

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: October 30, 2018

REVISION DATE: March 29, 2022

ISSUED TO

**Poet Biorefining – Caro, LLC**

State Registration Number (SRN): N6996

LOCATED AT

1551 Empire Drive, Caro, Michigan 48723

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N6996-2018a

Expiration Date: October 30, 2023

Administratively Complete ROP Renewal Application Due Between  
April 30, 2022 and April 30, 2023

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-N6996-2018a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

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Chris Hare, Saginaw Bay District Supervisor

**TABLE OF CONTENTS**

**AUTHORITY AND ENFORCEABILITY ..... 3**

**A. GENERAL CONDITIONS..... 4**

Permit Enforceability ..... 4

General Provisions..... 4

Equipment & Design ..... 5

Emission Limits..... 5

Testing/Sampling ..... 5

Monitoring/Recordkeeping ..... 6

Certification & Reporting ..... 6

Permit Shield ..... 7

Revisions ..... 8

Reopenings..... 8

Renewals..... 9

Stratospheric Ozone Protection ..... 9

Risk Management Plan..... 9

Emission Trading..... 9

Permit to Install (PTI) ..... 10

**B. SOURCE-WIDE CONDITIONS ..... 11**

**C. EMISSION UNIT CONDITIONS ..... 14**

EMISSION UNIT SUMMARY TABLE..... 14

EUFB cooler..... 17

EUDDGSSILO ..... 20

EUINHIBITTANK..... 22

EUGENSET ..... 24

EUBOILER..... 27

**D. FLEXIBLE GROUP CONDITIONS..... 29**

FLEXIBLE GROUP SUMMARY TABLE..... 29

FGCORN-DDGS..... 31

FGSCALP..... 34

FGFLOUR..... 37

FGFERM&DIST ..... 39

FGDDGSDRYERS..... 43

FGETHLOAD..... 48

FGNSPSTANKS ..... 50

FGNSPSVVa ..... 52

FGETHANOLTANKS ..... 58

**E. NON-APPLICABLE REQUIREMENTS ..... 60**

**APPENDICES ..... 61**

Appendix 1. Acronyms and Abbreviations..... 61

Appendix 2. Schedule of Compliance..... 62

Appendix 3. Monitoring Requirements ..... 62

Appendix 4. Recordkeeping ..... 62

Appendix 5. Testing Procedures ..... 62

Appendix 6. Permits to Install..... 62

Appendix 7. Emission Calculations ..... 63

Appendix 8. Reporting ..... 63

## AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

## Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).<sup>2</sup> **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

## Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"<sup>2</sup> **(R 336.1301(1))**
  - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
  - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(R 336.1901(b))**

## Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).<sup>2</sup> **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
  - a. The date, location, time, and method of sampling or measurements.
  - b. The dates the analyses of the samples were performed.
  - c. The company or entity that performed the analyses of the samples.
  - d. The analytical techniques or methods used.
  - e. The results of the analyses.
  - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
  - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**



## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

### **Permit to Install (PTI)**

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table.

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Individual HAP	Less than 10 TPY <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All emission units located at the facility	SC VI.2	<b>R 336.1205(2)</b>
2. Total HAPs	Less than 25 TPY <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All emission units located at the facility	SC VI.2	<b>R 336.1205(2)</b>

#### II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall comply with all provisions of the federal NSPS as specified in Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, of 40 CFR Part 60, Subparts A and VVa.<sup>2</sup> **(40 CFR Part 60, Subparts A and VVa)**
- The permittee shall not operate any equipment unless the malfunction abatement plan (MAP), revised as necessary according to the procedures of Rule 911, is implemented and maintained. The MAP shall include procedures for maintaining and operating equipment in a satisfactory manner, including during malfunction events, and a program for corrective action for such events. If the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the MAP within 45 days after such an event occurs.<sup>2</sup> **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**
- The permittee shall not operate any equipment unless an emergency response plan (aka emergency action plan), to be followed in the event of an emergency, has been submitted to the local fire department or county emergency response agency and is implemented and maintained. By October 1 each year, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates.<sup>1</sup> **(R 336.1901)**

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall monitor emissions and operating information in accordance with the federal NSPS as specified in Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, of 40 CFR Part 60, Subparts A and VVa.<sup>2</sup> **(R 336.1225, R 336.1702(b), 40 CFR Part 60, Subparts A and VVa)**
2. The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period individual HAP and total HAP emission rate calculations, as required by SC I.1 and SC I.2. All records shall be kept on file for a period of at least five years and made available to the Department upon request.<sup>2</sup> **(R 336.1205(2))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall keep records of emissions and operating information to comply with the federal NSPS as specified in 40 CFR Part 60, Subparts A and VVa. Information required to be submitted to the Administrator shall be submitted to the AQD District Supervisor in an acceptable format within 30 days following the end of the semiannual period in which the data were collected. The permittee shall keep all required records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(b), 40 CFR 60.486a, 40 CFR 60.487a)**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

### C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCORNPIT	Corn dump pit and auger	11/4/2002	FGCORN-DDGS
EUCORNELEV1	Corn elevator from corn dump pit	11/4/2002	FGCORN-DDGS
EUCORNBIN1	Corn bin 1	11/4/2002	FGCORN-DDGS
EUCORNBIN2	Corn bin 2	11/4/2002	FGCORN-DDGS
EUCORNBIN3	Corn bin 3	11/4/2002	FGCORN-DDGS
EUCORNBIN4	Corn bin 4	11/4/2002	FGCORN-DDGS
EUCORNBIN5	Corn bin 5	10/15/2007	FGCORN-DDGS
EUCORNBIN6	Corn bin 6	10/15/2007	FGCORN-DDGS
EUCORNBIN7	Corn bin 7	10/15/2007	FGCORN-DDGS
EUDDGSPIT	DDGS <sup>1</sup> dump pit and auger	11/4/2002	FGCORN-DDGS
EUDDGSELEV	DDGS elevator	11/4/2002	FGCORN-DDGS
EUDDGCONV	DDG fill conveyor	11/4/2002	FGCORN-DDGS
EURAILLOAD1	Rail load spout #1 (for DDGS)	11/4/2002	FGCORN-DDGS
EUTRUCKLOAD1	Truck load spout #1 (for DDGS)	11/4/2002	FGCORN-DDGS
EUCORNELEV2	Corn elevator from corn bins	11/4/2002	FGSCALP
EUSCALPER	Scalper	11/4/2002	FGSCALP
EUHAMMERMILL1	Hammermill #1	10/20/2005	FGFLOUR
EUHAMMERMILL2	Hammermill #2	10/20/2005	FGFLOUR
EUHAMMERMILL3	Hammermill #3	10/20/2005	FGFLOUR
EUHAMMERMILL4	Hammermill #4	10/20/2005	FGFLOUR
EUHAMMERMILL5	Hammermill #5	4/1/2016	FGFLOUR
EUFLOURELEV	Flour elevator	11/4/2002	FGFLOUR
EUFLOURCONV	Flour conveyor	11/4/2002	FGFLOUR
EUFERMENTER1	Fermenter #1	11/4/2002	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER2	Fermenter #2	11/4/2002	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER3	Fermenter #3	11/4/2002	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER4	Fermenter #4	11/4/2002	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER5	Fermenter #5	10/20/2005	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER6	Fermenter #6	10/20/2005	FGFERM&DIST FGNSPSV <sub>a</sub>
EUFERMENTER7	Fermenter #7	4/1/2016	FGFERM&DIST FGNSPSV <sub>a</sub>

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFERMENTER8	Fermenter #8	5/20/2019	FGFERM&DIST, FGNSPSVVa
EUBEERWELL	Beer well	11/4/2002	FGFERM&DIST FGNSPSVVa
EUBEERSTRIP	Beer stripper	11/4/2002	FGFERM&DIST FGNSPSVVa
EUBEERSTRIP2	Beer stripper #2	TBD	FGFERM&DIST FGNSPSVVa
EURECTIFIER	Rectifier	11/4/2002	FGFERM&DIST FGNSPSVVa
EUSIDESTRIP	Side stripper	11/4/2002	FGFERM&DIST FGNSPSVVa
EUSIEVE	Molecular sieve	11/4/2002	FGFERM&DIST FGNSPSVVa
EUSIEVE2	Molecular sieve #2	4/1/16	FGFERM&DIST FGNSPSVVa
EUYEAST	Yeast tank	11/4/2002	FGFERM&DIST
EUEVAPORATOR	Evaporator	11/4/2002	FGFERM&DIST
EURTO	Regenerative Thermal Oxidizer	10/20/2005	FGDDGSDRYERS FGFERM&DIST
EUTO&HRB	Thermal oxidizer and heat recovery boiler	10/20/2005	FGDDGSDRYERS
EUDDGSDRYER1	DDGS dryer	11/4/2002	FGDDGSDRYERS
EUDDGSDRYER2	DDGS dryer	11/4/2002	FGDDGSDRYERS
EUCENTRIFUGE1	Centrifuge #1	11/4/2002	FGDDGSDRYERS
EUCENTRIFUGE2	Centrifuge #2	11/4/2002	FGDDGSDRYERS
EUCENTRIFUGE3	Centrifuge #3	11/4/2002	FGDDGSDRYERS
EUCENTRIFUGE4	Centrifuge #4	11/4/2002	FGDDGSDRYERS
EUCENTRIFUGE5	Centrifuge #5	10/1/2005	FGDDGSDRYERS
EUCENTRIFUGE6	Centrifuge #6	4/1/2016	FGDDGSDRYERS
EUFBCOOLER	Fluidized bed cooler w/fabric filter collector (CE008)	11/4/2002 4/1/2016 5/20/2019	NA
EUDDGSSILO	DDGS silo w/ Fabric filter collectors (F-849 & F-620))	11/4/2002	NA
EUTRUCKLOAD3	Truck load spout #3 (for ethanol, including E85)	11/4/2002 5/22/2009	FGETHLOAD FGNSPSVVa
EUTRUCKLOAD4	Truck load spout #4 (for ethanol, including E85)	11/4/2002 5/22/2009	FGETHLOAD FGNSPSVVa
EURAILLOAD2	Rail load spout #2 (for ethanol, including E85)	11/4/2002 5/22/2009	FGETHLOAD FGNSPSVVa
EUGENSET	1129 break HP CI, Diesel generator	11/4/2002	NA
EUBOILER	Package Boiler	10/20/2005	NA
EUIINHIBITANK	Storage tank for corrosion inhibitor	11/4/2002	NA
EUNATGASTANK1	Storage tank T-802 for denaturant (natural gasoline)	3/12/2008	FGNSPSTANKS FGNSPSVVa
EU200TANK1	Storage tank T-803 for 200 proof ethanol	3/12/2008	FGETHANOLTANKS FGNSPSVVa
EU200TANK2	Storage tank T-804 for 200 proof ethanol	3/12/2008	FGETHANOLTANKS FGNSPSVVa
EU190TANK	Storage tank T-801 for 190 proof ethanol	11/4/2002	FGETHANOLTANKS FGNSPSVVa

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUNATGASTANK2	Storage tank T-805 for denaturant (natural gasoline)	3/12/2008	FGNSPSTANKS FGNSPSVVa
EUFLOURCONV	Drag Flour Conveyor	4/1/2016	FGFLOUR
EUFLOURELEV	Flour Elevator	4/1/2016	FGFLOUR
EUBEERSTRIP2	Beer Stripper #2	4/1/2016	FGFERM&DIST
EUEVAPORATOR	Two-stage evaporator	11/4/2002 4/1/2016	NA
EUSTILLAGETANK	Whole Stillage Tank	4/1/2016	FGDDGSDRYERS

<sup>1</sup>DDGS refers to Dried Distiller's Grains and Solubles.



**EUFBCOOLER  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Fluidized bed cooler. PTI No. 39-19.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Fabric filter collector (CE008)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.0060 lbs per 1000 lbs of gas <sup>a,2</sup>	Hourly	EUFBCOOLER	SC V.1, VI.2	<b>R 336.1331</b>
2. PM10	0.65 lb/hr <sup>2</sup>	Hourly	EUFBCOOLER	SC V.1, VI.2	<b>40 CFR 52.21(c) &amp; (d)</b>
3. PM 2.5	0.65 lb/hr <sup>2</sup>	Hourly	EUFBCOOLER	SC V.1, VI.2	<b>40 CFR 52.21(c) &amp; (d)</b>
4. VOC	7.54 lb/hr <sup>2</sup>	Hourly	EUFBCOOLER	SC V.1, VI.1	<b>R 336.1225, R 336.1702(a)</b>

<sup>a</sup> Calculated on a dry gas basis

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate EUFBCOOLER unless the fabric filter collector (CE008) is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> **(R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, PM2.5, and VOC emission rates from EUFBCOOLER by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #1. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

**Reference Test Method Table #1**

<b>Pollutant</b>	<b>Test Method Reference</b>
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
VOCs	40 CFR Part 60, Appendix A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep production records on a monthly basis and other records necessary to demonstrate compliance with the VOC emission rate limit. The VOC emission rate shall be calculated based upon monthly records prorated to an hourly rate.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
2. The permittee shall monitor and record the pressure drop and/or a visible emission check of the fabric filter collector (CE008) on a daily basis, during days of operation, and will inspect the fabric filter collector (CE008) on an annual basis to confirm satisfactory operation. For the purpose of this condition, a visible emission check does not have to be in accordance with Method 9. If a check reveals any visible emissions from the vent (excluding uncombined water vapor), the permittee shall perform any maintenance required to eliminate visible emissions. The permittee shall keep records of the results of the visible emission check and of any maintenance performed after visible emissions are observed.<sup>2</sup> **(R 336.1331, 40 CFR 52.21(c) & (d))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV007	37 <sup>2</sup>	35 <sup>2</sup>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUDDGSSILO  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Dried distiller’s grains and solubles silo. PTI No. 175-15B.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

- Fabric filter collector (F-849 – associated with the silo and vent no. SV008). Product is discharged to either the silo or flat storage, but not both.
- Fabric filter collector (F-620 – associated with flat storage and vent no. SV008).

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.0080 lbs per 1000 lbs of gas <sup>a2</sup>	Hourly	EUDDGSSILO	SC V.1, VI.1	<b>R 336.1331</b>
2. PM10	0.15 lb/hr <sup>2</sup>	Hourly	EUDDGSSILO	SC V.1, VI.1	<b>40 CFR 52.21(c) &amp; (d)</b>
3. PM2.5	0.07 lb/hr <sup>2</sup>	Hourly	EUDDGSSILO	SC V.1, VI.1	<b>40 CFR 52.21(c) &amp; (d)</b>

<sup>a</sup> Calculated on a dry gas basis

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate EUDDGSSILO unless the fabric filter collectors (F-849 & F-620) are installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (**R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d)**)

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from EUDDGSSILO by testing at the owner’s expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #2. An alternate method, or a modification to the approved EPA Method may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in test protocol that are proposed after initial submittal. The permittee must submit a complete report of

the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

**Reference Test Method Table #2**

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record the pressure drop and/or a visible emissions check of fabric filter collector F-620 or F-849 on a daily basis, during days of operation, and will inspect the fabric filter collectors (F-620 & F-849) on an annual basis to confirm satisfactory operation. For the purpose of this condition, a visible emission check does not have to be in accordance with Method 9. If a check reveals any visible emissions from the vent (excluding uncombined water vapor), the permittee shall perform any maintenance required to eliminate visible emissions. The permittee shall keep records of the results of the visible emission check and of any maintenance performed after visible emissions are observed. (R 336.1213(3))

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV008 <sup>a</sup>	16 x 18 <sup>2</sup>	112 <sup>2</sup>	40 CFR 52.21(c) & (d)
<sup>a</sup> Discharges horizontally			

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUINHIBITANK  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Storage tank for corrosion inhibitor. PTI No. 210-01.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not fill EUINHIBITANK unless it is equipped with submerged fill piping. Submerged fill, similar to bottom fill, means that liquid entering the vessel must enter below the liquid level in the vessel.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUGENSET**  
**EMISSION UNIT CONDITIONS**

**DESCRIPTION**

An existing emergency stationary reciprocating internal combustion engine (RICE) located at an Area Source of Hazardous Air Pollutants (HAP) emissions, as identified within Title 40 of the Code of Federal Regulations (CFR), Part 63, National Emission Standard for HAP (NESHAP) for Stationary RICE, Subpart ZZZZ (40 CFR 63.6580-6675). PTI No. 210-01.

Engine ID or Serial Number	Engine Manufacturer	Engine Model	Purchase Date	Engine Build Date	Rated Horsepower	Fuel in Use	CI or SI	Is Engine Certified?**(yes/no)
EUGENSET	-	-	5/17/2002	11/4/2002	1129 break	Diesel	CI	No

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall change oil and filter every 500 hours of operation or annually, whichever comes first. **(40 CFR Part 63, Subpart ZZZZ, Table 2d.4)**
2. The permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR Part 63, Subpart ZZZZ, Table 2d.4)**
3. The permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR Part 63, Subpart ZZZZ, Table 2d.4)**
4. The permittee shall operate the minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emissions standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
5. There is no time limit on the use of emergency stationary RICE in emergency situations. **(40 CFR 63.6640(f)(1))**



6. The permittee may operate the emergency stationary RICE for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine for a maximum of 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer’s emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e))**
2. The permittee shall install a non-resettable hour meter if one is not already installed. **(40 CFR 6625(f))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. **(40 CFR 63.6655(e))**
2. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. **(40 CFR 63.6655(f))**
3. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. **(40 CFR 63.6655(f))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV017	8 <sup>2</sup>	12 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ (NESHAP for stationary reciprocating internal combustion engines). If applicable, permittee shall also comply with 40 CFR Part 60, Subpart IIII. **(40 CFR Part 63, Subpart ZZZZ, 40 CFR Part 60, Subpart IIII)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUBOILER  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Natural Gas Package Boiler. PTI 210-01B.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM10	7.6 LB/MMft <sup>3</sup> natural gas consumed <sup>2</sup>	Hourly	EUBOILER	SC VI.1	R 336.1331

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall only use sweet natural gas as fuel in EUBOILER.<sup>2</sup> **(40 CFR 52.21(c) and (d))**
2. The permittee shall comply with all provisions of the federal NSPS Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to the equipment in EUBOILER.<sup>2</sup> **(40 CFR Part 60, Subparts A & Dc)**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records of the natural gas consumed by EUBOILER on a daily basis. The permittee shall keep these records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1331, 40 CFR Part 60, Subparts A & Dc)**

2. The permittee shall maintain copies of utility bills indicating the receipt of natural gas from a supplier of commercial grade natural gas. **(R 336.1213(3)(b)(i))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

## **VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV023	48 <sup>2</sup>	75 <sup>2</sup>	40 CFR 52.21(c) & (d)

## **IX. OTHER REQUIREMENT(S)**

NA

### **Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCORN-DDGS	Corn and DDGS handling area w/fabric filter collector (CE001). This flexible group is subject to the requirements of 40 CFR Part 60, Subpart DD.	EUCORNPIT, EUCORNELEV1, EUCORNBIN1, EUCORNBIN2, EUCORNBIN3, EUCORNBIN4, EUCORNBIN5, EUCORNBIN6, EUCORNBIN7, EUDDGSPIT, EUDDGSELEV, EUDDGCONV, EURAILLOAD1, EUTRUCKLOAD1
FGSCALP	Scalper unit w/fabric filter collector (CE002).	EUCORNELEV2, EUSCALPER
FGFLOUR	Milling area w/baghouses. (Hammermill 1-5)	EUFLOURELEV, EUFLOURCONV, EUHAMMERMILL1, EUHAMMERMILL2, EUHAMMERMILL3, EUHAMMERMILL4, EUHAMMERMILL5
FGFERM&DIST	Fermentation and Distillation processes that exhaust to one of two packed-bed wet scrubbers (CE004 or CE014). If the scrubbers are down for maintenance the exhaust can be rerouted to the RTO (CE012). FGFERM&DIST is subject to the requirements of 40 CFR Part 64. The CAM subject pollutant is VOC. This flexible group is also subject to the requirements of 40 CFR Part 60, Subpart VVa.	EUFERMENTER1, EUFERMENTER2, EUFERMENTER3, EUFERMENTER4, EUFERMENTER5, EUFERMENTER6, EUFERMENTER7, EUFERMENTER8, EUBEERWELL, EUBEERSTRIP, EUBEERSTRIP2, EURECTIFIER, EUSIDESTRIP, EUSIEVE, EUSIEVE2, EUYEAST, EUEVAPORATOR, EURTO
FGDDGSDRYERS	Dried Distiller's Grains with Solubles (DDGS) Dryers and Centrifugation with the following air pollution control equipment: <ul style="list-style-type: none"> <li>• Multiclone dust collector (CE006 &amp; CE007)</li> <li>• Thermal Oxidizer &amp; Heat Recovery Boiler (TO&amp;HRB) (CE010)</li> <li>• Regenerative Thermal Oxidizer (RTO) (CE012)</li> </ul> FGDDGSDRYERS is subject to the requirements of 40 CFR Part 64. The CAM subject pollutant is VOC.	EUDDGSDRYER1, EUDDGSDRYER2, EUTO&HRB, EURTO, EUCENTRIFUGE1, EUCENTRIFUGE2, EUCENTRIFUGE3, EUCENTRIFUGE4, EUCENTRIFUGE5, EUCENTRIFUGE6, EUSTILLAGETANK
FGETHLOAD	Ethanol truck and rail load out. FGETHLOAD is subject to the requirements of 40 CFR Part 60, Subpart VVa.	EUTRUCKLOAD3, EUTRUCKLOAD4, EURAILLOAD2

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGNSPSTANKS	Denaturant storage w/ tank nos. T-802 and T-805. FGNSPSTANKS is subject to the requirements of 40 CFR Part 60, Subpart VVa.	EUNATGASTANK1, EUNATGASTANK2
FGNSPSVva	All pumps, valves and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each open-ended valve or line and all associated closed vent systems and control devices. FGNSPSVva is subject to the requirements of Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 of 40 CFR Part 60, Subpart VVa.	EUFERMENTER1, EUFERMENTER2, EUFERMENTER3, EUFERMENTER4, EUFERMENTER5, EUFERMENTER6, EUFERMENTER7, EUFERMENTER8, EUBEERWELL, EUBEERSTRIP, EUBEERSTRIP2, EURECTIFIER, EUSIDESTRIP, EUSIEVE, EUSIEVE2, EUTRUCKLOAD3, EUTRUCKLOAD4, EURAILLOAD2, EUNATGASTANK1, EUNATGASTANK2, EU190TANK, EU200TANK1, EU200TANK2
FGETHANOLTANKS	Ethanol storage tank nos. T-801, T-803 and T-804. FGETHANOLTANKS is subject to the requirements of 40 CFR Part 60, Subpart VVa.	EU190TANK, EU200TANK1, EU200TANK2

**FGCORN-DDGS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Corn and DDGS handling area. PTI No. 175-15B.

**Emission Units:** EUCORNPIT, EUCORNELEV1, EUCORNBIN1, EUCORNBIN2, EUCORNBIN3, EUCORNBIN4, EUCORNBIN5, EUCORNBIN6, EUCORNBIN7, EUDDGSPIT, EUDDGSELEV, EUDDGCONV, EURAILLOAD1, EUTRUCKLOAD1

**POLLUTION CONTROL EQUIPMENT**

Fabric filter collector (CE001)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.0050 lbs per 1000 lbs of gas <sup>a2</sup>	Hourly	FGCORN-DDGS	SC V.1, VI.1	<b>R 336.1331</b>
2. PM10	0.56 lb/hr <sup>2</sup>	Hourly	FGCORN-DDGS	SC V.1, VI.1	<b>40 CFR 52.21(c) &amp; (d)</b>
3. PM2.5	0.36 lb/hr <sup>2</sup>	Hourly	FGCORN-DDGS	SC V.1, VI.1	<b>40 CFR 52.21(c) &amp; (d)</b>

<sup>a</sup> Calculated on a dry gas basis.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not exceed a throughput of 9,700 tons of grain per day in EUCORNELEV1.<sup>2</sup> **(R 336.1331, 40 CFR 52.21(c) & (d))**
2. The permittee shall not operate any equipment in FGCORN-DDGS unless the fabric filter collector (CE001) is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> **(R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from FGCORN-DDGS by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #3. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical

Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1225, R 336.1331, R 336.1702, R 336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

**Reference Test Method Table #3**

<b>Pollutant</b>	<b>Test Method Reference</b>
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep, in a satisfactory manner, records of the tons of grain processed in EUCORNELEV1 on a daily basis, as required by SC III.1.<sup>2</sup> (R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))
2. The permittee shall monitor and record the pressure drop and/or a visible emissions check of the fabric filter collector (CE001) on a daily basis and will inspect the fabric filter collector (CE001) on an annual basis to confirm satisfactory operation. For the purpose of this condition, a visible emission check does not have to be in accordance with Method 9. If a check reveals any visible emissions from the vent (excluding uncombined water vapor), the permittee shall perform any maintenance required to eliminate visible emissions. The permittee shall keep records of the results of the visible emission check and of any maintenance performed after visible emissions are observed. (R 336.1213(3))

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV001	36 <sup>2</sup>	105 <sup>2</sup>	40 CFR 52.21(c) & (d)



**IX. OTHER REQUIREMENT**

1. The permittee shall comply with all provisions of the federal NSPS Standards of Performance for Grain Elevators as specified in 40 CFR Part 60, Subparts A and DD, as they apply to the equipment in FGCORNDDGS.<sup>2</sup>  
**(40 CFR Part 60, Subparts A & DD)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGSCALP  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Scalper unit. PTI 175-15B.

**Emission Units:** EUCORNELEV2, EUSCALPER

**POLLUTION CONTROL EQUIPMENT**

Fabric filter collector (CE002)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.010 lbs per 1000 lbs of gas <sup>a2</sup>	Hourly	FGSCALP	SC V.1	R 336.1331
2. PM10	0.09 lb/hr <sup>2</sup>	Hourly	FGSCALP	SC V.1	40 CFR 52.21(c) & (d)
3. PM2.5	0.04 lb/hr <sup>2</sup>	Hourly	FGSCALP	SC V.1	40 CFR 52.21(c) & (d)

<sup>a</sup> Calculated on a dry gas basis.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate any equipment in FGSCALP unless the fabric filter collector (CE002) is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from FGSCALP by testing at the owner’s expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #4. An alternate method, or a modification to the approved EPA Method may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1225, R336.1331, R336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

**Reference Test Method Table #4**

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record the pressure drop and/or a visible emissions check of the fabric filter collector (CE002) on a daily basis and will inspect the fabric filter collector (CE002) on an annual basis to confirm satisfactory operation. For the purpose of this condition, a visible emission check does not have to be in accordance with Method 9. If a check reveals any visible emissions from the vent (excluding uncombined water vapor), the permittee shall perform any maintenance required to eliminate visible emissions. The permittee shall keep records of the results of the visible emission check and of any maintenance performed after visible emissions are observed. (R 336.1213(3))

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV002 <sup>a</sup>	12 <sup>2</sup>	68 <sup>2</sup>	40 CFR 52.21(c) & (d)

<sup>a</sup> This stack discharges horizontally

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGFLOUR  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Milling area. PTI No. 175-15B.

**Emission Units:** EUFLOURELEV, EUFLOURCONV, EUHAMMERMILL1, EUHAMMERMILL2, EUHAMMERMILL3, EUHAMMERMILL4, EUHAMMERMILL5

**POLLUTION CONTROL EQUIPMENT**

Hammermill-1 baghouse (F-110), Hammermill-2 baghouse (F-111), Hammermill-3 baghouse (F-112), Hammermill-4 baghouse (F-113), Hammermill-5 baghouse (F114)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.0040 lbs per 1000 lbs of gas <sup>a2</sup>	Hourly	FGFLOUR	SC V.1, VI.1	R 336.1331
2. PM10	1.10 lb/hr <sup>2</sup>	Hourly	EUHAMMERMILL1-5	SC V.1, VI.1	40 CFR 52.21(c) & (d)
3. PM2.5	0.93 lb/hr <sup>2</sup>	Hourly	EUHAMMERMILL1-5	SC V.1, VI.1	40 CFR 52.21(c) & (d)

<sup>a</sup> Calculated on a dry gas basis. The emission limit applies to the combined emissions of all emission units in the flexible group.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

- The permittee shall not operate any equipment in FGFLOUR unless its associated baghouses (Hammermill 1-5) are installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from FGFLOUR by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #5. An alternate method, or a modification to the approved EPA Method may be specified in an AQD approved Test Protocol. No less

than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1225, R336.1331, R336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

**Reference Test Method Table #5**

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record the pressure drop and/or conduct a visible emissions check of each of the baghouses (Hammermill 1–5) on a daily basis and will inspect the baghouses on an annual basis to confirm satisfactory operation. For the purpose of this condition, a visible emission check does not have to be in accordance with Method 9. If a check reveals any visible emissions from the stack (excluding uncombined water vapor), the permittee shall perform any maintenance required to eliminate visible emissions. The permittee shall keep records of the results of the visible emission check and of any maintenance performed after visible emissions are observed. (R 336.1213(3))

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV035	54 <sup>2</sup>	48 <sup>2</sup>	40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGFERM&DIST**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Fermentation and distillation processes. FGFERM&DIST is subject to the requirements of 40 CFR Part 64. The CAM subject pollutant is VOC. This flexible group is also subject to the requirements of the federal NSPS Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subpart VVa. PTI No. 39-19.

**Emission Units:** EUFERMENTER1, EUFERMENTER2, EUFERMENTER3, EUFERMENTER4, EUFERMENTER5, EUFERMENTER6, EUFERMENTER7, EUFERMENTER8, EUBEERWELL, EUBEERSTRIP, EUBEERSTRIP2, EURECTIFIER, EUSIDESTRIP, EUSIEVE, EUSIEVE2, EUYEAST, EUEVAPORATOR, EURTO

**POLLUTION CONTROL EQUIPMENT**

Packed-bed wet scrubbers (CE004 or CE014); regenerative thermal oxidizer (RTO) (CE012) for Scrubber Bypass Episode. These are CAM subject control devices.

**I. EMISSION LIMIT**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	19.66 lb/hr**2	Hourly	FGFERM&DIST	SC IV.1, 2, V.1, VI.1, 2, 3,4	<b>R 336.1225, R 336.1702(a)</b>
2. VOC	30.74 lb/hr***2	Hourly	FGFERM&DIST	SC V.2, VI.5	<b>R 336.1225, R 336.1702(a)</b>
3. Acetaldehyde	1.50 lb/hr <sup>1</sup>	Hourly	FGFERM&DIST	SC IV.1, 2, V.1	<b>R 336.1225</b>

\*\* Emission limit will apply when venting through the scrubber (CE004 or CE014).  
 \*\*\* Emission Limit will apply when venting through the RTO(CE012).

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION**

- The permittee shall maintain a minimum overall VOC control efficiency of 97.0 percent across the scrubbers (CE004 and CE014).<sup>2</sup> **(R 336.1225, R 336.1702(a))**
- The permittee shall not operate the scrubber (CE004 or CE014) at a reduced water flow rate unless a revised malfunction abatement plan (MAP) has been developed and implemented for FGFERM&DIST. The revised plan shall be updated as necessary to reflect changes in equipment, to implement corrective actions and to address malfunctions. The MAP shall be made available to the AQD upon request.<sup>2</sup> **(R 336.1910, R 336.1912)**
- Scrubber Bypass Episode: the permittee may operate equipment in FGFERM&DIST without the associated scrubber and chiller installed, maintained, and operated in a satisfactory manner if, in the event that both associated scrubbers (CE004 and CE014) are unavailable due to maintenance or other operational reason, the equipment in FGFERM&DIST is vented to the RTO (CE012). The RTO must be installed, maintained and operated in a satisfactory manner according to the MAP. The permittee shall not operate FGFERM&DIST while bypassing the scrubbers for more than 100 hours per 12-month rolling time period.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate any equipment in FGFERM&DIST unless the chiller associated with the scrubber in operation (CE004 or CE014) is installed, maintained, and operated in a satisfactory manner, except allowed by SC III.3. Satisfactory operation of the chiller includes maintaining the exhaust temperature of the scrubber in the range identified in the MAP as constituting satisfactory operation.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
2. The permittee shall not operate any equipment in FGFERM&DIST unless one of the scrubbers (CE004 or CE014) is installed, maintained, and operated in a satisfactory manner, except as allowed by SC III.3. Satisfactory operation of the scrubber includes maintaining the scrubber liquid flow rate and pressure drop in the range identified in the MAP as constituting satisfactory operation. An excursion of the scrubber liquid flow rate and pressure drop limit is the exceedance of the operational parameter limit or acceptable range defined in the MAP. Upon detecting an excursion of the liquid flow rate and pressure drop limit, the permittee shall restore operation of the scrubber to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, 40 CFR 64.6(c) & 64.7(d))**
3. The permittee shall equip and maintain each scrubber (CE004 and CE014) with a liquid flow rate indicator capable of accurately indicating the scrubber liquid flow rate over the entire range of flow rates that constitutes satisfactory operation, as described in the MAP. This includes, but is not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, and maintaining the device according to manufacturer's specifications (e.g., equipment calibration, etc.).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c) & 64.7(b))**
4. The permittee shall equip and maintain each scrubber (CE004 and CE014) with a pressure drop measuring device. This includes, but is not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, and maintaining the device according to manufacturer's specifications (e.g., equipment calibration, etc.).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c) & 64.7(b))**
5. The permittee shall equip and maintain each scrubber (CE004 and CE014) with a temperature indicator that is capable of accurately indicating the exhaust temperature over the entire range of temperatures that constitutes satisfactory operation as described in the MAP.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. On or before April 30, 2023, the permittee shall verify VOC and Acetaldehyde emission rates from FGFERM&DIST by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #6. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1902, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**



**Reference Test Method Table #6**

<b>Pollutant</b>	<b>Test Method Reference</b>
VOCs	40 CFR Part 60, Appendix A
Acetaldehyde	40 CFR Part 63, Appendix A

2. Upon request of the AQD District Supervisor, the permittee shall verify VOC emission rates from FGFERM&DIST during the Scrubber Bypass Episode, as described in SC III.3, by testing at the owner's expense in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1902, R 336.2001, R 336.2003, R336.2004, 40 CFR 52.21(c) & (d))**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
2. The permittee shall monitor the scrubber liquid flow rate and exhaust temperature of the operational scrubber (CE004 or CE014) on a continuous basis during operation of FGFERM&DIST.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
3. The permittee shall record the scrubber liquid flow rate, exhaust temperature and pressure drop of the operational scrubber (CE004 or CE014) on a daily basis. The data point recorded shall be the average of all data collected during the operating day.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
4. The permittee shall keep production records on a monthly basis and other records necessary to demonstrate compliance with the VOC emission rate limit listed in SC I.1. The VOC emission rate shall be calculated based upon monthly records, prorated to an hourly rate. The permittee shall keep these records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
5. The permittee shall keep, in a satisfactory manner, records of the number of scrubber bypass episodes per calendar month and 12-month rolling time period as determined at the end of each calendar month. The permittee shall also record the duration, in hours, of each scrubber bypass episode and the reason the scrubber bypass episode occurred. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(a))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. Each semiannual report of deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. **(40 CFR 64.9(a)(2)(i))**
6. Each semiannual report of deviations shall include summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than monitor downtime associated with zero and span or other daily calibration checks, if applicable). **(40 CFR 64.9(a)(2)(ii))**
7. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of EUFERMENTER8, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUFERMENTER8. **(R 336.1201(7)(a))**

See Appendix 8

### VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV004	24 <sup>1</sup>	83 <sup>1</sup>	<b>R 336.1225</b>
2. SV024*	44 <sup>1</sup>	100 <sup>1</sup>	<b>R 336.1225</b>
3. SV029	24 <sup>1</sup>	61 <sup>1</sup>	<b>R 336.1225</b>
*During a bypass episode only			

### IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable requirements of Compliance Assurance Monitoring (CAM) as specified in 40 CFR Part 64. **(40 CFR Part 64)**
2. The permittee shall comply with all provisions of the federal NSPS Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subparts A and VVa, as they apply. **(40 CFR Part 60, Subparts A and VVa)**

#### Footnotes:

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## FGDDGSDRYERS FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

Dried Distiller's Grains with Solubles (DDGS) dryers and centrifugation. FGDDGSDRYERS is subject to the requirements of Compliance Assurance Monitoring (CAM) as specified in 40 CFR Part 64. The CAM subject pollutant is VOC. PTI No. 39-19.

**Emission Units:** EUDDGSDRYER1, EUDDGSDRYER2, EUTO&HRB, EURTO, EUCENTRIFUGE1, EUCENTRIFUGE2, EUCENTRIFUGE3, EUCENTRIFUGE4, EUCENTRIFUGE5, EUCENTRIFUGE6, EUSTILLAGETANK

### POLLUTION CONTROL EQUIPMENT

- Multiclone dust collector (CE006 & CE007)
- Thermal Oxidizer & Heat Recovery Boiler (TO&HRB) (CE010)
- Regenerative Thermal Oxidizer (RTO) (CE012)

The TO&HRB and RTO are CAM subject control devices.

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	4.00 lb/hr <sup>2</sup>	Hourly	EUTO&HRB	SC V.2, VI.4, 5	R 336.1331
2. PM10	4.00 lb/hr <sup>2</sup>	Hourly	EUTO&HRB	SC V.1, VI.4, 5	40 CFR 52.21(c) & (d)
3. PM 2.5	4.00 lb/hr <sup>2</sup>	Hourly	EUTO&HRB	SC V.1, VI.4, 5	40 CFR 52.21(c) & (d)
4. PM	6.00 lb/hr <sup>2</sup>	Hourly	EURTO	SC V.2, VI.4, 5	R 336.1331
5. PM10	6.00 lb/hr <sup>2</sup>	Hourly	EURTO	SC V.1, VI.4, 5	40 CFR 52.21(c) & (d)
6. PM2.5	6.00 lb/hr <sup>2</sup>	Hourly	EURTO	SC V.1, VI.4, 5	40 CFR 52.21(c) & (d)
7. VOC	9.00 lb/hr combined**2	Hourly	FGDDGSDRYERS	SC V.1, VI.1, 2, 3, 6	R 336.1225, R 336.1702(a), R 336.1901
8. VOC	6.13 lb/hr combined***2	Hourly	EUCENTRIFUGE1 to 6 and EUSTILLAGETANK	SC V.3, VI.1, 2, 3, 7	R 336.1225, R 336.1702(a), R 336.1901
9. NO <sub>x</sub>	0.10 lb/MMBtu <sup>2</sup>	Hourly	FGDDGSDRYERS	SC V.1	40 CFR 52.21(c) & (d)

\*\*Combined refers to TO&HRB stack and RTO stack.

\*\*\*Combined refers to stack 025 when producing wet cake and TO&HRB and RTO are not operating.

### II. MATERIAL LIMIT(S)

NA

### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only use sweet natural gas as fuel in EUDDGSDRYER1 and EUDDGSDRYER2.<sup>2</sup> (40 CFR 52.21(c) & (d))

2. The permittee shall only use sweet natural gas as supplemental fuel in the thermal oxidizer EUTO&HRB (CE010) and in the regenerative thermal oxidizer EURTO (CE012).<sup>2</sup> **(40 CFR 52.21(c) & (d))**
3. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to the equipment in FGDDGSDRYERS.<sup>2</sup> **(40 CFR Part 60, Subparts A & Dc)**
4. The permittee shall only exhaust emissions from EUCENTRIFUGE1 to 6 and EUSTILLAGETANK to stack SV025 when wet cake is produced. Otherwise, the permittee shall not operate EUCENTRIFUGE1 to 6 unless EUTO&HRB (CE010) or EURTO (CE012) are installed, maintained and operated in a satisfactory manner according to the MAP.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901)**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate either dryer in FGDDGSDRYERS unless the associated multiclone (CE006 or CE007) is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of each multiclone includes maintaining it according to the MAP.<sup>2</sup> **(R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**
2. The permittee shall not feed materials to either dryer in FGDDGSDRYERS unless either the thermal oxidizer EUTO&HRB (CE010) or the regenerative thermal oxidizer EURTO (CE012) is installed, maintained, and operated in a satisfactory manner and overall operation complies with a scenario in SC IV.2(c). Satisfactory operation includes taking the actions listed below:<sup>2</sup> **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1901, R 336.1910, 40 CFR 52.21(c) & (d))**
  - a. Satisfactory operation of the thermal oxidizer (CE010) includes maintaining it according to the MAP, attaining a minimum VOC destruction efficiency of 95.0 percent by weight, and maintaining a minimum temperature consistent with satisfactory operation, as described in the MAP;
  - b. Satisfactory operation of the regenerative thermal oxidizer (CE012) includes maintaining it according to the MAP, attaining a minimum VOC destruction efficiency of 95.0 percent by weight, and maintaining a minimum temperature consistent with satisfactory operation, as described in the MAP;
  - c. Acceptable operating scenarios for each dryer and oxidizer in FGDDGSDRYERS are the following:
    - i. If both oxidizers are operating, the permittee may operate one or both dryers;
    - ii. If the thermal oxidizer (CE010) is the only oxidizer operating, the permittee may operate one or both dryers;
    - iii. If the regenerative thermal oxidizer (CE012) is the only oxidizer operating, the permittee shall not operate more than one dryer.

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. On or before April 30, 2023, the permittee shall verify PM, PM10, PM2.5, VOC, and NOx emission rates from EUTO&HRB (CE010) and EURTO (CE012) by testing at the owner’s expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table #7. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1331, R 336.1702, R 336.1902, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

**Reference Test Method Table #7**

<b>Pollutant</b>	<b>Test Method Reference</b>
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A

2. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUTO&HRB (CE010) and EURTO (CE012) by testing at the owner's expense in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1331, R 336.1902, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**
3. Upon request of the AQD District Supervisor, the permittee shall verify VOC emission rates from EUCENTRIFUGE1 to 6 and EUSTILLAGETANK by testing at the owner's expense in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1225, R 336.1702, R 336.1902, R 336.2001, R 336.2003, R 336.2004)**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record on a continuous basis the minimum temperature to which exhaust gases from the dryers are exposed in the thermal oxidizer EUTO&HRB (CE010).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record on a continuous basis the minimum temperature to which exhaust gases from the dryers are exposed in the regenerative thermal oxidizer EURTO (CE012).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
3. The permittee shall keep, in a satisfactory manner, continuous records of the minimum temperature to which exhaust gases from the dryers are exposed in the thermal oxidizer EUTO&HRB (CE010) and the regenerative thermal oxidizer EURTO (CE012).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
4. The permittee shall monitor the multiclone dust collector (CE006 & CE007) pressure drop on a continuous basis during operation of FGDDGSDRYERS. **(R 336.1331, 40 CFR 52.21(c) & (d))**
5. The permittee shall record the multiclone dust collector (CE006 & CE007) pressure drop on a daily basis. The data point recorded shall be the average of all data collected during the operating day. **(40 CFR 52.21(c) & (d))**
6. The permittee shall keep monthly production records, monthly records of the ethanol content of distillation bottoms, and other records necessary to demonstrate compliance with the VOC emission rate limit listed in SC I.7 from FGDDGSDRYERS. The emission rate shall be calculated based upon monthly records, prorated to an hourly rate. The permittee shall keep these records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
7. The permittee shall keep monthly wet cake production records and other records necessary to demonstrate compliance with the VOC emission rate limit listed in SC I.8 when EUCENTRIFUGE1 to 6 and EUSTILLAGETANK are not being vented to EUTO&HRB (CE010) or EURTO (CE012). The emission rate shall be calculated based upon monthly records, prorated to an hourly rate based on actual hours operated manufacturing wet cake when EUCENTRIFUGE1 to 6 and EUSTILLAGETANK are not being vented to EUTO&HRB (CE010) or EURTO (CE012). The permittee shall keep these records on file for a period of at least

five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

8. The permittee shall keep, in a satisfactory manner, records of the natural gas consumed by EUTO&HRB on a daily basis. The permittee shall keep these records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> **(R 336.1331, 40 CFR Part 60, Subparts A and Dc)**
9. The permittee shall continuously monitor the temperature of the thermal oxidizer EUTO&HRB (CE010) and the regenerative thermal oxidizer EURTO (CE012). Continuous shall be defined as sampling at least every 15 minutes. **(40 CFR 64.6 (c)(1))**
10. The permittee shall conduct all required monitoring per the applicable CAM Plan for EUTO&HRB (CE010) and EURTO (CE012) and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9. **(40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
11. An excursion is defined by any three-hour block average where the temperature from the thermal oxidizer EUTO&HRB (CE010) or the temperature from the regenerative thermal oxidizer EURTO (CE012) falls below the normal operating values specified in the MAP. Excursions trigger an internal investigation, corrective action(s) and a CAM excursion summary reporting requirement. **(40 CFR 64.6(c)(2))**
12. The permittee shall promptly notify AQD for the need to modify the CAM Plan for EUTO&HRB (CE010) or EURTO (CE012) if it is found to be inadequate and shall submit a proposed modification to the ROP, if necessary. **(40 CFR 64.7(e))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. Each semiannual report of deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. **(40 CFR 64.9(a)(2)(i))**
6. Each semiannual report of deviations shall include summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than monitor downtime associated with zero and span or other daily calibration checks, if applicable). **(40 CFR 64.9(a)(2)(ii))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV006	80 <sup>2</sup>	125 <sup>2</sup>	<b>R 336.1225, R 336.1901, 40 CFR 52.21(c) &amp; (d)</b>
2. SV024	44 <sup>2</sup>	100 <sup>2</sup>	<b>R 336.1225, R 336.1901, 40 CFR 52.21(c) &amp; (d)</b>
3. SV025	6 <sup>1</sup>	35 <sup>1</sup>	<b>R 336.1225</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall maintain copies of utility bills indicating the receipt of natural gas from a supplier of commercial grade natural gas. **(R 336.1213(b)(i))**
2. The permittee shall comply with all applicable requirements of Compliance Assurance Monitoring (CAM) as specified in 40 CFR Part 64. **(40 CFR Part 64)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **FGETHLOAD FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Ethanol truck and rail load out. FGETHLOAD is subject to the requirements of the federal NSPS Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subpart VVa. PTI No. 39-19.

**Emission Units:** EUTRUCKLOAD3, EUTRUCKLOAD4, EURAILLOAD2

### **POLLUTION CONTROL EQUIPMENT**

Thermal oxidizer EUTO&HRB (CE010) for truck load out.

### **I. EMISSION LIMIT(S)**

NA

### **II. MATERIAL LIMIT(S)**

1. The FGETHLOAD throughput shall not exceed the following:
  - a. 5,000,000 gallons per 12-month rolling time period of natural gasoline, hereinafter “denaturant;”
  - b. 95,000,000 gallons per 12-month rolling time period of total ethanol and denaturant, combined;
  - c. A total of 5,000,000 gallons per 12-month rolling time period of total ethanol and denatured ethanol, combined under all of the following conditions combined:
    - i. While the displaced vapor contents from loading trucks through EUTRUCKLOAD3 and EUTRUCKLOAD4 are not being controlled by the thermal oxidizer (CE010);
    - ii. While transferring through EURAILLOAD2 to receiving railcars that last transported denaturant.Each annual throughput limit above shall be based on a rolling 12-month time period as determined at the end of each calendar month.<sup>2</sup> (R 336.1225, R 336.1227(2), R 336.1702(a))

### **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not load trucks through EUTRUCKLOAD3 (SV014) while the vapor recovery system fan is not operating.<sup>1</sup> (R 336.1225, R 336.1227(2))

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not transfer material through EURAILLOAD2 unless the receiving railcar has been certified as dedicated to transporting ethanol, including denatured ethanol, except as allowed by SC II.1(c)(ii).<sup>1</sup> (R 336.1225, R 336.1227(2))
2. Except as allowed by SC II.1(c)(i), the permittee shall not load trucks through EUTRUCKLOAD3 and EUTRUCKLOAD4 unless the thermal oxidizer (CE010) is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer (CE010) is specified in FGDDGSDRYERS SC IV.2(a).<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)

### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA



**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep, in a satisfactory manner, the following records for FGETHLOAD for each calendar month and for the rolling 12-month time period ending each calendar month:
  - a. Throughput of denaturant, ethanol, and denatured ethanol for FGETHLOAD;<sup>1</sup> **(R 336.1225, R 336.1227(2))**
  - b. Throughput of total ethanol and denatured ethanol for EUTRUCKLOAD3 and EUTRUCKLOAD4 combined while displaced vapor contents of the trucks being loaded are exhausted through SV014 or SV015;<sup>1</sup> **(R 336.1225, R 336.1227(2))**
  - c. Throughput of total ethanol and denatured ethanol for EURAILLOAD2 to receiving railcars that last transported denaturant;<sup>1</sup> **(R 336.1225, R 336.1227(2))**
  - d. Total of throughputs recorded for SC VI.1.b and SC VI.1.c;<sup>1</sup> **(R 336.1225, R 336.1227(2))**
  - e. Railcars receiving material through EURAILLOAD2 each month and which railcars have been certified as dedicated to transporting ethanol, including denatured ethanol.<sup>1</sup> **(R 336.1225, R 336.1227(2))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV006	80 <sup>1</sup>	125 <sup>1</sup>	<b>R 336.1225</b>
2. SV014	12 <sup>1</sup>	10 <sup>1</sup>	<b>R 336.1225</b>
3. SV015	12 <sup>1</sup>	10 <sup>1</sup>	<b>R 336.1225</b>
4. SV016	4 <sup>1</sup>	25 <sup>1</sup>	<b>R 336.1225</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all provisions of the federal NSPS Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subparts A and VVa, as they apply. **(40 CFR Part 60, Subparts A and VVa)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGNSPSTANKS**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Denaturant storage. FGNSPSTANKS is subject to the requirements of Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, as specified in 40 CFR Part 60, Subpart Kb and Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subpart VVa. PTI No. 210-01.

**Emission Units:** EUNATGASTANK1 (T-802), EUNATGASTANK2 (T-805)

**POLLUTION CONTROL EQUIPMENT**

Floating roof

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Kb, as they apply to each storage tank in FGNSPSTANKS.<sup>2</sup> **(40 CFR Part 60, Subparts A and Kb)**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain each storage tank in FGNSPSTANKS with an internal floating roof that meets or exceeds the requirements of 40 CFR 60.112b(a)(1).<sup>2</sup> **(R 336.1225, R 336.1702(b), R 336.1910, 40 CFR 60.112b(a)(1))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each storage tank in FGNSPSTANKS, in accordance with the federal NSPS as specified in 40 CFR Part 60, Subparts A and Kb, the permittee shall do both of the following:
  - a. keep records of inspections and operating information;

b. report defects found during inspections.  
 The permittee shall keep the records on file for a period of at least five years and make them available to the Department upon request. All defect reports required to be submitted to the Administrator shall be submitted to the District Supervisor, Air Quality Division, within 30 days of the inspection in which the defect was discovered.<sup>2</sup> **(R 336.1225, R 336.1702(b), 40 CFR 60.115b(a))**

2. For each storage tank in FGNSPSTANKS, the permittee shall keep a record of the tank’s dimensions and an analysis showing the tank’s capacity in accordance with the federal NSPS as specified in 40 CFR Part 60, Subparts A and Kb. The permittee shall keep each tank’s record and analysis on file for the life of the tank and make the records and analyses available to the Department upon request.<sup>2</sup> **(40 CFR 60.116b(b))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all provisions of the federal NSPS as specified in 40 CFR Part 60, Subparts A and VVa, as they apply. **(40 CFR Part 60, Subparts A and VVa)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## FGNSPSVVa FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

All pumps, valves and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each open-ended valve or line and all associated closed vent systems and control devices. FGNSPSVVa is subject to the requirements of Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 of 40 CFR Part 60, Subpart VVa.

**Emission Units:** EUFERMENTER1, EUFERMENTER2, EUFERMENTER3, EUFERMENTER4, EUFERMENTER5, EUFERMENTER6, EUFERMENTER7, EUFERMENTER8, EUBEERWELL, EUBEERSTRIP, EUBEERSTRIP2, EURECTIFIER, EUSIDESTRIP, EUSIEVE, EUSIEVE2, EUTRUCKLOAD3, EUTRUCKLOAD4, EURAILLOAD2, EUNATGASTANK1, EUNATGASTANK2, EU190TANK, EU200TANK1, EU200TANK2

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

NA

#### II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate each pressure relief device in gas/vapor service with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in 40 CFR 60.485a(c), except during pressure releases and as provided in 40 CFR 60.482-4a(c) and (d). After each pressure release, the permittee shall return the pressure relief device to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than five calendar days after the pressure release, except as provided in 40 CFR 60.482-9a. No later than five calendar days after the pressure release, the permittee shall monitor the pressure relief device to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background.<sup>2</sup> **(40 CFR 60.482-4a(a) and (b))**
2. The permittee shall design and operate enclosed combustion devices used to comply with 40 CFR Part 60, Subpart VVa to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 ppmv, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 C.<sup>2</sup> **(40 CFR 60.482-10a(c))**
3. The permittee shall, if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors follow either one of the following procedures:<sup>2</sup> **(40 CFR 60.482-8a(a))**
  - a. Monitor the equipment within 5 days by the method specified in 40 CFR 60.485a(b). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. **(40 CFR 60.482-8a(a)(1))**
    - i. When a leak is detected, the permittee shall repair it as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. The first attempt at the repair shall be made no later than five calendar days after each leak is detected. First attempts at

repair include, but are not limited to, the best practices described in 40 CFR 60.482-7a(e).

**(40 CFR 60.482-8a(b) through (d))**

- b. Eliminate the visual, audible, olfactory, or other indication of a potential leak. **(40 CFR 60.482-8a(a)(2))**
4. The permittee may delay repair of equipment for which leaks have been detected if: **(40 CFR 60.482-9a)**
  - a. Repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. **(40 CFR 60.482-9a(a))**
  - b. The equipment is isolated from the process and does not remain in VOC service. **(40 CFR 60.482-9a(b))**
  - c. The permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair and when repair procedures are affected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR 60.482-10a. **(40 CFR 60.482-9a(c))**
  - d. For pumps, if repair requires the use of a dual mechanical seal system that includes a barrier fluid system and repair is completed as soon as practicable, but not later than six months after the leak was detected. **(40 CFR 60.482-9a(d))**

Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.<sup>2</sup> **(40 CFR 60.482-9a(e))**

5. The permittee shall repair leaks of a closed vent system, as indicated by an instrument reading greater than 500 ppmv above background or by visual inspections, as soon as practicable except as provided below. A first attempt at repair shall be made no later than five calendar days after the leak is detected. Repair shall be completed no later than 15 calendar days after the leak is detected.<sup>2</sup> **(40 CFR 60.482-10a(g))**
  - a. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. **(40 CFR 60.482-10a(h))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip each open-ended valve or line with a cap, blind flange, plug or a second valve, except as provided in 40 CFR 60.482-1a(c); 40 CFR 60.482-6a(d) or (e), which shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. In addition, the permittee shall ensure that:<sup>2</sup> **(40 CFR 60.482-6a)**
  - a. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed; **(40 CFR 60.482-6a(b))**
  - b. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with 40 CFR 60.482-6a(a) at all other times. **(40 CFR 60.482-6a(c))**
2. The permittee shall operate closed vent systems and control devices used to comply with 40 CFR Part 60, Subpart VVa at all times when emissions may be vented to them.<sup>2</sup> **(40 CFR 60.482-10a(m))**
3. The permittee shall, when each leak is detected as specified in 40 CFR 60.482-2a, 60.482-7a, 60.482-8a, 60.482-10a do the following:<sup>2</sup> **(40 CFR 60.486a)**
  - a. Attach a weatherproof and readily visible identification, marked with the equipment identification number, to the leaking equipment. The identification on a valve may be removed after it has been monitored for two successive months as specified in 40 CFR 60.482-7a(c) and no leak has been detected during those two months. The identification on equipment except on a valve, may be removed after it has been repaired. **(40 CFR 60.486a(b))**
  - b. Record the following information in a log that shall be kept for 5 years in a readily accessible location: **(40 CFR 60.486a(c))**

- i. The instrument and operator identification numbers and the equipment identification number;
- ii. The date the leak was detected and the dates of each attempt to repair the leak;
- iii. Repair methods applied in each attempt to repair the leak;
- iv. "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485a(a) after each repair attempt is equal to or greater than 10,000 ppm;
- v. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;
- vi. The signature of the permittee (or designate) whose decision it was that repair could not be affected without a process shutdown;
- vii. The expected date of successful repair of the leak if a leak is not repaired within 15 days;
- viii. Dates of process unit shutdowns that occur while the equipment is unrepaired;
- ix. The date of successful repair of the leak.

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall demonstrate compliance with the requirements of 40 CFR Part 60, Subparts A and VVa within 180 days of initial startup. All required testing shall be at the owner's expense. The permittee shall notify the AQD District Supervisor in writing within 15 days of the date of commencement of trial operation in accordance with 40 CFR 60.7(a)(3). Performance testing procedures shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60, Appendix A. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Compliance with 40 CFR 60.482-1a through 40 CFR 60.482-10a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485a. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2a to 40 CFR 60.482-10a if it is identified as required in 40 CFR 60.486a(e)(5).<sup>2</sup> **(R 336.1225, R 336.1702(b), 40 CFR Part 60, Subparts A and VVa, 40 CFR 60.482-1a, 40 CFR 60.485a)**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall monitor each pump in light liquid service as follows:
  - a. Check, by visual inspection, each calendar week for indications of liquids dripping from the pump seal, except as provided in 40 CFR 60.482-1a(f). If there are indications of liquids dripping from the pump seal, the permittee shall follow the procedure specified in 40 CFR 60.482-2a(b)(2)(i) or 40 CFR 60.482-2a(b)(2)(ii). **(40 CFR 60.482-2a(a)(2) and 40 CFR 60.482(a)(b)(2))**
  - b. Monitor monthly to detect leaks by the methods specified in 40 CFR 60.485a(b), except as provided in 40 CFR 60.482-1a(c) and (f) and 40 CFR 60.482-2a(d), (e), and (f). If an instrument reading of 2,000 ppm or greater is measured, a leak is detected. **(40 CFR 60.482-2a(a)(1) and 40 CFR 60.482-2a(b)(1)(ii))**

When a leak is detected, the permittee shall repair it as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than five calendar days after each leak is detected.<sup>2</sup> **(40 CFR 60.482-2a(c))**

2. The permittee shall monitor each valve in gas/vapor service and in light liquid service monthly to detect leaks by the methods specified in 40 CFR 60.485a(b) and shall comply with the following, except as provided in 40 CFR 60.482-7a(f), (g) and (h); 40 CFR 60.482-1a(c) and (f); 40 CFR 60.483-1a and 40 CFR 60.483-2a:<sup>2</sup> **(40 CFR 60.482-7a)**
  - a. If an instrument reading of 500 ppm or greater is measured, a leak is detected; **(40 CFR 60.482-7a(b))**
  - b. Any valve for which a leak is not detected for two successive months may be monitored for the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months; **(40 CFR 60.482-7a(c))**

- c. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than five calendar days after each leak is detected. **(40 CFR 60.482-7a(d))**
  - d. First attempts at repair include, but are not limited to, the following best practices where practicable: **(40 CFR 60.482-7a(e))**
    - i. Tightening of bonnet bolts;
    - ii. Replacement of bonnet bolts;
    - iii. Tightening of packing gland nuts;
    - iv. Injection of lubricant into lubricated packing.
  - e. Any value that is designated, as described in 40 CFR 60.486a(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the monthly monitoring if the valve has no external actuating mechanism in contact with the process fluid, is operated with emissions less than 500 ppm above background as determined by the method specified in 40 CFR 60.485a(c) and is tested for compliance with the 500 ppm above background instrument reading initially upon designation, annually, and at other times requested by the AQD District Supervisor; **(40 CFR 60.482-7a(f))**
  - f. Any value that is designated, as described in 40 CFR 60.486a(f)(1), as an unsafe-to-monitor valve is exempt from the monthly monitoring if the permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of performing monthly monitoring, and the permittee adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times; **(40 CFR 60.482-7a(g))**
  - g. Any value that is designated, as described in 40 CFR 60.486a(f)(2), as a difficult-to-monitor valve is exempt from the monthly monitoring if: **(40 CFR 60.482-7a(h))**
    - i. The permittee demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;
    - ii. Has less than 3% of its total number of valves designated as difficult-to-monitor;
    - iii. The permittee follows a written plan that requires monitoring of the valve at least once per calendar year.
3. The permittee shall monitor control devices used to comply with 40 CFR Part 60, Subpart VVa to ensure that they are operated and maintained in conformance with their designs.<sup>2</sup> **(40 CFR 60.482-10a(e))**
4. The permittee shall inspect each closed vent system according to the procedures and schedule specified in 40 CFR 60.482-10a(f), except as follows:<sup>2</sup> **(40 CFR 60.482-10a(f))**
- a. The vapor collection system or closed vent system is operated under a vacuum; **(40 CFR 60.482-10a(i))**
  - b. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(1), as unsafe to inspect are exempt from the inspection requirements if they comply with the following: **(40 CFR 60.482-10a(j))**
    - i. The permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger; and
    - ii. The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times;
  - c. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(2), as difficult to inspect are exempt from the inspection requirements if they comply with the following: **(40 CFR 60.482-10a(k))**
    - i. The permittee demonstrates that the equipment cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;
    - ii. Has less than 3% of the total number of closed vent system equipment designated as difficult to inspect;
    - iii. The permittee follows a written plan that requires inspection of the equipment at least once every five years. A closed vent system is exempt from inspection if it is operated under a vacuum.
5. The permittee shall record the following information:<sup>2</sup> **(40 CFR 60.482-10a(l))**
- a. Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment;

- b. Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment;
  - c. For each inspection during which a leak is detected, a record of the information specified in 40 CFR 60.486a(c);
  - d. For each inspection conducted in accordance with 40 CFR 60.485a(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected;
  - e. For each visual inspection conducted in accordance with 40 CFR 60.482-10a(f)(1)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.
6. The permittee shall record the following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10a. This information shall be kept in a readily accessible location:<sup>2</sup> **(40 CFR 60.486a(d))**
- a. Detailed schematics, design specifications, and piping and instrumentation diagrams;
  - b. The dates and descriptions of any changes in the design specifications;
  - c. A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10a(e). To ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring;
  - d. Periods when the closed vent systems and control devices required in 40 CFR 60.482-2a and 40 CFR 60.482-4a are not operated as designed, including periods when a flare pilot light does not have a flame;
  - e. Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2a and 40 CFR 60.482-4a.
7. The permittee shall record the following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1a to 40 CFR 60.482-10a. This information shall be kept in a readily accessible location:<sup>2</sup> **(40 CFR 60.486a(e))**
- a. A list of identification numbers for equipment subject to the requirements in 40 CFR Part 60 Subpart VVa;
  - b. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-2a(e) and 40 CFR 60.482-7a(f). The designation of this equipment shall be signed by the permittee;
  - c. A list of equipment identification numbers for pressure relief devices required to comply with 40 CFR 60.482-4a;
  - d. The dates of each compliance test as required in 40 CFR 60.482-2a(e), 60.482-4a, and 60.482-7a(f), the background level measured during each compliance test, and the maximum instrument reading measured at the equipment during each compliance test;
  - e. A list of identification numbers for equipment in vacuum service.
8. The permittee shall record the following information pertaining to all valves subject to the requirements of 40 CFR 60.482-7a(g) and (h) and to all pumps subject to the requirements of 40 CFR 60.482-2a(g). This information shall be kept in a readily accessible location:<sup>2</sup> **(40 CFR 40.486a(f))**
- a. A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump;
  - b. A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve.
9. The permittee shall record a schedule of monitoring and the percent of valves found leaking during each monitoring period for valves complying with 40 CFR 60.483-2a.<sup>2</sup> **(40 CFR 60.486a(g))**
10. The permittee shall record the design criterion required in 40 CFR 60.482-2a(d)(5) and an explanation of the design criterion and any changes to this criterion and the reasons for the changes. This information shall be kept in a readily accessible location.<sup>2</sup> **(40 CFR 60.486a(h))**



11. The permittee shall record the following information for use in determining exemptions as provided in 40 CFR 60.480a(d). This information shall be kept in a readily accessible location:<sup>2</sup> **(40 CFR 60.486a(i))**
  - a. An analysis demonstrating the design capacity of the affected facility;
  - b. A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and
  - c. An analysis demonstrating that equipment is not in VOC service.
12. The permittee shall record information and data used to demonstrate that a piece of equipment is not in VOC service. This information shall be kept in a readily accessible location.<sup>2</sup> **(40 CFR 60.486a(j))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall submit reports as required to comply with the federal NSPS as specified in 40 CFR Part 60, Subparts A and VVa. Information required to be submitted to the Administrator shall be submitted to the AQD District Supervisor in an acceptable format within 30 days following the end of the semiannual period in which the data were collected. Information required to be submitted includes semiannual reports, beginning six months after the initial startup date. The initial semiannual report shall include the information listed in 40 CFR 60.487a(b) and all semiannual reports shall include the information listed in 40 CFR 60.487a(c). The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(40 CFR 60.487a)**

See Appendix 8

## **VIII. STACK/VENT RESTRICTION(S)**

NA

## **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in the 40 CFR Part 60, Subparts A and VVa, as they apply to the equipment in FGNSPSVVa.<sup>2</sup> **(40 CFR Part 60, Subparts A and VVa)**
2. The permittee shall comply with all provisions of the federal NSPS as specified in 40 CFR Part 60, Subparts A and Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, as they apply.<sup>2</sup> **(40 CFR Part 60, Subparts A and Kb)**

### **Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGETHANOLTANKS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Ethanol storage. FGETHANOLTANKS is subject to the requirements of Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, as specified in 40 CFR Part 60, Subpart VVa. PTI No. 210-01.

**Emission Units:** EU190TANK (T-801), EU200TANK1 (T-803), EU200TANK2 (T-804)

**POLLUTION CONTROL EQUIPMENT**

Floating roof

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EU190TANK, EU200TANK1, or EU200TANK2 unless the associated internal floating roof is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the internal floating roofs for EU190TANK, EU200TANK1, and EU200TANK2 according to the MAP.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall equip and maintain EU190TANK, EU200TANK1, and EU200TANK2 with internal floating roofs that meet or exceed the requirements of 40 CFR 60.112b(a)(1).<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep, in a satisfactory manner, a continuing record of inspections of the floating roofs in EU190TANK, EU200TANK1, and EU200TANK2. The record shall include descriptions of the defects or

malfunctions, if any, that were discovered during such inspections, and of the corrective action taken. The permittee shall keep these records on file for a period of at least five years and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all provisions of the federal NSPS as specified in 40 CFR Part 60, Subparts A and VVa, as they apply. (40 CFR Part 60, Subparts A and VVa)

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

## APPENDICES

### Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H <sub>2</sub> S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SDS	Safety Data Sheet	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
VE	Visible Emissions	µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

## Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

## Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

## Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

## Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

## Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N6996-2013. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N6996-2013 is being reissued as Source-Wide PTI No. MI-PTI-N6996-2018a.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
175-15B		Application for an increase in the denatured ethanol throughput, the ability to load out undenatured ethanol, proposed PM2.5, PM10, VOC, and acetaldehyde limits, the installation of a second wet scrubber, the correction of specific stack parameters, and the installation of a single stack for the five hammermills instead of five separate stacks.	EUFB cooler, EUDDGSSILO, FGCORN-DDGS, FGSCALP, FGFLOUR, FGFERM&DIST, FGDDGSDRYERS, FGETHLOAD

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-N6996-2018.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
39-19	202200002 / March 29, 2022	To incorporate PTI No. 39-19 into the ROP, which is to modify the existing ethanol production facility. The modifications and installations include: Installing an 8th fermentation tank, which exhausts similar to the existing	EUFB cooler, EUFERMENTER1, EUFERMENTER2, EUFERMENTER3, EUFERMENTER4, EUFERMENTER5

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		<p>seven fermenters (wet scrubber with bypass to RTO); Increases the combined ethanol and denaturant loadout limit to 95 MMGPY; Re-routes the whole stillage tank from the wet scrubber to the RTO/TO; increased a VOC emission limit on EUFBCOOLER to 7.54 lbs/hr based on a recent stack test; and modified stack vent #25 to a vertical discharge for FGDDGSDRYERS.</p> <p>Additionally, there were no increases of existing emission limits with the exception of the lb/hr increase for EUFBCOOLER. The PTE calculations were included with the PTI application for the facility that showed it would continue with its synthetic minor status for PSD regulations. The PTI was not required to go through the public participation process.</p>	<p>EUFERMENTER6  EUFERMENTER7  EUFERMENTER8  EUBEERWELL  EUBEERSTRIP  EUBEERSTRIP2  EURECTIFIER  EUSIDESTRIP  EUSIEVE  EUSIEVE2  EUYEAST  EUEVAPORATOR  EURTO  EUTO&amp;HRB  EUDDGSDRYER1  EUDDGSDRYER2  EUCENTRIFUGE1  EUCENTRIFUGE2  EUCENTRIFUGE3  EUCENTRIFUGE4  EUCENTRIFUGE5  EUCENTRIFUGE6  EUTRUCKLOAD3  EUTRUCKLOAD4  EURAILLOAD2  EUNATGASTANK1  EUNATGASTANK2  EU190TANK  EU200TANK1  EU200TANK2  EUSTILLAGETANK  FGFERM&amp;DIST  FGDDGSDRYERS  FGETHLOAD  FGNSPSVVa</p>

**Appendix 7. Emission Calculations**

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

**Appendix 8. Reporting**

**A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

**B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.