

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE

PERMITTEE

ConAgra Food Ingredients Company
Attn: Alan Bindle
101 Water Street
Chester, Illinois 62233

Application No.: 07080063

I.D. No.: 157010AAD

Applicant's Designation:

Date Received: August 24, 2007

Subject: Flour Milling

Date Issued: July 6, 2011

Expiration Date: July 6, 2016

Location: 101 Water Street, Chester, Randolph County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Fuel Combustion

One (1) 10.46 mmBtu/hour Natural Gas-Fired Boiler;

Process

Four (4) Roller Mills Controlled by Baghouse;
One (1) Transfer Controlled by Baghouse;
One (1) Flour Storage Controlled by Baghouse;
One (1) Air Lift Controlled by Baghouse;
One (1) Flour Drying Controlled by Baghouse;
One (1) Internal Air Controlled by Baghouse;
One (1) Hammermill Controlled by Baghouse;
One (1) Air Purifier Controlled by Baghouse;
Two (2) Separators Controlled by Baghouse;
Two (2) Scouring Controlled by Baghouse;
Three (3) Entoleters Controlled by Baghouse;
One (1) Hammermill Screening Controlled by Baghouse;
One (1) Transfer Wheat Room Controlled by Baghouse;
One (1) Vacuum Cleaning Enclosed;
One (1) Feed Pelletizing Cooler Controlled by Cyclone;
One (1) Flour Loadout (Rail);
One (1) Flour Loadout (Truck) Controlled by Sock Filter;
One (1) Pellet Loadout (Barge);
One (1) Pellet Loadout (Truck); and
One (1) Bulk Feed Loadout (Truck)

Elevator

One (1) Receiving Pit (Truck and Rail) Controlled by Baghouse;
One (1) 10.0 mmBtu/hour Natural Gas Fired Grain Dryer;
Internal Transfer Controlled by Baghouse; and
Grain Storage Bins (> 1,000,000 Bushels);

Other

Chlorine Usage for Bleaching Flour and Treatment of Water
Phosphine Usage as an Insecticide; and
Methyl Bromide Fumigation as an Insecticide;

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Particulate Matter less than 10 microns (PM₁₀) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. This source is subject to the New Source Performance Standard (NSPS) for Grain Elevators, 40 CFR 60 Subparts A and DD. The Illinois EPA is administrating NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
 - b. Pursuant to 40 CFR 60.300(a), the provisions of 40 CFR 60 Subpart DD apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under 40 CFR 60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.
 - c. Pursuant to 40 CFR 60.300(b), any facility under 40 CFR 60.300(a) which commences construction, modification or reconstruction after August 3, 1978, is subject to the requirements of 40 CFR 60 Subpart DD.
 - d. Pursuant to 40 CFR 60.302(a)(1), on and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of 40 CFR 60 Subpart DD shall cause to be discharged into the atmosphere any gases which exhibits greater than 0 percent opacity from any column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - e. Pursuant to 60.302(b), on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of 40 CFR 60 Subpart DD shall cause

to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

- i. Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
 - ii. Exhibits greater than 0 percent opacity.
- f. Pursuant to 40 CFR 60.302(c), on and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:
- i. Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
 - ii. Any grain handling operation which exhibits greater than 0 percent opacity.
 - iii. Any truck loading station which exhibits greater than 10 percent opacity.
 - iv. Any barge or ship loading station which exhibits greater than 20 percent opacity.
- g. Pursuant to 40 CFR 60.302(d), the owner or operator of any barge or ship unloading station shall operate as follows:
- i. The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
 - ii. The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft³/bu).
 - iii. Rather than meet the requirements of 40 CFR 60.302(d)(1) and (2) the owner or operator may use other methods of emission control if it is demonstrated to the Illinois EPA or USEPA's satisfaction that they would reduce emissions of particulate matter to the same level or less.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- e. Housekeeping Practices. Pursuant to 35 Ill. Adm. Code 212.461(b), all grain-handling and grain-drying operations, regardless of size, must implement and use the following housekeeping practices:
 - i. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.
 - ii. Cleaning and Maintenance.
 - A. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tend to rot or become airborne.
 - B. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.
 - C. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.
 - iii. Dump Pit.
 - A. Aspiration equipment shall be maintained and operated.
 - B. Dust control devices shall be maintained and operated.

- iv. Head House. The head house shall be maintained in such a fashion that visible quantities of dust or dirt are not allowed to escape to the atmosphere.
 - v. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.
 - vi. Housekeeping Check List. Housekeeping check lists to be developed by the Illinois EPA shall be completed by the manager and maintained on the premises for inspection by Illinois EPA personnel.
- f. Pursuant to 35 Ill. Adm. Code 212.463(a), unless otherwise exempted pursuant to 35 Ill. Adm. Code 212.461(c) or (d) or allowed to use alternate control according to 35 Ill. Adm. Code 212.461(g), grain-drying operations for which construction or modification commenced prior to June 30, 1975, with a total grain-drying capacity in excess of 750 bushels per hour for 5 percent moisture extraction at manufacturer's rated capacity (using the American Society of Agricultural Engineers Standard 248.2, Section 9, Basis for Stating Drying Capacity of Batch and Continuous-Flow Grain Dryers) shall be operated in such a fashion as to preclude the emission of particulate matter larger than 300 microns mean particle diameter, shall apply for an operating permit pursuant to 35 Ill. Adm. Code 201, and shall comply with the following:
- Column Dryers. The largest effective circular diameter of transverse perforations in the external sheeting of a column dryer shall not exceed 0.094 inch, and the grain inlet and outlet shall be enclosed.
- 4a. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
5. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.
6. This permit is issued based on the source not being subject to the National Emission Standards (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63 Subpart DDDDDDD because the source does not use a material containing chromium or a material containing manganese in the manufacturing of prepared feeds.
- 7a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S.

Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- b. Pursuant to 35 Ill. Adm. Code 212.461(a), 35 Ill. Adm. Code 212.302(a), 212.321, and 212.322 shall not apply to grain-handling and grain-drying operations, portable grain-handling equipment and one-turn storage space.
- c. Pursuant to Section 9(f) of the Illinois Environmental Protection Act (Act), any grain elevator located outside of a major population area, as defined in Section 211.3610 of Title 35 of the Illinois Administrative Code, shall be exempt from the requirements of Section 212.462 of Title 35 of the Illinois Administrative Code provided that the elevator:
 - i. Does not violate the prohibitions of Section 9(a) of the Act or have a certified investigation, as defined in Section 211.970 of Title 35 of the Illinois Administrative Code, on file with the Illinois EPA; and
 - ii. Is not required to obtain a Clean Air Act Permit Program permit pursuant to Section 39.5 of the Act. Notwithstanding the above exemption, new stationary source performance standards for grain elevators, established pursuant to Section 9.1 of the Act and Section 111 of the federal Clean Air Act, shall continue to apply to grain elevators.
- 8. Pursuant to 35 Ill. Adm. Code 215.541, the provisions of 35 Ill. Adm. Code 215.301 and 215.302 shall not apply to the spraying or use of insecticides, herbicides or other pesticides.
- 9a. Pursuant to 40 CFR 60.11(b), compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, any alternative method that is approved by the Illinois EPA or USEPA, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).
- b. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.
- c. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner

consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The baghouses shall be in operation at all times when the associated with the truck and rail dump pit is in operation and emitting air contaminants.
- c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the baghouses and the cyclone collectors such that the baghouses and the cyclone are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- d. Each dump pit shall be inspected for proper operation while receiving is occurring, at least once each week (Monday through Sunday) when grain is received.
- e. The grain elevator shall be inspected for presence of visible emissions from internal transfer and cleaning, while such activity is occurring, at least once each week when such activity is performed.
- f. Grain load-out socks, sleeves or equivalent devices shall be inspected for proper operation while load-out is occurring, at least once each week when grain load-out is performed.
- g. The boiler and the grain dryer shall only be operated with natural gas as the fuel. The use of any other fuel in the boiler or grain dryer requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- h. The feed produced at the source shall not use any material containing chromium or any material containing manganese. The production of feed at the source material containing chromium or a material containing manganese requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. The amount of material handled by the source shall not exceed the following limits:

- i. The amount of grain received, that is, unloaded in the dump pit areas at the elevator shall not exceed 25,000 tons per month and 250,000 tons per year;
 - ii. The amount of flour produced shall not exceed 20,000 tons per month and 200,000 tons per year;
 - iii. The amount of feed produced shall not exceed 7,500 tons per month and 75,000 tons per year; and
 - iv. Feed pelletizing shall not exceed 2,500 tons per month and 20,000 tons per year.
- b. Emissions and operation of the grain handling, flour milling operation, and feed manufacturing operation shall not exceed the following limits:

Emission Unit	Throughput*		(Lb/T)	E M I S S I O N S					
	(T/Mo)	(T/Yr)		PM	(T/Mo)	(T/Yr)	(Lb/T)	PM ₁₀	(T/Mo)
Wheat Receiving - Hopper Truck**	31,250	125,000	0.035	0.01	0.02	0.0078	0.01	0.01	0.01
Wheat Receiving - Straight Truck**	26,875	107,500	0.180	0.02	0.10	0.059	0.01	0.01	0.03
Wheat Receiving - Rail	4,375	17,500	0.032	0.07	0.28	0.0078	0.02	0.02	0.07
Handling 1 Elevator A**	127,875	511,500	0.061	0.04	0.16	0.034	0.02	0.02	0.09
Bin Vents 1 Elevator A	127,875	511,500	0.025	1.60	6.39	0.0063	0.40	0.40	1.61
Handling 2 Elevator B**	63,938	255,750	0.061	0.02	0.08	0.0034	0.01	0.01	0.01
Bin Vents 2 Elevator B	63,938	255,750	0.025	0.80	3.20	0.0063	0.20	0.20	0.81
Handling 3 Elevator C**	131,750	527,000	0.061	0.04	0.16	0.0034	0.01	0.01	0.01
Bin Vents 3 Elevator C	131,750	527,000	0.025	1.65	6.59	0.0063	0.42	0.42	1.66
Wheat Dryer	31,250	250,000	0.220	3.44	27.50	0.055	0.86	0.86	6.88
Cleaning House **	31,250	250,000	0.075	0.01	0.09	0.019	0.01	0.01	0.02
Mill House+	31,250	250,000	70.000	5.47	43.75	35.000	2.73	2.73	21.88
Rail Loadout**	8,500	68,000	0.003	0.01	0.01	0.0008	0.01	0.01	0.01
Truck Loadout**	15,750	126,000	0.0033	0.01	0.01	0.0008	0.01	0.01	0.01
Bags**	750	6,000	0.0033	0.01	0.01	0.0008	0.01	0.01	0.01
Pelletizing with Cyclone++	2,500	20,000	3.600	0.45	3.60	1.800	0.23	0.23	1.80
Pellet Feed Ship Truck	2,227	17,813	0.086	0.10	0.77	0.029	0.03	0.03	0.26
Pellet Feed Ship Barge	117	938	0.016	0.01	0.01	0.004	0.01	0.01	0.01
Bulk Feed Loadout	7,031	56,250	0.0033	0.01	0.09	0.0008	0.01	0.01	0.02
				Totals:	92.82				35.20

- * one bushel = 60 lbs (wheat)
 ** controlled by baghouse (99% overall control efficiency)
 + controlled by baghouse (99.5% overall control efficiency)
 ++ controlled by cyclone (90% overall control efficiency)

These limits are based the maximum throughput of the grain storage elevator, standard emission factors (Table 9.9-1 and Table 9.9-2, AP-42, Fifth Edition, Volume I, Update 2003, May 2003) and applicable

controls (99 percent control efficiency for baghouse, 99 percent control efficiency for enclosed internal transfer, 99.5 percent control efficiency for wheat milling baghouse, and 90 percent control efficiency for cyclone.

- c. Operation and emissions of the boiler and dryer combined shall not exceed the following limits:

- i. Natural Gas Usage: 9.02 mmscf/month, 90.2 mmscf/year.

- ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	0.38	3.79
Nitrogen Oxides (NO _x)	100.0	0.45	4.51
Particulate Matter (PM)	7.6	0.03	0.34
Sulfur Dioxide (SO ₂)	0.6	0.01	0.02
Volatile Organic Material (VOM)	5.5	0.02	0.25

These limits are based on the maximum fuel usage, a heat content of 1,000 Btu/scf for natural gas, 8,760 hours per year of operation, and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- d. Usage of materials and emissions from fumigation shall not exceed the following limits:

<u>HAP Pollutant</u>	<u>Material Usage</u>		<u>HAP Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Phosphine	0.2	2.0	0.2	2.0
Methyl Bromide	0.8	8.0	0.8	8.0

These limits are based on the maximum material usage.

- e. This permit is issued based on negligible emissions of chlorine from tempering water and the flour bleaching operation. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- f. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

- g. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 40 CFR 60.8(a), at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
 - i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
 - ii. Approves the use of an equivalent method;
 - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
 - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
 - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
- c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
- d. Pursuant to 40 CFR 60.8(d), the owner or operator of an affected facility shall provide the Illinois EPA or USEPA at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Illinois EPA or USEPA the opportunity to have an observer present. If after 30 days notice for an initially

scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Illinois EPA or USEPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Illinois EPA or USEPA by mutual agreement.

- e. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to such facility. This includes:
 - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and
 - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).
 - iv. Utilities for sampling and testing equipment.
 - f. Pursuant to 40 CFR 60.8(f), unless otherwise specified in the applicable subpart of 40 CFR Part 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard under 40 CFR Part 60. For the purpose of determining compliance with an applicable standard under 40 CFR Part 60, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA's or USEPA's approval, be determined using the arithmetic mean of the results of the two other runs.
13. Pursuant to 40 CFR 60.11(e)(2), except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in 40 CFR Part 60 applies shall conduct opacity observations in accordance with 40 CFR 60.11(b), shall record the opacity of emissions, and shall report to the Illinois EPA or USEPA the opacity results along with the results of the initial performance test required under 40 CFR 60.8. The inability of an owner or operator to

secure a visible emissions observer shall not be considered a reason for not conducting the opacity observations concurrent with the initial performance test.

- 14a. Pursuant to 40 CFR 60.303(a), in conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of 40 CFR Part 60 or other methods and procedures as specified in 40 CFR 60.303, except as provided in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in 40 CFR 60.303(c).
- b. Pursuant to 40 CFR 60.303(b), the owner or operator shall determine compliance with the particulate matter standards in § 60.302 as follows:
 - i. Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.
 - ii. Method 2 shall be used to determine the ventilation volumetric flow rate.
 - iii. Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
- c. Pursuant to 40 CFR 60.303(c)(1), the owner or operator may use the following as alternatives to the reference methods and procedures specified in 40 CFR 60.303: For Method 5, Method 17 may be used.
- 15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 16 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
16. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 17a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
18. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its

operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

19. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 20a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the dust collectors, cyclones, scrubbers, filter receivers, socks, and biogas flare:
 - A. Records for periodic inspection of the dust collectors, cyclones, scrubbers, filter receivers, socks, and biogas flare with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Records of housekeeping check lists;
 - iii. Records for the inspections required by Conditions 10(c), (d) and (e), with date, time and observations if such information is not incorporated in the housekeeping check list.
 - iv. Total grain received (tons/month and tons/year);
 - v. The amount of flour produced (tons/month and tons/year);
 - vi. The amount of feed produced (tons/month and tons/year);

- vii. Feed pelletizing throughput (tons/month and tons/year);
 - viii. Natural gas usage (mmscf/month and mmscf/year);
 - ix. Amount of Chlorine used (tons/month and tons/year);
 - x. Amount of Phosphine used (tons/month and tons/year);
 - xi. Amount of Methyl Bromide used (tons/month and tons/year); and
 - xii. Monthly and aggregate annual emissions of CO, NO_x, PM, PM₁₀, SO₂, VOM, and HAPs from source with supporting data and calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) 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 or USEPA request for records during the course of a source inspection.
21. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 22a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) 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
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

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

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

Date Signed: _____

ECB:MJD:psj

cc: Illinois EPA, Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Flour Milling Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year of PM₁₀, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						Single	Combined
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Wheat Receiving - Hopper Truck			0.02	0.01				
Wheat Receiving - Straight Truck			0.10	0.03				
Wheat Receiving - Rail			0.28	0.07				
Handling 1 Elevator A			0.16	0.09				
Bin Vents 1 Elevator A			6.39	1.61				
Handling 2 Elevator B			0.08	0.01				
Bin Vents 2 Elevator B			3.20	0.81				
Handling 3 Elevator C			0.16	0.01				
Bin Vents 3 Elevator C			6.59	1.66				
Wheat Dryer			27.50	6.88				
Cleaning House			0.09	0.02				
Mill House			43.75	21.88				
Rail Loadout			0.01	0.01				
Truck Loadout			0.01	0.01				
Bags			0.01	0.01				
Pelletizing with Cyclone			3.60	1.80				
Pellet Feed Ship Truck			0.77	0.26				
Pellet Feed Ship Barge			0.01	0.01				
Bulk Feed Loadout			0.09	0.02				
Fuel Combustion	3.79	4.51	0.34	0.34	0.02	0.25		
Tempering Water							0.44	0.44
Flour Bleaching							0.44	0.44
Fumigation							8.00	10.00
Totals	<u>3.79</u>	<u>4.51</u>	<u>93.16</u>	<u>35.54</u>	<u>0.02</u>	<u>0.25</u>	<u>9.00</u>	<u>22.50</u>

MJD:psj