                                      |
| 31.5 - 31.8  | 31.5 - 31.8              | Reserved   | Reserved   | Kept                                      |
| 31.9   | 31.9                     | Actuals PALs   | Actuals PALs   | Kept, some language updated               |
| 31.10  | 31.10                    | Validity of rules  | Validity of rules  | Kept                                      |
| 31.11 - 31.19                                      | N/A                      | Reserved   | N/A  | Rescinded and removed                     |
| 31.20  | N/A                      | Special requirements for nonattainment areas designated before May 18, 1998  | N/A  | Rescinded and removed                     |
| <b>Chapter 32</b>                                  |                          |  |  |   |
| <b>32</b>  | <b>N/A</b>               | <b>AFO Field Study</b>   | <b>N/A</b>   | <b>Rescinded Ch. 32. (Reserved)</b>       |
| 32.1   | N/A                      | Animal feeding operations field study  | N/A  | Rescinded, reserved, and language removed |
| 32.2   | N/A                      | Definitions  | N/A  | Rescinded, reserved, and language removed |
| 32.3   | N/A                      | Exceedance of the health effects value (HEV) for hydrogen sulfide  | N/A  | Rescinded, reserved, and language removed |
| 32.4   | N/A                      | Exceedance of the health effects standard (HES) for hydrogen sulfide   | N/A  | Rescinded, reserved, and language removed |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>   | <b>Current Title &amp; Description</b>  | <b>Action Taken</b>                       |
|--|--------------------------|--|---|---|
| 32.5   | N/A                      | Iowa Air Sampling Manual   | N/A   | Rescinded, reserved, and language removed |
| <b>Chapter 33</b>                                  |                          |  |   |   |
| <b>33</b>  | <b>33</b>                | <b>Special regulations and construction permit requirements for major stationary sources—<br/>Prevention of significant deterioration (PSD) of air quality</b> | <b>Construction permit requirements for major stationary sources—<br/>Prevention of significant deterioration (PSD)</b> | <b>Kept</b>                               |
| 33.1   | 33.1                     | Purpose  | Purpose   | Kept, some language updated               |
| 33.2   | 33.2                     | Reserved   | Reserved  | Kept                                      |
| 33.3   | 33.3                     | Special construction permit requirements for major stationary sources in areas designated attainment or unclassified (PSD)                                     | PSD construction permit requirements for major stationary sources   | Kept, some language updated               |
| 33.4 - 33.8  | 33.4 - 33.8              | Reserved   | Reserved  | Kept                                      |
| 33.9   | 33.9                     | Plantwide applicability limitations (PALs)   | Plantwide applicability limitations (PALs)  | Kept, some language updated               |
| 33.10  | 33.10                    | Exceptions to adoption by reference  | Exceptions to adoption by reference   | Kept, some language updated               |
| <b>Chapter 34</b>                                  |                          |  |   |   |
| <b>34</b>  | <b>N/A</b>               | <b>Emissions Trading-CAIR-CAMR</b>   | <b>N/A</b>  | <b>Rescinded Ch. 34. (Reserved)</b>       |
| 34.1   | N/A                      | Purpose  | N/A   | Rescinded, reserved, and language removed |
| 34.2 - 34.199                                      | N/A                      | Reserved   | N/A   | Rescinded, reserved, and language removed |
| 34.200   | N/A                      | Provisions for air emissions trading and other requirements for the Clean Air Interstate Rule (CAIR) - rescinded   | N/A   | Rescinded, reserved, and language removed |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>             | <b>Current Title &amp; Description</b> | <b>Action Taken</b>                       |
|--|--------------------------|--|--|---|
| 34.201   | N/A                      | CAIR NOx annual trading program general provisions - rescinded               | N/A                                    | Rescinded, reserved, and language removed |
| 34.202   | N/A                      | CAIR designated representative for CAIR NOx sources - rescinded              | N/A                                    | Rescinded, reserved, and language removed |
| 34.203   | N/A                      | Permits - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.204   | N/A                      | Reserved   | N/A                                    | Rescinded, reserved, and language removed |
| 34.205   | N/A                      | CAIR NOx allowance allocations - rescinded                                   | N/A                                    | Rescinded, reserved, and language removed |
| 34.206   | N/A                      | CAIR NOx allowance tracking system - rescinded                               | N/A                                    | Rescinded, reserved, and language removed |
| 34.207   | N/A                      | CAIR NOx allowance transfers - rescinded                                     | N/A                                    | Rescinded, reserved, and language removed |
| 34.208   | N/A                      | Monitoring and reporting - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.209   | N/A                      | CAIR NOx opt-in units - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.210   | N/A                      | CAIR SO2 trading program - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.211 - 34.219                                    | N/A                      | Reserved   | N/A                                    | Rescinded, reserved, and language removed |
| 34.220   | N/A                      | CAIR NOx ozone season trading program - rescinded                            | N/A                                    | Rescinded, reserved, and language removed |
| 34.221   | N/A                      | CAIR NOx ozone season trading program general provisions - rescinded         | N/A                                    | Rescinded, reserved, and language removed |
| 34.222   | N/A                      | CAIR designated representative for CAIR NOx ozone season sources - rescinded | N/A                                    | Rescinded, reserved, and language removed |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b>  | <b>Current Title &amp; Description</b> | <b>Action Taken</b>                       |
|--|--------------------------|---|--|---|
| 34.223   | N/A                      | CAIR NOx ozone season permits - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.224   | N/A                      | Reserved  | N/A                                    | Rescinded, reserved, and language removed |
| 34.225   | N/A                      | CAIR NOx ozone season allowance allocations - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.226   | N/A                      | CAIR NOx ozone season allowance tracking system - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.227   | N/A                      | CAIR NOx ozone season allowance transfers - rescinded   | N/A                                    | Rescinded, reserved, and language removed |
| 34.228   | N/A                      | CAIR NOx ozone season monitoring and reporting - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.229   | N/A                      | CAIR NOx ozone season opt-in units - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.230 - 34.299                                    | N/A                      | Reserved  | N/A                                    | Rescinded, reserved, and language removed |
| 34.300   | N/A                      | Provisions for air emissions trading and other requirements for the Clean Air Mercury Rule (CAMR) - rescinded | N/A                                    | Rescinded, reserved, and language removed |
| 34.301   | N/A                      | Mercury (Hg) budget trading program general provisions - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.302   | N/A                      | Hg designated representative for Hg budget sources - rescinded  | N/A                                    | Rescinded, reserved, and language removed |
| 34.303   | N/A                      | General Hg budget trading program permit requirements - rescinded   | N/A                                    | Rescinded, reserved, and language removed |

| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b> | <b>Current Title &amp; Description</b> | <b>Action Taken</b>                       |
|--|--------------------------|--|--|---|
| 34.304   | N/A                      | Hg allowance allocations - rescinded                             | N/A                                    | Rescinded, reserved, and language removed |
| 34.305   | N/A                      | Hg allowance tracking system - rescinded                         | N/A                                    | Rescinded, reserved, and language removed |
| 34.307   | N/A                      | Monitoring and reporting - rescinded                             | N/A                                    | Rescinded, reserved, and language removed |
| 34.308   | N/A                      | Performance specifications - rescinded                           | N/A                                    | Rescinded, reserved, and language removed |
| <b>Chapter 35</b>                                  |                          |  |  |   |
| <b>35</b>  | <b>N/A</b>               | <b>Grant Assistance Programs</b>                                 | <b>N/A</b>                             | <b>Rescinded Ch. 35. (Reserved)</b>       |
| 35.1   | N/A                      | Purpose  | N/A                                    | Rescinded, reserved, and language removed |
| 35.2   | N/A                      | Definitions  | N/A                                    | Rescinded, reserved, and language removed |
| 35.3   | N/A                      | Role of the department of natural resources                      | N/A                                    | Rescinded, reserved, and language removed |
| 35.4   | N/A                      | Eligible projects  | N/A                                    | Rescinded, reserved, and language removed |
| 35.5   | N/A                      | Forms  | N/A                                    | Rescinded, reserved, and language removed |
| 35.6   | N/A                      | Project selection  | N/A                                    | Rescinded, reserved, and language removed |
| 35.7   | N/A                      | Funding sources  | N/A                                    | Rescinded, reserved, and language removed |
| 35.8   | N/A                      | Type of financial assistance                                     | N/A                                    | Rescinded, reserved, and language removed |
| 35.9   | N/A                      | Term of loans  | N/A                                    | Rescinded, reserved, and language removed |
| 35.10  | N/A                      | Reduced award  | N/A                                    | Rescinded, reserved, and language removed |
| 35.11  | N/A                      | Fund disbursement limitations                                    | N/A                                    | Rescinded, reserved, and language removed |
| 35.12  | N/A                      | Applicant cost share   | N/A                                    | Rescinded, reserved, and language removed |



| <b>Previous Chapter #<br/>(Prior to 5/15/2024)</b> | <b>Current Chapter #</b> | <b>Previous Title &amp; Description<br/>(Prior to 5/15/2024)</b> | <b>Current Title &amp; Description</b> | <b>Action Taken</b>                       |
|--|--------------------------|--|--|---|
| 35.13  | N/A                      | Eligible costs   | N/A                                    | Rescinded, reserved, and language removed |
| 35.14  | N/A                      | Ineligible costs   | N/A                                    | Rescinded, reserved, and language removed |
| 35.15  | N/A                      | Written agreement  | N/A                                    | Rescinded, reserved, and language removed |

## Appendix B: Applicable Federal Standards

A list of the promulgated NSPS rules, EPA Region 7 staff contact information (for questions pertaining to the rule), compliance assistance links and a link to each NSPS and NESHAP can be found at the link below:

<https://www.epa.gov/caa-permitting/air-technology-standards-region-7>

### 40 CFR Part 60 – New Source Performance Standards

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**Subpart A** – General Provisions

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-A?toc=1>

**Subpart Dc** – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Dc?toc=1>

**Subpart Kb** – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Kb?toc=1>

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

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-DD?toc=1>

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

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-VV?toc=1>

**Subpart IIII** – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-IIII?toc=1>

### 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants

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**Subpart A** – General Provisions

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-A>

**Subpart FFFF** – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-FFFF?toc=1>

**Subpart ZZZZ** – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZ>

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

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-DDDDD?toc=1>

## Appendix C: CAM Plan(s) Summary

### I. Background

#### A. Emission Unit

Description: See Table 98 for full listing  
Identification: See Table 98 for full listing  
Facility: Vantage Corn Processors, LLC  
Cedar Rapids, IA

#### B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: See Table 98 for full listing  
Emission Limit or Standard: See Table 98 for full listing  
Current Monitoring Requirements: See Table 99 for full listing

#### C. Control Technology

See Table 98 for full listing

### II. Monitoring Approach

#### General Monitoring Guidelines

- CAM involves the observation of control equipment indicators. See Table 99 for full listing. This plan defines acceptable ranges for these indicators. CAM also includes control equipment inspections when excursions of the indicator have taken place and possible corrective action and maintenance, if necessary.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.

#### Excursion from Compliance

- An excursion occurs when an observed compliance indicator is outside of its defined applicable indicator range during normal operations, not including startup and shutdown events. An excursion does not necessarily indicate a violation of applicable permit terms, conditions, and/or requirements. However, an excursion must be reported in the Annual Compliance Certification Report.
- Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion.

#### A. Indicator

See Table 99 for a full list of monitoring indicators identified by emission point and associated control equipment.

#### B. Measurement Approach

See Table 99 for individual monitoring frequencies for each of the selected monitoring indicators identified by emission point and associated control equipment.

#### C. Indicator Range\

See Table 99 for the appropriate indicator range(s) for each of the selected monitoring indicators identified by emission point and associated control equipment. An excursion is defined as an observation of a monitoring indicator that falls outside/below the identified

indicator range. Where no visible emissions are the monitoring indicator, the presence of visible emissions is defined as an excursion. Excursions trigger an inspection, corrective action, and a recordkeeping requirement.

D. Performance Criteria

Data representativeness:

Excursions from the normal operating range(s) of the monitoring indicators listed in Table 99 could reveal a decrease in the performance of the control equipment and potentially result in an increase of emissions if corrective actions are not initiated.

Recordkeeping and Reporting  
(Verification of operational status):

Record any excursions and corrective actions, inspections, and maintenance resulting from readings outside/below the indicator range, or the presence of visible emissions. Records of the monitoring indicator measurements shall be kept for a minimum of five (5) years and shall be available for inspection by the federal, state, and local air pollution regulatory agencies and/or their representatives. Records shall be legible and maintained in an orderly manner.

QA/QA Practices and Criteria:

All instruments and control equipment will be calibrated, maintained, and operated according to the manufacturer's specifications. For visible emissions observations as identified in Table 99, observe no emissions are being emitted. If any emission is seen, the system is immediately shut down for review.

Data Collection Procedure:

Monitoring indicators are recorded in the plant information system and will be maintained for 5 years. Operator logs and maintenance records will be kept for 5 years.

Averaging Period:

None

Corrective Action:

In all cases, corrective action shall be taken as soon as possible, but later than 8 hours from the observation of the excursion.

**Table 98. Compliance Assurance Monitoring Plan Summary Table**

| SEP  | EU                | EU Description   | CE Description & CE ID                          | Pollutant | Emission Limit(s)            | Regulation No.                                      |
|------|-------------------|--|---|-----------|------------------------------|---|
| 403  | 403A              | Hammermill #1  | Baghouse 403A<br>Baghouse 403B<br>Baghouse 403C | PM        | 0.004 gr/dscf<br>0.1 gr/dscf | PSD Permit #07-A-535-P3<br>LCPH ATI 7543 / PTO 7362 |
|      | 403B              | Hammermill #2  |   |           |                              |   |
|      | 403C              | Hammermill #3  |   |           |                              |   |
|      | 403D              | Hammermill #4  |   |           |                              |   |
|      | 403F              | Hammermill #5  |   |           |                              |   |
|      | 403G              | Hammermill #6  |   |           |                              |   |
|      | 403H              | Hammermill #7  |   |           |                              |   |
|      | 403I              | Elevator to Mill Corn Belt Conveyor A                                    |   |           |                              |   |
|      | 403J              | Elevator to Mill Corn Belt Conveyor B                                    |   |           |                              |   |
|      | 403M              | Rotex Scalper A  |   |           |                              |   |
|      | 403N              | Rotex Scalper B  |   |           |                              |   |
|      | 403O              | Mill Storage Hopper A  |   |           |                              |   |
|      | 403P              | Mill Storage Hopper B  |   |           |                              |   |
|      | 403Q              | Mill Flour Drag A  |   |           |                              |   |
| 403R | Mill Flour Drag B |  |   |           |                              |   |
| 403S | Mill Blender A    |  |   |           |                              |   |
| 403T | Mill Blender B    |  |   |           |                              |   |
| 478  | 478<br>478A       | DDGS Flat Storage Ventilation<br>DDGS Rail Loading Shuttle Drag Conveyor | Baghouse 478                                    | PM        | 0.1 gr/dscf<br>1.03 lb/hr    | LCPH ATI 7391 / PTO 7055                            |

**Table 99. Summary of CAM Required Monitoring**

| SEP | Pollutant | Current Monitoring Requirements | Monitoring Indicator | Indicator Range                    | Measurement Approach                                   | Monitoring Frequency |
|-----|-----------|---------------------------------|----------------------|------------------------------------|--|----------------------|
| 403 | PM        | Visual emissions                | VE                   | No VE                              | Visible emissions from baghouse exhaust                | Weekly               |
|     |           | Differential pressure           | $\Delta P$           | $\geq 0.3$ and $\leq 5.0$ in. W.C. | Differential pressure measurement using pressure gauge | Daily                |
| 478 | PM        | Visual emissions                | VE                   | No VE                              | Visible emissions from baghouse exhaust                | Weekly               |
|     |           | Differential pressure           | $\Delta P$           | $\geq 0.5$ and $\leq 8.0$ in. W.C. | Differential pressure measurement using pressure gauge | Daily                |

## Appendix D: Opacity Monitoring Summary

The facility shall check the opacity periodically when the emission units listed in Table 100 are at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five (5) years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight (8) hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity greater than the Opacity Limit from emission units listed in Table 100, this would be a violation and corrective action will be taken as soon as possible, but no later than eight (8) hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts during the required observation period have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

**Table 100. Opacity Monitoring**

| SEP ID | EU ID | Opacity Limit <sup>1</sup> | Frequency |
|--------|-------|----------------------------|-----------|
| 400    | All   | 0%                         | Weekly    |
| 401    | All   | 0%                         | Weekly    |
| 403    | All   | 0%                         | Weekly    |
| 420    | All   | 0%                         | Weekly    |
| 422    | 422   | 0%                         | Weekly    |
| 423    | 423   | 0%                         | Weekly    |
| 425    | 425   | 0%                         | Weekly    |
| 426    | 426   | 0%                         | Weekly    |
| 427    | 427   | 0%                         | Weekly    |

| SEP ID | EU ID     | Opacity Limit <sup>1</sup> | Frequency |
|--------|-----------|----------------------------|-----------|
| 428    | 428       | 0%                         | Weekly    |
| 429    | 429       | 0%                         | Weekly    |
| 450    | 450       | 0%                         | Weekly    |
| 451    | 450       | 0%                         | Weekly    |
| 478    | 478, 478A | 20%                        | Weekly    |
| 481    | All       | 0%                         | Weekly    |
| 482    | 482       | 0%                         | Weekly    |
| 497    | All       | 0%                         | Weekly    |

<sup>1</sup> Opacity limit listed in this table is the most restrictive of all applicable opacity limits.

Authority for Requirement: 567 IAC 24.108(14)

## Appendix E: Stack Testing Summary

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. *567 IAC 21.10(7)*

**Table 101. Stack Testing Summary**

| SEP ID | Description                               | Pollutant              | Deadline(s) | Test Method  |
|--------|---|------------------------|-------------|--|
| 400    | South Grain Receiving & Storage           | PM                     | //          | 40 CFR 60, Appendix A, Method 5<br>40 CFR 51, Appendix M, Method 202     |
| 401    | North Grain Receiving & Storage           | PM                     | //          | 40 CFR 60, Appendix A, Method 5<br>40 CFR 51, Appendix M, Method 202     |
| 420    | Distillation, Dehydration, & Fermentation | VOC                    | //          | 40 CFR 63, Appendix A, Method 320 or<br>40 CFR 60, Appendix A, Method 18 |
| 425    | Indirect-Fired DDGS Dryer #1              | VOC                    | //          | 40 CFR 63, Appendix A, Method 320 or<br>40 CFR 60, Appendix A, Method 18 |
| 426    | Indirect-Fired DDGS Dryer #2              | VOC                    | //          | 40 CFR 63, Appendix A, Method 320 or<br>40 CFR 60, Appendix A, Method 18 |
| 428    | Indirect-Fired DDGS Dryer #4              | VOC                    | //          | 40 CFR 63, Appendix A, Method 320 or<br>40 CFR 60, Appendix A, Method 18 |
| 429    | Indirect-Fired DDGS Dryer #5              | VOC                    | //          | 40 CFR 63, Appendix A, Method 320 or<br>40 CFR 60, Appendix A, Method 18 |
| 478    | DDGS Flat Storage Ventilation             | PM<br>PM <sub>10</sub> | //          | 40 CFR 60, Appendix A, Method 5<br>40 CFR 51, Appendix M, Method 202     |

Authority for Requirement: 567 IAC 24.108(3)



## Appendix F: Compliance Plan Summary

The owner of this equipment or the owner's authorized agent shall complete the compliance actions outlined in Table 102 before the specified deadline. These compliance actions are required in lieu of delaying the issuance of this Title V operating permit and reflect corrections to permit language or actions required to return to compliance at the specified equipment.

**Table 102. Compliance Plan Summary**

| <b>SEP ID</b> | <b>Description of EU</b>        | <b>Description of Change Requiring Permit Modification</b>  | <b>Compliance Deadline</b>               |
|---------------|---------------------------------|---|--|
| 400           | South Grain Receiving & Storage | Update associated emission units on PSD Permit #07-A-533-P1 | Within 6 months of Title V issuance date |
| 401           | North Grain Receiving & Storage | Update associated emission units on PSD Permit #07-A-534-P1 | Within 6 months of Title V issuance date |