

217/782-2113

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

PERMITTEE

Cargill Dry Corn Ingredients  
Attn: Dennis Aitken  
616 South Jefferson  
Paris, Illinois 61944

Application No.: 95100037                      I.D. No.: 045030ABG  
Applicant's Designation: PARIS, ILLINOIS   Date Received: October 10, 1995  
Operation of: Corn Manufacturing Plant  
Date Issued:                                      Expiration Date<sup>2</sup>:  
Source Location: 616 South Jefferson, Paris, Edgar County, Illinois, 61944  
Responsible Official: Michael F. Smith, Vice President, Manufacturing

This permit is hereby granted to the above-designated Permittee to OPERATE a corn manufacturing plant, 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 Michael Haggitt at 217/782-2113.

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

DES:MVH:jar

cc: Illinois EPA, FOS, Region 3  
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.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Cargill Dry Corn Ingredients  
616 South Jefferson  
Paris, Illinois 61944  
217/465-5331

I.D. No.: 045030ABG  
Standard Industrial Classification: 2041, Flour and Other Grain  
Mill Products

1.2 Owner/Parent Company

Cargill Dry Corn Ingredients  
616 South Jefferson  
Paris, Illinois 61944

1.3 Operator

Cargill Dry Corn Ingredients  
616 South Jefferson  
Paris, Illinois 61944

Dennis Aitken, Maintenance Manager  
217/465-5331

1.4 General Source Description

The Cargill Dry Corn Ingredients is located at 616 South Jefferson in Paris. The source operates a grain mill.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CO	Carbon Monoxide
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
ft <sup>3</sup>	Cubic Feet
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	Degrees Kelvin
kPa	Kilopascals
kg	Kilograms
kW	Kilowatts
l	liters
lb	Pound
ILCS	Illinois Compiled Statutes
MBtu	Million British thermal units
Mg	Megagrams
MW	Megawatts
mmHg	Millimeters of Mercury
mmscf	Million standard cubic feet
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
psia	pounds per square inch absolute
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
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
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
VOL	Volatile Organic Liquid
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:

None

- 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 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/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)].

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a) (8)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a) (11)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a) (17)]. Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents,

surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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
<b>Corn Mill</b>			
C004	Tailstock Cooler Vent		None
C006	Filter 5B		Baghouse
C015	Tailstock/Germ Dryers		Cyclone
C016	Tailstock/Germ Dryers		Cyclone
C019	Penthouse C Dust Collector		Baghouse
C025	Thrustock Baghouse		Baghouse
C026	Tailstock Aspiration Filter		Baghouse
C027	South 4 Grit Storage Silo Vent		Filter
C028	North 4 Grit Storage Silo Vent		Filter
C030	Yellow Goods Loadout		None
C031A	Flour/M Meal Loadout Lift		Bag Filter
C031B	Flour/M Meal Loadout Conveyor		None
C032A	Feed to Storage Silos		Filter
C032B	Feed to Storage Silos		Filter
C033	Feed Loadout		None
C034	Feed Storage Bin Vents		Filter
C036	Corn Mill Degermination I	2003	Baghouse
C037	Corn Mill Degermination II		Baghouse
C038	Corn Mill Degermination III		Baghouse
C039	Corn Mill Degermination IV		Baghouse
C040	Corn Mill Degermination V		Baghouse
C041	General Aspiration XIV		Baghouse
C042	General Aspiration XV		Baghouse
C043	New Flash Dryer		Baghouse
C044	Granulated Meal Dryer		Baghouse
C045	Brewer's Grit Dryer		Baghouse
<b>Elevator</b>			
E001/E002	Truck Dump System	1968	None
E006	Cob Storage Bin Loadout		None
E007	Railcar Dump		None
E008	Elevator Pre-cleaning System	2002	Baghouse
E009	Elevator Blending System		Baghouse
E010	Elevator Cleaning House I		Baghouse
E011	Elevator Cleaning House II		Baghouse
E012	Elevator Cleaning House III		Baghouse
<b>Powerhouse</b>			
P007	Natural Gas Boiler rated at 33.5 MBtu	2000	None
P008	Natural Gas with Backup Fuel Oil Boiler rated at 33.5 MBtu	2000	None
<b>Specialty</b>			
S001	980 Silo Vent		Filter
S002	Specialty Silo Vents		Filter
S003	Extruder Inlet Suction		Cyclone
S004	Extruder Collet Cyclone		Cyclone
S005	Extruder Collet Drying		
S006 (A & B)	Collet Filter Receiver Fans		Filters
S007	Dried Extruder Flour to Sieves		Filters

Emission Unit	Description	Date Constructed	Emission Control Equipment
(A - D)			
S008	980 Filter Receivers		Baghouse
S013	Specialty Product Loadout	1999	None
S014	Bran Product Protection System		None
S015	Flour Product Protection System		None

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 PM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

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.
- 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 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All storage piles of materials with uncontrolled emissions of fugitive particulate matter in excess of 45.4 Mg per year (50 T/yr) which are located within a source whose potential particulate emissions from all emission units exceed 90.8 Mg/yr (100 T/yr) shall be protected by a cover or sprayed with a surfactant solution or water on a regular basis, as needed, or treated by an equivalent method, in accordance with the operating program required by 35 IAC Sections 212.309, 212.310 and 212.312 [35 IAC 212.304(a)].

The above shall not apply to a specific storage pile if the owner or operator of that pile proves to the Agency that fugitive particulate emissions from that pile do not cross the property line either by direct wind action or reentrainment [35 IAC 212.304(b)].

- d. All conveyor loading operations to storage piles shall utilize spray systems, telescopic chutes, stone ladders, or other equivalent methods, in accordance with the operating program [35 IAC 212.305].
- e. All normal traffic pattern access areas surrounding storage piles and all normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].
- f. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying, or other equivalent methods [35 IAC 212.307].
- g. Crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins, and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding, or be treated by an equivalent method, in accordance with the operating program [35 IAC 212.308].

#### 5.2.4 Ozone Depleting Substances

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.

#### 5.2.5 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.

#### 5.2.6 Future Applicable Regulations

- 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.

#### 5.2.7 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.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

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

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	1.58
Sulfur Dioxide (SO <sub>2</sub> )	29.45
Particulate Matter (PM)	175.99
Nitrogen Oxides (NO <sub>x</sub> )	35.05
HAP, not included in VOM or PM	-----
Total	242.07

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

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 Records for Operating Scenarios

N/A

5.6.3 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 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

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.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Grain Processing

7.1.1 Description

Grain is received by either truck or rail and stored in silos. The grain is processed to make a variety of granulated products.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
<b>Corn Mill</b>		
C004	Tailstock Cooler Vent	None
C006	General Aspiration I	Baghouse
C015	Tailstock/Germ Dryers	Cyclone
C016	Tailstock/Germ Dryers	Cyclone
C019	General Aspiration II	Baghouse
C025	General Aspiration VIII	Baghouse
C026	General Aspiration IX	Baghouse
C027	South Storage Silo Vent	Filter
C028	North Storage Silo Vent	Filter
C030	Yellow Goods Loadout	None
C031A	Flour/M Meal Loadout Lift	Bag Filter
C031B	Flour/M Meal Loadout Conveyor	None
C032A	Feed to Storage	Filter
C032B	Feed to Storage	Filter
C033	Feed Loadout	None
C034	Feed Storage Bin Vents	Filter
C036	Corn Mill Degermination I	Baghouse
C037	Corn Mill Degermination II	Baghouse
C038	Corn Mill Degermination III	Baghouse
C039	Corn Mill Degermination IV	Baghouse
C040	Corn Mill Degermination V	Baghouse
C041	General Aspiration XIV	Baghouse
C042	General Aspiration XV	Baghouse
C043	Flash Dryer #1	Baghouse
C044	Flash Dryer #2	Baghouse
C045	Flash Dryer #3	Baghouse
<b>Elevator</b>		
E001	Elevator Truck Dump	None
E006	Loadouts	None
E007	Elevator Railroad Car Dump	None
E008	Elevator Pre-cleaning System	Baghouse
E009	Elevator Blending System	Baghouse
E010	Elevator Cleaning House I	Baghouse
E011	Elevator Cleaning House II	Baghouse
E012	Elevator Cleaning House III	Baghouse
<b>Specialty</b>		
S001	Corn Bran to Specialty Bran Silo	Filter
S002	Corn Meal to Specialty Meal Silo	Filter

Emission Unit	Description	Emission Control Equipment
S008	Flakes to Cutter, Bran Packer Suction & Corn Bran Grinding	Baghouse
S013	Finished Product Loading	None
S014	Bin Vent Filters	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected plant" for the purpose of these unit-specific conditions, is the grain processing plant described in Condition 7.1.1 and 7.1.2.
- b. The affected plant is subject to the emission limits identified in Condition 5.2.2.
- c. The affected plant is subject to 35 IAC 212.462 - Grain Handling Operations

Unless otherwise exempted pursuant to 35 IAC 212.461(c) or (d), or allowed to use alternate control according to 35 IAC 212.461(g), existing grain-handling operations with a total annual grain through-put of 300,000 bushels or more shall demonstrate compliance with the following [35 IAC 212.462]:

Cleaning and Separating Operations: [35 IAC 212.462(a)]

- i. 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 [35 IAC 212.462(a)(1)].
- ii. For grain-handling sources having a grain through-put of not more than 2 million bushels per year or located outside 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 90 percent by weight prior to release into the atmosphere [35 IAC 212.462(a)(2)].
- iii. 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 [35 IAC 212.462(a)(3)].

Major Dump-Pit Area: [35 IAC 212.462(b)]

Induced Draft [35 IAC 212.462(b)(1)]

- iv. 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: [35 IAC 212.462(b)(1)(A)]

$$V = Q/A$$

Where:

V = Face velocity

Q = Induced draft volume in scfm

A = Effective grate area in ft<sup>2</sup>

- v. The induced draft air stream for grain-handling sources having a grain through-put of not more than 2 million bushels per year or located outside 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 90 percent by weight; and [35 IAC 212.462(b)(1)(B)]
- vi. 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 [35 IAC 212.462(b)(1)(C)]
- vii. 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 [35 IAC

212.462(b)(1)(D)]

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) [35 IAC 212.462(b)(2)].

Internal Transferring Area: [35 IAC 212.462(c)]

viii. Internal transferring area shall be enclosed to the extent necessary to prohibit visible particulate matter emissions directly into the atmosphere [35 IAC 212.462(c)(1)].

ix. Air contaminants collected from internal transfer operations for grain-handling sources having a grain through-put of not more than 2 million bushels per year or located outside 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 90 percent by weight prior to release into the atmosphere.

x. 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.

Load-Out Area: [35 IAC 212.462(d)]

xi. 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 [35 IAC 212.462(d)(1)].

xii. 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 [35 IAC 212.462(d)(2)].

Watercraft Loading: [35 IAC 212.462(d)(3)]

xiii. Particulate matter emissions generated during loading for grain-handling sources having a grain through-put of not more than 2 million bushels per year or located outside a major

population area shall be captured in an induced draft air stream, which shall be ducted through air pollution control equipment that has a rated and actual particulate matter removal efficiency of not less than 90 percent by weight prior to release into the atmosphere [35 IAC 212.462(d)(3)(A)].

- xiv. Particulate matter emissions generated during loading for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be captured in an induced draft air stream, which shall be ducted through air pollution control equipment that has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere; except for the portion of grain loaded by trimming machines for which particulate matter emission reductions, at a minimum, shall equal the reduction achieved by compliance with 35 IAC 212.462(d)(3)(A) [35 IAC 212.462(d)(3)(B)].

- d. The affected plant is subject the 35 IAC 212.463 - Grain Drying Operations

Unless otherwise exempted pursuant to 35 IAC 212.461(c) or (d) or allowed to use alternate control according to 35 IAC 212.461(g), grain-drying operations for which construction or modification commenced prior to June 30, 1975, with a total grain-drying capacity in excess of 750 bushels per hour for 5 percent moisture extraction at manufacturer's rated capacity (using the American Society of Agricultural Engineers Standard 248.2, Section 9, Basis for Stating Drying Capacity of Batch and Continuous-Flow Grain Dryers, incorporated by reference in Section 212.113 of this Part) shall be operated in such a fashion as to preclude the emission of particulate matter larger than 300 microns mean particle diameter, shall comply with the following: [35 IAC 212.463]

- i. Column Dryers. The largest effective circular diameter of transverse perforations in the external sheeting of a column dryer shall not exceed 0.094 inch, and the grain inlet and outlet shall be enclosed [35 IAC 212.463(a)].
- ii. Rack Dryers. No portion of the exhaust air of rack dryers shall be emitted to the ambient atmosphere without having passed through a particulate collection screen having a maximum opening of 50 mesh, U.S. Sieve Series [35 IAC 212.463(b)].
  - A. All such screens will have adequate self-cleaning mechanisms, the exhaust gas of

which for grain-handling facilities having a grain through-put of not more than 2 million bushels per year or located outside a major population area shall be ducted through air pollution control equipment which has a rated and actual particulate removal efficiency of 90 percent by weight prior to release into the atmosphere [35 IAC 212.463(b)(1)].

- B. All such screens will have adequate self-cleaning mechanisms, the exhaust gas of which for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be ducted through air pollution control equipment which has a rated and actual particulate removal efficiency of 98 percent by weight prior to release into the atmosphere [35 IAC 212.463(b)(2)].
- iii. Other Types of Dryers. All other types of dryers shall be controlled in a manner which shall result in the same degree of control required for rack dryers pursuant to 35 IAC 212.463(b) [35 IAC 212.463(c)].
- iv. New and Modified Grain-Drying Operations. Grain-drying operations constructed or modified on or after June 30, 1975, shall comply with the control equipment requirements of 35 IAC 212.463, except for new and modified grain-drying operations which do not result in a total grain-drying capacity in excess of 750 bushels per hour for 5 percent moisture extraction at manufacturer's rated capacity, using the American Society of Agricultural Engineer Standard 248.2, Section 9, Basis for Stating Drying Capacity of Batch and Continuous-Flow Grain Dryers [35 IAC 212.463(d)].
- e. Alternate Control of Particulate Emissions [35 IAC 212.461(g)].
  - i. Grain-handling or grain-drying operations, which were in numerical compliance with 35 IAC 212.322, as of April 14, 1972, and continue to be in compliance with 35 IAC 212.322 need not comply with the provisions under 35 IAC 212.461, except the housekeeping practices in 35 IAC 212.461(b) [35 IAC 212.461(g)(1)].
  - ii. Grain-handling or grain-drying operations, which were not in numerical compliance with 35 IAC 212.322, as of April 14, 1972, but which came into compliance with 35 IAC 212.321 prior to April 14, 1972, and continue to be in compliance with 35 IAC 212.321 need not comply with the provisions under 35 IAC 212.461,

- except the housekeeping practices in 35 IAC 212.461(b) [35 IAC 212.461(g) (2)].
- iii. Proof of compliance with 35 IAC 212.461(g) shall be made by stack sampling and/or material balance results obtained from actual testing of the subject emission unit or process and be submitted at the time of an application for, or renewal of, an operating permit [35 IAC 212.461(g) (3)].
- f. The affected plant's emission units not subject to 35 IAC 212.462 - Grain Handling Operations or 35 IAC 212.463 - Grain Drying Operations that were constructed or modified prior to April 14, 1972 are subject to 35 IAC 212.322(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 10.3) [35 IAC 212.322(a)].

- g. The affected plant's emission units not subject to 35 IAC 212.462 - Grain Handling Operations or 35 IAC 212.463 - Grain Drying Operations constructed or modified on or after April 14, 1972 are subject to 35 IAC 212.321(a), 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 which, 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 10.2) [35 IAC 212.321(a)].

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected plant not being subject to the New Source Performance Standards (NSPS) for Grain Elevators, 40 CFR Part 60, Subpart DD, because the affected plant has less than 1 million bushel grain storage capacity pursuant to 40 CFR 60.301(f).

#### 7.1.5 Operational and Production Limits and Work Practices

- a. Housekeeping Practices. All grain-handling and grain-drying operations, regardless of size, must implement

- and use the following housekeeping practices: [35 IAC 212.461(b)]
- i. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation. [35 IAC 212.461(b)(1)]
  - ii. Cleaning and Maintenance. [35 IAC 212.461(b)(2)]
    - 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. [35 IAC 212.461(b)(2)(A)]
    - B. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere. [35 IAC 212.461(b)(2)(B)]
    - 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. [35 IAC 212.461(b)(2)(C)]
  - iii. Dump Pit. [35 IAC 212.461(b)(3)]
    - A. Aspiration equipment shall be maintained and operated. [35 IAC 212.461(b)(3)(A)]
    - B. Dust control devices shall be maintained and operated. [35 IAC 212.461(b)(3)(B)]
  - 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. [35 IAC 212.461(b)(4)]
  - v. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust. [35 IAC 212.461(b)(5)]
  - vi. Housekeeping Check List. Housekeeping check lists to be developed by the Agency shall be completed by the manager and maintained on the premises for inspection by Agency personnel. [35 IAC 212.461(b)(6)]
- b. The three flash dryers and the water heater shall only burn natural gas as fuel only.
  - c. The maximum rated firing rate of flash dryers shall not exceed 16 million Btu/hr total.
  - d. Methyl bromide use shall not exceed 15,000 lbs per

year for the affected plant.

7.1.6 Emission Limitations

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

- a. Emissions of NO<sub>x</sub> and CO from the flash dryers combined shall not exceed 2.0 and 1.5 lb/hr and 8.8 and 6.6 tons/year, respectively.

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) [T1].

The above limitations were established in Permit 02070032, 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].

- b. Emissions from the affected plant shall not exceed the following limits:

Emission Unit	Grain Loading	Gas Flow Rate	PM Emissions	
	(gr/scf)	(acfm)	(Lb/Hr)	(Ton/Yr)
Bin Vent Filters SO13 (A, B and C)	0.02	1,000	0.171	0.75

These limits are based on the information provided in the permit application. 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) [T1].

The above limitations were established in Permit 99100047, 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].

- c. Emissions from the affected plant shall not exceed the following limits:

Emission Unit	PM Emissions	
	(Lb/Hr)	(Ton/Yr)
900 Ton Storage Bin	0.2	0.9

These limits are based on the maximum hours of operation and information provided in the permit application. 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) [T1].

The above limitations were established in Permit 74110036, 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].

- d. Emissions from the affected specialty mill suction system shall not exceed the following limits:

Emission Unit	PM Emissions (Tons/Yr)
Flakes to Cutter, Bran Packer Suction & Corn Bran Grinding (S008)	4.2

These limits are based on the allowable emission limit (0.97 lbs/hr) at the maximum operating rate (331 lbs/hr) and the maximum hours of operation (8736 hr/yr) indicated in the permit application. 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) [T1].

The above limitations were established in Permit 78090014, 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].

7.1.7 Testing Requirements

- a. The affected plant is subject to the applicable testing requirements established in 35 IAC Part 212 Subpart A: General Provisions for Particulate Matter Emissions.

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 plant to demonstrate compliance with Conditions 5.5.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Corn milled based on the daily grind rate, recorded at least once per day.
- b. Corn dried based on the daily drying rate, recorded at least once per day.
- c. Throughput (bushels/day monthly average).
- d. The maximum emission of PM/PM<sub>10</sub> (lb/hour) from each emission unit or group of emission units controlled by a single control device, considering maximum exhaust flow and nominal exhaust loading, with supporting documentation.
- e. Records addressing use of good operating practices for the control equipment:
  - i. Records for periodic inspection of the control equipment with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected 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:

- a. Emissions from or operation of the affected plant in excess of the limits specified in Conditions 5.5.1, and 7.1.6 within 30 days of such occurrence.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.1.12 Compliance Procedures

- a. Compliance with Conditions 5.5.1, 7.1.3 and 7.1.6, PM emissions from the affected plant shall be calculated based on:

- i. The applicable emission factors for grain elevators and grain processing, Tables 9.9.1-1 and 9.9.1-2, AP-42, Volume I, Fifth Edition, Supplement D, May, 1998, or current edition, or
- ii. The results of emission test(s) on the affected process or a similar process. The emission test(s) shall be the most recent, valid and deemed acceptable to the Agency.

7.2 Powerhouse

7.2.1 Description

One natural gas fired boiler and one natural gas fired boiler with back-up distillate fuel oil.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P007	Natural Gas Boiler rated at 33.5 MBtu	None
P008	Natural Gas with Backup Fuel Oil Boiler rated at 33.5 MBtu	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unit specific conditions, are the natural gas fired boilers listed in Condition 7.2.1 and 7.2.2.
- b. The affected boilers are subject to the emission limits identified in Condition 5.2.2.
- c. The emissions of particulate matter into the atmosphere in any one hour period shall not exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/MBtu) [35 IAC 212.206].
- d. The emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from boiler P008 burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/MBtu) [35 IAC 214.122(b) (2)].
- e. The emission of carbon monoxide (CO) into the atmosphere from any affected boiler with actual heat input greater than 2.9 MW (10 MBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]
- f. The affected boilers are subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc because the boilers were constructed after June 9, 1989 and the firing rates of the affected boilers are less than 100 Hr/hr and greater than 10 Hr/hr.

- g. Pursuant to the New Source Performance Standard, the emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from boiler P008 burning liquid fuel exclusively shall not exceed 215 ng/J of actual heat input when distillate fuel oil is burned (0.5 lb/MBtu); as an alternative the Permittee shall not combust oil in boiler P008 that contains greater than 0.5 weight percent sulfur. All limits shall be based on a 30-day rolling average. [40 CFR 60.42c(d) and (g)]
- h. Pursuant to the New Source Performance Standard, the emission of gases into the atmosphere from any affected boiler, except during periods of startup, malfunction and shutdown, shall not exhibit an opacity greater than 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [40 CFR 60.43c(c) and (d)]

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. There are no applicable requirements for particulate matter or sulfur dioxide pursuant to 40 CFR 60 Subpart Dc for boiler P007 because of firing natural gas only.
- b. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 MBtu/hr).
- c. The affected boilers are not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

#### 7.2.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired in boiler P007.
- b. Natural gas or distillate (#2) fuel oil shall be the only fuel fired in the boiler P008.

#### 7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

- a. Emissions from the affected boilers shall not exceed the following limits:

Pollutant	E M I S S I O N S			
	Boiler P007		Boiler P008	
	(Lb/Hr)	(Ton/Yr)	(Lb/Hr)	(Ton/Yr)
NO <sub>x</sub>	3.28	14.38	4.72	20.67
CO	2.76	12.03	2.76	12.03
SO <sub>2</sub>	0.02	0.09	6.70	29.36
VOM	0.18	0.79	0.18	0.79
PM	0.25	1.12	0.47	2.07

These limits are based on the maximum fuel usage based on the operating hours (8760 hr/yr) and emission factors listed in Condition 7.1.12. Emissions of NO<sub>x</sub>, SO<sub>2</sub> and PM from the boiler P008 are based on the maximum fuel oil usage based on the operating hours (8760 hr/yr). 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) [T1].

The above limitations were established in Permit 00060032, 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].

7.2.7 Testing Requirements

- a. The performance test(s) and monitoring requirements for sulfur dioxide emissions may be met sampling and analyzing in the initial tank of oil and demonstrating that it contains less than the required weight percent sulfur. Thereafter, the tank shall be sampled and analyzed after each new shipment of oil, as specified in 40 CFR 60.44c. Alternatively, the Permittee shall comply by meeting the fuel supplier certification requirements described in 40 CFR 60.48c.

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 each affected boiler to demonstrate compliance with Conditions 5.5.1, 7.2.5, and 7.2.7, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for each affected boiler (mmscf/month and mmscf/year);

- b. Total distillate fuel usage for affected boiler P008 (gal/month and gal/year).
- c. The maximum sulfur content (in wt %) and the gross heating value of oil (MBtu/lb) for each shipment of distillate fuel oil used in affected boilers P008.
- d. Monthly and annual aggregate VOM, CO, PM, SO<sub>2</sub> and NO<sub>x</sub> emissions, based on natural gas consumption and distillate oil consumption for each boiler and the applicable emission factors from Condition 7.2.12(d) with supporting calculations.

7.2.10 Reporting Requirements

- a. If there is an exceedance of the requirements 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 [Section 39.5(7)(f)(ii) of the Act.]
- b. The Permittee shall fulfill all applicable notification and reporting requirements of the NSPS 40 CFR 60.7 and 60.48.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3(c) and (e) are assumed to be achieved by the work practices inherent in operation of a boiler, thus no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Conditions 5.5.1 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
  - i. Emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5
NO <sub>x</sub>	100
CO	84

These are the emission factors for controlled low-NO<sub>x</sub> burners natural gas combustion in small boilers (<100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March 1998.

Boiler Emissions (ton) = natural gas consumed multiplied by the appropriate emission factor/2000.

- ii. Emissions from the boiler P008 burning distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factors (lb/10<sup>3</sup> gallon)</u>
PM	2
NO <sub>x</sub>	20
SO <sub>2</sub>	142%S
VOM	0.56
CO	5.0

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional/residential combustors, Tables 1.3-1, 1.3-3 and 1.3-7, AP-42, Volume I, Fifth Edition, September 1998. "%S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Boiler Emissions (ton) = distillate fuel oil consumed (gallons) multiplied by the appropriate emission factor/2000.

## 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 July 31, 2003 (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

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. 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;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. 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

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, 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 (#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  
2009 Mall Street  
Collinsville, Illinois 62234
  - iii. Illinois EPA - Air Permit Section (MC 11)  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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 authorized by this permit; 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 authorized by this permit.

#### 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) (l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Netting Project from Permit 02070032

Total Project Maximum PM/PM<sub>10</sub> Emissions

Emission Source/ Stack Designation	Name	Maximum Airflow (cfm)	Maximum Emission Rate (gr/dsf) *	PM/PM <sub>10</sub> Emissions	
				(Lb/Hr)	(Ton/Yr)
C036	Corn Mill Degermination I	8,400	7.5 x 10 <sup>-3</sup>	0.54	2.37
C037	Corn Mill Degermination II	8,400	7.5 x 10 <sup>-3</sup>	0.54	2.37
C038	Corn Mill Degermination III	8,400	7.5 x 10 <sup>-3</sup>	0.54	2.37
C039	Corn Mill Degermination IV	8,400	7.5 x 10 <sup>-3</sup>	0.54	2.37
C040	Corn Mill Degermination V	6,800	7.5 x 10 <sup>-3</sup>	0.44	1.91
C041	General Aspiration XIV	6,350	7.5 x 10 <sup>-3</sup>	0.41	1.79
C042	General Aspiration XV	4,250	7.5 x 10 <sup>-3</sup>	0.27	1.20
C043	Flash Dryer #1	24,000	----	1.26	5.53
C044	Flash Dryer #2	11,500	4.0 x 10 <sup>-4</sup>	0.040	0.173
C045	Flash Dryer #3	6,200	3.7 x 10 <sup>-3</sup>	0.198	0.866
PO09	New Water Heater	----	----	0.0062	0.273
EO10	Elevator Cleaning House I	14,500	7.5 x 10 <sup>-3</sup>	0.93	4.08
EO11	Elevator Cleaning House II	14,500	7.5 x 10 <sup>-3</sup>	0.93	4.08
EO12	Elevator Cleaning House III	14,500	7.5 x 10 <sup>-3</sup>	0.93	4.08
			Totals:	7.40	33.46

\* For information only, emission rate based on 99.9% control efficiency of the baghouses.

PM/PM<sub>10</sub> Emissions Units Removal

Emission Source/ Stack Designation	Name	Maximum Throughput (Ton/Hr)	2001 Operation Hours	Total PM		PM <sub>10</sub>	
				Actual Emissions (Lb/Hr)	Actual Emissions (Ton/Yr)	Actual Emissions (Lb/hr)	Actual Emissions (Ton/Yr)
CO01	Corn Transfer to Production	76.00	6,182	0.46	1.43	0.26	0.80
CO08	Thrustock Cleaner Aspiration	1.00	6,182	0.003	0.01	0.003	0.01
CO09	Thrustock Cooler Aspiration	1.00	6,182	0.02	0.07	0.01	0.02
CO10	Thrustock Aspiration	0.75	6,182	0.06	0.17	0.01	0.04
CO12	Micropulverizer I	2.50	6,182	0.03	0.09	0.03	0.09
CO13	Micropulverizer II	2.50	6,182	0.03	0.09	0.03	0.09
CO14	Micropulverizer III	2.50	6,182	0.03	0.09	0.03	0.09
CO17	Thrustock Dryers	15.00	6,182	0.33	1.02	0.08	0.26
CO18	Thrustock Dryers	30.00	6,182	0.66	2.04	0.17	0.51
CO20	General Aspiration III	1.30	6,182	0.004	0.02	0.004	0.01
CO21	General Aspiration IV	0.20	6,182	0.001	0.002	0.001	0.002
CO22	General Aspiration V	0.20	6,182	0.001	0.002	0.001	0.002
CO23	General Aspiration VI	0.20	6,182	0.001	0.002	0.001	0.002
CO24	General Aspiration VII	0.20	6,182	0.001	0.002	0.001	0.002
CO35	General Aspiration XIII	Unknown	6,182	1.80	5.56	1.80	5.56
CO29	Collets to Grinding	N/A	6,182				
0001/0002	Oil Cake Extruders Suction	4.00	6,182	0.10	0.30	0.05	0.15
0003	Germ Dryers	6.00	6,182	1.08	3.34	1.08	3.34
EO03	General Conveyor Suction	65.2	4,121	2.57	7.95	1.43	4.43
EO04	Corn Mill Tailcorn System	65.2	4,121	0.07	0.23	0.04	0.13
EO05	Corn Cleaning System	75	4,121	5.63	17.39	1.32	4.09
				Total 2001 Emissions Eliminated		39.8	19.6

Change in PM/PM<sub>10</sub> Emissions

**Table I - Emissions Increases With The Proposed Modification Project**

<u>Item of Equipment</u>	<u>Proposed Operation Date</u>	<u>PM/PM<sub>10</sub> Emissions Increase (Tons/Year)</u>
Mill Modification - New Units	2003	33.46

**Table II - Source-Wide Creditable Contemporaneous Emission Increases**

<u>Item of Equipment</u>	<u>Operation Date</u>	<u>PM/PM<sub>10</sub> Emissions Increase (Tons/Year)</u>
Boilers P007 and P008 (Permit 00060032)	2000	3.19

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

<u>Item of Equipment</u>	<u>Operation Date</u>	<u>PM/PM<sub>10</sub> Emissions Increase (Tons/Year)</u>
Mill Modification - Shutdown Units	2002	- 19.6
Boilers P001 (Permit 00060032)	2000	- 32.04

**Table III - Overall Emissions Increase**

	<u>(Tons/Year)</u>
Increases Associated With The Proposed Modification	33.46
Contemporaneous Emission Increases	3.19
Contemporaneous Emission Decreases	- 51.64
Total Increases of PM/PM <sub>10</sub> 2002 - 1998	- 14.99

10.2 Attachment 2 Emissions of Particulate Matter from New Process Emission Units

10.2.1 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. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/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 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
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

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
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 Emissions of Particulate Matter from Existing Process Emission Units

10.3.1 Process Emission Units for Which Construction or Modification Commenced Prior to 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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

Where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates up to 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rate in excess of 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.4 Attachment 4 - 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: \_\_\_\_\_

## 10.5 Attachment 5 - 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;
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
  - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
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; and
- Are not required to be processed as a significant permit modification.

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 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
- 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>
	I.D. 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.

Source Information		
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:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

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

Applicant Information	
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.

10.7 Attachment 7 - 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.

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

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