

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
And  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Aventine Renewable Energy, Inc.  
Attn: Jerry Weiland  
1300 South Second Street  
Pekin, Illinois 61554

<u>Application No.:</u> 96030001	<u>I.D. No.:</u> 179060ACR
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 1, 1996
<u>Operation of:</u> Corn Wet Milling & Ethanol Production Operations	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Source Location:</u> 1300 South Second Street, Pekin, Tazewell County	
<u>Responsible Official:</u> Ronald H. Miller, President	

This permit is hereby granted to the above-designated Permittee to OPERATE a Corn Wet Milling & Ethanol Production Plant at 1300 S. Second Street, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 2  
USEPA

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	6
3.0 INSIGNIFICANT ACTIVITIES	8
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	10
5.0 OVERALL SOURCE CONDITIONS	11
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NO <sub>x</sub> TRADING PROGRAM	17
6.1 Description of NO <sub>x</sub> Trading Program	
6.2 Applicability	
6.3 General Provisions of the NO <sub>x</sub> Trading Program	
6.4 Requirements for NO <sub>x</sub> Allowances	
6.5 Monitoring Requirements for Budget Units	
6.6 Recordkeeping Requirements for Budget Units	
6.7 Reporting Requirements for Budget Units	
6.8 Allocation of NO <sub>x</sub> Allowances to Budget Units	
6.9 Eligibility to Obtain NO <sub>x</sub> Allowances from the New Source Set-Aside (NSSA)	
6.10 Eligibility for Early Reduction Credits (ERC)	

	<u>PAGE</u>
6.11 Budget Permit Required by the NO <sub>x</sub> Trading Program	
6.12 References	
7.0 UNIT SPECIFIC CONDITIONS	25
7.1 Grain Unloading and Handling	
7.2 Steep Acid Preparation System	
7.3 Germ Drying and Handling	
7.4 Gluten Drying and Handling	
7.5 Fiber Drying and Milling	
7.6 Fermentation	
7.7 Yeast Processing	
7.8 Ethanol Distillation	
7.9 Ethanol Storage Tanks and Load Out Operations	
7.10 Steam Production	
7.11 Waste Water Treatment Plant	
7.12 Supplemental Plant Handling Processes	
8.0 GENERAL PERMIT CONDITIONS	94
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	
9.0 STANDARD PERMIT CONDITIONS	99
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

	<u>PAGE</u>
10.0 ATTACHMENTS	
10.1 Attachment 1 - PM <sub>10</sub> Emission Limits for Certain Operations	1-1
10.2 Attachment 2 - Allowable Emissions of Particulate Matter	
10.3 Attachment 3 - Example Certification by a Responsible Official	3-1
10.4 Attachment 4 - Guidance on Revising This Permit	4-1
10.5 Attachment 5 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)	5-1
10.6 Attachment 6 - Guidance on Renewing This Permit	6-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Aventine Renewable Energy, Inc.  
1300 South Second Street  
Pekin, Illinois 61554  
309/347-9241

I.D. No.: 179060ACR  
Standard Industrial Classification: 2869, Industrial Organic  
Chemical

1.2 Owner/Parent Company

Aventine Renewable Energy, LLC.  
1300 South Second Street  
Pekin, Illinois 61554

1.3 Operator

Aventine Renewable Energy, Inc.  
1300 South Second Street  
Pekin, Illinois 61554

Contact Person's Name:  
Steve Antonacci  
309/347-9241

1.4 General Source Description

Aventine Renewable Energy, Inc. is located at 1300 South Second Street in Pekin and produces both beverage and fuel ethanol. The source is capable of producing around 110 million gallons of ethanol per year. The process of making ethanol starts by using starch, one of the products of the corn milling operation. The starch is converted to simple sugars and then fermented to produce ethyl alcohol. The fermented product and yeast are separated from the ethyl alcohol. The ethyl alcohol is purified to 190 proof and 200 proof and is either denatured for an automobile fuel additive or sent out as an industrial (beverage) grade alcohol. Aventine Renewable Energy, Inc. supplies CO<sub>2</sub> (byproduct from the fermentation/distillation operations) to two independently operated plants (Continental Carbonic and Boc Gas), located on its property, for their production needs. All three facilities are considered a single source for the purposes of the Title V Program and 40 CFR 52.21. Illinois EPA shall pursue Continental Carbonic and Boc Gas for applying for two separate CAAPP permits.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
Cd	Cadmium
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EP	Emission Point/Process
°F	Degrees Fahrenheit
ft	Feet
G	Grams
gal	Gallons
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HMIWI	Hospital/Medical/Infectious Waste Incinerator
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mg	milligram
mmBtu	Million British thermal units

FINAL DRAFT/PROPOSED CAAPP PERMIT  
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I.D. No.: 179060ACR  
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mmscf	Million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
Pb	Lead
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO <sub>2</sub>	Sulfur Dioxide
T	Ton
TEQ	Toxic equivalency
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Woodworking Operations

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

#### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
  - 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
  - 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.3 Addition of Insignificant Activities
- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
  - 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
  - 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	Grain Unloading and Handling	Prior to 1972	Baghouses
Unit 2	Steep Acid Preparation System	Prior to 1972	Scrubber
Unit 3	Germ Drying and Handling	Prior to 1972; 1974; 1977; 1990	Cyclones
Unit 4	Gluten Drying and Handling	Prior to 1972; 1984; 1990	Cyclones
Unit 5	Fiber Drying and Milling	Prior to 1972; 1984; 1991	Scrubber; Thermal Oxidizer; Baghouses
Unit 6	Fermentation	1981; 1992	Scrubber
Unit 7	Yeast Processing	1999	Scrubber; Baghouse
Unit 8	Ethanol Distillation	1981; 1992	Scrubbers
Unit 9	Ethanol Storage Tanks and Load Out Operations	1981; 1986; 1992; 1995	Vapor Combustion Unit for truck bays (proposed)
Unit 10	Steam Production	1944; 1958; 1976	Cyclones; Electrostatic Precipitator
Unit 11	Waste Water Treatment Plant	Prior to 1972; 1988	Flare (for anaerobic digester)
Unit 12	Supplemental Plant Handling Processes	1973	Cyclone; Baghouses

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, CO and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 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 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
  - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of

the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

Emission limitations are not set for this source for the purpose of permit fees. The Permittee shall be required to pay the maximum fee of \$250,000.00 per year, pursuant to Section 39.5(18) (a) (ii) (A) of the Act.

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

None

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7) (b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

- a. Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

5.10 Pending USEPA actions

The USEPA has been reviewing operations and assessing emissions from the ethanol production plants across the country. Such review may be finalized by establishing some source-specific emission limits and/or requirements through Consent Decree or other available enforcement tools. This permit does not reflect this ongoing investigation and does not shield Aventine Renewable Energy, Inc from any requirements that would be applicable for this source as a result of the USEPA actions. This permit shall be revised accordingly, if any additional/new requirements for this particular source will be established by USEPA.

5.10 PM<sub>10</sub> Limits

As a part of the proposed settlement of enforcement case of Midwest Grain (located on the adjacent property), the Illinois EPA and Aventine Renewable Energy have agreed on establishing limits for certain emission units that will adequately protect NAAQS for PM<sub>10</sub> emissions at this area. These limits may be found in Attachment 1 of this permit.

## 6.0 NO<sub>x</sub> TRADING PROGRAM

### 6.1 Description of NO<sub>x</sub> Trading Program

The NO<sub>x</sub> Trading Program is a regional "cap and trade" market system for large sources of NO<sub>x</sub> emissions in the eastern United States, including Illinois. It is designed to reduce and maintain NO<sub>x</sub> emissions from the emission units covered by the program within a budget to help contribute to attainment and maintenance of the ozone ambient air quality standard in the multi-state region covered by the program, as required by Section 126 of the CAA. The NO<sub>x</sub> Trading Program applies in addition to other applicable requirements for NO<sub>x</sub> emissions and in no way relaxes these other requirements.

Emission units that are subject to the NO<sub>x</sub> Trading Program are referred to as "budget units." Sources that have one or more budget unit subject to the NO<sub>x</sub> Trading Program are referred to as budget sources.

The NO<sub>x</sub> Trading Program controls NO<sub>x</sub> emissions from budget units during a seasonal control period from May 1 through September 30 of each year, when weather conditions are conducive to formation of ozone in the ambient air. (In 2004, the first year that the NO<sub>x</sub> Trading Program is in effect, the control period will be May 31 through September 30.) By November 30 of each year, the allowance transfer deadline, each budget source must hold "NO<sub>x</sub> allowances" for the actual NO<sub>x</sub> emissions of its budget units during the preceding control period. The USEPA will then retire NO<sub>x</sub> allowances in the source's accounts in amounts equivalent to its seasonal emissions. If a source does not have sufficient allowances in its accounts, USEPA would subtract allowances from the source's future allocation for the next control period and impose other penalties as appropriate. Stringent monitoring procedures developed by USEPA apply to budget units to assure that actual emissions of NO<sub>x</sub> emissions are accurately determined.

The number of NO<sub>x</sub> allowances available for budget sources is set by the overall budget for NO<sub>x</sub> emissions established by USEPA. This budget requires a substantial reduction in NO<sub>x</sub> emissions from historical levels as necessary to meet air quality goals. In Illinois, separate rules have been established for the budget units that are electrical generating units (EGU) and for large units at manufacturing plants and institutions (non EGU), like the boilers at this source. Under these rules, the allocation or share of the NO<sub>x</sub> allowances for non-EGU is set in an amount established by rule [35 IAC Part 217, Appendix E]. New budget unit, for which limited operating data may be available, may

obtain NO<sub>x</sub> allowances from the new source set-aside (NSSA), a portion of the overall budget reserved for new budget units.

In addition to directly receiving or purchasing NO<sub>x</sub> allowances as described above, budget sources may transfer NO<sub>x</sub> allowances from one of their units to another. They may also purchase allowances in the marketplace from other sources that are willing to sell some of the allowances that they have received. Each budget source must designate an account representative to handle all its allowance transactions. The USEPA, in a central national system, will maintain allowance accounts and record transfer of allowances among accounts.

The ability of sources to transfer allowances will serve to minimize the costs of reducing NO<sub>x</sub> emissions from budget units to comply with the overall NO<sub>x</sub> budget. In particular, the NO<sub>x</sub> emissions of budget units that may be most economically controlled will be targeted by sources for further control of emissions. This will result in a surplus of NO<sub>x</sub> allowances from those units that can be transferred to other units at which it is more difficult to control NO<sub>x</sub> emissions. Experience with reduction of sulfur dioxide emissions under the federal Acid Rain program has shown that this type of trading program not only achieves regional emission reductions in a more cost-effective manner but also results in greater overall reductions than application of traditional emission standards to individual emission units.

The USEPA developed the plan for the NO<sub>x</sub> Trading Program with assistance from affected states. Illinois' rules for the NO<sub>x</sub> Trading Program are located at 35 IAC Part 217, Subpart U and W, for non-EGUs and EGUs, respectively. These rules have been approved by the USEPA. These rules provide for interstate trading of NO<sub>x</sub> allowances, as mandated by Section 9.9 of the Act. Accordingly, these rules refer to and rely upon federal rules at 40 CFR Part 96, which have been developed by USEPA for certain aspects of the NO<sub>x</sub> Trading Program, and which an individual state must follow to allow for interstate trading of allowances.

Note: This narrative description of the NO<sub>x</sub> Trading Program is for informational purposes only and is not enforceable.

## 6.2 Applicability

- a. The following emission units are budget units for purposes of Illinois' NO<sub>x</sub> Trading Program. Accordingly, this source is a budget source and the Permittee is the owner or operator of a budget source and budget units. In this

section of this permit, these emission units are addressed as budget units.

Coal-Fired Boiler "C"

- b. This Permit does not provide "low-emitter status" for the above emission units pursuant to 35 IAC 217.472.

6.3 General Provisions of the NO<sub>x</sub> Trading Program

- a. This source and the budget units at this source shall comply with all applicable requirements of Illinois' NO<sub>x</sub> Trading Program, i.e., 35 IAC Part 217, Subpart U, and 40 CFR Part 96 (excluding 40 CFR 96.4(b) and 96.55(c), and excluding 40 CFR 96, Subparts C, E and I), pursuant to 35 IAC 217.456(a) and 217.456(f) (2).
- b. Any provision of the NO<sub>x</sub> Trading Program that applies to a budget source (including any provision applicable to the account representative of a budget source) shall also apply to the owner and operator of such budget sources and to the owner and operator of each budget unit at the source, pursuant to 35 IAC 217.456(f) (3).
- c. Any provision of the NO<sub>x</sub> Trading Program that applies to a budget EGU (including any provision applicable to the account representative of a budget unit) shall also apply to the owner and operator of such budget unit. Except with regard to requirements applicable to budget units with a common stack under 40 CFR 96, Subpart H, the owner and operator and the account representative of one budget unit shall not be liable for any violation by any other budget unit of which they are not an owner or operator or the account representative, pursuant to 35 IAC 217.456(f) (4).

6.4 Requirements for NO<sub>x</sub> Allowances

- a. Beginning in 2004, by November 30 of each year, the allowance transfer deadline, the account representative of each budget unit at this source must hold allowances available for compliance deductions under 40 CFR 96.54 in the budget unit's compliance account or the source's overdraft account in an amount that shall not be less than the budget unit's total NO<sub>x</sub> emissions for the preceding control period (rounded to the nearest whole ton), as determined in accordance with applicable monitoring requirements, plus any number of allowances necessary to account for actual utilization (e.g., for testing, start-

up, malfunction, and shut down) under 40 CFR 96.42(e) for the control period, pursuant to 35 IAC 217.456(d)(1). For purposes of this requirement, an allowance may not be utilized for a control period in a year prior to the year for which the allowance is allocated, pursuant to 35 IAC 217.456(d)(4).

- b. The account representative of a budget unit that has excess emissions in any control period, i.e., NO<sub>x</sub> emissions in excess of the number of NO<sub>x</sub> allowances held as provided above, shall surrender allowances as required for deduction under 40 CFR 96.54(d)(1), pursuant to 35 IAC 217.456(f)(5). In addition, the owner or operator of a budget unit that has excess emissions shall pay any fine, penalty, or assessment, or comply with any other remedy imposed under 40 CFR 96.54(d)(3) and the Act, pursuant to 35 IAC 217.456(f)(6). Each ton of NO<sub>x</sub> emitted in excess of the number of NO<sub>x</sub> allowances held as provided above for each budget unit for each control period shall constitute a separate violation of 35 IAC Part 217 and the Act, pursuant to 35 IAC 217.456(d)(3).
  
- c. An allowance allocated by the Illinois EPA or USEPA under the NO<sub>x</sub> Trading Program is a limited authorization to emit one ton of NO<sub>x</sub> in accordance with the NO<sub>x</sub> Trading Program. As explained by 35 IAC 217.456(d)(5), no provisions of the NO<sub>x</sub> Trading Program, the budget permit application, the budget permit, or a retired unit exemption under 40 CFR 96.5 and no provision of law shall be construed to limit the authority of the United States or the State of Illinois to terminate or limit this authorization. As further explained by 35 IAC 217.456(d)(6), an allowance allocated by the Illinois EPA or USEPA under the NO<sub>x</sub> Trading Program does not constitute a property right. As provided by 35 IAC 217.456(d)(2), allowances shall be held in, deducted from, or transferred among allowances accounts in accordance with 35 IAC Part 217, Subpart U, and 40 CFR 96, Subparts F and G.

#### 6.5 Monitoring Requirements for Budget Units

- a. The Permittee shall comply with the monitoring requirements of 40 CFR Part 96, Subpart H, for the budget unit and the compliance of the budget unit with the emission limitation under 6.4(a) shall be determined by the emission measurements recorded and reported in accordance with 40 CFR 96, Subpart H, pursuant to 35 IAC 217.456(c)(1) and (c)(2).

- b. The account representative for the source and the budget unit at the source shall comply with those sections of the monitoring requirements of 40 CFR 96, Subpart H, applicable to an account representative, pursuant to 35 IAC 217.456(c) (1).

Note: Pursuant to 40 CFR 96.70(b), existing budget units are to begin complying with applicable monitoring requirements of 40 CFR Part 96 at least one year in advance of the start of the first control period governed by the NO<sub>x</sub> Trading Program.

#### 6.6 Recordkeeping Requirements for Budget Units

Unless otherwise provided below, the Permittee shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This 5-year period may be extended for cause at any time prior to the end of the 5 years, in writing by the Illinois EPA or the USEPA.

- a. The account certificate of representation of the account representative for the source and each budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 40 CFR 96.13, as provided by 35 IAC 217.456(e) (1) (A). These certificates and documents must be retained on site at the source for at least 5-years after they are superseded because of the submission of a new account certificate of representation changing the account representative.
- b. All emissions monitoring information, in accordance with 40 CFR 96, Subpart H, (provided that to the extent that 40 CFR 96, Subpart H, provides for a 3-year period for retaining records, the 3-year period shall apply), pursuant to 35 IAC 217.456(e) (1) (B).
- c. Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO<sub>x</sub> Trading Program or documents necessary to demonstrate compliance with requirements of the NO<sub>x</sub> Trading Program, pursuant to 35 IAC 217.456(e) (1) (C).
- d. Copies of all documents used to complete a budget permit application and any other submission under the NO<sub>x</sub> Trading Program, pursuant to 35 IAC 217.456(e) (1) (D).

6.7 Reporting Requirements for Budget Units

- a. The account representative for this source and each budget unit at this source shall submit to the Illinois EPA and USEPA the reports and compliance certifications required under the NO<sub>x</sub> Trading Program, including those under 40 CFR 96, Subparts D and H, and 35 IAC 217.474, pursuant to 35 IAC 217.456(e) (2).
- b. Notwithstanding the provisions for CAAPP permits, these submittals need only be signed by the designated representative, who may serve in place of the responsible official for this purpose, as provided by Section 39.5(1) of the Act, and submittals to the Illinois EPA need only be made to the Illinois EPA, Air Compliance Unit.

6.8 Allocation of NO<sub>x</sub> Allowances to Budget Units

- a. As the budget units identified in Condition 6.2(a) are "existing" units listed in 35 IAC Part 217, Appendix E, these units are entitled to NO<sub>x</sub> allowances as specified by Appendix E, subject to transfers of allowances from the source made in accordance with 35 IAC 217.462(b). (The portion of Appendix E that applies to the Permittee is provided in Condition 6.12.) The number of NO<sub>x</sub> allowances actually allocated for these budget units shall be the number of NO<sub>x</sub> allowances allocated by the Illinois EPA in accordance with 35 IAC 217.466(a) and issued by USEPA, which may reflect adjustments to the overall allocations to budget units as provided for by 35 IAC 217.460 and 217.462(c).
- b. To the extent that NO<sub>x</sub> allowances remain in the NSSA after any allocation for new budget units, the Permittee is also entitled to a pro-rata share of such remaining allowances as provided by 35 IAC 217.466(d).

6.9 Eligibility to Obtain NO<sub>x</sub> Allowances from the New Source Set-Aside (NSSA)

The Permittee is not eligible to obtain NO<sub>x</sub> allowances from the NSSA for the budget units identified in Condition 6.2(a), as provided by 35 IAC 217.468, because the units are "existing" budget units.

6.10 Eligibility for Early Reduction Credits (ERC)

The Permittee is not eligible to request NO<sub>x</sub> allowances for the budget units identified in Condition 6.2(a) for any early

reductions in NO<sub>x</sub> emissions prior to the 2004 control period, as provided by 35 IAC 217.470, because these units are not equipped with continuous emission monitoring systems for NO<sub>x</sub>.

6.11 Budget Permit Required by the NO<sub>x</sub> Trading Program

- a. For this source, this segment of the CAAPP Permit, i.e., Section 6, is the Budget Permit required by the NO<sub>x</sub> Trading Program and is intended to contain federally enforceable conditions addressing all applicable NO<sub>x</sub> Trading Program requirements. This Budget Permit shall be treated as a complete and segregable portion of the source's permit, as provided by 35 IAC 217.458(a)(2).
- b. The Permittee and any other owner or operator of this source and each budget unit at the source shall operate the budget units in compliance with this Budget Permit, pursuant to 35 IAC 217.456(b)(2).
- c. No provision of this Budget Permit or the associated application shall be construed as exempting or excluding the Permittee, or other owner or operator and, to the extent applicable, the account representative of a budget source or budget unit from compliance with any other regulation or requirement promulgated under the CAA, the Act, the approved State Implementation Plan, or other federally enforceable permit, pursuant to 35 IAC 217.456(g).
- d. Upon recordation by USEPA under 40 CFR 96, Subpart F or G, every allocation, transfer, or deduction of an allowance to or from the budget units' compliance accounts or to or from the source's general or overdraft account is deemed to amend automatically and become part of this budget permit, pursuant to 35 IAC 217.456(d)(7). This automatic amendment of this budget permit shall be deemed an operation of law and will not require any further review.
- e. No revision of this Budget Permit shall excuse any violation of the requirements of the NO<sub>x</sub> Trading Program that occurs prior to the date that the revision to this permit takes effect, pursuant to 35 IAC 217.456(f)(1).
- f. The Permittee, or other owner or operator of the source, shall reapply for a Budget Permit for the source as required by 35 IAC Part 217, Subpart U and Section 39.5 of the Act. For purposes of the NO<sub>x</sub> Trading Program, the application shall contain the information specified by 35 IAC 217.458(b)(2).

FINAL DRAFT/PROPOSED CAAPP PERMIT  
 Aventine Renewable Energy, Inc.  
 I.D. No.: 179060ACR  
 Application No.: 96030001  
 July 29, 2003

6.12 References

35 IAC Part 217 Appendix E - (provisions applicable to the Permittee)

Company ID No./Name	Unit Designation	Unit Description	Budget Allocation	Budget Allocation Less 3% NSSA
179060ACR Williams	73020087019	Boiler "C"	377	366
Company's Total Allocation			377	366

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1 Grain Unloading and Handling

7.1.1 Description

Corn enters the facility by truck or railcar. Corn is delivered to dump pits and then transported from the pits into storage silos. The central vacuum cleaning system is used on as needed basis for the grain elevator and used to collect spilled corn cleaning materials from the floor in the elevator. The grain handling dust control system is the grain handling and grain cleaning systems.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 1	<ul style="list-style-type: none"> <li>• Truck Unloading</li> <li>• Rail Unloading</li> <li>• Grain Handling Dust Control</li> <li>• Central Vacuum Cleaning</li> <li>• Corn Cleaning System</li> </ul>	Baghouse  Baghouse  Baghouse  Baghouse  Baghouse (Building 17)

7.1.3 Applicability Provisions and Applicable Regulations

- a. An affected "grain unloading and handling unit" is an emission unit, described in Conditions 7.1.1 and 7.1.3.
- b. An affected grain unloading and handling unit is subject to requirements of 35 IAC 212.461(b) and 212.462. These requirements are discussed further in this section.

7.1.4 Non-Applicability of Regulations of Concern

35 IAC 212.302(a), 212.321, and 212.322 shall not apply to grain-handling equipment pursuant to 35 IAC 212.461(a).

7.1.5 Operating Requirements and Work Practices

- a. Each affected grain unloading and handling unit is subject to the following housekeeping practices:
  - i. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.
  - ii. Cleaning and Maintenance.
    - A. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tend to rot or become airborne.
    - B. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.
    - C. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.
  - iii. Dump Pit.
    - A. Aspiration equipment shall be maintained and operated.
    - B. Dust control devices shall be maintained and operated.
  - iv. Head House. The head house shall be maintained in such a fashion that visible quantities of dust or dirt are not allowed to escape to the atmosphere.
  - v. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.
  - vi. Housekeeping Check List. Housekeeping check lists to be developed by the Illinois EPA shall be completed by the manager and maintained on the premises for inspection by

the Illinois EPA personnel [35 IAC  
212.461(b)].

- b. Each affected grain unloading and handling unit is subject to the following requirements of 35 IAC 212.462:

i. Cleaning and Separating Operations

- A. Particulate matter generated during cleaning and separating operations shall be captured to the extent necessary to prevent visible particulate matter emissions directly into the atmosphere.
- B. For grain-handling sources having a grain through-put exceeding 2 million bushels per year and located within a major population area, air contaminants collected from cleaning and separating operations shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere.

ii. Major Dump-Pit Area

- A. Induced Draft.
1. Induced draft shall be applied to major dump pits and their associated equipment (including, but not limited to, boots, hoppers and legs) to such an extent that a minimum face velocity is maintained, at the effective grate surface, sufficient to contain particulate emissions generated in unloading operations. The minimum face velocity at the effective grate surface shall be at least 200 fpm, which shall be determined by using the equation:

$$V = Q/A$$

where:

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

V = face velocity; and  
Q = induced draft volume in scfm;  
and  
A = effective grate area in ft<sup>2</sup>;  
and

2. The induced draft air stream for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be confined and conveyed through air pollution control equipment which has an overall rated and actual particulate collection efficiency of not less than 98 percent by weight; and
3. Means or devices (including, but not limited to, quick-closing doors, air curtains or wind deflectors) shall be employed to prevent a wind velocity in excess of 50 percent of the induced draft face velocity at the pit; provided, however, that such means or devices do not have to achieve the same degree of prevention when the ambient air wind exceeds 25 mph. The wind velocity shall be measured, with the induced draft system not operating, at a point midway between the dump-pit area walls at the point where the wind exits the dump-pit area, and at a height above the dump-pit area floor of approximately 2 ft; or
4. Any equivalent method, technique, system or combination thereof adequate to achieve, at a minimum, a particulate matter emission reduction equal to the reduction which could be achieved by compliance with 35 IAC 212.462(b)(1).

iii. Internal Transferring Area

- A. Internal transferring area shall be enclosed to the extent necessary to prohibit visible particulate matter emissions directly into the atmosphere.
- B. Air contaminants collected from internal transfer operations for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere.

iv. Load-Out Area

- A. Truck and hopper car loading shall employ socks, sleeves or equivalent devices which extend 6 inches below the sides of the receiving vehicle, except for topping off. Choke loading shall be considered an equivalent method as long as the discharge is no more than 12 inches above the sides of the receiving vehicle.
- B. Box car loading shall employ means or devices to prevent the emission of particulate matter into the atmosphere to the fullest extent, which is technologically and economically feasible.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected grain unloading and handling unit is subject to the following limits:

Unit/Operation	Operating Hours	PM Emissions	
	Hr/Yr	Lb/Hr	T/Yr
Truck Grain Unloading	5,304	6.1	16.4
Rail Grain Unloading	6,084	5.5	17.0
Grain Handling Dust Control	8,736	6.2	27.1
Central Vacuum Cleaning System	2,080	0.08	0.1
Corn Cleaning System	8,736	1.56	6.8

These limitations were established in Operating Permit 92010082. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

Compliance with annual limits for all emission units described in Condition 7.1.6 shall be determined based on the 12 months of data.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected grain unloading and handling unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Amount of grain transferred (bushels/tons per month and bushels/tons per year) individually for each grain unloading and handling unit and totally for entire group.
- b. Hours of operation (hr/yr) for each affected unit/operation described in Condition 7.1.6.
- c. Emissions calculated based on the procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected grain unloading and handling unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such

deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.461 and 212.462 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected grain unloading and handling unit.
- b.  $PM_{10}$  Emissions = (Air flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [100 - (Efficiency, %)/100]

7.2 Unit 2 Steep Acid Preparation System

7.2.1 Description

The steep acid preparation system is a system that converts sulfur into sulfurous acid that will be used for the steeping process. The sulfurous acid is used to soften the corn kernel that will allow easier milling and separation of the different products of the kernel. The only emissions from this system are SO<sub>2</sub>.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 2	Sulfur Towers	Scrubber

7.2.3 Applicability Provisions and Applicable Regulations

- a. An affected "steep acid preparation system" is an emission unit described in Conditions 7.2.1 and 7.2.2.
- b. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].

7.2.4 Non-Applicability of Regulations of Concern

None

7.2.5 Operating Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the scrubber, including periodic inspection, routine maintenance and repair of defects.
- b. Total sulfur usage is limited to 961,750 pounds per year.
- c. At least 48% of the sulfur added to steepwater shall be retained in products shipped from the plant.

7.2.6 Emission Limitations

None

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected steep acid preparation system to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total sulfur usage on the monthly and annual basis (T/mo and T/yr).
- b. Total SO<sub>2</sub> derived from burning sulfur (T/mo and T/yr).
- c. Engineering estimate of SO<sub>2</sub> retention in the product (wt.%).
- d. Total emissions of SO<sub>2</sub> calculated based on the procedures established in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected steep acid preparation system with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the emission limits established of Condition 7.2.3(b) is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected steep acid preparation system.
- b. Monthly and annual emissions of SO<sub>2</sub> shall be calculated based on the following mass balance equation:

$$\text{Emissions} = \text{SO}_2 \text{ Processed} - [(\text{Retention in Products}) \\ + (\text{Concentration in Waste Water and Incoming Corn})]$$

7.3 Unit 3 Germ Drying and Handling

7.3.1 Description

Four germ dryers (## 1, 3, 5 and 6) are the steam tube dryers that reduce the moisture of the corn germ. A rotary dryer is a long tube that slopes slightly from one end to the other. The germ is introduced in the high end and as the tube turns, the germ is moved through dryer to the lower end. Hot air is circulated through the dryer to aid in moisture removal. As it nears the lower end, the product drops into a conveying system that transports it to its next location. The germ pneumatic cooler is a process that is used to cool hot, dry germ. The germ is mixed with cool air to lower its temperature, and then is divided among four cyclone separators to separate the germ from the air.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 3	Four germ dryers (P-17-02, P-17-06, P-17-09, P-17-10)	Cyclones
	Germ Pneumatic Transport Cooler (P-17-03)	Cyclone
	Germ Cooling System (P-17-13)	Cyclone

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected germ processing unit" is an emission unit as described in Conditions 7.3.1 and 7.3.2.
- b. Each affected germ processing unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Operating Requirements and Work Practices

The Permittee shall follow good operating practices for the cyclones, including periodic inspection, routine maintenance and repair of defects.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected germ processing unit is subject to the following limits:

Unit/Operation	Operating Hours	PM Emissions	
	Hr/Yr	Lb/Hr	T/Yr
Germ Dryers (I.D. P-17-06, 09, 10)	8,736	10.15	46.82
Germ Pneumatic Transport System (I.D. P-17-03)	8,736	1.39	6.09
Germ Cooling System (I.D. P-17-03)	8,736	2.0	8.74

These limitations were established in Operating Permit 92010082. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

Compliance with annual limits for all emission units described in Condition 7.1.6 shall be determined based on the 12 months of data.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected germ processing units to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Amount of germ processed through dryers and handling unit (T/mo and T/yr).
- b. Records of maintenance activities for germ processing units and associated cyclones.
- c. Monthly and annual emissions calculated in accordance with Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected germ processing units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with the PM/PM<sub>10</sub> emission limits of Condition 7.3.2(b) is assured and achieved by the proper operation and maintenance, as required by this

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

section and the work-practices inherent in operation of the affected germ processing units.

- b.  $PM/PM_{10}$  Emissions = (Air flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [100 - (Efficiency, %)/100]

7.4 Unit 4 Gluten Drying and Handling

7.4.1 Description

Gluten is dried with 2 direct-fired roll dryers: #4 and #9. Gluten dryer #4 is heated by using bio-gas (generated by the waste water treatment plant) as a primary fuel. The secondary fuel is natural gas. Fuel oil may be used in the event of a natural gas shortage. Gluten dryer #9 is heated by using a combination of natural gas and exhaust gas from the thermal oxidizer. Fuel oil also may be used in the event of a gas shortage. The gluten cooling system consists of a transport line to the storage hopper.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 4	Gluten Dryers ##4 and 9	Cyclones
	Gluten Transport Cooling System	Cyclone

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected gluten drying and handling system" is an emission unit as described in Conditions 7.4.1 and 7.4.2.
- b. Each affected gluten drying and handling system is subject to 35 IAC 212.321(b) (1), which provides that:
 

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operating Requirements and Work Practices

- a. Gluten dryer #4 is heated by using bio-gas (generated by the waste water treatment plant) as a primary fuel and the natural gas or fuel oil #2 as the back-up fuels.
- b. Gluten dryer #9 is heated by using a combination of natural gas and exhaust gases from the thermal oxidizer.
- c. Annual consumption of fuel oil in the gluten dryer #4 shall not exceed 165,000 gallons.
- d. The Permittee shall follow good operating practices for the cyclones, including periodic inspection, routine maintenance and repair of defects.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected gluten drying and handling system is subject to the following:

- a. Nitrogen oxide emissions from each affected gluten dryer shall not exceed 3.6 lb/hour and 15.7 ton/year.
- b. Sulfur dioxide from the gluten dryer #4 attributed to use of oil shall not exceed 7.2 lb/hr and 3.7 ton/year.

These limitations were established in Permit 92010082. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.4.7 Testing Requirements

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluten drying and handling system to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly and annual usage of the following fuels:
  - i. Natural gas (mmscf/mo and mmscf/yr);
  - ii. Biogas (mmscf/mo and mmscf/yr); and
  - iii. Fuel oil #2 (gal/mo and gal/yr).
- b. Amount of gluten processed for each individual gluten drying and handling unit (T/mo and T/yr).
- c. Records of maintenance activities for gluten drying/handling units and associated cyclones.
- d. Monthly and annual emissions calculated in accordance with Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected gluten drying and handling system with the permit requirements as follows, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this

permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the PM/PM<sub>10</sub> emission limits of Condition 7.4.2(b) is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected gluten drying and handling units.
- b.  $PM/PM_{10} \text{ Emissions} = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [100 - (\text{Efficiency, \%})/100]$
- c. Emissions attributed to the fuel combustion in the gluten dryers shall not exceed the following limits:

i. Natural Gas

Pollutant	Emission Factor (lb/mmscf)
PM	7.6
NO <sub>x</sub>	100.0 (35*)
VOM	5.5
CO	84.0

\* Manufacturer's emission factor used for low NO<sub>x</sub> burners of the Hot Water Heater

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

ii. Fuel Oil #2

Pollutant	Emission Factor (lb/1,000 gal)
PM	2.0
NO <sub>x</sub>	20.0
SO <sub>2</sub>	142S
CO	5.0

These are the emission factors for uncontrolled distillate fuel oil combustion, Table 1.3-1, Volume I, September 1998. "S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

iii. Biogas

Emission factors for this mode of operation shall be determined by the Permittee based on the composition of combusted biogases.

7.5 Unit 5 Fiber Drying and Milling

7.5.1 Description

The fiber dryers (3) are steam tube roll dryers. There are cyclones at the end of each dryer for capturing the product entrained in the dryer exhaust stream. The air from the dryers passes through a condensing scrubber and a thermal oxidizer. The exhaust from the thermal oxidizer is sent into dryer #9 firebox for supplemental heat. In the event that dryer #9 is down, the exhaust is sent through the thermal oxidizer stack. After the fiber is dried, it is cooled for storage. The pre-cooler is used during the warmer months in order to maintain the proper temperatures for the cooling system. The pre-cooler consists of a roll dryer that circulates ambient air while fiber is passing through the system. The fiber cooler consists of the same style roll dryers, which serve the same purpose as the pre-cooler. Lastly, fiber is sent through the hammermills to crush the fiber to a consistent size.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 5	Three Fiber Dryers; #2 Pre-cooler; Fiber Cooling System; Hammermill System	Condensing Scrubber; Thermal Oxidizer; Baghouses

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected fiber drying/milling processing unit" is an emission unit as described in Conditions 7.5.1 and 7.5.2.
- b. Each affected fiber drying/milling processing unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates

specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- d. Emissions of organic material in excess of those permitted by Section 215.301 are allowable if such emissions are controlled by thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].

7.5.4 Non-Applicability of Regulations of Concern

None

7.5.5 Operating Requirements and Work Practices

See Condition 7.5.7.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected fiber drying/milling processing unit are subject to the following:

See Condition 7.5.7.

7.5.7 Testing Requirements

Testing of the thermal oxidation system required by USEPA. This testing is to be conducted during the summer/fall of 2003. Revisions of Conditions 7.5.5, 7.5.6 and 7.5.7 are required after obtaining appropriate stack testing data.

7.5.8 Monitoring Requirements

- a. The afterburner combustion chamber for the afterburner shall be preheated to the manufacturer's recommended temperature and/or the temperature demonstrated during compliance testing (at least 95% destruction efficiency), before the fiber drying is begun, and this temperature shall be maintained during operation of the affected fiber drying/milling processing unit.
- b. The Permittee shall follow good operating practices for the afterburner and other air pollution control

devices including periodic inspection, routine maintenance and repair of defects.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fiber drying/milling processing unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly and annual fiber throughput (t/mo and t/yr);
- b. Temperature records flow chart of an oxidizer;
- c. Records of maintenance and inspection activities of air pollution control systems;
- d. Records of stack test results conducted on the affected fiber drying/milling processing unit; and
- e. Monthly and annual emissions calculated in accordance with Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected fiber drying/milling processing unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected fiber drying/milling processing unit.
- b. To determine compliance with Conditions 5.5.1, 7.5.3 and 7.5.6, VOM emissions from the affected fiber dryers shall be calculated based on the emission factors derived from the stack testing of the thermal oxidation system required by USEPA. This testing is to be conducted during the summer/fall of 2003. Revision of Condition 7.5.12 is required after obtaining appropriate VOM emission factors derived from the stack testing.

7.6 Unit 6 Fermentation

7.6.1 Description

The fermentation system consists of 12 tanks that convert sugar to alcohol and CO<sub>2</sub> using yeast. The sugar is derived from the breakdown of starch to dextrose. The process utilizes continuous fermentation to create alcohol. The alcohol at the end of the fermentation train is between 8-10%. At this stage it is called beer and is transferred to the beer well in the distillation system. The CO<sub>2</sub> is captured off the tanks and sold to processing plants adjacent to the facility. The VOM emissions, which are controlled by using 2 scrubbers, are not emitted from the fermentation process during normal operation, but are passed to distillation operations and collocated CO<sub>2</sub> plants along with CO<sub>2</sub> - a primary raw material component of their operations - where VOM emissions generated by fermentation are finally being released.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 6	Fermentation Tanks	Two CO <sub>2</sub> Scrubbers

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected fermentation unit" is an emission unit described in Conditions 7.6.1 and 7.6.2.
- b. An affected fermentation unit is subject to 35 IAC 215.302 that requires a reduction of 85% of uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.6.4 Non-Applicability of Regulations of Concern

- a. The affected fermentation unit is not subject to 40 CFR Part 60 Subparts NNN and RRR based on the exemption of the creation of ethanol by biological synthesis from the scope of these standards.
- b. The affected fermentation unit is not subject to requirements of 40 CFR 60.482 (Subpart VV) based on the definition of "in VOC service" (40 CFR 60.481), when the piece of equipment must contain or contact a process fluid that is at least 10 percent VOC by weight. At any time affected fermentation unit

contains less than above-mentioned VOC cut-off level and, therefore, exempt from the standards of 40 CFR 60.482.

- c. The affected fermentation unit is not subject to 35 IAC Subpart Q "Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment" because the applicability criteria of 35 IAC 215.421 (>10% percent of VOM) are not met.

#### 7.6.5 Operating Requirements and Work Practices

- a. At all times, the Permittee shall to the extent practicable, maintain and operate affected fermentation unit, including the CO<sub>2</sub> scrubbers, in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose the associated scrubbers shall achieve at least 95 percent control efficiency, for emissions of VOM, on the hourly average basis.
- b. Vent streams from the fermentation process and the distillation process, including existing beer column vent, shall either be ducted to an adjacent CO<sub>2</sub> plant operated under a supply contract with the Permittee or
- c. The Permittee shall operate, maintain, and repair all air pollution control equipment in a manner that assures that the applicable emission limits set in this permit are met at all times. The actions taken by the Permittee to meet this requirement shall include at least the following:
  - i. Written operating procedures shall be maintained and updated describing normal process and equipment operating parameters; monitoring or instrumentation for measuring control equipment operating parameters, if any; and control equipment inspection and maintenance practices. With respect to control equipment maintenance practices, the operating procedures may incorporate the manufacturers recommended operating instructions, if a copy of these instructions is attached to the procedures.
  - ii. Visual inspections of air pollution control equipment shall be conducted on a regular

schedule. These inspections shall include a detailed inspection of the performance and condition of control equipment at least once per year.

- iii. Prompt repairs shall be made upon identification of need, either as a consequence of formal inspections or other observations.
- iv. Written records of inspection, maintenance and repair activities shall be kept in accordance with Section 7.6.

7.6.6 Emission Limitations

It should be noted, that VOM emissions, which are controlled by using 2 scrubbers, are not emitted from the fermentation process during normal operation, but are passed through a closed loop piping systems to distillation operations and collocated CO<sub>2</sub> plants, along with alcohol and CO<sub>2</sub> - a primary raw material component of collocated CO<sub>2</sub> plants operations - where VOM emissions generated by fermentation are finally released.

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fermentation unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Production of CO<sub>2</sub> (T/mo and T/yr);
- b. Production of beer (T/mo and T/yr);
- c. The Permittee shall keep written records of inspections, other equipment observations, preventative maintenance, maintenance activities other than preventative maintenance, and repair of

air pollution control equipment, which include date, duration, nature, and description of observation or action.

- d. The Permittee shall record any period during which an emission source violated applicable emission limits, including the requirements of this permit, based upon the above records. This record shall include the cause for noncompliance, if known; the corrective action taken; and steps taken to prevent reoccurrence, if any.
- e. The VOM concentration in the product produced (wt. %).

#### 7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected fermentation unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

#### 7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.6.12 Compliance Procedures

Destruction efficiency of scrubbers shall be verified through the proper testing procedures established by USEPA.

7.7 Unit 7 Yeast Processing

7.7.1 Description

The whole beer from the ethanol distillation process first runs through a separation process. This removes the yeast solids from the whole beer. The clear liquid is sent to a 20,000-gallon tank (beer tank). The yeast slurry will be collected in one 7,500-gallon tank. The yeast slurry is then pumped to the still where alcohol and water are stripped from the yeast and sent to the beer tank. A vent on the still serves as an emission point. The concentrated yeast slurry is then pumped into a 7,500-gallon tank to be processed for drying operation or transferred to tank trucks. The yeast solids from the dryer supply tank are pressurized and sprayed into the drying chamber. Air heated from natural gas combustion is introduced to the drying chamber. The dried yeast separates out in cyclones located after the spray dryer. The air is then sent through a condensing scrubber. The solids from the dryer cyclones are pneumatically transported to the yeast hopper. The pneumatic transport system emissions are controlled by a baghouse dust collector. The yeast hopper has a bin vent filter to control the particulate from breathing losses. The packaging system has a vacuum line drawing particulate emissions into the baghouse dust collector.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 7	Yeast Still	None
	Yeast Spray Dryer (Firing Rate - 33.0 mmBtu/hr)	Condensing Scrubber
	Yeast Pneumatic Transport System	Baghouse
	Yeast Hopper	None
	Beer Tank	None

7.7.3 Applicability Provisions and Applicable Regulations

- a. An "affected yeast processing unit" is an emission unit described in Conditions 7.7.1 and 7.7.2 above.
- b. Each affected yeast processing unit is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.7.4 Non-Applicability of Regulations of Concern

None

7.7.5 Operating Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the wet scrubber, including periodic inspection, routine maintenance and repair of defects.
- b. The spray dryer shall use only natural gas as a fuel.
- c. The amount of yeast produced shall not exceed 4,421 lb/hour.

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected yeast processing unit is subject to the following:

- a. PM<sub>10</sub> emissions

<u>Item of Equipment</u>	<u>PM-10 Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Spray Dryer with Scrubber	1.16	5.08
Dried Yeast Transport with Baghouse	0.004	0.02
Dried Yeast Hopper with Filter	0.013	<u>0.06</u>
TOTAL:		5.16

b. NO<sub>x</sub> emissions

<u>Item of Equipment</u>	Nitrogen Oxide Emissions	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Spray Dryer with Scrubber	1.98	8.67

c. CO Emissions

<u>Item of Equipment</u>	Carbon Monoxide Emissions	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Spray Dryer with Scrubber	2.73	11.96

d. VOM Emissions

<u>Item of Equipment</u>	VOM Emissions	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Still Supply Tank	1.22	5.34
Distillation Column	1.80	7.88
Dryer Supply Tank	0.01	0.04
Spray Dryer with Scrubber	2.71	11.87
Beer Tank	0.61	<u>2.67</u>

TOTAL: 27.80

e. These limitations were established in Operating Permit 98030024. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

f. Compliance with annual limits for all emission units described in Condition 7.7.6 shall be determined based on the 12 months of data.

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

The operating pressure drop across each baghouse shall be measured during normal plant operating conditions, at least once a day. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's specifications.

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected yeast processing unit to demonstrate compliance with Conditions 5.5.1 and 7.7.6 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the pressure drop measurements across each baghouse as established in Condition 7.7.8.
- b. Records of maintenance and inspection activities of air pollution control systems.
- c. Natural gas usage for dryer (mmscf/month and mmscf/yr).
- d. Type and amount of yeast produced (lb/day).
- e. Monthly and annual emissions calculated in accordance with Condition 7.7.12.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

- a. Compliance with the PM emission limits established by Condition 7.7.3(b) is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected yeast processing unit.
- b. Compliance with emission limits of Condition 7.7.6 shall be calculated based on the following emission

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

factors derived from the stack testing conducted on  
8/99:

Emissions	Emission Factor, Ton/Ton yeast produced
PM <sub>10</sub>	0.0002
NO <sub>x</sub>	0.0004
CO	0.0006
VOM	0.0014

7.8 Unit 8 Ethanol Distillation

7.8.1 Description

The distillation process begins at the beer well. A series of distillation columns use steam to drive off the impurities and concentrate the alcohol. The alcohol reaches 95% concentration with the columns. The final 5% water is removed using molecular sieves. The distillation process can produce 110 million gallons of alcohol per year. A substream of the distillation process is the Grain Neutral Spirit (GNS) distillation. 30 million gallons of the 110 million gallon rate can pass through this process. Alcohol from the middle of the distillation process is rehydrated then distilled again to remove impurities in the alcohol. 100% alcohol is produced using a molecular sieve.

The primary distillation system utilizes a scrubber to control VOM off the non-condensable gas stream.

The GNS non-condensable gas stream is tied into the CO2 header for fermentation. The CO2 header goes through scrubbers for VOM control.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 8	Ethanol Distillation	Secondary Vent Scrubber

7.8.3 Applicability Provisions and Applicable Regulations

- a. An "affected ethanol distillation unit" is an emission unit described in Condition 7.8.1 and 7.8.2.
- b. An affected ethanol distillation unit is subject to 35 IAC 215.302 that requires a reduction of 85% of uncontrolled organic material that would be otherwise emitted to the atmosphere.
- c. The affected ethanol distillation unit is subject to the New Source Performance Standard (NSPS) for Equipment Leaks of volatile organic compounds in the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 60, Subparts A and VV. Requirements of Subpart VV are discussed further in this Section. Requirements of Subpart VV are more stringent than

those established in 35 IAC Part 215 Subpart Q and, therefore, supersede requirements of Subpart Q.

7.8.4 Non-Applicability of Regulations of Concern

The affected ethanol distillation unit is not subject to 40 CFR Part 60 Subpart NNN and RRR based on the exemption of the creation of ethanol by biological synthesis from the scope of these standards.

7.8.5 Operating Requirements and Work Practices

- a. At all times, the Permittee shall to the extent practicable, maintain and operate affected ethanol distillation unit, including the secondary scrubber, in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose the secondary scrubber shall achieve at least 95 percent control efficiency, for emissions of VOM, on the hourly average basis.
- b. Annual plant production shall not exceed 110,000,000 gallons of alcohol.
- c. The following requirements of 40 CFR Part 60 Subpart VV shall be implemented:
  - i. Pumps in light liquid service (40 CFR 60.482-2);
  - ii. Compressors (40 CFR 60.482-3);
  - iii. Pressure relief devices in gas/vapor service (40 CFR 60.482-4);
  - iv. Sampling connection systems (40 CFR 60.482-5);
  - v. Open-ended valves or lines (40 CFR 60.482-6);
  - vi. Valves in gas/vapor service in light liquid service (40 CFR 60.482-7);
  - vii. Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors (40 CFR 60.482-8);
  - viii. Delay of repair (40 CFR 60.482-9); and

ix. Closed vent systems and control devices (40  
CFR 60.482-10)

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected ethanol distillation unit is subject to the following:

This permit is issued based on the total process emissions of VOM from the distillation area, as measured at the distillation scrubber, not exceeding 2 lb/hr and 8.78 tons/year.

The above limitations were established in Construction Permit 02080060, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.8.7 Testing Requirements

All necessary tests shall be conducted in accordance with testing requirements established by 40 CFR 60.485.

7.8.8 Monitoring Requirements

The Permittee shall install, operate and maintain measurement and monitoring devices for the following parameters on each scrubber:

- a. Scrubbant flow rate (gallons per minute).
- b. Pressure drop.
- c. These monitoring data shall be collected at all times that the scrubber is in use.

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected ethanol distillation unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Alcohol processed (gal/mo and gal/year).
- b. Log of equipment inspection and maintenance.
- c. Log of scrubbant flow rate and pressure drop inspection.
- d. Records of all leak detection activities as identified in 40 CFR 60.486.
- e. The information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1 to 60.482-10, as required by 40 CFR 60.486(e).
- f. Monthly and annual emissions calculated in accordance with Condition 7.8.12.

7.8.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected ethanol distillation unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

- b. The Permittee shall submit semiannual reports to the Illinois EPA as required by 40 CFR 60.487(a), (b), and (c).

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

- a. Compliance with requirements and standards established in 40 CFR Part 60 Subpart VV will be determined by review of records and report, review of performance test results, and inspections using the methods and procedures specified in 40 CFR 60.485.
- b. Compliance with emission limits of Condition 7.8.6 shall be calculated based on the emission factors derived from the recently conducted stack test.

7.9 Unit 9 Ethanol Storage Tanks and Load Out Operations

7.9.1 Description

After processing through distillation, ethanol is transferred to intermediate storage tanks, denaturated in the North Power tank, and then load out through barge, rail, and truck bays.

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 9	<u>Alcohol Storage Tanks:</u>	
	North Power Tank (denaturated ethanol) (1,266,000 gallons capacity)	Floating Roof
	South Power Tank (1,266,000 gallons)	Floating Roof
	North Intermediate Tank (63,000 gallons)	Floating Roof
	South Intermediate Tank (63,000 gallons)	Floating Roof
	Technical Alcohol Tank (50,000 gallons)	Floating Roof
	Rerun Tank (126,000 gallons)	Floating Roof
	Denaturant Tank (126,000 gallons)	Floating Roof
	East Industrial Alcohol Tank (30,000 gallons)	Floating Roof
	West Industrial Alcohol Tank (30,000 gallons)	Floating Roof
	<u>Ethanol Load Out Bays:</u>	
	Rail - five bays	None
	Truck - two bays	Vapor Combustion (proposed)
	Barge - one bay (located on the MGP Ingredients property)	None

7.9.3 Applicability Provisions and Applicable Regulations

- a. An "affected ethanol storage and load-out unit" is an emission unit described in Conditions 7.9.1 and 7.9.2.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].
- c. Emissions of organic material in excess of those permitted by Section 215.301 are allowable if such emissions are controlled by thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].
- d. Ethanol storage tanks, constructed after July 23, 1984, are subject to 40 CFR Part 60, Subpart Kb. Applicable requirements of Subpart Kb are discussed further in this Section.

7.9.4 Non-Applicability of Regulations of Concern

- a. Ethanol (alcohol) storage tanks are not by definition a petroleum liquid storage tanks pursuant to the definition established by USEPA and Illinois EPA. Therefore, ethanol storage tanks constructed before July 23, 1984 are not subject to 40 CFR Part 60, Subparts K and Ka.
- b. Ethanol storage tanks are not subject to 35 IAC 215.121 because the vapor pressure of ethanol is less than 17.24 kPa (2.5 psia).
- c. Storage tanks used for beverage alcohol are not subject to 40 CFR Part 60, Subpart Kb, pursuant to 40 CFR 60.110b(d) (7).

7.9.5 Operating Requirements and Work Practices

- a. At all times, the Permittee shall to the extent practicable, maintain and operate affected ethanol storage and load out unit, including control device(s), in a manner consistent with good air pollution control practice for minimizing emissions.
- b. The true vapor pressure of a dehydration agent stored shall not exceed 1.27 psia at 60°F.
- c. The true vapor pressure of denatured alcohol stored shall not exceed 1.5 psia at 60°F.
- d. The true vapor pressure of denaturant stored shall not exceed 4.9 psia at 60°F and the annual throughput of denaturant shall not exceed 5.5 million gallons.
- e. Loadout of ethanol shall be performed with submerged fill pipes into clean tanks or tanks in normal dedicated service to ethanol.
- f. Requirements for tanks with internal floating roofs, pursuant to 40 CFR 60.112b(1):
  - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
  - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
    - A. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall

of the storage vessel and the floating roof continuously around the circumference of the tank.

- B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
  - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- 5. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
  - 6. Rim space vents shall be equipped with a gasket and are to be set to open only when the

internal floating roof is not floating or at the manufacturer's recommended setting.

7. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
8. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

#### 7.9.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected ethanol storage and load-out units are subject to the following limits:

##### a. Storage Tanks

This permit is issued based on the total emissions of VOM from the storage tanks, not exceeding 5.7 tons/year.

##### b. Ethanol Load-out

This permit is issued based on the total emissions of VOM from all load-out areas (not considering proposed control track load-out), not exceeding 55.8 tons/year

These limitations of Conditions 7.9.6(a) and (b) above were established in Operating Permit 92010082. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

Compliance with annual limits for all emission units described in Condition 7.9.6 shall be determined based on the 12 months of data.

7.9.7 Testing Requirements

Testing of the storage tanks subject to 40 CFR 60, Subpart Kb shall be performed in accordance with testing requirements of 40 CFR 60.113b.

7.9.8 Monitoring Requirements

Records of the tank dimensions and a vapor pressure of liquids stored shall be kept and determined in accordance with 40 CFR 60.116b.

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected ethanol storage and load-out unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of ethanol transferred and load out by each individual group of load out bays (barge, rail, and truck) in gallons/month and gallons/year.
- b. Amount of ethanol throughput by each individual tank in gallons/month and gallon/year.
- c. Vapor pressure of liquids stored and transferred (kPa or psia).
- d. Log of maintenance and repair jobs performed.
- e. Stack test results of affected ethanol storage and load-out emission control unit (vapor combustion unit on track loading).
- f. Records of the tank dimensions in accordance with 40 CFR 60.116b.
- g. Monthly and annual emissions calculated in accordance with Condition 7.9.12.

7.9.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected ethanol storage and load-out unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

- a. Compliance with the emission limits established of Condition 7.9.3(b) is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected ethanol storage and load out unit.
- b. Monthly and annual VOM emissions from storage tanks shall be calculated based on the TANK program.
- c. Monthly and annual VOM emissions from load out operation shall be calculated based on the standard emissions factors for petroleum/gasoline loading losses established by AP-42, Tables 5.2-1 and 5.2-2.

7.10 Unit 10 Steam Production

7.10.1 Description

Boilers provide steam to the entire plant.

7.10.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
Unit 10	Boilers	Coal-fired Boilers "A" and "B" with a Maximum Heat Input - 242.0 mmBtu/hr each. Date of Construction: 1944	Multi-cyclone
		Coal/oil supplemental-fired Boiler "C" with a Maximum Heat Input - 330.0 mmBtu/hr. Date of Construction: 1958	Electrostatic Precipitator
		Natural gas/#2 Oil-fired Boiler "D" with a Maximum Heat Input - 195.0 mmBtu/hr. Date of Construction: 1976	None

7.10.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a boiler described in Conditions 7.10.1 and 7.10.2 above.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].
- c. The emissions of particulate matter into the atmosphere in any one-hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion unit using liquid fuel exclusively [35 IAC 212.206].

- d. Both affected boilers "A" and "B" are subject to the emission standard of 35 IAC 212.203(a) and PM emissions from burning solid fuel shall not exceed 0.2 lb/mmBtu in any one hour period for each boiler.
- e. An affected boiler "C" is subject to the emission standard of 35 IAC 212.202 and PM emissions from burning solid fuel shall not exceed 0.1 lb/mmBtu in any one hour period.
- f. An affected boiler "D" is subject to 35 IAC 214.122(b)(2). No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one-hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively:
  - To exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu).
- g. Affected boilers "A", "B", and "C" are subject to the following limit established by 35 IAC 214.141(b):
  - Existing industrial sources, not equipped with flue gas desulfurization systems as of December 1, 1980, located in the Peoria major metropolitan area, shall not exceed 5.5 pounds of sulfur dioxide per mmBtu of actual heat input (2,365 nanograms per joule) in any one-hour period.
- h. Affected boiler "C" is subject to requirements of 35 IAC Part 217, Subpart U "NO<sub>x</sub> Control and Trading Program For Specified NO<sub>x</sub> Generating Units". Certain requirements of Subpart U are discussed in Section 6.0 "NO<sub>x</sub> Trading Program".

#### 7.10.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boiler "D" not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

- b. This permit is issued based on the affected boilers "A", "B" and "D" not being subject to requirements of 35 IAC Part 217, Subpart U "NO<sub>x</sub> Control and Trading Program For Specified NO<sub>x</sub> Generating Units" because the firing rate of each of these boilers is less than 250 mmBtu/hr.
- c. All affected boilers are not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides From New Fuel Combustion Emission Sources, because either the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr) or construction was commenced prior to 1972.
- d. Pursuant to 35 IAC 215.303, any fuel combustion emission unit is not subject to 35 IAC Part 215, Subpart G: Use of Organic Material.
- e. Neither of the affected boilers "A", "B", "C" and "D" is subject to 40 CFR Part 60, Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units" because all these boilers had been constructed prior to June 19, 1984.

7.10.5 Operational and Production Limits and Work Practices

- a. Affected boiler "D" shall only be operated with natural gas or fuel oil #2 as the fuel.
- b. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of an affected boilers "A", "B", "C", and "D", the Permittee is authorized to continue operation of the affected boilers in violation of the applicable requirements of Conditions 7.10.3, as necessary to provide essential service, prevent risk of injury to personnel or severe damage to equipment, or if shutting down the boiler would lead to a greater amount of emissions during subsequent startup than would be caused by continuing to run the boiler for a short period until repairs can be made. This authorization is subject to the following requirements:

- i. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall as soon as practicable repair the affected boiler(s) or remove the boiler(s) from

service, so that excess emissions cease. This shall be accomplished within 6 hours or noon of the Illinois EPA's next business day, whichever is greater, unless the Permittee obtains an extension from the Illinois EPA. The Illinois EPA may grant such extension if the Permittee demonstrates that the affected boiler(s) could not be reasonably repaired or removed from service within the allowed time and that, based on the actions, which have been taken and will be taken, the Permittee is taking reasonable steps to minimize excess emissions and will repair the affected boiler(s) or remove it from service as soon as practicable.

- ii. The Permittee shall fulfill all applicable recordkeeping and reporting requirements of Conditions 7.10.9 and 7.10.10.
- iii. Following notification to the Illinois EPA of a malfunction or breakdown with excess emissions, the Permittee shall comply with all reasonable directives of the Illinois EPA with respect to such incident, pursuant to 35 IAC 201.263.

c. Startup Provisions

The Permittee is authorized to operate the affected boilers "A", "B", "C", and "D" in violation of the applicable limits of Conditions 7.9.3 during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual startups and frequency of startups. This authorization is subject to the following requirements:

- i. This authorization only extends for a period of up to 6 hours following initial firing of fuel during each startup event. This limitation shall not apply when extended low temperature operation of the boiler is necessary for replacement refractory curing or other required maintenance activities.
- ii. The Permittee shall conduct startup of the affected boilers in accordance with the

manufacturer's written or electronic instructions or other written or electronic instructions maintained on the site that are specifically developed to minimize excess emissions from both "cold" and "hot" startups and that include, at a minimum, the following measures:

- A. Review of the operational condition of the affected boilers prior to initiating startup of the boiler; and
- B. Periodic review of the operating parameters of the affected boilers during each startup accompanied by appropriate adjustments to the startup to reduce or eliminate excess emissions.

7.10.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected boilers are limited to the following:

None

7.10.7 Testing Requirements

Pursuant to 35 IAC 214.101(d), the Permittee shall analyze calendar weekly composites of daily samples of the coal burned in boilers "A", "B" and "C" and report these analyses to the IEPA on a quarterly basis. ASTM procedures shall be used for sulfur and heating value determinations.

7.10.8 Monitoring Requirements

None

7.10.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. For boilers "A", "B", "C", amount of coal consumed (tons/month and tons/year) and records for sulfur content (wt. %) in the coal received. Mine analysis of the coal supplied to the Permittee may be used to

satisfy coal sampling requirements, provided that sampling and analysis follow ASTM methods.

- b. Total amount of fuel oil #2 consumed (gal/mo and gal/yr).
- c. Total natural gas usage (mmscf/mo and mmscf/yr).
- d. Records of coal sampling analyses data, as specified in Condition 7.10.7.
- e. Records for Startups:
  - i. Records of the source's established startup procedures for affected boilers; and
  - ii. Records for each startup of an affected boiler that results in excess of opacity or regulated air pollution emissions.
- f. Records for Continued Operation during Malfunctions and Breakdowns:
  - i. A maintenance and repair log for each affected boiler and associated control equipment, listing each activity performed with date; and
  - ii. Records for each incident when operation of an affected boiler continued during malfunction or breakdown, including the following information:
    - A. Date and duration of malfunction or breakdown.
    - B. A description of the malfunction or breakdown.
    - C. The corrective actions used to reduce the quantity of emissions and the duration of the incident.
    - D. If excess emissions occurred for twelve or more hours:

An explanation why continued operation of the affected boiler was necessary.

The preventive measures planned or taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.

An estimate of the magnitude of excess emissions during the incident.

- g. Emissions of regulated air pollutants calculated based on compliance procedure established in Condition 7.10.12.

#### 7.10.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations in Conditions 7.10.3 and 7.10.6, as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

#### 7.10.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.10.12 Compliance Procedures

Compliance with the emission limits established in Condition 5.5 of this permit shall be based on the recordkeeping requirements of Condition 7.10.9 and the emission factors and formulas listed below:

a. Natural Gas Mode

Pollutant	Emission Factor (lb/10 <sup>6</sup> ft <sup>3</sup> )
PM	7.6
NO <sub>x</sub>	140.0
SO <sub>2</sub>	0.6
VOM	5.5
CO	84.0

These are the emission factors for uncontrolled natural gas combustion in large boilers with low-NO<sub>x</sub> burners (> 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

Emissions(lb) = natural gas consumed multiplied by the appropriate emission factor.

b. Boilers "C" and "D" (Fuel Oil #2)

Pollutant	Emission Factor (lb/10 <sup>3</sup> gal)
NO <sub>x</sub>	25
SO <sub>2</sub>	157S*
CO	5
PM	2

These are the emission factors for uncontrolled distillate fuel oil combustion, AP-42, Table 1.3-1, September 1998.

\* "S" indicates that the weight % of sulfur in the oil should be multiplied by the value given. With the fuel with 0.3% sulfur, "S" = 0.3

Emissions (lb) = fuel oil consumed multiplied by the appropriate emission factor.

c. Boilers "A", "B", "C" (Coal-fired)

Pollutant	Emission Factor (Uncontrolled) (lb/ton)
NO <sub>x</sub>	15
SO <sub>2</sub>	38S*
CO	0.5
PM	10A**
HCL	1.2

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

These are the emission factors for uncontrolled coal-fired boilers, AP-42, Tables 1.1-3 and 1.1-15 (for HCL).

\* "S" indicates that the weight % of sulfur in the coal should be multiplied by the value given. For the coal with 2.0% sulfur, "S" = 2.0

\*\* "A" indicates that the weight % of ash in the coal should be multiplied by the value given. For the coal with 4.0 ash, "A" = 4.0. For PM emissions calculation, control device destruction efficiency shall be utilized.

7.11 Unit 11 Wastewater Treatment Plant

7.11.1 Description

The wastewater treatment plant consists of retention basins, anaerobic and aerobic digestion and clarification. The wastewater consists of: condensed vapors from the feed dryers, the water off the bottom of the auxiliary column, condensed vapors from the evaporation process, and plant sumps. The anaerobic process creates methane that is used in the #4 gluten dryer and the thermal oxidizer. In the event that the gas is not used a flare controls the VOM emissions.

7.11.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 9:	Retention Basins Aerobic Digester Anaerobic Digester	None None Flare

7.11.3 Applicability Provisions and Applicable Regulations

- a. The "affected wastewater treatment plant" for the purpose of these unit-specific conditions, is a unit described in Conditions 7.11.1 and 7.11.2.
- b. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- c. For uncontrolled emissions, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.305, and 215.304 and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.11.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected waste water treatment plant not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected waste water treatment plant does not have potential pre-control device emissions of the applicable regulated

air pollutant that equals or exceeds major source threshold levels.

- b. The affected waste water treatment plant is not subject to 40 CFR Part 63 Subpart QQ "National Emission Standards for Surface Impoundments" because no references are made for application of Subpart QQ in any of subpart of 40 CFR Parts 60, 61, or 63 applicable to the affected waste water treatment plant, as specified and required by applicability criteria of 40 CFR 63.940.

7.11.5 Operational and Production Limits and Work Practices

- a. At all times, the Permittee shall, to the extent practicable, maintain and operate basins and digestors, including associated air pollution capture and control equipment, in accordance with written operating procedures that provide for good air pollution control practice for minimizing emissions. At a minimum, these practices shall include the following provisions for operation of the flare:
  - i. The flare shall be operated with a flame present at all times when biogases are not utilized and burned by gluten dryer #4.
  - ii. The presence of a flare pilot flame shall be monitored using a thermocouple or other comparable device to detect the presence of a flame.
  - iii. If the pilot flame goes out, the flow of off-gases to the flare shall be discontinued until the pilot flame is restored.

7.11.6 Emission Limitations

None

7.11.7 Testing Requirements

None

7.11.8 Monitoring Requirements

None

#### 7.11.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected wastewater treatment plant to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain a copy of the written operating procedures, required by Condition 7.11.5, which procedures shall be reviewed at least annually and revised as needed.
- b. The Permittee shall maintain an operating log for the control system, that at minimum, identifies periods of time when the system is not in operation, maintenance and repair activities.
- c. The Permittee shall maintain records of the following items for the affected lagoons:
  - i. Biogas flow rate, scfm;
  - ii. Hours of operation for the flare (hours/month and hours/year); and
  - iii. Hours of operation when the biogases are utilized by gluten dryer #4 (hours/month and hours/year).
- d. Records of emissions calculated based on the Compliance Procedures of Condition 7.11.12.

#### 7.11.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected wastewater treatment plant with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the

recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.11.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.11.12 Compliance Procedures

- a. Compliance with the limitations of Condition 7.11.3(b) is assured and achieved by the work-practices inherent in operation of affected wastewater treatment plant.
- b. Calculation of emissions from the waste water treatment plant shall be based on the recordkeeping requirements of Condition 7.11.9 and the USEPA program WATER9.

7.12 Group 12: Supplemental Plant Handling Processes

7.12.1 Coal Handling System

7.12.1.1 Description

The coal handling system conveys the coal used in the boilers at this facility. This system is comprised of an elevator and other legs that move the coal from the coal dump into the storage bins.

7.12.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 12.1	Coal Handling	Conveying of coal	Cyclone

7.12.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coal handling unit" for the purpose of these unit specific conditions is equipment described in Conditions 7.12.1.1 and 7.12.1.2.
- b. The affected coal handling unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.12.1.4 Non-Applicability of Regulations of Concern

None

7.12.1.5 Operational and Production Limits, and Work Practices

The Permittee shall follow good operating practices for the cyclone, including periodic inspection, routine maintenance and repair of defects.

7.12.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, this equipment is subject to the following:

None

7.12.1.7 Testing Requirements

None

7.12.1.8 Monitoring Requirements

None

7.12.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for this equipment to demonstrate compliance with Condition 7.12.1.3(b), pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of coal processed, tons/month and tons/year.
- b. Monthly and annual emissions of PM<sub>10</sub> calculated in accordance with compliance procedures established in Condition 7.12.1.12.
- c. Records of maintenance activities performed for an air pollution control devices.

7.12.1.10 Reporting Requirements

Compliance Section of non-compliance with the emission limitations and emissions of PM<sub>10</sub> as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the

exceedance or violation and efforts to reduce emissions and future occurrences.

7.12.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the pollution control equipment and the work-practices inherent in operation of the affected coal handling unit.
- b. For purposes of calculation PM<sub>10</sub> emissions from the affected coal handling unit, the following equation shall be used:

$$\text{PM}_{10} \text{ Emissions}^* = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100].$$

- \* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

7.12.2 Lime Storage System

7.12.2.1 Description

The lime storage system pneumatically conveys lime into a hopper. The lime is used for the wastewater treatment facility.

7.12.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 12.2	Pneumatic Transfer Line	Conveying of lime	Baghouse

7.12.2.3 Applicability Provisions and Applicable Regulations

a. An "affected lime storage unit" for the purpose of these unit specific conditions is equipment described in Conditions 7.12.2.1 and 7.12.2.2.

b. The affected lime storage unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.12.2.4 Non-Applicability of Regulations of Concern

None

7.12.2.5 Operational and Production Limits, and Work Practices

The Permittee shall follow good operating practices for the baghouse, including periodic inspection, routine maintenance and repair of defects.

7.12.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, this equipment is subject to the following:

None

7.12.2.7 Testing Requirements

None

7.12.2.8 Monitoring Requirements

None

7.12.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for this equipment to demonstrate compliance with Condition 7.12.2.3(b), pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of lime received, tons/month and tons/year.
- b. Monthly and annual emissions of PM<sub>10</sub> calculated in accordance with compliance procedures established in Condition 7.12.2.12.
- c. Records of maintenance activities performed for an air pollution control devices.

7.12.2.10 Reporting Requirements

Compliance Section of non-compliance with the emission limitations and emissions of PM as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the

exceedance or violation and efforts to reduce emissions and future occurrences.

7.12.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the pollution control equipment and the work-practices inherent in operation of the affected lime storage unit.
- b. For purposes of calculation PM<sub>10</sub> emissions from the affected lime storage unit, the following equation shall be used:

$$\text{PM}_{10} \text{ Emissions}^* = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100].$$

- \* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

7.12.3 Soda Ash Storage System

7.12.3.1 Description

The Soda Ash Storage System pneumatically conveys soda ash into a hopper. Soda ash is used for pH control.

7.12.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 12.3	Pneumatic transfer line	Conveying of Soda Ash	Baghouse

7.12.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected soda ash storage unit" for the purpose of these unit specific conditions is equipment described in Conditions 7.12.3.1 and 7.12.3.2.
- b. The affected soda ash storage unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.12.3.4 Non-Applicability of Regulations of Concern

None

7.12.3.5 Operational and Production Limits, and Work Practices

The Permittee shall follow good operating practices for the baghouse, including periodic inspection, routine maintenance and repair of defects.

7.12.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, this equipment is subject to the following:

None

7.12.3.7 Testing Requirements

None

7.12.3.8 Monitoring Requirements

None

7.12.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for this equipment to demonstrate compliance with Condition 7.12.3.3(b), pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of soda ash received, tons/month and tons/year.
- b. Monthly and annual emissions of PM<sub>10</sub> calculated in accordance with compliance procedures established in Condition 7.12.3.12.
- c. Records of maintenance activities performed for an air pollution control device.

7.12.3.10 Reporting Requirements

Compliance Section of non-compliance with the emission limitations and emissions of PM as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the

exceedance or violation and efforts to reduce emissions and future occurrences.

7.12.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the pollution control equipment and the work-practices inherent in operation of the affected soda ash storage unit.
- b. For purposes of calculation PM<sub>10</sub> emissions from the affected soda ash storage unit, the following equation shall be used:

$$\text{PM}_{10} \text{ Emissions}^* = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100].$$

- \* As specified by the manufacturer or vendor of the baghouse, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

7.12.4 Clay Storage System

7.12.4.1 Description

The Clay Storage System pneumatically conveys clay into a hopper. Clay is used for bulking material in the fiber product.

7.12.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 12.4	Pneumatic transfer line	Conveying of Clay	Baghouse

7.12.4.3 Applicability Provisions and Applicable Regulations

a. An "affected clay handling unit" for the purpose of these unit specific conditions is equipment described in Conditions 7.12.4.1 and 7.12.4.2.

b. The affected clay handling unit is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.12.4.4 Non-Applicability of Regulations of Concern

None

7.12.4.5 Operational and Production Limits, and Work Practices

The Permittee shall follow good operating practices for the baghouse, including periodic inspection, routine maintenance and repair of defects.

7.12.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, this equipment is subject to the following:

None

7.12.4.7 Testing Requirements

None

7.12.4.8 Monitoring Requirements

None

7.12.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for this equipment to demonstrate compliance with Condition 7.12.4.3(b), pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of fiber and clay processed, tons/month and tons/year.
- b. Monthly and annual emissions of PM<sub>10</sub> calculated in accordance with compliance procedures established in Condition 7.12.4.12.
- c. Records of maintenance activities performed for an air pollution control devices.

7.12.4.10 Reporting Requirements

Compliance Section of non-compliance with the emission limitations and emissions of PM<sub>10</sub> as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the

exceedance or violation and efforts to reduce emissions and future occurrences.

7.12.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.4.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the pollution control equipment and the work-practices inherent in operation of the affected clay handling unit.
- b. For purposes of calculation  $PM_{10}$  emissions from the affected clay handling unit, the following equation shall be used:

$$PM_{10} \text{ Emissions}^* = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100].$$

- \* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_{insert public notice start date} (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this

permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority 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 CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

#### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this 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, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the 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 this permit [Section 39.5(7) (o) (ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7) (k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 PM<sub>10</sub> Emission Limits for Certain Operations (as required by Condition 5.11)

Unit Description	Control	PM <sub>10</sub> Concentration, Gr/scf	PM <sub>10</sub> Emission Limit for Boilers Lb/mmBtu
Corn Cleaning System (P-17-29)	Centrifugal Collector & Fabric Filter	0.01	N/A
Grain Handling Dust Control System (P-01-07)	Fabric Filter	0.01	N/A
Corn Germ Cooling System (P-17-13)	Centrifugal Collector	0.03	N/A
First Germ Drying System (P-17-09)	Centrifugal Collector	0.03	N/A
Gluten Cooling System (P-17-17)	Centrifugal Collector	0.03	N/A
Germ Pneumatic Transport Cooler (Cyclones) (P-17-03)	Centrifugal Collector	0.03	N/A
Fiber/Gluten Drying System (P-17-18)	Centrifugal Collector	0.03	N/A
Feed Cooling System (P-17-31)	Fabric Filter	0.01	N/A
Truck Grain Unloading Station (P-80-01)	Fabric Filter	0.01	N/A
Second Germ Drying System (P-17-10)	Centrifugal Collector	0.03	N/A
Central Vacuum Cleaning System (P-01-06)	Centrifugal Collector	0.01	N/A
Rail Dump Pit (P-01-05)	Fabric Filter	0.01	N/A
First Pass Rotary Germ Drying System (P-17-02)	Centrifugal Collector	0.03	N/A
#4 Gluten Drying System (P-17-05)	Centrifugal Collector	0.03	N/A
Coal Handling system (P-23-01)	Centrifugal Collector	0.03	N/A
Feed Mill (2 Hammer Mills & Conveyors) (P-17-01)	Fabric Filter	0.01	N/A

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

Unit Description	Control	PM <sub>10</sub> Concentration, Gr/scf	PM <sub>10</sub> Emission Limit for Boilers Lb/mmBtu
Woodworking Process (P-09-02)	Centrifugal Collector	0.03	N/A
Manufacturing Supply Handling System (P-13-01)	Fabric Filter	0.01	N/A
Corn Cob Dust Control, Flour Conveyor (P-17-30)	Fabric Filter	0.01	N/A
#3 Germ Dryer System	Cyclone	0.03	N/A
#2 Feed Precooler	Baghouse	0.01	N/A
Spray Dryer with Scrubber	Scrubber	0.01	N/A
Dried Yeast Transport with Baghouse	Fabric Filter	0.01	N/A
Feed & Gluten Transport System (P-17-26)	Fabric Filter	0.01	N/A
Dried Yeast Hopper	Fabric Filter	0.01	N/A
Boilers:			
"A"	Multicyclones	N/A	0.2
"B"	Multicyclones	N/A	0.2
"C"	ESP & Centrifugal Collector	N/A	0.1
"D"	None	N/A	0.1

10.2 Attachment 2 Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

where:

P = process weight rate;  
 E = allowable emission rate; and,

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

FINAL DRAFT/PROPOSED CAAPP PERMIT  
 Aventine Renewable Energy, Inc.  
 I.D. No.: 179060ACR  
 Application No.: 96030001  
 July 29, 2003

<u>Metric</u>		<u>English</u>	
<u>P</u>	<u>E</u>	<u>P</u>	<u>E</u>
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

10.4 Attachment 4 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where 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 Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
 Division Of Air Pollution Control -- Permit Section  
 P.O. Box 19506  
 Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	ID number:
	Permit number:
Date received:	

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

<b>Source Information</b>		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

<b>Owner Information</b>		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

<b>Operator Information (if different from owner)</b>		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

<b>Applicant Information</b>	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

<b>Summary Of Application Contents</b>	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

<b>Signature Block</b>	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.6 Attachment 6 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked

yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Aventine Renewable Energy, Inc.  
I.D. No.: 179060ACR  
Application No.: 96030001  
July 29, 2003

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

AB:psj