

217/782-2113

CONSTRUCTION PERMIT - NSPS SOURCE

PERMITTEE

One Earth Energy, LLC
Attn: Mitch Dawson
1306 West 8th Street
Gibson City, Illinois 60936

Application No.: 06050059

I.D. No.: 053010AAW

Applicant's Designation:

Date Received: May 15, 2006

Subject: Fuel Ethanol Plant

Date Issued:

Location: 1306 West 8th Street, Gibson City, Ford County

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a fuel ethanol plant with a nominal design capacity of 110 million gallons/year denatured ethanol, including the units listed in Attachment A and other ancillary operations, as described in the above-referenced application. This Permit is subject to the following conditions and the standard conditions attached hereto.

Section 1: Plant-Wide Conditions

1.0 Introduction

1.1 Plant-Wide Operating Limitations

- a. The amount of grain processed at this plant shall not exceed 4.0 million bushels/month and 40.0 million bushels/year.
- b. Ethanol production from the plant, determined as denatured ethanol shipped from the loading rack, shall not exceed 11 million gallons/month and 110 million gallons/year.
- c. Annual natural gas usage by the plant shall not exceed 3720 million cubic feet.
- d. Compliance with these annual limitations and other annual limitations of this permit shall be determined from a running total of 12 months of data, unless otherwise specified in the particular condition.

1.2 Plant-wide Emission Limitations

- a. Emissions from the plant shall not exceed the limitations in Table I. For purposes of determining compliance with these limitations, the procedures in the unit-specific conditions of this permit shall be followed unless other credible evidence provides a more accurate estimate of emissions.

- b. i. This permit is issued based on the source not being a major source for Hazardous Air Pollutants (HAP), so that this source is not subject to the requirements of Section 112(g) of the Clean Air Act.
- ii. If not otherwise specified for a particular emission unit, the emissions of HAPs, other than acetaldehyde, shall not exceed the following limits, which are expressed as a percentage of the VOM limitations:

Individual HAP: 10.0 percent of VOM limit
Aggregate HAPs: 15.0 percent of VOM limit.

Note: Refer to Tables I for limitations for acetaldehyde emissions.

1.3 Regulations of General Applicability

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 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, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) or 212.124.

1.4 Good Air Pollution Control Practice

The Permittee shall operate and maintain the emission units at this plant, including associated air pollution control equipment, in a manner consistent with good air pollution control practice, as follows:

- a. At all times, including periods of startup, shutdown, malfunction or breakdown, operate as practicable to minimize emissions.
- b. Conduct routine inspection and perform appropriate maintenance and repairs to facilitate proper functioning of equipment and minimize or prevent malfunctions and breakdowns.
- c. Install, calibrate and maintain required instrumentation according to the supplier's specifications or as otherwise necessary to assure reliable operation of such devices.

- d. Install stacks for the principal emission units designed with a height and exhaust velocity that satisfy good engineering practices.

1.5 Retention and Availability of Records

All records, including logs and procedures, required by this permit shall be retained by the Permittee at a readily accessible location at the source for at least three years from the date of entry and shall be available for inspection by the Illinois EPA upon request. Any records retained in electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection. The Permittee shall provide copies of any required records requested by the Illinois EPA as soon as is practicable, considering the nature and extent of the requested records.

1.6 Plant-Wide Reporting

- a. The Permittee shall submit Quarterly Compliance Reports as specified in the unit specific conditions of this permit and Condition 3.4(b).
- b.
 - i. The Permittee shall submit an Annual Emission Report in accordance with 35 IAC Part 254.
 - ii. With its Annual Emission Report the Permittee shall report:
 - A. The annual operating hours of the distillation process, fermentation process and the feed drying system, and the percentage of these operating hours, if any, that these units operated out of compliance.
 - B. Significant deficiencies in the condition of emission units and control systems as related to emissions identified during the detailed annual inspection of equipment.
- c.
 - i. The Permittee shall notify the Illinois EPA within 30 days of any deviation from the operating limitations in Condition 1.1 or the annual emission limitations set for the plant. Any such notification shall include the information specified in Condition 3.4.
 - ii. Notwithstanding the above or provisions in the Unit Specific Conditions of this permit for reporting deviations, if deviation will occur from required maintenance, repair or other activity that can be scheduled in advance, the Permittee shall also notify the Illinois EPA prior to undertaking such activity, if it is

feasible to do so. Such notification shall be submitted at least 5 days in advance unless the activity is scheduled less than 5 days in advance. Such notification shall be followed by such other notification or reporting as required for the deviations.

1.7 Submission of Reports

- a. i. All notifications and reports required by this permit shall be sent to the Illinois EPA at the following address unless otherwise indicated:

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

- ii. A copy of each report or notification shall also be sent directly to the Illinois EPA's regional office at the following address:

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

- b. When this permit requires immediate notification, such notification shall be provided by telephone and followed by facsimile or e-mail transmittal of a narrative report.

1.8 Other Requirements

- a. This permit does not relieve the Permittee of the responsibility to comply with all Local, State and Federal Regulations which are part of the applicable Illinois State Implementation Plan, as well as all other applicable Federal, State and Local requirements.
- b. In particular, this permit does not excuse the Permittee from the obligation to undertake further actions at the source as may be needed to eliminate air pollution, including nuisance due to odors, such as raising the height of stacks, using alternative scrubbant materials, installing back-up control systems or altering process conditions in emission units.

Section 2: Unit Specific Conditions

2.1 Diesel Generator

2.1.1 Description

A diesel engine generator would be used to maintain electrical power for the emergency fire pump at the plant if the plant experiences an interruption or outage in the power supply from the grid.

2.1.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Engine	Diesel Engine Generator (300 hp)	----

2.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected engine" for the purpose of these unit-specific conditions, is the engine generator described in Conditions 2.1.1 and 2.1.2.

2.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected engine not being subject to 35 IAC 212.321, Emission of Particulate Matter from Process Emission Units, because due to the nature of this process, such rules cannot reasonably be applied.

2.1.5 Operational and Production Limits and Work Practices

- a. Fuel oil shall be the only fuel fired in the affected engine.
- b. The affected engine shall not operate more than 500 hours per year.
- c. The sulfur content of the fuel oil fired in the affected engine shall not exceed 0.05% by weight.

2.1.6 Emission Limitations

- a. Emissions from the affected engine shall not exceed the following limits. These limits are based on the information provided in the permit application including the maximum capacity of the engine (300 hp), standard emission factors and maximum operation (500 hours per year).

Pollutant	Emissions	
	(Lb/Hr)	(Tons/Yr)
NO _x	3.45	0.86
CO	0.18	0.05
VOM	0.09	0.02
PM	0.06	0.02
SO ₂	0.39	0.10

- b.
 - i. The acetaldehyde emissions of affected engine shall not exceed 0.002 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from affected engine shall not exceed 0.002 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde, from affected engine shall not exceed 0.003 tons/yr.

2.1.1.7 Testing Requirements

Upon written request by the Illinois EPA, the Permittee shall perform emission tests as requested for the affected engine as specified in Conditions 3.1(b), (d), (e), and (f).

2.1.1.8 Monitoring Requirements

None

2.1.1.9 Recordkeeping Requirements

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

- a. Fuel usage, gallons/month and gallons/yr.
- b. The sulfur content of the fuel used in the affected engine (% by weight), which shall be recorded for each shipment of fuel delivered to the plant.
- c. Operating hours (hours/month and hours/year).
- d. The manufacturer's specification for emission from the engine or applicable emission factors, with supporting documentation.
- e. Monthly and annual NO_x, CO, PM, SO₂, and VOM emissions, based on fuel consumption and other operating data, and appropriate emission factors, with supporting calculations.

2.1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected engine as follows. These reports shall include the information specified in Condition 3.4.

- a. The use of fuel with sulfur content in excess of 0.05% by weight, the limit specified in Condition 2.1.5(c), with the amount and length of time this fuel was used and the additional emission of SO₂ that accompanied the incident.
- b. The deviations addressed above and all other deviations shall be reported in the quarterly compliance report.

2.2 Grain Receiving, Handling, Milling, and Processing

2.2.1 Description

The plant includes a grain elevator at which corn is received by truck or rail car and stored in bins prior to processing. The total storage capacity of the elevator is approximately 1.0 million bushels. The initial processing of the corn occurs in the elevator, when the corn is screened or cleaned to remove cobs and other foreign matter. The cleaned grain is then transferred to a "day bin", ground in a hammermill and conveyed to the mixer. In the mixer the ground grain is mixed with recycled process water from the cook water tank and sent to slurry tank for enzymatic processing.

2.2.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Grain Receiving and Storage System	Truck and Rail Dump Station	Baghouse 1
	Conveyors	
	Elevators	
	Storage Silos (1-4)	
	Cleaner	
Grain Milling	Grain Day Bin	Baghouse 2
	Hammermill Feed	
	Hammermills (1-4)	
	Hammermill Discharge Conveyors	

2.2.3 Applicability Provisions and Applicable Regulations

- a.
 - i. The "affected grain handling operations" for the purpose of these unit-specific conditions, are the grain handling operation described in Conditions 2.2.1 and 2.2.2.
 - ii. The "affected grain milling operations" for the purpose of these unit-specific conditions, are the grain milling operation described in Conditions 2.2.1 and 2.2.2.
- b. The affected grain handling operations are subject to 35 IAC 212, Subpart S: Agriculture. The Permittee shall comply with all applicable requirements of Subpart S. [See Conditions 2.2.5(a) and (b)]
- c. Affected grain milling units are subject to 35 IAC 212.321, which provide that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of

particulate matter from all other similar process emission unit, 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 35 IAC 212.321(c).

2.2.4 Non-Applicability of Regulations of Concern

- a. The affected grain handling operations are not subject to 35 IAC 212.321, because the affected operations are subject to 35 IAC 212, Subpart S. [35 IAC 212.461(a)]
- b. This permit is issued based on the affected operations not being subject to 40 CFR 60, Subpart DD: Standards of Performance for Grain Elevators, because the source's total permanent grain storage capacity will not exceed the applicability threshold of the NSPS (threshold of 2,500,000 bushels permanent storage capacity).

2.2.5 Operational Limits and Control Requirements

- a. Housekeeping Practices. The Permittee shall implement and use the following housekeeping practices for affected operation, pursuant to 35 IAC 212.461(b):
 - i. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.
 - ii. Cleaning and Maintenance.
 - A. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tend to rot or become airborne.
 - B. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.
 - C. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.
 - iii. Dump Pit.
 - A. Aspiration equipment shall be maintained and operated.
 - B. Dust control devices shall be maintained and operated.

- iv. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.
 - v. Housekeeping Check List. A written Housekeeping Check List for the grain handling operation, developed and maintained by the Permittee, shall be completed by the manager of the operation on at least a monthly basis and copies maintained on the premises for inspection by the Illinois EPA.
- b. Individual grain handling operations shall comply with applicable requirements of 35 IAC 212.462 (see below), if a certified investigation performed by the Illinois EPA determines that such operation is causing or tending to cause air pollution. [Section 9 of the Environmental Protection Act]
- i. Cleaning and Separating Operations. [35 IAC 212.462(a)]
 - A. Particulate matter generated during cleaning and separating operations shall be captured to the extent necessary to prevent visible particulate matter emissions directly into the atmosphere.
 - B. 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.
 - ii. Dump-Pit Areas. [35 IAC 212.462(b)]
 - A. 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 feet per minute.
 - B. The induced draft air stream 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;

- C. Means or devices (including, but not limited to, 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.

iii. Internal Transferring Area. [35 IAC 212.462(c)]

- A. Internal transferring area shall be enclosed to the extent necessary to prohibit visible particulate matter emissions directly into the atmosphere.
 - B. Air contaminants collected from internal transfer operations 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.
- c. The Permittee shall operate the baghouses of the affected operations with a pressure drop that is within a range that is consistent with manufacturer's recommended levels or that during emission testing that demonstrated compliance with applicable requirements.
 - d. The Permittee shall operate and maintain air pollution control equipment in a manner that assures that applicable requirements are met. The actions taken by the Permittee to meet this requirement shall include at least the following:
 - i. Written operating procedures shall be maintained and updated describing normal process and equipment operating parameters; monitoring or instrumentation for measuring control equipment operating parameters, if any; and control equipment inspection and maintenance practices. With respect to control equipment maintenance practices, the operating procedures may incorporate the manufactures recommended operating instructions, if a copy of these instructions is attached to the procedures.
 - ii. Visual inspections of air pollution control equipment shall be conducted on a regular schedule. These inspections shall include a detailed inspection of

the performance and condition of control equipment at least once per year.

2.2.6 Emission Limitations

- a.
 - i. Fabric filters (baghouses) on affected processes shall comply with an emission limit of 0.005 grain per standard cubic foot (gr/scf).
 - ii. There shall be no visible emissions of fugitive emission, as defined by 40 CFR 60.301, from the affected grain handling operations.
 - iii. The affected grain unloading operation shall not exhibit opacity greater than 5 percent.
- b.
 - i. Particulate matter emissions from affected operation shall not exceed the following limits. These limits are based on information provided in the application, including grain receiving and handling operation of 6750 hr/yr.

<u>Operation</u>	<u>Emissions (Lb/Hr)</u>	<u>(Ton/Yr)</u>
Grain Receiving and Handling	2.06	6.76
Grain Milling	1.20	5.26
TOTAL		12.02

- ii. The above limits do not account for uncaptured particulate matter emissions from the receiving and handling of grain, which shall not exceed 2.97 tons/year.

2.2.7 Testing Requirements

The Permittee shall perform emission tests as requested for affected operations as specified in Condition 3.1.

2.2.8 Monitoring Requirements

The Permittee shall install, operate, and maintain instrumentation on each baghouse for the affected operation to measure pressure drop across the baghouse.

2.2.9 Recordkeeping Requirements

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

- a. The permanent grain storage capacity of the plant, with supporting documentation, which record shall be updated if the permanent grain storage capacity of the plant changes.

- b. A copy of the manufacturer's specifications and recommended operating and maintenance procedures for each baghouse for the affected operations.
- c. Records related to grain throughput, on a monthly basis:
 - i. Grain received (tons/month).
 - ii. Grain in storage (tons).
 - iii. Grain processed, based on amount received adjusted for change in amount stored (tons/month).
 - iv. Grain processed (tons/year).
- d. The differential pressure of the baghouses at least once per operating day.
- e. Logs for inspections, other equipment observations, preventative maintenance, maintenance activities other than preventative maintenance, and repair of air pollution control equipment which include: date, duration, nature, and description of observation or action.
- f.
 - i. Documentation for the PM emission factor(s) used by the Permittee to determine emissions of the affected operation.
 - ii. All other data used or relied upon to determine the PM emissions of affected operations.
 - iii. PM emissions from affected operations (tons/month and tons/year) based on appropriate emission factors and operating data, with supporting calculations.

2.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected operations as follows. These notifications shall include the information specified by Condition 3.4.
 - i. Excess opacity that lasts more than 24 minutes (four 6-minute averaging periods) shall be immediately reported to the Illinois EPA.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.3 Mash Preparation and Fermentation

2.3.1 Description

Ethanol is produced by fermentation of the starch in corn. Ground corn is prepared for fermentation by converting it to "mash", by the addition of water and enzymes in a series of liquefaction and saccharification tanks that with heating, break the ground corn into fine slurry. In the fermentation tanks, yeast is added to the mash to begin the batch fermentation process.

The CO₂-rich gas generated by the fermentation tanks is routed through a scrubber to recover ethanol and other organic compounds in the exhaust. The fermentation scrubber is also referred to as the "CO₂ scrubber", as it scrubs the CO₂ stream from the fermentation tanks. The wastewater generated from the scrubbing process is routed back to the cook water tank for reuse.

The emissions from the feed preparation (mixer, cook water tank, slurry tanks, flash tank, and yeast tanks), along with the emissions of certain units associated distillation process would be controlled by recuperative thermal oxidizer/boiler systems. (See Condition 2.5)

2.3.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Mash Preparation	Mixer	Oxidizer/Boiler Systems
	Yeast Tanks (1-2)	
	Slurry Tanks (1-2)	
	Cook Water Tank	
	Liquifaction Tanks (1-4)	----
	Flash Tank	----
	Misc. Chemical Tanks	----
Fermentation	Fermenters (1-7)	Fermentation Scrubber
	Beer Well	

2.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected unit" for the purpose of these unit specific conditions is an emission unit described in Conditions 2.3.1 and 2.3.2.
- b. The affected units are subject to 35 IAC 212.321. (Refer to Condition 2.2.3(c))
- c. The affected units are subject to 35 IAC 215.301, which provides that no person shall cause or allow the discharge of more than 8 lbs/hr of organic material from an emission source, unless either emissions are controlled by at least

85 percent, as provided in 35 IAC 215.302, or the emissions do not qualify as photochemically reactive material, as defined by 35 IAC 211.4690 and do not contribute to an odor nuisance.

2.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected fermentation units not being subject to the NSPS for VOC Emissions from SOCMR Reactor Process, 40 CFR 60 Subpart RRR, because the fermentation tanks involve biological reaction and operate as batch processes.

2.3.5 Operational and Production Limits and Work Practices

- a. The key operating parameters of the fermentation scrubber shall be maintained at levels that are consistent with levels at which emission testing demonstrated compliance with applicable requirements:
 - i. Minimum scrubber water flow rate: hourly average.
 - ii. Maximum scrubber water outlet temperature: hourly average.
 - iii. Maximum scrubber exhaust gas outlet temperature: hourly average.
- b. If the differential pressure across the fermentation scrubber is outside of the normal operating range as defined by the Permittee for a period of 4 hours, the Permittee shall inspect the scrubber within 24 hours and initiate appropriate corrective action to restore the pressure drop of the scrubber to the normal range.
- c. The Permittee shall operate and maintain the fermentation scrubber in accordance with written procedures developed and maintained by the Permittee.
- d.
 - i. If emission testing of the affected units controlled by fermentation scrubber shows compliance with requirements for VOM by less than a 10 percent margin, the Permittee shall implement a Control Improvement Program (Program) for the affected process with the objective of achieving compliance by a margin of at least 10 percent.
 - ii. The Permittee shall submit a copy of the program to the Illinois EPA for its review and comments within 30 days after receiving test results that triggers this requirement for a Control Improvement Program (Program).

- iii. A. The Program shall be completed in one year.
- B. Following completion of the Program, the Permittee shall again test VOM emissions from the affected units.

2.3.6 Emission Limitations

- a. The VOM emissions from the affected units that are to be controlled, i.e., the fermentation tanks and beer well, shall not exceed 910 lb/million gallons ethanol or be controlled by at least 98 percent by weight.
- b.
 - i. Emissions of VOM from the affected units that are to be controlled shall not exceed 11.4 pounds/hour and 50.0 tons/year.
 - ii. This permit is issued based on negligible PM emissions from the affected units emission units. For this purpose, PM emissions from these units, in total, shall not exceed 0.1 lb/hr and 0.44 tons/year.
- c. The VOM emissions from miscellaneous units (e.g., thin stillage tank, syrup tank, liquefaction tanks, and whole stillage tank) that are not controlled shall not exceed 0.65 tons/yr, total. Compliance with this limit shall be determined based on annual basis.
- d.
 - i. The acetaldehyde emissions of the affected units shall not exceed 1.45 lb/hr and 6.33 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from the affected units shall not exceed 0.01 lb/hr and 0.05 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde from the affected units shall not exceed 0.04 lb/hr and 0.14 tons/yr.

2.3.7 Testing Requirements

The Permittee shall perform emission tests as requested for affected unit as specified in Condition 3.1.

2.3.8 Monitoring Requirements

- a. The Permittee shall equip the fermentation scrubber with continuous monitoring devices for the scrubber water flow rate, scrubbant discharge temperature at the bottom of the scrubber, scrubber exhaust gas discharge temperature, rate of reagent addition to the scrubbant, and differential

pressure across the packed bed and demister section of the scrubber. These monitoring devices shall be installed, operated, maintained and calibrated according to the supplier's specifications and record minute-by-minute and average hourly data. The Permittee shall maintain logs for the maintenance and repair of these devices.

- b. During any period when measurements are not recorded by the computerized data logging system, measurements shall be manually recorded at least twice per shift.

2.3.9 Recordkeeping Requirements

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

- a. Records of normal process parameters, with supporting calculations and documentation:
 - i. Mash feed rate to fermenters.
 - ii. Quantity of mash in the fermentation tanks.
- b. Records for any period during which any affected unit was in operation when the fermentation scrubber was not in operation or was malfunctioning so as to cause emissions in excess of applicable emissions limitation.
- c. The Permittee shall keep a log for inspection, maintenance, and repairs for affected units and the fermentation scrubber.
- d. Records for any upsets in fermentation operations or other operations that could generate additional VOM and HAP emissions, with a description of the incident, an estimate of the additional VOM and HAP emissions that occurred with supporting calculations, and background information.
- e. Records of the VOM and HAP emissions from the affected units (tons/month and tons/year), as determined at the scrubber and any other vents, based on appropriate emission factors, with supporting calculations.

Note: For the purpose of these records, HAPS shall include acetaldehyde and other organic HAPS emitted from the affected units, as addressed during emissions testing.

2.3.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for

the affected units as follows. These notifications shall include the information specified by Condition 3.4.

- i. If there is an exceedance of applicable requirements for the fermentation scrubber by more than 2.0 percent, as determined by the monitoring required by Condition 2.3.8, that lasts longer than three hours, the Permittee shall immediately notify the Illinois EPA.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.
- b. If there is any deviation of the requirements of this permit, not addressed by the above reporting requirements, as determined by the records required by this permit or by other means, the Permittee shall submit a report with the quarterly compliance report.
- c. Notwithstanding the above, if a deviation from the requirements of this permit will occur from required maintenance, repair or other activity that can be scheduled in advance, the Permittee shall also notify the Illinois EPA prior to undertaking such activity if it is feasible to do so. Such notification shall be submitted at least 5 days in advance unless the activity is scheduled less than 5 days in advance. This notification may be supplemented with additional information submitted within 7 days of the deviation, as needed to provide all information required by Condition 3.4(a).

2.4 Distillation

2.4.1 Description

During the distillation process, the solids and water are separated from the ethanol-rich "beer" produced in the fermentation tanks with a vacuum distillation system, to produce approximately 190 proof ethanol (95% ethanol, 5% water). The remaining water in the ethanol is removed in a molecular sieve to produce approximately 200 proof (100% ethanol). Denaturant is added to the finished product prior to storage.

The emissions from the distillation process, along with the emissions of certain units associated mash preparation for fermentation are controlled by oxidizer/boiler systems. (See Condition 2.5)

2.4.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Distillation	Beer Column	----
	Stripper Column	----
	Rectifier Column	----
	Molecular Sieve	----
	CIP Mash Screen	----
	190 Proof Condenser	Oxidizer/Boiler
	200 Proof Condenser	
Solid Separation and Evaporation	Evaporators	----
	Centrifuges (1-6)	----
	Whole Stillage Tank	----
	Syrup Tank	----
	Thin Stillage Tank	----

2.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected unit" for the purpose of these unit specific conditions is an emission unit described in Conditions 2.4.1 and 2.4.2.
- b. The affected units are subject to 35 IAC 212.321. [Refer to Condition 2.2.3(c)]
- c. The affected units are subject to 35 IAC 215.301. [Refer to Condition 2.3.3(c)]

2.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected distillation units not being subject to either 40 CFR 60, Subpart NNN or RRR, Standards of Performance for Volatile Organic

Compound Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations, or Reactor Processes, respectively, based upon guidance from USEPA that this regulation is not applicable to processing of material produced by biological reaction.

- b. This permit does not address the applicability of 35 IAC 215.301 for the affected units that are controlled by oxidizer/boiler systems because the organic material emissions of the processes are required to be controlled by greater than 85%, such that organic material emissions are less than 8.0 lb/hr. [Refer to Condition 2.5.6(a)]

2.4.5 Operational and Production Limits and Work Practices

The affected units that are controlled by oxidizer/boiler systems shall not operate when the oxidizer/boiler systems are not in service.

2.4.6 Emission Limitations

This permit is issued based on no emissions from the operation of the affected units other than emissions that occur through the oxidizer/boiler systems, as addressed in Condition 2.5.6(a); emissions from miscellaneous units, as addressed by Condition 2.3.6(c); or emissions attributable to leaking components, as addressed in Condition 2.8.6.

2.4.7 Testing Requirements

None

2.4.8 Monitoring and Instrumentation Requirements

None

2.4.9 Recordkeeping Requirements

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

- a. Records of normal distillation process operating parameters, hourly average, with supporting calculations and documentation:
 - i. Beer feed rate
 - ii. Beer well ethanol content
 - iii. 190-proof feed rate
 - iv. 200-proof feed rate

- b. A log or other records for operation of the affected units, including:
 - i. Identification of any period of oxidizer/boiler system deviation or upsets and the operating levels of the units during such incident.
 - ii. Records for any period during which any affected unit was in operation when associated oxidizer/boiler was not in operation or was malfunctioning so as to cause an emissions level in excess of the emission limitations.
- c. A log and log for inspection, maintenance, and repairs for affected units.
- d. Records for any upsets in the affected units that could generate additional VOM or HAP emissions, with a description of the incident, an estimate of the additional VOM and HAP emissions that occurred with supporting calculations, and background information.

2.4.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected process as follows. These notifications shall include the information specified by Condition 3.4.
 - i. If there are direct emissions from an affected units, contrary to Condition 2.4.6, the Permittee shall notify the Illinois EPA within 72 hours.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.
- b. If there is any deviation of the requirements of this permit, not addressed by the above reporting requirements, as determined by the records required by this permit or by other means, the Permittee shall submit a report with the quarterly compliance report.
- c. Notwithstanding the above, if a deviation from the requirements of this permit will occur from required maintenance, repair or other activity that can be scheduled in advance, the Permittee shall also notify the Illinois EPA prior to undertaking such activity if it is feasible to do so. Such notification shall be submitted at least 5 days in advance unless the activity is scheduled less than 5 days in advance. This notification

may be supplemented with additional information submitted within 7 days of the deviation, as needed to provide all information required by Condition 3.4(a).

2.5 Feed Drying Operations

2.5.1 Description

Stillage, the solids-laden material recovered from the bottom of the distillation system, is processed in mechanical centrifuges for de-watering. The recovered water from the centrifuges is processed in a steam driven evaporator to produce thick syrup. The wet cake from the centrifuges and the syrup from the evaporator are mixed and further processed by drying.

Four natural gas fired dryers (with a nominal heat input capacity of 45 million Btu/Hr, each) will be used to produce dry feed from wet cake. These dryers will have the capacity to convert all wet cake produced at the plant into dry feed. The dryers will be equipped with cyclones to minimize carry out of PM with the exhaust. Two natural gas-fired recuperative thermal oxidizer (Oxidizer/Boiler) systems will control emissions of CO, VOM, HAP and PM from the dryers. The oxidizer will also function as the furnace for the boiler to supply steam to the plant, with a nominal heat input capacity of 122 million Btu/hour, each. Feed cooling drum is controlled by a baghouse and partially vented through the oxidizer/boiler systems.

The oxidizer systems also control the emissions from certain units in the mash preparation (mixer, slurry tanks, yeast tanks and cook water tank) and the distillation area (190 proof condenser and 200 proof condenser).

2.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	
Mash Preparation	Mixer	Oxidizer/Boiler Systems	
	Slurry Tanks		
	Cook Water Tank		
	Yeast Tanks		
Distillation	Rectifier Column/190 Proof Condenser		
	Molecular Sieve/200 Proof Condenser		
Feed Dewatering and Drying	Evaporators/Centrifuges/Centrate Tank		
	Two Dryer systems (each dryer system has two dryer/cyclone in series)		
Feed Cooling Operation	Feed Cooling Drum		Baghouse and Oxidizer/Boiler systems

2.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected unit" for the purpose of these unit specific conditions is an emission unit described in Conditions 2.5.1 and 2.5.2.
- b. Each oxidizer/boiler is subject to the New Source Performance Standard (NSPS) for Industrial-Commercial-Institutional Steam Generating units, 40 CFR 60, Subpart Db and related provisions in 40 CFR 60, Subpart A General Provisions.
 - i. The emission of nitrogen oxides (NO_x) from each oxidizer/boiler system, including period of startup, malfunction, and breakdown shall not exceed 0.1 lb/mmBtu in accordance with the provisions of the NSPS 40 CFR 60.44b(a) (1) (i) for low heat release steam generating units.
 - ii. At all times, the Permittee shall maintain and operate the oxidizer/boiler systems, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions, pursuant to 40 CFR 60.11(d).
- c. The affected units are subject to 35 IAC 212.321. [Refer to Condition 2.2.3(c)]
- d. The affected units are subject to 35 IAC 215.301. (Refer to Condition 2.3.3(c))

2.5.4 Non-Applicability of Regulations of Concern

- a. For the oxidizer/boiler systems, there are no applicable NSPS control requirements for emissions of PM or SO₂, pursuant to 40 CFR 60.43b or 60.42b, respectively, as the oxidizer/boiler systems fires natural gas.
- b. For the affected units that are controlled by the oxidizer/boiler system, this permit does not address the applicability of 35 IAC 215.301 because the organic material emissions of the units are required to be controlled by greater than 85 percent, such that organic material emissions are less than 8.0 lb/hr.
- c. This permit is issued based on the oxidizer/boiler systems not being subject to NSPS or state emission standards for steam generating units with a heat input capacity of 250 million Btu/hour or more because the capacity of the oxidizers, combined, excluding the dryers, is less than this level.

2.5.5 Operational and Production Limits and Work Practices

- a.
 - i.
 - A. Natural gas and biogas from the bio-methanator shall be the only fuel fired in the feed dryers.
 - B. Natural gas shall be the only fuel fired in the oxidizer/boiler systems.
 - ii.
 - A. The rated firing capacity of the feed dryers shall not exceed 45 million Btu/hour, each.
 - B. The rated firing capacity of the burners in oxidizer/boiler system shall not exceed 122 million Btu/hour, each.
 - iii. The feed dryers and oxidizer/boiler systems shall be equipped, operated, and maintained with low NO_x burner technology.
- b. The cyclone for the feed dryer and the oxidizer/boiler systems shall be designed so as to be able to be operated to maintain effective control of emissions across the full range of operation of the dryer/cyclone systems, such that control of emissions is not significantly degraded by the operating rate of the dryer/cyclone systems, as related to the control of PM provided by the cyclones, or the steam demands of the facility as related to the firing rate of the oxidizer/boiler systems and the control provided for VOM and CO.
- c.
 - i. During operation of the feed dryers, the key operating parameters of the feed dryers, including the maximum temperature at the inlet of each feed dryer, shall be maintained at levels that are consistent with levels at which emission testing demonstrated compliance with applicable requirements for PM emissions.
 - ii. During periods when feed is present in the dryers or emissions from other units are vented to the oxidizers, the minimum combustion chamber temperature of each oxidizer/boiler system shall be maintained at a temperature that is consistent with the temperature at the manufacturer's recommended temperature or at which emission testing demonstrated compliance with applicable requirements.
 - iii. The combustion chamber of the oxidizers shall be preheated to the manufacturer's recommended temperature or a temperature that is consistent with the most recent emission test in which compliance was demonstrated, prior to sending the wet cake to the

feed dryers or venting other units to the oxidizer/boiler systems.

- iv. Notwithstanding the above, for the purpose of evaluation of the oxidizer/boiler systems and further emission testing, the Permittee may operate the oxidizer/boilers systems at different operating parameters in accordance with a detailed plan describing the evaluation and testing program submitted to and approved by the Illinois EPA.
- d. The Permittee shall operate and maintain the feed dryers and associated control system in accordance with written procedures developed and maintained by the Permittee. These procedures shall provide for good air pollution control practices to minimize emissions and shall include the Permittee's standard operating procedures for startup, normal operation, and shutdown of the dryer system and address likely malfunction and upsets events for the dryer system.
- e. If emission testing of the affected units shows compliance with VOM limitations by less than a 10 percent margin, the Permittee shall implement a Control Improvement Program (Program) for the affected units as set by Condition 2.3.5(d).

2.5.6 Emission Limitations

- a.
 - i. The VOM emissions from affected units controlled by oxidizer/boiler systems shall be controlled by at least 98 weight percent or to a concentration of no more than 10 ppmv, whichever is less stringent.
 - ii. The CO emissions from affected units controlled by each oxidizer/boiler system shall be controlled by at least 90 weight percent or to a concentration of no more than 100 ppmv, whichever is less stringent.
 - iii. The NO_x emissions from affected oxidizer/boiler system shall not exceed 0.05 lb/mmBtu considering total heat input of natural gas to both the feed dryer and oxidizer/boiler system.
- b.
 - i. Emissions of affected units controlled by each oxidizer/boiler system shall not exceed the following limits:

<u>Pollutant</u>	<u>Each Oxidizer/Boiler</u>		<u>Combined</u>
	<u>(lb/hr)</u>	<u>(tons/year)</u>	<u>(tons/yr)</u>
NO _x	10.96	46.43	92.86
CO	9.79	41.49	82.97
VOM	2.74	11.60	23.20
PM/PM ₁₀	3.16	13.39	26.77
SO ₂	9.62	40.74	81.47

- ii. The acetaldehyde emissions of affected units controlled by each oxidizer/boiler systems shall not exceed 0.18 lb/hr and 0.75 tons/yr.
- iii. The emissions of individual HAPs, other than acetaldehyde, from affected units controlled by each oxidizer/boiler systems shall not exceed 0.39 lb/hr and 1.70 tons/yr.
- iv. The emissions of total HAPs, other than acetaldehyde, from affected units controlled by each oxidizer/boiler systems shall not exceed 1.39 lb/hr and 6.11 tons/yr.

2.5.7 Testing Requirements

The Permittee shall perform emission tests as requested for affected units as required in Condition 3.1.

2.5.8 Monitoring Requirements

- a. The Permittee shall install, calibrate, operate, and maintain the following monitoring devices for the feed dryers, which shall be operated at all times that the feed dryer is in operation. These devices shall record appropriate parameters at least every 15 minutes and this data and hourly average data shall both be recorded.
 - i. Inlet temperature each feed dryer.
 - ii. Negative air pressure in each feed dryer.
 - iii. Damper valve position.
- b. The Permittee shall install, calibrate, operate, and maintain the following monitoring devices for each oxidizer/boiler system, which shall be operated at all times that the oxidizer/boiler system is in operation. These devices shall record appropriate parameters at least every 15 minutes and this data and hourly average data shall both be recorded.

- i. Combustion chamber temperature of the each oxidizer/boiler system.
- c.
 - i.
 - A. The Permittee shall install, calibrate, operate, and maintain a continuous monitoring system on the oxidizer/boiler systems for NO_x emissions. This system shall be operated during all periods of operation of the boiler except for continuous monitoring system breakdowns and repairs. Data is to be recorded during calibration checks, and zero and span adjustments. [40 CFR 60.48b]
 - B. The Permittee shall install, calibrate, operate, and maintain a CO continuous monitoring system on the exhaust from oxidizer/boiler systems within one year after the initial emission testing required by this permit unless this testing or further testing conducted by the Permittee demonstrates that the unit normally complies by a margin of at least 25 percent with the emission limits in this permit or the Illinois EPA approves further time for the Permittee to achieve this performance.
 - ii.
 - A. These monitoring systems shall be operated during all periods of operation of the oxidizer/boiler systems except for continuous emission monitoring system breakdowns and repairs. The Permittee shall comply with applicable requirements of the NSPS for continuous emission monitoring, including any requirements that USEPA may establish on a case-by-case basis pursuant to 40 CFR 60.13(i) to supplement generally applicable requirements for NO_x monitoring system to address the NO_x contained in the exhaust stream from the feed dryers.
 - B. The Permittee shall maintain records for the continuous monitoring system, including recorded emission concentrations and records of maintenance, calibration, and operational activity associated with the system.
 - C. The Permittee shall submit quarterly monitoring reports to the Illinois EPA for these systems.
 - iii. The requirement for a CO monitoring system may be revised or waived in the operating permit for the

source if the Illinois EPA determines that compliance with requirements for CO emissions is not facilitated to a significant degree by such monitoring.

- d. The Permittee shall equip each oxidizer/boiler system with a continuous monitoring device for combustion chamber temperature, which device shall be installed, calibrated, operated, and maintained according to the supplier's specifications and shall be operated at all times that the oxidizer is in use.
- e. The Permittee shall install, operate, and maintain devices to monitor the valve or damper position on the flow control devices directing the various exhaust streams to the oxidizer/boiler systems, which shall be operated at all times that the plant is in operation. The position of these valves shall be monitored electronically by the plant operating system.
- f.
 - i. These devices shall be installed, operated, and maintained and calibrated in accordance with good air pollution control practice for reliable operation and accurate data. The Permittee shall maintain logs for the maintenance and repair of these devices.
 - ii. The temperature monitor shall be maintained within an accuracy of 1 percent.

2.5.9 Recordkeeping Requirements

- a. Records to be kept for each operating day, pursuant to the NSPS, 40 CFR 60, Subpart Db for each affected oxidizer/boiler system:
 - i. Calendar date [40 CFR 60.49b(g)(1)].
 - ii. Total natural gas usage for the affected oxidizer/boiler system (ft³/day) [40 CFR 60.49b(d)].
 - iii. The average hourly NO_x emission rates (expressed in lb/million Btu heat input) measured or if parametric monitoring is approved, records shall be kept of NO_x emissions as predicted by parametric monitoring [40 CFR 60.49b(g)(2)].
 - iv. The 30-day average NO_x emission rates (lb/million Btu heat input) calculated at the end of each operating date from the measured or if parametric monitoring is approved, records shall be kept of NO_x emissions as predicted by parametric monitoring, hourly NO_x emission rates for the preceding 30 operating days [40 CFR 60.49b(g)(3)].

- v. Identification of the operating date when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken [40 CFR 60.49b(g)(4)].
 - vi. Identification of the operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient and a description of corrective actions taken [40 CFR 60.49b(g)(5)].
 - vii. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data [40 CFR 60.49b(g)(7)].
 - viii. Identification of the times when the pollutant concentration exceeds full span of the continuous monitoring system. [40 CFR 60.49b(g)(8)].
 - ix. Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3. [40 CFR 60.49b(g)(9)].
 - x. Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of 40 CFR 60 [40 CFR 60.49b(g)(10)].
- b. Calculations of the annual capacity factor, determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar quarter, per quarter [40 CFR 60.49b(d)].
- c. The Permittee shall maintain records of the following items:
- i. Design information for the feed dryers and oxidizer/boiler systems:
 - A. The design heat input of each feed dryer.
 - B. Moisture removal capacity of each feed dryer, lb water/hour.
 - C. The design heat input of each oxidizer/boiler system, Btu/hr.

- ii. Feed production as shipped (dry feed: tons/month, wet feed: tons/month).
- iii. Natural gas usage (scf/month and scf/year) for the feed dryers.
- iv. Records for upsets in feed dryer operations or other operations that could generate additional emissions, with a description of the incident, explanation, and corrective actions and any preventative measures taken, and an estimate of the additional CO, VOM, PM, and HAP emissions that occurred, with supporting calculations and background information.
- v. Records of the monthly and annual NO_x, CO, PM, SO₂, VOM, and HAP emissions from the oxidizer/boiler systems, with supporting calculations.

Note: For the purpose of these records, HAPS shall include acetaldehyde and other organic HAPS emitted from the affected units addressed during emissions testing.

- d. The Permittee shall maintain an operation log(s) and log(s) for inspection, maintenance, and repairs for feed dryers and feed cooling and transport system, and associated control system. For the feed dryers, this log shall identify periods of the time when feed is present in the dryers, the oxidizer/boiler systems not in operation.

2.5.10 Reporting Requirements

- a. The Permittee shall fulfill all applicable notification and reporting requirements of the NSPS for each affected oxidizer/boiler system including:
 - i. Written notification of commencement of construction, no later than 30 days after such date. [40 CFR 60.7(a)(1)];
 - ii. Written notification of the actual date of initial startup, within 15 days after such date. [40 CFR 60.7(a)(3)].
- b. The Permittee shall fulfill all applicable reporting and notification requirements of the NESHAP 40 CFR 63.7545 and 63.7550 for each affected oxidizer/boiler system.
- c. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected units as follows. These notifications shall include the information specified by Condition 3.4.

- i. For NO_x emissions from the affected oxidizer/boiler systems, excess emissions are defined as any calculated 30-day rolling average NO_x emission rate, as (1) determined under 40 CFR 60.46b(e), that exceeds the applicable NSPS standard, and (2) any 3-hour block average NO_x emission rate that exceeds the hourly NO_x limitation in Condition 2.5.6(a) (iii).
 - ii. If there is an exceedance of applicable requirements for the oxidizer/boiler systems, as determined by the monitoring required by Condition 2.5.8 that lasts longer than three hours (180 minutes), the Permittee shall immediately notify the Illinois EPA. The initial notification for such a deviation may be supplemented with additional information submitted within seven days of the deviation, as needed to provide all information required by Condition 3.4.
 - iii. The deviations addressed above and all other deviations from applicable requirements shall be reported with the quarterly compliance report.
- d. Notwithstanding the above, if a deviation from the requirements of this permit will occur from required maintenance, repair or other activity that can be scheduled in advance, the Permittee shall also notify the Illinois EPA prior to undertaking such activity if it is feasible to do so. Such notification shall be submitted at least five days in advance unless the activity is scheduled less than five days in advance. This notification may be supplemented with additional information submitted within seven days of the deviation, as needed to provide all information required by Condition 3.4(a).

2.5.11 Compliance Procedures

- a. For VOM and CO emissions from the oxidizer/boiler systems, periods of excess emissions shall include any 1-hour period when the feed dryers are operating in which the average combustion temperature is more than 50°F below the temperature during testing that demonstrated compliance with applicable requirements. Additional provisions or revised provisions defining excess emissions may be included in subsequent permits based on actual operating data and experience.

2.6 Feed Handling and Loadout Operations

2.6.1 Description

The dried feed from the dryers is conveyed to feed cooler and cooled prior to sending to feed storage area for shipping to the customers. Emissions from feed cooling drum is controlled by a baghouse and partially vented through the oxidizer/boiler systems (See Condition 2.5). PM emissions from feed handling and loadout operation are controlled by a baghouse.

2.6.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Feed Cooling Operation	Feed Cooling Drum	Baghouse and Oxidizer/Boiler systems
Feed Storage and Loadout	Feed Storage	Baghouse
	Truck Loadout	
	Rail Loadout	
	Wet Feed Storage Pad	----

2.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected unit" for the purpose of these unit specific conditions is an emission unit described in Conditions 2.6.1 and 2.6.2.
- b. The affected units are subject to 35 IAC 212.321. (Refer to Condition 2.2.3(c))
- c. The affected units are subject to 35 IAC 215.301. (Refer to Condition 2.3.3(c))

2.6.4 Nonapplicability

None

2.6.5 Operational Requirements

- a. The Permittee shall operate the baghouse for the affected units with a pressure drop that is within a range that is consistent with manufacturer's recommended levels or that during emission testing that demonstrated compliance with applicable requirements.
- b. The Permittee shall operate and maintain the air pollution control equipment for the affected units in a manner that assures that applicable requirements are met. The actions taken by the Permittee to meet this requirement shall include at least the following:

- i. Written operating procedures shall be maintained and updated describing normal process and equipment operating parameters; monitoring or instrumentation for measuring control equipment operating parameters, if any; and control equipment inspection and maintenance practices. With respect to control equipment maintenance practices, the operating procedures may incorporate the manufactures recommended operating instructions, if a copy of these instructions is attached to the procedures.
 - ii. Visual inspections of air pollution control equipment shall be conducted on a regular schedule. These inspections shall include a detailed inspection of the performance and condition of control equipment at least once per year.
- c. Emissions of particulate matter from feed loadout shall be controlled by partial enclosure and loadout practices to minimize loss of dust.

2.6.6 Emission Limitations

- a.
 - i. Fabric filter (baghouse) on feed cooler baghouse shall comply with an emission limit of 0.005 grain per standard cubic feet (gr/scf).
 - ii. Emissions of PM from feed cooler baghouse shall not exceed 0.56 lb/hr and 2.82 tons/year.
 - iii. VOM emissions from the feed cooler baghouse shall not exceed 2.04 lb/hr and 8.92 tons/yr.
 - iv. The acetaldehyde emissions from feed cooler baghouse shall not exceed 0.19 tons/yr.
 - v. The emissions of individual HAPs, other than acetaldehyde, from the feed cooler baghouse shall not exceed 0.09 tons/yr.
 - vi. The emissions of total HAPs, other than acetaldehyde, from the feed cooler baghouse shall not exceed 0.16 tons/yr.

Note: This limit does not include the feed cooler baghouse exhaust that is routed through oxidizer/boiler systems for combustion air. (See Condition 2.5.6(b))

- b.
 - i. Fabric filter (baghouse) on dry feed storage and loadout operation shall comply with an emission

limit of 0.005 grain per standard cubic feet (gr/scf).

- ii. Emissions of PM from dry storage and loadout operation shall not exceed 0.39 lb/hr and 1.71 tons/yr. These limits do not account for uncaptured particulate matter emissions from the feed storage and loadout operation, which shall not exceed 0.03 tons/year.
- iii. This permit is issued based on negligible VOM emissions from the dry feed storage and loadout operation. For this purpose, VOM emissions shall not exceed 0.1 lb/hr and 0.44 tons/yr.
- c.
 - i. Emissions of VOM from the wet cake transfer and loadout operation shall not exceed 0.07 month and 0.07 tons/year.
 - ii. This permit is issued based on negligible PM emissions from the wet cake transfer and loadout operation. For this purpose, PM emissions shall not exceed 0.1 lb/hr and 0.44 tons/yr.

2.6.7 Testing Requirements

The Permittee shall perform emission tests for affected units as required in Condition 3.1.

2.6.8 Monitoring Requirements

- a. The Permittee shall install, operate instrumentation on the baghouse for the affected units to measure pressure drop across the baghouse.

2.6.9 Recordkeeping Requirements for Affected Units

The Permittee shall maintain the following records for the affected units:

- a. A copy of the manufacturer's specifications and recommended operating and maintenance procedures for the baghouses for the affected units.
- b. Differential pressure across the baghouses for the affected units, as recorded at least once per operating day.
- c. Feed production as shipped (dry feed: tons/month, wet feed: tons/month).

- d. Logs for inspections, other equipment observations, preventative maintenance, maintenance activities other than preventative maintenance, and repair of air pollution control equipment which include: date, duration, nature, and description of observation or action.
- e. The following records related to PM emissions:
 - i. Documentation for the PM emission factor(s) used by the Permittee to determine emissions of the affected units.
 - ii. All other data used or relied upon to determine the PM emissions of affected units.
 - iii. PM emissions (tons/month and tons/year) based on appropriate emission factors and operating data, with supporting calculations.

2.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected units as follows. These notifications shall include the information specified by Condition 3.4.

- a. Excess opacity from the affected units that lasts more than 24 minutes (four 6-minute averaging periods) shall be immediately reported to the Illinois EPA.
- b. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.7 Ethanol and Denaturant Storage Tanks

2.7.1 Description

Internal floating roof storage tanks are used to store denaturant and product ethanol.

2.7.2 List of Emission Equipment and Pollution Control Equipment

Process	Description	Emission Control Equipment
Storage Tanks	Two Denatured Ethanol Tanks (1,500,000 Gallons, each)	Internal Floating Roof with Primary and Secondary Seals
	200 Proof Ethanol Tank (200,000 Gallons)	Internal Floating Roof with Primary and Secondary Seals
	190 Proof Ethanol Tank (200,000 Gallons)	Internal Floating Roof with Primary and Secondary Seals
	Gasoline Denaturant Tank (200,000 Gallons)	Internal Floating Roof with Primary and Secondary Seals
	Corrosive Inhibitor Tank (3,000 Gallons)	----

2.7.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit specific conditions is a storage tank described in Conditions 2.7.1 and 2.7.2.
- b. The affected tanks are subject to the NSPS for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb, and related provisions in Subpart A.
- c. The affected tanks are subject to the control requirements of 35 IAC 215.122(b), which requires a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. [Submerged Loading Pipe - 35 IAC 215.122(b)]

2.7.4 Non-Applicable Regulations

For the affected tanks, this permit does not address the applicability of 35 IAC 215.120, 215.127, and 215.128. This is based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 215.120, 215.127, and 215.128, following the review of the requirements of 40 CFR 60 Subpart Kb and 35 IAC 215.120, 215.127, and 215.128.

2.7.5 Control Requirements

Each affected tank shall be equipped with the following closure devices between the wall of the storage vessel and the edge of

the internal floating roof or other device complying with the NSPS [40 CFR 60.112b(a)(1)(ii)]:

- a. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

2.7.6 Emission Limitations

- a. Emissions of VOM from the affected tanks shall not exceed 2.69 tons/year. Emissions from the affected storage tanks shall be determined based on operating information for the tanks and the USEPA's TANKS program.
- b.
 - i. The acetaldehyde emissions from affected tanks shall not exceed 0.001 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from the affected tanks shall not exceed 0.01 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde, from the affected tanks shall not exceed 0.01 tons/yr.

2.7.7 Operating Requirements

- a. Each affected tank is limited to the storage of ethanol or denaturant.
- b. Each affected tank shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a)(1) and 60.113b(a), as follows:
 - i. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a)(1)(i)]
 - ii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]

- iii. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a) (1) (iv)]
- iv. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a) (1) (v)]
- v. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a) (1) (vi)]
- vi. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a) (1) (vii)]
- vii. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a) (1) (viii)]
- viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a) (1) (ix)]
- ix. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted. [40 CFR 60.113b(a) (2) and (a) (3) (ii)]
- x. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has

holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off. [40 CFR 60.113b(a) (3) (ii) and (a) (4)]

2.7.8 Inspection Requirements

The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each affected tank, including the following:

- a. For affected tanks equipped with a liquid-mounted, on an annual basis, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage tank from service within 45 days. If a failure that is detected during this inspection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA in the inspection report required in Condition 2.7.10 (40 CFR 60.115b(a) (3)). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the storage tank will be emptied as soon as possible. [40 CFR 60.113b(a) (2)]
- b. As applicable for tanks equipped with both primary and secondary seals, visually inspect each affected tank as follows: [40 CFR 60.113b(a) (3)]
 - i. Visually inspect the tank as specified by 40 CFR 60.113(a) (4) at least every 5 years; or
 - ii. Visually inspect the tank as specified by 40 CFR 60.113(a) (2) at least once every 12 months.
- c. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the tank is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none

of the conditions specified in this paragraph exist before refilling the storage tank with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of tanks for which annual visual inspection are performed and at intervals greater than 5 years in the case of tanks equipped with double-seal systems complying by means of 40 CFR 60.112b(a) (1) (ii) (B). [40 CFR 60.113b(a) (4)]

The Permittee shall give prior notification to the Illinois EPA for the above inspections as required by 40 CFR 60.113b(a) (5). (See also Condition 2.7.10 (b))

2.7.9 Recordkeeping Requirements

- a. The Permittee shall fulfill the applicable recordkeeping requirements of 40 CFR 60.115b for each affected tank pursuant to 40 CFR 60.115b(a), including keep a record of each inspection performed as required by Condition 2.7.8. [40 CFR 60.115b(a) (2)]
 - i. The date the inspection was performed;
 - ii. Who performed the inspection;
 - iii. The method of inspection;
 - iv. The observed condition of each feature of the internal floating roof (seals, roof decks and fittings), with the raw data recorded during the inspection; and
 - v. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Condition 2.7.8(c):

Sufficient records to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.
- c.
 - i. The Permittee shall keep the operating records required by 40 CFR 60.116b for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

- ii. The Permittee shall keep the Material Safety Data Sheet (MSDS) or other comparable data for the VOLs stored in each affected tanks, which records shall be used to identify HAPs that may be emitted from the storage and loadout of VOL.
- d. The Permittee shall keep monthly and annual VOM and HAP emissions attributable to the affected tanks in tons/month and ton/year in accordance with the Condition 2.7.6 to be calculated and recorded at least annually, unless a more frequent determination is necessary to determine whether the plant's annual emissions of VOM have exceeded the limit in Table I.

2.7.10 Reporting Requirements

- a. The Permittee shall fulfill all applicable reporting and notification requirements of the NSPS, 40 CFR 60.7, for the affected tanks.
- b. The Permittee shall submit written notifications and reports to the Illinois EPA as required by the NSPS, for each affected tank, as follows:
 - i. If any of the conditions described in Condition 2.7.8(c) are detected during the annual visual inspection required in Condition 2.7.8, a report shall be furnished to the Illinois EPA within 30 days of the inspection. Each report shall identify the tank, the nature of the defects, and the date the tank was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a) (3)]
 - ii. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of a tank for which an inspection is required by Conditions 2.7.8 to afford the Illinois EPA the opportunity to have an observer present. If such inspection is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Illinois EPA at least 7 days prior to the refilling of the tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA at least 7 days prior to the refilling. [40 CFR 60.113b(a) (5)]
- c. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for

the affected tanks as follows. These notifications shall include the information specified by Condition 3.4.

- i. If a tank is damaged so there is a deviation from an applicable requirements which is not repaired or otherwise corrected within 24 hours, the Permittee shall then immediately notify the Illinois EPA.
- ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.7.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to continue to comply with applicable requirements and to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof.

2.8 Loading Rack

2.8.1 Description

The loading rack transfers ethanol into tank trucks or railcars for shipment. VOM emissions occur from the VOM-laden air displaced from the tank when material is loaded.

2.8.2 List of Emission Units and Pollution Control Equipment

Process	Description	Emission Control Equipment
Ethanol Loadout	Loading Rack Used for Loading Ethanol Into Trucks and Railcars	----
	Truck Loadout	Flare 1
	Rail Loadout	

2.8.3 Applicability Provisions and Applicable Regulations

- a. An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack described in Conditions 2.8.1 and 2.8.2.

2.8.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected loading rack not being subject to applicable requirements for handling of gasoline because the vapor pressure of the ethanol product is less than 4.0 psi and hence will not be subject to the requirements applicable to handling of gasoline, including 40 CFR 60 Subpart XX, the NSPS for Bulk Gasoline Terminals.
- b. The affected loading rack is excused from the requirement to use submerged loading pipes pursuant to 35 IAC 215.122(a) because each affected loading rack is equipped and operated with vapor collection and control equipment.

2.8.5 Control Requirements and Operational Limitations

- a. The Permittee shall route vapor displaced by ethanol loadout into the truck or railcar to the flare system.
- b. The flare shall be designed and be operated to comply with applicable requirements of 40 CFR 60.18, including:
 - i. The flare shall be operated by the Permittee with no visible emissions as determined by the methods specified in 40 CFR 60.18(f)(1), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

- ii. The flare shall be operated by the Permittee with a flame present when vapors displaced by ethanol loadout are being vented to it, as determined by the methods specified in 40 CFR 60.18(f)(2).
 - iii. The flare shall be used only with the net heating value of the gas being combusted being 300 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR 60.18(f)(3). Note: Natural gas or other gaseous fuel may be added to the displaced vapors to comply with this requirement.
 - iv. The flare shall be operated by the Permittee with an exit velocity less than the maximum allowable velocity, V_{max} , as determined by the method specified in 40 CFR 60.18(f)(6).
 - v. The Permittee shall monitor the flare to ensure that it is operated and maintained in conformance with the manufacturer's design, as required by 40 CFR 60.18(d).
- c. The Permittee shall generally operate the ethanol loading rack with the flare system in accordance with good air pollution control practice to minimize emissions of VOM.
 - d. The vapor control system shall be operated at all times during the loading of organic liquids and all displaced vapors are to be vented only to the vapor control system.
 - e. At all times during the loading of organic liquids, the vapor control system shall operate and all vapors displaced in the loading of organic materials are to be vented only to the vapor control system.
 - f. There shall be no liquid drainage from the loading device of the affected loading rack when it is not in use.
 - g. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the organic material loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection.
 - h. All loading and vapor return lines shall be equipped with fittings that are designed to be vapor tight.

2.8.6 Emission Limitations

- a. This permit is issued based on the flare achieving a nominal VOM destruction efficiency of at least 98 percent.
- b. The total organic compound emissions (controlled) from the affected loading rack shall not exceed 0.0862 and 0.0088 pounds per 1000 gallons of material loaded to truck and railcars, respectively. This rate shall include those emissions not captured or controlled.
- c. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO) and volatile organic material (VOM) from ethanol loadout and flaring shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission Limits</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
NO _x	0.2	1.89
CO	1.0	10.08
VOM	0.4	3.38

These limits are based on the information in the application including emissions from the flare combustion, maximum ethanol loadout to truck (38.5 million gallons per year) and flare destruction efficiency (98%).

- d. This permit is issued based on minimal emissions of PM and SO₂ from the flare. For this purpose, emissions shall not exceed a nominal emission rate of 0.1 pound/hour and 0.44 tons/year.
- e.
 - i. The acetaldehyde emissions from affected loading rack shall not exceed 0.01 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from the affected loading rack shall not exceed 0.46 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde, from the affected loading rack shall not exceed 1.23 tons/yr.

2.8.7 Testing Requirements

Upon written request by the Illinois EPA, The Permittee shall perform emission tests as requested for the affected loading rack as specified in Condition 3.1.

2.8.8 Monitoring Requirements

- a. The Permittee shall operate the affected loading rack and flare in accordance with written procedures. These procedures may be the procedures provided by the supplier of equipment or procedures developed and maintained by the Permittee.
- b. The Permittee shall keep a copy of the operating and maintenance procedures for the flare system provided by the supplier at a location at the plant where they are readily accessible to the individuals who are responsible for operation and maintenance of the flare.

2.8.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected loading rack:

- a. Operating records for each day on which ethanol loadout is conducted, as follow:
 - i. Date and amount of ethanol loaded.
 - ii. Confirmation that established operating procedures were followed.
 - iii. Confirmation that the flare functioned properly, i.e., a flame was present and no visible emissions were observed except as allowed by 40 CFR 60.18(c)(1).
- b. Records for each event when ethanol loadout continues when the flare is not operating properly to control VOM emissions:
 - i. Date, time, and duration of event.
 - ii. Description of event.
 - iii. Estimated amount of ethanol loaded until the situation was corrected or loadout ceased.
 - iv. Reason why loadout could not be immediately ceased.
 - v. Corrective actions taken.
 - vi. Actions taken to prevent or reduce the likelihood of future occurrences.
- c. An inspection, maintenance and repair log for the flare system, which lists activities that are performed, with date and responsible individual(s).

- d. A file containing emission factors, developed using published USEPA emissions estimation methodology, and standard USEPA emission factors, as control systems are properly operated.
- e. Monthly and annual records of the emissions of VOM, CO, NO_x and HAP from the affected loading rack, with supporting calculations. For this purpose, standard emission factors shall be used for periods when the flare operates properly, e.g., 98 percent destruction of VOM. For periods when the flare does not operate properly, specific estimates of emissions shall be made, accompanied by written justification or explanation.

2.8.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected loading rack as follows. These notifications shall include the information specified by Condition 3.4.
 - i. If there is an exceedance of applicable requirements during loadout of ethanol that lasts longer than one hour, the Permittee shall immediately notify the Illinois EPA. For this purpose, an exceedance shall be considered to continue even if operation of the loading rack is interrupted if the exceedance condition is still present when operation is resumed.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.8.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical changes with respect to these units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner if these changes would accompany an activity that would constitute construction or modification of an emission unit, as defined in 35 IAC 201.102.

Changes in fittings made during the course of repair and maintenance of the affected loading rack.

2.9 Leaking Components

2.9.1 Description

Equipment components, such as valves, flanges, etc., involved with the fermentation, distillation and subsequent handling of ethanol and denaturant generate VOM emissions when they leak.

2.9.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Measures
Process Components (Valves, Flanges, Pumps, Seals, etc.)	Processing of Organic Material through the Plant's Piping System	Leak Detection and Repair Program

2.9.3 Applicability Provisions

- a. The "affected components" are equipment components, described in Condition 2.9.1 and 2.9.2 that are in VOM service.
- b. The affected components associated with the fermentation and distillation operations are subject to the NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60, Subpart VV, and related provisions in Subpart A.

2.9.4 Non-Applicable Regulations

- a. This permit is issued based on affected components not being subject to the requirements of 35 IAC Part 215, Subpart Q, Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment, pursuant to the applicability provisions at 35 IAC 215.420, because the plant will have less than 1,500 components in gas or light liquid service (which components are used to manufacture the chemicals or polymers listed in 35 IAC Part 215, Appendix D).
- b. For the affected components, this permit does not address the applicability of 35 IAC 215.142 to certain components because the leaks of organic material are being addressed by the requirements of the NSPS, 40 CFR 60 Subpart VV or comparable requirements, which require timely repairs of any leaking component.

2.9.5 Control Requirements

For affected components, that are subject to 40 CFR 60, Subpart VV, the Permittee shall follow the work practice requirements set

forth in 40 CFR 60.482-1 (Standards: General), 60.482-2 (Standards: Pumps in light liquid service), 60.482-4 (Standards: Pressure relief devices in gas/vapor service), 60.482-5 (Standards: Sampling connection systems), 60.482-6 (Standards: Open-ended valves or lines), 60.482-7 (Standards: Valves in gas/vapor service and light liquid service)*, 60.482-8 (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors), 60.482-9 (Standards: Delay of repair), and 60.482-10 (Standards: Closed vent systems and control devices).

* The Permittee may elect to utilize the alternative standards of 40 CFR 60.483-1 or 60.483-2, where applicable.

2.9.6 Emission Limitations

- a. Emissions of VOM from the affected components shall not exceed 8.84 tons per year, total, as determined by use of appropriate USEPA methodology for estimating emissions from leaking components.
- b.
 - i. The acetaldehyde emissions from affected components shall not exceed 1.37 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from the affected components shall not exceed 0.14 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde, from the affected components shall not exceed 0.18 tons/yr.

2.9.7 Operating Requirements

- a. For affected components that are not subject to 40 CFR Part 60, Subpart VV, the Permittee shall repair any affected component from which a leak of volatile organic liquid (VOL) is detected or observed. The repair shall be completed as soon as practicable but no later than 21 days after the leak is found. If the leaking component cannot be repaired until the process unit is shut down, the leaking component must then be repaired before the unit is restarted.
- b. For affected components that are subject to 40 CFR 60, Part 60, Subpart VV the Permittee shall follow the operating requirements set in 40 CFR 60.482-1 (Standards: general), 60.482-2 (Standards: Pumps in light liquid service), 60.482-4 (Standards: Pressure relief devices in gas/vapor service), 60.482-5 (Standards: Sampling

connection systems), 60.482-6 (Standards: Open-ended valves or lines), 60.482-7 (Standards: Valves in gas/vapor service and light liquid service), 60.482-8 (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors), 60.482-9 (Standards: Delay of repair), and 60.482-10 (Standards: Closed vent systems and control devices).

2.9.8 Inspection Requirements

For all affected components that are in VOC service, as defined by 40 CFR 60.481, other than components in vacuum service, the Permittee shall follow the inspection requirements set forth in 40 CFR 60.482-1 (Standards: General), 60.482-2 (Standards: Pumps in light liquid service), 60.482-4 (Standards: Pressure relief devices in gas/vapor service), 60.482-5 (Standards: Sampling connection systems), 60.482-6 (Standards: Open-ended valves or lines), 60.482-7 (Standards: Valves in gas/vapor service and light liquid service)*, 60.482-8 (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors), 60.482-9 (Standards: Delay of repair), and 60.482-10 (Standards: Closed vent systems and control devices).

* The Permittee may elect to utilize the alternative standards of 40 CFR 60.483-1 through 60.483-2, where applicable.

2.9.9 Recordkeeping Requirements

The Permittee shall maintain the following records related to affected components:

- a. The applicable records as specified in 40 CFR 60.486.
- b. A leaking components monitoring log, which shall contain the following information:
 - i. The name of the process unit where the component is located;
 - ii. The type of component (e.g., valve, pump seal);
 - iii. The identification number of the component;
 - iv. The date on which a leaking component is discovered;
 - v. The date on which a leaking component is repaired;
 - vi. The date and instrument reading of the recheck procedure after a leaking component is repaired;

- vii. A record of the calibration of the monitoring instrument;
 - viii. The identification number of leaking components which cannot be repaired until process unit shutdown; and
 - ix. The total number of components inspected and the total number of components found leaking during that monitoring period.
- c. All required reports as specified at 40 CFR 60.487.
 - d. Records on at least an annual basis of the VOM and HAP emissions attributable to affected components, with supporting documentation and calculations.

2.9.10 Reporting Requirements

- a. The Permittee shall fulfill all applicable notification and reporting requirements of the NSPS for the affected components.
- b. The Permittee shall report any deviations from the requirements of this permit for the affected components in the quarterly compliance report submitted to the Illinois EPA. These reports shall include the information specified by Condition 3.4.

2.9.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to repair and replace affected components without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102.

2.10 Bio-methanator

2.10.1 Description

The bio-methanator treats certain wastewater streams that contain high levels of organic material, producing a small stream of methane-rich bio-gas as a byproduct. This bio-gas is either used as fuel at the plant, substituting for natural gas, or disposed of by burning in the flare associated with the bio-methanator.

2.10.2 List of Emission Units and Pollution Control Measures

Emission Unit Description	Emission Control Equipment
Bio-methanator (1-4)	Bio-methanator Flare

2.10.3 Applicable Regulations

- a. An "affected unit," for the purpose of these unit-specific conditions, is bio-methanators described in Conditions 2.10.1 and 2.10.2.
- b. The affected units are subject to 35 IAC 212.321. (Refer to Condition 2.2.3(c))

2.10.4 Non-Applicability of Regulations of Concern

None

2.10.5 Operational and Production Limits and Work Practices

- a. The exhaust from the affected units shall directly routed to the flare or used as fuel in the dryer.

2.10.6 Emission Limitations

- a. Emissions from the affected units, excluding emissions associated with use of bio-gas in the dryer, shall each not exceed the following limits:

<u>Pollutant</u>	<u>Emission Factor (Lb/million Btu)</u>	<u>Emission Rate</u>	
		<u>(Lb/hr)</u>	<u>(Tons/yr)</u>
NO _x	0.068	0.44	1.00
CO	0.370	2.37	5.22
VOM	0.052	0.33	0.73

These limits are based on the information provided in the permit application including maximum capacity of the bio-methanator flare (6.4 million Btu/hr) and standard emission factors for flare operation.

- b. This permit is issued based on minimal emissions of PM and SO₂ from the bio-methanator flare. For this purpose, emissions shall not exceed a nominal emission rate of 0.1 pound/hour and 0.44 tons/year.
- c.
 - i. The acetaldehyde emissions from affected units shall not exceed 0.01 tons/yr.
 - ii. The emissions of individual HAPs, other than acetaldehyde, from the affected units shall not exceed 0.01 tons/yr.
 - iii. The emissions of total HAPs, other than acetaldehyde, from the affected units shall not exceed 0.02 tons/yr.

2.10.7 Testing Requirements

None

2.10.8 Monitoring Requirement

The bio-methanator flare shall be equipped with a monitor or other device to confirm presence of a flame if bio-gas is being sent to the flare

2.10.9 Recordkeeping Requirements

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

- a. A file containing estimates of the maximum and typical rates of bio-gas generation, cubic feet and million Btu/hr, with supporting data and calculations.
- b. A file containing estimates of the typical rate of gas consumed by the pilot flame for the bio-methanator flare, if any.
- c. The actual amount of bio-gas directed to the bio-methanator flare, if the Permittee estimates emissions from the affected units for only bio-gas actually directed to the bio-methanator flare (rather than assuming that all bio-gas is flared).
- d. Information for periods of time when the bio-methanator flare operated without a flame present, including amount of biogas exhausted through the bio-methanator flare.
- e. Records on at least an annual basis of the VOM, CO and NO_x emissions from the affected units, with supporting documentation and calculations.

2.10.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected units as follows. These notifications shall include the information specified by Condition 3.4.
 - i. If the affected units are damaged so there is a deviation from an applicable requirements that is not repaired or otherwise corrected within 12 hours, the Permittee shall then immediately notify the Illinois EPA.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.11 Cooling Tower

2.11.1 Description

A non-contact cooling tower is used to support the heat exchangers used to cool process streams and to condense surplus steam being returned to boilers.

2.11.2 List of Emission Units and Pollution Control Measures

Process	Description	Control Measure
Cooling Tower	Non-Contact Cooling Tower (4 cells)	Drift Eliminators

2.11.3 Applicable Regulations

- a. An "affected cooling tower" for the purpose of these unit specific conditions is the cooling tower described in Conditions 2.11.1 and 2.11.2.
- b. The affected unit is subject to 35 IAC 212.321. (Refer to Condition 2.2.3(c))

2.11.4 Non-Applicability of Regulations of Concern

None

2.11.5 Operational and Production Limits and Work Practices

- a. The cooling tower shall be equipped with drift eliminators with a design draft loss efficiency of at least 0.005 percent.
- b. Only non VOC additives shall be used in the cooling tower.

2.11.6 Emission Limitations

Emissions of PM from the cooling tower shall not exceed 13.7 tons per year.

2.11.7 Testing Requirements

None

2.11.8 Monitoring Requirement

None

2.11.9 Recordkeeping Requirements

The Permittee shall maintain records of the following information for the affected unit:

- a. The design data for the affected unit, including water circulation rate (gal/min) and design loss rate of the drift eliminators (percent).
- b. Total dissolved solids concentration of the water circulated in the cooling tower on at least a quarterly basis (ppm).
- c. A file containing emission factors used for calculating PM emissions with supporting documentation.
- d. Records on at least an annual basis of the PM emissions from the affected unit, with supporting documentation and calculations.

2.11.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected unit as follows. These notifications shall include the information specified by Condition 3.4.
 - i. If the affected unit is damaged so there is a deviation from an applicable requirements that is not repaired or otherwise corrected within 24 hours, the Permittee shall then immediately notify the Illinois EPA.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

2.12 Roadways and Other Sources of Fugitive Dust

2.12.1 Description

Fugitive dust/particulate matter emissions are generated by vehicle traffic on roadways and parking lots at the plant. The plant would have approximately 1 mile of roadways, to receive and ship materials and provide access to the facilities. Emissions of particulate matter will be controlled by paving major roadways, which handle all the traffic coming into or leaving the plant, and by a dust control program for all roadways.

2.12.2 List of Emission Units and Pollution Control Measures

Operation	Description	Control Measure
Fugitive Dust	Plant Roads and Parking Lots and Vehicle Traffic	Paving and Sweeping

2.12.3 Applicable Regulations

- a. The "affected operations" for the purpose of these unit-specific conditions are the operations described in Condition 2.12.1 and 2.12.2.
- b. Visible emissions of fugitive particulate matter from any process, including material handling or storage activity, shall not be present beyond the property line of the source, pursuant to 35 IAC 212.301. (See also Condition 1.3(a))

2.12.4 Non-Applicability of Regulations of Concern

- a. The affected operations are not subject to the requirements of 35 IAC 212.321 ("the process weight rate" rule) because of the disperse nature of these emissions units. [35 IAC 212.323]

2.12.5 Operational and Production Limits and Work Practices

- a. Multi-service road segments, i.e., portion of roadways that handle truck traffic for grain, feed, and fuel ethanol trucks, shall be paved.
- b. The Permittee shall follow good air pollution control practices to minimize nuisance fugitive dust from plant roads, parking areas, and other open areas of the plant. These practices shall provide for pavement on all regularly traveled entrances and exits to the plant and treatment (sweeping, application of water, use of dust suppressant, etc., when necessary) of paved and unpaved roads and areas that are routinely subject to vehicle traffic.

- c.
 - i. The Permittee shall carry out control measures for fugitive dust in accordance with a written control program maintained by the Permittee. This program shall set forth the measures being implemented to demonstrate compliance with Conditions 2.12.3, 2.12.5(a) and 2.12.6, to control fugitive dust at each area of the plant with the potential to generate significant quantities of fugitive dust. This program shall include: (i) A map or diagram showing the location of all fugitive emission units controlled, including the location, identification, length, and width of roadways, and volume and nature of expected traffic or other activity; (ii) estimated dust emissions control technique (e.g., water spray surfactant spray, water flushing, or sweeping); (iii) triggers for additional control, e.g., observation of extended dust plumes following passage of vehicles.
 - ii. The Permittee shall submit a copy of a revised fugitive dust control program to the Illinois EPA for review within 90 days of a request from the Illinois EPA for a revision to the program to address observed deficiencies in the control program.

2.12.6 Emission Limitations

Emissions of PM from the affected operations shall not exceed 36.77 tons per year, as determined by use of appropriate USEPA methodology for estimating emissions of fugitive dust.

2.12.7 Testing Requirements

None

2.12.8 Monitoring Requirement

None

2.12.9 Recordkeeping Requirements

The Permittee shall maintain the following records with respect to the affected operations:

- a. A file documenting assumptions about the quantity and nature of vehicle traffic at the plant as related to the grain receipts and loadout of ethanol and feed.
- b. Records documenting implementation of the fugitive dust control program, including:

- i. For each dust control treatment of a roadway: the name and location of the roadway controlled, the type of treatment, identification of each truck used, application rate of water or other dust suppressant material, and total quantity of material applied;
 - ii. A log recording incidents when control measures were not carried out as scheduled or were not fully implemented and incidents when additional control measures were carried out, with description of each such incident and explanation. This log shall address any adjustments to the scheduling of control measures made by the Permittee due to weather conditions that either acted to reduce or increase the level of potential dust, such as precipitation or extended periods of dry weather.
- c. Records on at least an annual basis of the PM emissions from the affected operations, with supporting documentation and calculations.

2.12.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for affected operations as follows. These notifications shall include the information specified by Condition 3.4.
 - i. If there is an exceedance of Condition 2.12.3(b) that lasts longer than one hour, the Permittee shall immediately notify the Illinois EPA.
 - ii. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.
- b. With the Quarterly Emission Report, the Permittee shall submit the following information to the Illinois EPA:

Dates when control measures otherwise required by the dust control program were not carried out with explanation.

Section 3: General Conditions

3.1 Emission Testing

- a. i. Within 180 days of initial startup of feed dryers, emissions of selected units as specified in the following table, shall be measured during conditions which are representative of maximum emissions:

Emission Unit/Process	Emissions					Efficiency	
	PM	VOM	NO _x	CO	HAP	VOM	CO
Grain Receiving and Handling Baghouse	X						
Milling Baghouse	X						
Fermentation Scrubber		X			X	X	
Oxidizer/Boiler 1	X**	X	X	X	X	X	X*
Oxidizer/Boiler 2	X**	X	X	X	X	X	X*
Feed Cooling Baghouse	X**						
DDGS Loading Baghouse	X						

* Efficiency testing need not be performed if the Permittee is demonstrating compliance based on the concentration of CO in the exhaust.

** Particulate matter tests shall include measurements of condensable particulate matter, as collected in the back half of the Method 5 sampling train or by separate measurements using USEPA Method 202 (40 CFR Part 51, Appendix M).

- ii. In addition to the emission testing required above, the Permittee shall perform emission tests as requested by the Illinois EPA for an emission unit within 45 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.

- b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the USEPA or Illinois EPA. Refer to 40 CFR 60, Appendix A, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Particulate Matter	USEPA Method 5 or 202
Nitrogen Oxides	USEPA Method 7, 7E, or 19
Opacity	USEPA Method 9
Carbon Monoxide	USEPA Method 10
Volatile Organic Material	USEPA Method 18 and 25/25A*
Hazardous Air Pollutants	USEPA Method 18*/**

- * Testing shall also be conducted in accordance with industry-specific guidance from USEPA on testing VOM and HAP emissions at ethanol plants.
 - ** USEPA Method 320 may also be used.
- c. For purposes of determining compliance of each oxidizer/boiler system with the NSPS standard:
- i. The emission tests for each oxidizer/boiler system shall be conducted and data collected in accordance with 40 CFR 60.8 and the test methods and procedures specified in 40 CFR 60.46(e).
 - ii. NO_x emissions shall be monitored for 30 successive oxidizer/boiler system operating days and the 30-day average emission rate is used to determine compliance of each oxidizer/boiler system with the NSPS standard. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period, unless USEPA approves alternative procedures to demonstrate compliance with the NSPS pursuant to 40 CFR 60.13(i).
- d. i. A written test plan shall be submitted to the Compliance Section of the Division of Air Pollution Control for review at least 45 days prior to the scheduled date of testing. This plan shall describe the specific procedures for testing, including as a minimum:
- A. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - B. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and any changes in the means or manner by which the operating parameters for the emission unit and any control equipment will be determined.
 - C. The specific determinations of emissions and operation that is intended to be made, including sampling and monitoring locations.
 - D. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.
- ii. As part of the approval of a test plan, the Permittee may request and the Illinois EPA may approve a program to evaluate alternative levels of operating parameters for a

control device, leading to testing at new values for operating parameters. In such case, the provisions of the approved test plan shall supersede the particular provisions of this permit with respect to the required level of operating parameters for the affected unit(s).

- e. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- f. Copies of the Final Reports for these tests shall be submitted to the Illinois EPA within 14 days after the test results are compiled and finalized but no later than 45 days after completion of sampling. The Final Report shall include as a minimum:
 - i. A summary of results
 - ii. General information
 - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule
 - iv. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration
- g. Copies of emission test reports shall be retained for at least five years after the date that an emission test is superseded by a more recent test.

3.2 Operation or Maintenance Procedures

Where this permit requires the Permittee to operate or maintain emission units in accordance with written procedures, such procedures may incorporate procedures provided by the equipment supplier.

3.3 Inspection, Maintenance and Repair Logs

Inspection, maintenance and repair logs shall include the following information:

- a. Identification of equipment, with date, time, responsible party and description of activity.

- b. Description of any corrective actions or preventative measures taken as result of inspection.

3.4 Reporting of Deviations

- a. Reports of deviations shall include the following information:
 - i. Identify the deviation, with date, time, duration and description.
 - ii. Describe the effect of the deviation on compliance, with an estimate of the excess emissions that accompanied the deviation, if any.
 - iii. Describe the probable cause of the deviation and any corrective actions or preventive measures taken.
- b. Quarterly compliance report shall be submitted no later than 45 days after the preceding calendar quarter. This report shall also provide a listing of all deviations for which immediate or 30-day reporting was required, but need not include copies of the previously submitted information.
- c. If there are no deviations during the calendar quarter, the Permittee shall still submit a compliance report, which report shall state that no deviations occurred during the reporting period.

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

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

DES:MVP:psj

cc: Region 3

ATTACHMENT A

Listing of Identified Emission Units and Process Equipment

Operation	Emission Unit/Process Equipment	Emission Control Equipment	
Oxidizer/Boiler systems	Recuperative Thermal Oxidizer (1-2)	Low-NO _x Burner	
	Feedwater Tank	----	
Fire Water Pump	Emergency Generator	----	
Grain Receiving and Storage System	Truck and Rail Dump Station	Baghouse 1	
	Conveyors		
	Elevators		
	Storage Silos (1-4)		
	Cleaner		
Grain Milling	Grain Day Bin	Baghouse 2	
	Hammermill Feed		
	Hammermills (1-4)		
Feed Preparation	Hammermill Discharge Conveyors	Oxidizer/Boiler Systems	
	Mixer		
	Slurry Tank (1-2)		
	Yeast Tank (1-2)		
	Liquifaction Tank (1-4)		----
	Cook Water Tank		----
	Flash Tank		----
Misc. Chemical Tanks	----		
Fermentation	Fermenters (1-7)	Fermentation Scrubber	
	Beer Well		
Distillation	Beer Column	----	
	Stripper Column	----	
	Rectifier Column	----	
	Molecular Sieve	----	
	CIP Mash Screen	----	
	190 Proof Condenser	Oxidizer/Boiler Systems	
	200 Proof Condenser		
Solid Separation and Evaporation	Centrate Tank		
	Evaporators		
	Centrifuges (1-6)		
	Whole Stillage Tank		----
	Syrup Tank		----
	Thin Stillage Tank		----
Feed Drying and Cooling	Dryer/Cyclone (1-4)	Oxidizer/Boiler Systems	
	Feed Cooling Drum	Baghouse and Oxidizer/Boiler Systems	
	Conveyors	----	
Feed Storage and Loadout	Dry Feed Storage	----	
	Conveyors	----	
	Truck and Rail Loadout	Baghouse	
	Wet Feed Storage and Loadout	----	

Operation	Emission Unit/Process Equipment	Emission Control Equipment
Storage Tanks	Two Denatured Ethanol Tank	Internal Floating Roof with Primary and Secondary Seals
	200 Proof Ethanol Tank	Internal Floating Roof with Primary and Secondary Seals
	190 Proof Ethanol Tank	Internal Floating Roof with Primary and Secondary Seals
	Gasoline Denaturant Tank	Internal Floating Roof with Primary and Secondary Seals
	Corrosive Inhibitor Tank	----
Bio-methanator	Bio-methanators (4)	Bio-methanator Flare
Ethanol Loadout	Loading Rack Used for Loading Ethanol Into Trucks and Railcars	----
	Truck Loadout	Loadout Flare
	Rail Loadout	
Process Components (Valves, Flanges, Pumps, Seals, etc.)	Processing of Organic Material through the Plant's Piping System	Leak Detection and Repair Program
Cooling Tower	Non-Contact Cooling Tower (4 cells)	Drift Eliminator
Fugitive Dust	Plant Roads and Parking Lots and Vehicle Traffic	Paving and Sweeping

TABLE I

Annual Emission Limitations (Tons/Year)

Emission Unit(s)	NO _x	CO	VOM	PM/PM ₁₀	SO ₂	Acet.	Other HAP	Total HAP	Ind. HAP
Emergency Generator	0.86	0.05	0.02	0.02	0.10	0.002	0.003	0.005	0.002
Grain Receiving and Handling				9.73					
Grain Milling				5.26					
Fermentation (Scrubber)			50.0	0.44		6.33	0.14	6.47	0.05
Oxidizer/Boiler Systems (Distillation/Feed Dryers/Coolers)	92.86	82.97	23.20	26.77	81.47	1.50	6.11	7.61	1.70
Cooler Baghouse			8.92	2.82		0.19	0.16	0.35	0.09
Dry Feed Loadout			0.44	1.71		0.04	0.07	0.11	0.03
Wet Cake Transfer & Loadout ¹			0.07	0.44					
Ethanol & Denaturant Tanks			2.69			0.001	0.01	0.01	0.01
Ethanol Loadout Rack (Flare)	1.89	10.08	3.38	0.44	0.44	0.01	1.23	1.24	0.46
Bio-methanator Flare	1.00	5.22	0.73	0.44	0.44	0.01	0.01	0.02	0.01
Component Leaks			8.84			1.37	0.18	1.55	0.14
Cooling Tower				13.70					
Miscellaneous Units			0.65			0.07	0.10	0.17	0.07
Plant Roads / Parking Areas									
				36.77					
Totals	96.61	98.32	98.87	98.54	82.45	9.523	8.013	17.54	2.56

MVP:psj

¹ During wet cake loadout, emissions will offset the emissions from drying operations.