

217/782-2113

CONSTRUCTION PERMIT -- NSPS SOURCE

PERMITTEE

Bunge North America, Inc.
Attn: Dean Hughes
321 East North Street
Danville, Illinois 61832

Application No.: 10050056

I.D. No.: 183020ABT

Applicant's Designation:

Date Received: May 27, 2010

Subject: New Boilers and Alternative Service for Rail Loadout #1

Date Issued: November 30, 2010

Location: 321 E. North Street, Danville, Vermillion County

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two boilers and use of existing Rail Loadout #1 for hominy and grain, as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

General Conditions for the Project

1.1 Introduction

- a. This permit authorizes the installation of two gas and liquid fuel-fired boilers, a larger primary boiler and a smaller backup boiler (the affected boilers). The affected boilers will be relocated from other facilities owned by the Permittee. These boilers will replace the existing coal-fired boiler and an existing backup boiler at the source. Those existing boilers, which are much larger than the new boilers, are no longer practical to operate as the Permittee has shut down the corn and soybean oil extraction operations at the source, with substantial reductions in its steam and electricity needs and in its emissions.
- b. This permit also authorizes use of existing Rail Loadout #1 (the affected rail loadout) for hominy and grain.

1.2 Applicability of PSD and Status of Source

- a. i. This permit is issued based on this project not constituting a major modification for purposes of the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, for any NSR pollutant. This is because it will not be accompanied by a significant increase in emissions of any NSR pollutant.

- ii. In particular, for emissions of PM, PM₁₀ and PM_{2.5}, this is because the potential emissions of the new boilers and the increase in emissions from the affected rail loadout will be less than the significant emission thresholds of the PSD rules, i.e., less than 25, 15, and 10 ton/year, respectively. (See Attachment 1.)
- b.
 - i. This permit is issued based on the source becoming a minor source for emissions of hazardous air pollutants (HAPs) due to the shutdown of the corn and soybean oil extraction operations and the coal-fired boiler at the source.
 - ii. When the new primary boiler begins operation, the emissions of HAPs from the source shall not exceed 8 tons per year of a single HAP and 20 tons per year of any combinations of such HAPs, so that the source is considered a minor source for HAPs.

1.3 Compliance Procedures for Emission Limits

- a. The limits set by this permit for PM₁₀ and PM_{2.5} only address filterable particulate and no condensable particulate, consistent with 40 CFR 52.21(b)(50)(vi).
- b. Compliance with annual limits set by this permit shall be determined from a running total of 12 months of data.

1.4 Retention and Availability of Records

All records required by this permit shall be retained on site for a period of at least five years and shall be readily available for inspection and copying by the Illinois EPA upon request. Any record retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

1.5 General Notification and Reporting Requirements

- a. The Permittee shall notify the Illinois EPA of deviations from permit requirements within 30 days or as otherwise provided by an operating permit for the source. Reports shall describe the deviations, the probable cause of such deviations, the corrective actions taken, and any preventive measures taken.
- b. Two copies of all notifications and reports required by this permit shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

Telephone: 217/782-5811 Fax: 217/782-6348

and one copy of all required notifications shall be sent to the Illinois EPA's regional office at the following address, unless otherwise indicated:

Illinois Environmental Protection Agency
 Division of Air Pollution Control
 Regional Field Office
 2009 Mall Street
 Collinsville, Illinois 62234

Telephone: 618/346-5120 Fax: 618/346-5155

1.6 Authorization for Operation

The Permittee is allowed to operate the affected boilers and affected rail loadout pursuant to this construction permit until a new or revised operating permit is issued addressing these units. This condition supersedes Standard Condition 6.

Unit-Specific Condition for the Primary Boiler (Affected Primary Boiler)

2.1 Description

A new primary boiler will be installed at the source. This boiler will be used as a primary boiler to provide steam to the plant. This boiler will burn natural gas as primary fuel and propane, distillate fuel oil (including biodiesel), and vegetable oil mix as secondary fuels. It will replace the existing coal-fired boiler. To minimize emissions of nitrogen oxides (NO_x), the burners for natural gas will be low-NO_x burners.

2.2 List of Emission Unit

Emission Unit	Description	Emission Control
Primary Boiler	Gas and liquid fuel-fired boiler, 96.6 mmBtu/hour rated heat input capacity B&W Model FM 1556, manufactured in 1967	Low-NO _x burners

2.3 Applicability Provisions and Emission Standards

- a. The "affected primary boiler" for the purpose of these unit-specific conditions is the boiler described in Conditions 2.1 and 2.2.
- b. Pursuant to 35 IAC, Chapter B, Subchapter c, emissions from the affected primary boiler shall not exceed the following standards, which apply on an hourly basis:

Pollutant	Standard	Limit
PM	35 IAC 212.206	0.10 lb/mmBtu*
SO ₂	35 IAC 214.161(b)	0.3 lb/mmBtu*
CO	35 IAC 216.121	200 ppm, @ 50% excess air

* Limit is applicable to emissions attributable to burning of liquid fuel.

- c. Pursuant to 35 IAC 212.123(a), the opacity of the exhaust from the affected boiler shall not exceed 30 percent, except as provided in 35 IAC 212.123(b).

2.4 Non-applicability Provisions

- a. This permit is issued based on the affected primary boiler not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc. This is because the affected boiler was manufactured before June 9, 1989 and has not undergone and will not be undergoing modification or reconstruction as defined in 40 CFR 60.2 and 60.15(b), respectively.
- b. This permit is issued based on the affected primary boiler not being subject to a case-by-case determination of Maximum Achievable Control technology (MACT) pursuant to Section 112(g) of the Clean Air Act because the source, including the affected primary boiler, will not be a major source of emissions for HAPs.

2.5 Operational Limits

- a. Natural gas, propane, distillate fuel oil, and vegetable oil shall be the only fuels fired in the affected primary boiler.
- b. The rated heat input capacity of the affected primary boiler shall not exceed 97 mmBtu/hour.
- c. The combined usage of liquid fuels in the affected primary boiler and the associated backup boiler (see Section 3.0) shall not exceed 850,000 gallons per year.
- d. The Permittee shall maintain the affected primary boiler in accordance with good air pollution control practices to assure proper functioning of equipment and minimize malfunctions, including maintaining the boilers in accordance with written procedures developed for this purpose.

2.6 Emission Limits

- a. i. The short-term emissions of NO_x from the affected primary boiler shall not exceed the following limits:

Pollutant	Limits			
	Gaseous Fuels		Liquid Fuels	
	Lbs/Hr	Lbs/mmBtu	Lbs/Hr	lbs/mmBtu
NO _x	7.7	0.080	16.3	0.171

- ii. Short-term emissions from the affected primary boiler shall not exceed the following limits.

Pollutant	Limits Lbs/Hour
CO	14.9
VOM	0.5
PM/PM ₁₀	1.4
SO ₂	2.9
Individual HAP ¹	0.25
Total HAP	0.5

¹ Individual HAP refers to individual pollutants, such as formaldehyde, benzene, toluene, hexane.

- b. Annual emissions from the affected primary boiler shall not exceed the following limits. These limits reflect information in the permit application.

Pollutant	Limits (Tons/Year)
NO _x	39.0
CO	65.4
VOM	2.4
PM/PM ₁₀	6.3
SO ₂	2.3
Individual HAP	1.2
Total HAP	2.4

- c. The combined annual emissions of NO_x and PM from the affected primary boiler and affected backup boiler (see Section 3.0) shall not exceed 39.9 and 6.5 tons/year, respectively.

Note: These limits account for additional emissions of 0.9 and 0.2 tons per year of NO_x and PM, respectively from the backup boiler during periods of transition between the two boilers when both boilers would be operated simultaneously. This reflects annual usage of up to 18.2 million scf of gaseous fuel in the backup boiler during transitions.

2.7 Testing Requirements

- a. The NO_x, CO, VOM, filterable PM, condensable PM, and HAP emissions of the affected primary boiler shall be measured by an independent testing service approved by the Illinois EPA, as follows, within 90 days after a written request from the Illinois EPA for such pollutants, and for firing of such fuel(s) as specified by the request.
- b. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing and shall include as a minimum:

- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing shall 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 affected boiler will be tracked and recorded.
 - iii. The specific determinations of emissions that are intended to be made, including sampling and monitoring locations; the test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.
- c. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five working days prior to the actual date of the test. The Illinois EPA may, at its discretion, accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.
- d. Three copies of the final reports for emission tests shall be forwarded to the Illinois EPA, Compliance Section within 30 days after the test results are compiled and finalized and no later than 60 days after the final day of emission testing. The final report from testing shall contain the following as a minimum:
- i. A summary of results.
 - ii. General information.
 - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - iv. Detailed description of test conditions, including:
 - A. Fuel consumption by type.
 - B. Firing rate (million Btu/hour).
 - C. Opacity during each test run, as determined by USEPA Method 9.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

2.8 Recordkeeping Requirements

The Permittee shall maintain the following records for the affected primary boiler:

- a. A file containing the following information:
 - i. The rated heat input capacity of the boiler, mmBtu/hour, with supporting documentation.
 - ii. Representative data for the heat content (Btu/scf or Btu/gallon) and sulfur and ash content (percent by weight) of each type of fuel fired in the boiler.
 - iii. Information demonstrating that the boiler is not an affected facility for purposes of the NSPS, 40 CFR 60 Subpart Dc, including documentation for the date of manufacture and original installation and records for repairs made to the boiler, including description, date and cost.
- b. An operating log or other records for the boiler that, at a minimum, shall include the following information:
 - i. Information for each startup and shutdown, including date, time and duration.
 - ii. Information for any incident in which the operation of the boiler continued during malfunction or breakdown, which records shall include date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- c. An inspection, maintenance, and repair log with dates and the nature of such activities for the affected primary boiler.
- d. The following records for the affected primary boiler:
 - i. Natural gas usage (scf/month and scf/year).
 - ii. Usage of secondary fuels by type (scf or gallons/month and scf or gallons/year).
- e. Records of the monthly and annual emissions of NO_x, CO, PM/PM₁₀ (filterable only), VOM, SO₂, and HAPs from the boiler (tons/month and tons/year), with supporting data or calculations.

Unit-Specific Conditions for the Backup Boiler (Affected Backup Boiler)

3.1 Description

A new backup boiler will be installed at the source to provide steam when the primary boiler is not available or cannot meet the steam needs of the source. This boiler is replacing an existing backup boiler at the source. This boiler will burn natural gas as primary fuel and propane, distillate oil (including biodiesel) and vegetable oil mix as secondary fuels.

3.2 List of Emission Units

Emission Unit	Description	Emission Control
Backup Boiler	Gas and liquid fuel-fired boiler 27.9 mmBtu/hour rated heat input capacity manufactured by Clayton in 2006	Low-NO _x Burners

3.3 Applicability Provisions and Emission Standards

- a. The "affected backup boiler" for the purpose of these unit-specific conditions is the boiler described in Conditions 3.1 and 3.2.
- b.
 - i. The affected backup boiler is an affected facility under the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc. As an affected facility, the Permittee must comply with applicable requirements of the NSPS, 40 CFR 60 Subpart Dc, and related requirements of 40 CFR 60, Subpart A, General Provisions, for the boiler. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
 - ii. Pursuant to the NSPS, 40 CFR 60.42c(d), the sulfur content of the fuel oil burned in the affected boiler shall be less than 0.5 percent by weight.
 - iii. Pursuant to the NSPS, 40 CFR 60.11(d), at all times the Permittee shall, to the extent practicable, maintain and operate the affected backup boiler in a manner consistent with good air pollution control practices for minimizing emissions.
- c. Pursuant to 35 IAC, Chapter B, Subchapter c, emissions from the affected backup boiler shall not exceed the following standards, which apply on an hourly basis:

Pollutant	Standard	Limit
PM	35 IAC 212.206	0.10 lb/mmBtu*
SO ₂	35 IAC 214.122(b)(2)	0.3 lb/mmBtu*
CO	35 IAC 216.121	200 ppm, @ 50% excess air

* Limit is applicable to emissions attributable to burning of liquid fuel.

- d. Pursuant to 35 IAC 212.123(a), the opacity of the exhaust from the affected backup boiler shall not exceed 30 percent, except as provided in 35 IAC 212.123(b).

3.4 Non-applicability Provisions

- a. This permit is issued based on the affected backup boiler not being subject to a case-by-case determination of Maximum Achievable Control technology (MACT) pursuant to Section 112(g) of the Clean Air Act because the source, including the affected backup boiler, will not be a major source of emissions for HAPs.
- b.
 - i. This permit is issued based on the Permittee using fuel supplier certifications, as described under 40 CFR 60.48c(f)(1), to demonstrate compliance with 40 CFR 60.42c(d) (Condition 3.3(b)(ii)) for sulfur content of fuel, rather than continuous emissions monitoring for SO₂, as allowed by the NSPS, 40 CFR 60.46c(e).
 - ii. This permit is issued based on the affected backup boiler not being subject to 40 CFR 60.43c(c) (the opacity standard of the NSPS) because heat input capacity of the boiler is less than 30 mmBtu/hr, as provided by 40 CFR 60.47c(c).

3.5 Operational Restrictions

- a. Natural gas, propane, distillate fuel oil, and vegetable oil shall be the only fuels fired in the affected backup boiler.
- b. The heat input of the affected backup boiler shall not exceed 28 mmBtu/hour.
- c.
 - i. The Permittee shall not operate the affected backup boiler and the affected primary boiler simultaneously except for periods of transition between the two boilers.
 - ii. The transition of the affected boilers shall be conducted while firing gaseous fuels in both boilers.
 - iii. The usage of gaseous fuel in the affected backup boiler during periods of transition shall not exceed 18.2 million scf.
- d. The Permittee shall maintain the affected backup boiler in accordance with good air pollution control practices to assure proper functioning of equipment and minimize malfunctions, including maintaining the boilers in accordance with written procedures developed for this purpose.

3.6 Emission Limits

- a. i. The short-term emissions of NO_x from the affected backup boiler shall not exceed the following limits:

Pollutant	Limits			
	Gaseous Fuels		Liquid Fuels	
	Lbs/Hr	Lbs/mmBtu	Lbs/Hr	Lbs/mmBtu
NO _x	2.7	0.097	4.0	0.144

- ii. Short-term emissions from the affected backup boiler shall not exceed the following limits.

Pollutant	Limits Lbs/Hour
CO	2.3
VOM	0.2
PM/PM ₁₀	0.7
SO ₂	0.9
Individual HAP ¹	0.1
Total HAP	0.2

¹ Individual HAP refers to individual pollutants, such as formaldehyde, benzene, toluene, hexane.

- b. Annual emissions from the affected backup boiler shall not exceed the following limits.

Pollutant	Limits (ton/yr)
NO _x	17.5
CO	10.1
VOM	0.9
PM/PM ₁₀	3.1
SO ₂	1.9
Individual HAP	0.4
Total HAP	0.9

Note: NO_x emissions of operation of the affected backup boiler and the affected primary boiler, combined, are limited to 39.9 tons per year by Condition 2.6(c).

3.7 Testing Requirements

- a. The NO_x CO, VOM, filterable PM, condensable PM, and HAP emissions of the affected backup boiler shall be measured by an independent testing service approved by the Illinois EPA, in accordance with Conditions 2.7(b), (c) and (d), within 90 days after a written request from the Illinois EPA for such pollutants, and for firing of such fuel(s) as specified by the request.

3.8 Recordkeeping Requirements

The Permittee shall maintain the following records for the affected backup boiler:

- a. A file containing the following information:
 - i. The rated heat input capacity of the boiler, mmBtu/hour, with supporting documentation.
 - ii. Representative data for the heat content (Btu/scf or Btu/gallon) and sulfur and ash content (percent by weight) of each type of fuel fired in the boiler.
- b. An operating log or other records for the boiler that, at a minimum, shall include the following information:
 - i. Information for each startup and shutdown, including date, time and duration, as required by 40 CFR 60.7(b).
 - ii. Information for any incident in which the operation of the boiler continued during malfunction or breakdown as addressed by 40 CFR 60.7(b), which records shall include date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- c. An inspection, maintenance, and repair log with dates and the nature of such activities for the boiler.
- d. The following records for the boiler:
 - i. Records of fuel oil supplier certification used to demonstrate compliance with 40 CFR 60.42c(d), including the information described under 40 CFR 60.48c(f)(1).
 - ii. Amount of each fuel combusted (scf or gallons/month and scf or gallons/year), pursuant to 40 CFR 60.48c(g).
 - iii. Amount of fuel combusted in the affected backup boiler during periods of transition between the two boilers (scf/month and scf/year).
- e. Records of the monthly and annual emissions of NO_x, CO, PM/PM₁₀ (filterable only), VOM, SO₂, and HAPs from the boiler (tons/month and tons/year), with supporting data or calculations.

3.9 Reporting Requirements

- a. The Permittee shall furnish the Illinois EPA with written notification as follows with respect to commencement of construction and operation of the affected backup boiler at the Permittee's Danville facility:
 - i. The date construction of the boiler commenced postmarked no later than 30 days after such date, pursuant to 40 CFR 60.7(a)(1).
 - ii. The actual date of initial startup of the boiler, postmarked within 15 days after such date, pursuant to 40 CFR 60.7(a)(3) and 60.48c(a), which shall be accompanied by (1) The design heat input capacity of the boiler and identification of the fuels to be combusted in the boiler, pursuant to 40 CFR 60.48c(a)(1); and (2) The annual capacity factor at which the Permittee anticipates operating the boiler based on fuel fired, pursuant to 40 CFR 60.48c(a)(3).

Unit-Specific Conditions for Rail Loadout #1 (Affected Rail Loadout)

4.1 Description

Existing Rail Loadout #1 (the affected rail loadout) will be used to handle grain and hominy (grits) from the dry corn mill. This change in operation of the affected rail loadout, which formerly handled soybean meal, is a consequence of the shutdown of the soybean extraction operations. The particulate emissions of the affected rail loadout will continue to be controlled by the existing dust capture system and baghouse (376RF12).

As the affected rail loadout would now handle grain, it will be subject to New Source Performance Standards (NSPS) for Grain Elevators, 40 CFR 60, Subpart DD, when grain is being handled.

4.2 List of Emission Units

Emission Unit	Description	Emissions Control
Rail Loadout #1	Existing rail loadout for grain and hominy (product from the dry corn mill)	Dust capture system and baghouse

4.3 Applicability Provisions and Emission Standards

- a. The "affected rail loadout" for the purpose of these unit-specific conditions is the loadout operation described in Conditions 4.1 and 4.2.
- b. i. The affected rail loadout is an affected facility under the federal NSPS for Grain Elevators, 40 CFR 60, Subpart DD. As an affected facility, the Permittee must comply with

applicable requirements of the NSPS, 40 CFR 60 Subpart DD, and related requirements of 40 CFR 60, Subpart A, General Provisions, for the affected rail loadout. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

- ii. Pursuant to 60.302(b), on and after the 60th day of achieving the maximum production rate at which the affected rail load out will be operated with grain, but no later than 180 days after initial startup with grain, the Permittee shall not cause to be discharged into the atmosphere from the affected rail loadout any process emission which:
 - A. Contains particulate matter (PM) in excess of 0.01 gr/dscf.
 - B. Exhibits greater than 0 percent opacity.
 - iii. Pursuant to 40 CFR 60.302(c), on and after the 60th day of achieving the maximum production rate at which the affected rail loadout will be operated with grain, but no later than 180 days after initial startup with grain, the Permittee shall not cause to be discharged into the atmosphere any fugitive emission from:
 - A. The affected rail loadout which exhibits greater than 5 percent opacity.
 - B. The grain handling operations associated with the affected rail loadout which exhibits greater than 0 percent opacity.
 - iv. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the affected rail loadout including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
 - v. If handling of grain by the affected rail loadout is permanently discontinued, the affected rail loadout will no longer be subject to the NSPS and the above requirements of the NSPS will cease to apply.
- c. The affected rail loadout is subject to 35 IAC 212.123(a), which provides that the opacity of the exhaust from any emission units shall not exceed 30 percent, except as provided in 35 IAC 212.123(b).
 - d. The affected rail loadout is subject to 35 IAC 212.301, which provides that no person shall cause or allow the emission of

fugitive PM from any process, including any material handling or storage activity that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source, except as provided in 35 IAC 212.314.

- e.
 - i. The affected rail loadout while handling grain is subject to 35 IAC 212.462(d), which provides that emissions of PM from loadout of grain shall be controlled by use of socks, choke loading or other equivalent method. As the Permittee controls PM emissions with an equivalent method, i.e., enclosed loadout with aspiration to a baghouse, that method is further addressed in Condition 4.5.
 - ii. While handling materials other than grain, the affected rail loadout is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar new process emission units, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).
- f. The affected rail loadout is subject to 35 IAC 212.461(b), which provides that the Permittee shall implement certain housekeeping practices for the affected rail loadout as specified in 35 IAC 212.461(b)(1) through (6), including a daily check of the associated control system, regular cleaning to collect dust and spilled grain and use of a housekeeping check list. If handling of grain by the affected rail loadout is permanently discontinued, the affected rail loadout will no longer be subject to this rule and these requirements will cease to apply.

4.4 Non-Applicability Provisions

- a. This permit is issued based on the affected rail loadout no longer being subject to 35 IAC 212.461(a) or 35 IAC 212.462(d), if handling of grain is permanently discontinued. This is because these rules only apply to handling of grain. Grain, as defined by 35 IAC 211.2650, means the whole kernel or seed of corn, soybeans, and any other cereal or oilseed plant and the normal fines, dust and foreign matter, which result from harvesting, handling, drying or conditioning, that has not been altered by grinding or processing.

4.5 Control Requirements

- a. The PM emissions of the affected rail loadout shall be controlled by enclosure of the loading spouts above the railcar with an aspiration hood with the hood vented to a baghouse with an air flow capacity of at least 30,000 scfm, so as to maintain compliance with the opacity standards of the NSPS for railcar

loading stations, i.e., 0 percent opacity for stack emissions and no more than 5 percent opacity for fugitive emissions.

- b. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the affected rail loadout including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions.

4.6 Testing Requirements

- a. Pursuant to 40 CFR 60.8, 60.302(b) and 60.303, no later than the 60th day of achieving the maximum production rate at which the affected rail load out will be operated with grain, but no later than 180 days after initial startup with grain, the Permittee shall have a performance test conducted for the affected rail loadout while handling grain in accordance with applicable testing requirements for such testing.

4.7 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected rail loadout:

- a. A file containing following information for the baghouse:
 - i. Design data including inlet flow rate (scfm), air to cloth ratio (feet/minute) and exhaust gas dust loading (gr/scf).
 - ii. Baghouse supplier recommendations for operation and maintenance of the equipment.
- b. Amounts of material handled, by type (tons/month and tons /year).
- c. An operating log or other records for the affected rail loadout that, at a minimum, shall include the following information:
 - i. Information generally confirming proper operation of the affected rail loadout for control of emissions.
 - ii. Information for any incident in which the operation of the rail loadout continued during s malfunction or breakdown of the control system, which records shall include date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- d. Records addressing inspection and maintenance of the control system:

- i. Records for periodic inspection of the control system with date, individual performing the inspection, and nature of inspection.
- ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Records of the emissions of PM, PM₁₀, and PM_{2.5} (tons/month and tons/year), with supporting calculations.

4.7 Reporting Requirements

- a. If the increase in the annual emissions from the affected rail loadout with this project, comparing past actual emissions before the project and actual emissions after this project, is 18.5 or more tons/year of PM, 5.78 tons or more of PM_{2.5}, (or 8.94 or more tons of PM₁₀), in addition to submitting a deviation notification in accordance with Condition 1.5(a), the Permittee shall also fulfill the applicable reporting requirements of 40 CFR 52.21(r)(6).

Please note that this permit does not address the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers, 40 CFR 63, Subparts DDDDD and JJJJJJ, which were only proposed at the time this permit was issued. For the affected boilers, when these NESHAP are adopted by USEPA and become effective, the Permittee will have to comply in a timely manner with the requirements of these NESHAP that apply for the affected boilers.

If you have any questions on this permit, please contact Manish Patel at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:MNP:psj

cc: Illinois EPA, FOS - Region 3
CAAPP Permit File -96020027, Illinois EPA

Attachment 1

Increases in Particulate Matter Emissions with the Project (tons/year)

	PM	PM ₁₀	PM _{2.5}
Primary and Backup Boilers Potential Emissions	6.5	6.5	3.7
Rail Loadout #1:			
Past Emissions	3.3	3.3	0.40
Future Projected Emissions	20.1	2.86	0.92
Increase (Difference)	16.8	-0.44	0.52
Overall Project Increase	23.3	6.06	4.22
Significant Emission Rate	25	15	10
Project Significant?	No	No	No
Increase More than 50 Percent of Significant Emission Rate?	Yes	No	No

MNP:psj