

- 3a. This permit is issued based upon this project not constituting a major modification subject to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. This is because the increases in emissions, comparing past actuals and future permitted emissions, are not significant. In particular, the increase in annual emissions allowed by the permit for PM is 3.5 tons (15.6 - 13.1 = 3.5) and for VOM is 39.89 tons (69.69 - 29.8 = 39.89).
- b. This permit is issued based on this project not being subject to a case-by-case determination of Maximum Achievable Control Technology (MACT) pursuant to 40 CFR 63, Subpart B, because it does not entail construction of new process units that are major sources of emissions for hazardous air pollutants.
- 4. At all times, the Permittee shall, to the extent practicable, maintain and operate affected units and associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- 5. The Lecithin Plant shall not use more than 69.69 tons of fresh solvent per year.

- 6a. i. PM emissions of affected units shall not exceed the following limits:

| <u>Emission Unit</u> | <u>Description</u> | <u>PM</u> | |
|----------------------|---|----------------|---------------|
| | | <u>(Lb/Hr)</u> | <u>(T/Yr)</u> |
| LE-02 | Fluid Bed Dryer | 1.70 | 7.43 |
| LE-03, -04 & -07 | Grinding & Screening and Granulation Fluid Bed Dryers (New* and Existing) | 0.48 | 2.10 |
| LE-07 | New Granulation Fluid Bed Dryer** | 0.48 | 2.10 |
| LE-05 | Lecithin Packaging | 0.90 | 3.94 |
| Total | | --- | 15.60 |

- * If new dryer is controlled by existing baghouse (CE LE-03)
- ** If new dryer is controlled by a new dedicated baghouse (CE LE-05).

- ii. This permit is issued based on minimal emissions of PM from other operations in the Lecithin Plant, not specifically addressed above. For this purpose, PM emissions shall not exceed 0.2 lbs/hour and 0.9 tons/year.
- b. VOM emissions of the Lecithin Plant shall not exceed 69.69 tons/year.
- c. Compliance with annual limits shall be determined based on a running total of 12 months of data.

7. Upon written request from the Illinois EPA, the Permittee shall promptly have PM emissions of affected units tested in accordance with the general procedures and methodology for PM testing set forth in the source's CAAPP permit.
- 8a. The Permittee shall install, operate and maintain instrumentation on each baghouse controlling a dryer (CE LE-02, CE LE-03 and CE LE-05, if installed) to measure pressure drop across the baghouse.
- b. The Permittee shall maintain records of the following items for the affected units in the Lecithin Plant:
 - i. Quantity of fresh solvent used in lecithin production (tons/month);
 - ii. Quantity of lecithin produced (tons/month);
 - iii. VOM emissions from solvent consumption associated with lecithin production as determined by material balance, including amount of solvent added to the system, the amount of solvent in the system, and the amount of solvent leaving the system (tons/month);
 - iv. PM emissions from the Lecithin Plant (tons/month and tons/year), with supporting calculations.
- c. These records shall be retained for a period of at least five years and shall be made available for inspection by the Illinois EPA upon request.
- 9a. The Permittee shall maintain records of the following operating parameters for the mineral oil absorber. These parameters shall be recorded at least once per shift.
 - i. Pressure drop across the absorber;
 - ii. Mineral oil recirculation rate (gallons/minute); and
 - iii. Vent gas flow rate (scfm).
- b. Records of inspection, maintenance, monitoring and repair activities for the absorber shall be kept on site and shall include as a minimum:
 - i. Date of inspection, maintenance, and repair activities.
 - ii. Description of maintenance or repair activity if not routine preventative maintenance.
 - iii. Probable cause for requiring maintenance or repair if not routine or preventative.
- c. The Permittee shall maintain records for any period during which the absorber was not in operation or was not operating properly.

- i. These records shall include each period of time when an operating parameter of a control system, as recorded above, deviated outside the level set as good air pollution control practice (date, duration, and description of the incident).
 - ii. These records shall include the cause for pollution control equipment not operating properly or being out of normal service, for incidents when control equipment failed to operate properly and shall identify the corrective actions that were taken, the repairs that were made, and the steps that were taken to prevent any such reoccurrence.
 - iii. These records shall also identify any such periods during which an emission unit exceeded the requirements of this permit, including applicable emission limits. This record shall include the cause for noncompliance, if known and the corrective action(s) and preventative measures taken to prevent any such reoccurrence if any.
 - iv. Number of hours operated at each emission rate identified above on a monthly basis, with explanation.
 - v. Monthly emissions of VOM and HAPs determined as the summation of the product of the above records.
 - vi. Annual emissions of VOM and HAPs.
10. Other than new emission and production limits and other new requirements established for the modified Lecithin Plant, this permit does not revise or relax any other requirements contained in the source's CAAPP permit, Permit 96030038, for the Lecithin Plant including requirements for monitoring, recordkeeping or reporting.
- 11a. The Permittee shall promptly notify the Illinois EPA of deviations from permit requirements for the Lecithin Plant. Reports shall describe the probable cause of such deviations and any corrective actions or preventive measures taken.
- b. The Permittee should notify the Illinois EPA if it decides to install a dedicated baghouse for the new granulation fluid bed dryer.
- 12a. Two copies of required reports and notifications shall be sent to:

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

Telephone: 217/782-5811

Facsimile: 217/524-4710

b. One copy to:

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

Telephone: 618/346-5120

Facsimile: 618/346-5155

13. The Permittee may operate the modified Lecithin Plant under this permit until its CAAPP permit is revised or reissued to address this project.

If you have any questions on this, please call Kevin Hecht at 217/782-2113.

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

DES:KTH:psj

cc: Region 2
Lotus Notes