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

March 31, 2020

PERMIT TO INSTALL 103-13B

ISSUED TO Cargill, Inc.

LOCATED AT 110 East Sherwood Street Decatur, Michigan 49045

IN THE COUNTY OF VanBuren

STATE REGISTRATION NUMBER M3654

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: March 26, 2020				
March 31, 2020	SIGNATURE:			
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan Air Emissions Reporting System

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review
PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction
SNCR Selective Non-Catalytic Reduction
SRN State Registration Number

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

^{*}For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

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POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit
°C Degrees Celsius CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Pegrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

kW Kilowatt
lb Pound
m Meter
mg Milligram
mm Millimeter
MM Million
MW Megawatts

NMOC Non-Methane Organic Compounds

NO_x Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter

pph Pounds per hour ppm Parts per million

ppmv Parts per million by volume
ppmw Parts per million by weight
psia Pounds per square inch absolute

psia Pounds per square inch absolut psig Pounds per square inch gauge

scf Standard cubic feet

 $\begin{array}{ccc} \text{sec} & \text{Seconds} \\ \text{SO}_2 & \text{Sulfur Dioxide} \end{array}$

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year Microgram

µm Micrometer or Micron

VOC Volatile Organic Compounds

yr Year

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GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))

- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

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11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)

- a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
- b) A visible emission limit specified by an applicable federal new source performance standard.
- c) A visible emission limit specified as a condition of this Permit to Install.
- 12. 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). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

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EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

	Emission Unit Description	Installation Date / Modification	Flexible
Emission Unit ID	(Including Process Equipment & Control Device(s))	Date	Group ID
EUGRAINRECEIVING N	Truck unloading operations consisting of (2) receiving pits at the North Elevator. 12,000 bushels/hr total capacity. Equipment and emission control details are listed in Appendix B.	March 2009 / 08-22-2014	FGGRAIN
EUGRAINRECEIVING S	Truck unloading operations consisting of (2) receiving pits at the South Elevator. 30,000 bushels/hr total capacity. Equipment and emission control details are listed in Appendix B.	March 2009 / 08-22-2014	FGGRAIN
EUTRUCKLOADING	Truck load-out operations consisting of (1) load-out area at the North Elevator and (2) load-out areas at the South Elevator. 30,000 bushels/hr total capacity. Equipment and emission control details are listed in Appendix B.	March 2009 / 03-31-2020	FGGRAIN
EURAILLOADING	Rail load-out operations consisting of (1) load-out area at the North Elevator. 30,000 bushels/hr capacity. Equipment and emission control details are listed in Appendix B.	December 2011 / 08-22-2014	FGGRAIN
EUGRAINHANDLING	Grain handling operations consisting of legs, scale hoppers and surge bins, turn heads, scalpers, gravity cleaners, conveyors, the headhouse, and other such structures. 42,500 bushels/hr total capacity. Emission control details are listed in Appendix B.	March 2007 / 08-22-2014	FGGRAIN
EUGRAINSTORAGE	Grain storage consisting of (7) dry grain silos and (2) wet grain silos at the North Elevator and (11) dry grain silos and (2) wet grain silos at the South Elevator. 5,358,000 bushels total capacity. Equipment details are listed in Appendix B.	March 2007 / 08-22-2014	FGGRAIN
EUGRAINDRYERN	22.5 MMBtu/hr natural gas-fired column grain dryer at the North Elevator. 4,000 bushels/hr capacity.	June 2009 / 08-22-2014	FGDRYER S
EUGRAINDRYERS	22.5 MMBtu/hr natural gas-fired column grain dryer at the South Elevator. 4,000 bushels/hr capacity.	March 2009 / 08-22-2014	FGDRYER S
EUTRUCKTRAFFIC	Truck traffic for delivery of materials to customers; truck traffic from material unloading to material load-out areas and loader traffic associated with storage equipment, storage pile handling and loading/unloading delivery trucks. All commercial truck areas and unpaved road portions from the grain elevators to the fertilizer handling area.	March 2007 / 08-22 2014	

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

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EUTRUCKTRAFFIC EMISSION UNIT CONDITIONS

DESCRIPTION

Truck traffic for delivery of materials to customers; truck traffic from material unloading to material load-out areas and loader traffic associated with storage equipment, storage pile handling and loading/unloading delivery trucks. All commercial truck areas and unpaved road portions from the grain elevators to the fertilizer handling area.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1301, 40 CFR 52.21(c) & (d))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUTRUCKTRAFFIC unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. (R 336.1371, R 336.1372, Act 451 324.5524)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. If visible emission readings are requested by the AQD District Supervisor, the permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUTRUCKTRAFFIC. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1301, 40 CFR 52.21(c) & (d))

VII. REPORTING

NA

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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:

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGGRAIN	Grain receiving, storage, load-out, and handling equipment and operations at the North and South Elevators.	EUGRAINRECEIVINGN, EUGRAINRECEIVINGS, EUTRUCKLOADING, EURAILLOADING, EUGRAINHANDLING, EUGRAINSTORAGE
FGDRYERS	(2) 22.5 MMBtu/hr natural gas-fired column grain dryers. 8,000 bushels/hr combined capacity.	EUGRAINDRYERN, EUGRAINDRYERS

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FGGRAIN FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Grain receiving, storage, load-out, and handling equipment and operations at the North and South Elevators.

Emission Unit: EUGRAINRECEIVINGN, EUGRAINRECEIVINGS, EUTRUCKLOADING, EURAILLOADING, EUGRAINHANDLING, EUGRAINSTORAGE

POLLUTION CONTROL EQUIPMENT

Dust collectors are installed/implemented on EUGRAINGRECEIVINGS, EURAILLOADING, and EUGRAINHANDLING

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements		
1. PM	0.01 lbs per 1000 lbs of gas ^a	Hourly	Each FGGRAIN exhaust stack (On and after the date that any particulate controls are installed)	SC V.3	R 336.1331		
2. PM	0.01 gr/dscf	Hourly	Each FGGRAIN exhaust stack from an NSPS DD affected facility	SC V.2	40 CFR 60.302(b)(1)		
^a Calculated on a wet gas basis							

- 3. Visible emissions (fugitive) from each NSPS DD affected unit in EUGRAINRECEIVINGS and each NSPS DD affected unit in EURAILLOADING shall not exceed a six-minute average of 5 percent opacity. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d), 40 CFR 60.302(c)(1))
- 4. Visible emissions (fugitive) from each NSPS DD affected unit in EUTRUCKLOADING shall not exceed a six-minute average of 10 percent opacity. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d), 40 CFR 60.302(c)(3))
- 5. There shall be no visible emissions (fugitive) from any NSPS DD affected unit in EUGRAINHANDLING. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d), 40 CFR 60.302(c)(2))
- 6. There shall be no visible emissions from any FGGRAIN NSPS DD affected facility exhaust stack. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d), 40 CFR 60.302(b)(2))
- 7. Visible emissions from any material storage piles maintained under FGGRAIN shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1301, 40 CFR 52.21(c) & (d))

II. MATERIAL LIMIT(S)

1. The permittee shall not process more than 3 million bushels (84,000 tons) of grain through EUGRAINRECEIVINGN per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

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2. The permittee shall not process more than 20 million bushels (560,000 tons) of grain individually through each EUGRAINRECEIVINGS and EUGRAINHANDLING per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

- 3. The permittee shall not process more than 20 million bushels (560,000 tons) of grain combined through EUGRAINRECEIVINGN and EUGRAINRECIVINGS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 4. The permittee shall not process more than 6 million bushels (168,000 tons) of grain through EUTRUCKLOADING per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 5. The permittee shall not process more than 20 million bushels (560,000 tons) of grain through EURAILLOADING per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 6. The permittee shall not process more than 20 million bushels (560,000 tons) of grain through EUGRAINSTORAGE per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate FGGRAIN unless the nuisance minimization plan for fugitive dust for all facility roadways, the facility yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. (R 336.1301, R 336.1371)
- 2. On and after the date that each area's particulate controls are installed/implemented, the permittee shall not operate that portion of FGGRAIN unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 60 days of that area's control installation/implementation, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for guick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
 - d) Any after-control exhaust stack names, locations, and parameters (maximum diameter/dimensions and minimum height).

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. On and after the date that each area's particulate controls are installed/implemented, the permittee shall not operate that portion of FGGRAIN unless the Control Device is installed, maintained, and operated in a satisfactory manner or the Control Measure is implemented, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

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2. The permittee shall not operate any portion of FGGRAIN unless the equipment's specified control device/measure is installed, maintained and operated in a satisfactory manner as listed in Appendix B. (R 336.1910, 40 CFR 52.21 (c) & (d))

- 3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the amount of grain processed through each portion of FGGRAIN on a continuous basis. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 4. On and after the date that each area's particulate controls are installed/implemented, the permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the operating parameter(s) for the FGGRAIN control device/measure as specified in the plan required by SC III.2. (R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- Upon request of the AQD District Supervisor, the permittee shall evaluate visible emissions from any FGGRAIN NSPS DD affected facility, at owner's expense, in accordance with federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and DD. The permittee must have prior approval from the AQD for visible emission observation procedures. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD within 45 days following the last date of the evaluation. (R 336.1301, 40 CFR Part 60 Subparts A & DD)
- 2. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from any FGGRAIN NSPS DD affected facility exhaust stack, as required by federal Standards of Performance for New Stationary Sources, by testing at owner's expense, in accordance with 40 CFR Part 60 Subparts A and DD. 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). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60 Appendix A. No less than 60 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. Verification of emission rates includes the submittal of 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. (40 CFR Part 60 Subparts A & DD)
- 3. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from each FGGRAIN exhaust stack on which particulate controls are installed 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. (R 336.1331)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- On and after the date that each area's particulate controls are installed/implemented, the permittee shall monitor and record the control equipment/measure operating parameters specified in the plan required by SC III.2 for that portion of FGGRAIN on a daily basis. (R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

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3. The permittee shall keep monthly records of the amount of grain processed individually through each EUGRAINRECEIVINGS, EURAILLOADING, and EUGRAINHANDLLING. The permittee shall also calculate on a monthly basis the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of grain processed on file and make them available to the Department upon request. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

- 4. The permittee shall keep monthly records of the amount of grain processed individually through each EUGRAINRECEIVINGN, EUTRUCKLOADING, and EUGRAINSTORAGE. The permittee shall also calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of grain processed on file and make them available to the Department upon request. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 5. The permittee shall keep, in a satisfactory manner, records of any visible emission readings for FGGRAIN. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d), 40 CFR 60.302(c)(1), 40 CFR 60.302(c)(3))

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. (40 CFR 60.7)

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 Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVBH1 (EUGRAINRECEIVIN GS & EUGRAINHANDLING)	30	9	R 336.1225, 40 CFR 52.21(c) & (d)
2.	SVBH2 (EURAILLOADING)	30	9	R 336.1225, 40 CFR 52.21(c) & (d)

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 40 CFR Part 60 Subparts A and DD (Standards of Performance for Grain Elevators), as they apply to FGGRAIN. **(40 CFR Part 60 Subparts A & DD)**
- 2. The permittee shall label all equipment using the company IDs in Appendix B, according to a method acceptable to the AQD District Supervisor. Labels shall be in a conspicuous location on the equipment. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)

Footnotes:

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

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FGDRYERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

(2) 22.5 MMBtu/hr natural gas-fired column grain dryers. 8,000 bushels/hr combined capacity.

Emission Unit: EUGRAINDRYERN, EUGRAINDRYERS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

		Time Period /		Monitoring /	Underlying Applicable	
Pollutant	Limit	Operating Scenario	Equipment	Testing Method	Requirements	
1. PM	0.01 lbs per	Test Protocol*	Each FGDRYERS	GC 13	R 336.1331	
	1000 lbs of gasa		exhaust stack			
^a Calculated on a wet gas basis						
*Test protocol shall specify averaging time						

2. Visible emissions from each grain dryer associated with FGDRYERS shall not exceed a six-minute average of 10 percent opacity. (R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

II. MATERIAL LIMIT(S)

- 1. The permittee shall not process more than 10 million bushels (280,000 tons) of grain through FGDRYERS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))
- 2. The permittee shall burn only natural gas in FGDRYERS. (R 336.1205, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGDRYERS unless the nuisance minimization plan for fugitive dust for all facility roadways, the facility yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. (R 336.1301, R 336.1371)

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The permittee shall not operate FGDRYERS unless all of the exhaust gases are passed through column plate perforations with diameters less than or equal to 0.094 inch. (R 336.1910, 40 CFR 60.302(a)(1))
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the amount of grain processed through FGDRYERS on a continuous basis. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1301, 40 CFR 52.21(c) & (d))

2. The permittee shall keep monthly records of the amount of grain processed through FGDRYERS. The permittee shall also calculate the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of grain processed on file and make them available to the Department upon request. (R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. (40 CFR 60.7)

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:

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 40 CFR Part 60 Subparts A and DD (Standards of Performance for Grain Elevators), as they apply to EUDRYERS. **(40 CFR Part 60 Subparts A & DD)**

Footnotes:

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

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APPENDIX A Nuisance Minimization Plan Fugitive Dust

1. Site Roadways / Plant Yard

- a) The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.
- b) All paved roadways and the plant yards shall be swept as needed between applications.
- c) Any material spillage on roads shall be cleaned up immediately.
- d) Any vehicle traveling on plant roads shall not exceed 8 mph. Signs, displaying the 8 mph speed limit, shall be posted at the entrance and exit of the plant yard.

II. Plant

The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve. All transfer points shall be enclosed.

III. Storage Piles

- a) Stockpiling of all materials shall be performed to minimize drop distance and control potential dust problems.
- b) All outdoor storage of materials shall be covered.
- c) Stockpiles shall be watered/treated on an as needed basis in order to meet the opacity limit of 5 percent. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

IV. Truck Traffic

On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any sideboard, side panel or tailgate. Otherwise, the truck shall be tarped.

V. AQD/MDEQ Inspection

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD if, following an inspection, the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.

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APPENDIX B Grain Elevator Equipment List

	i.	Grain Lievator Equipi	Date	NSPS DD	0
Equipment Description	ID	Size/Capacity	Installed	Subject	Control Device
North Receiving Pit 1	NR1	5,000 Bu/hr	3/2009	NO	NA
North Receiving Pit 2	NR2	7,000 Bu/hr	3/2009	NO	NA
EUGRAINRECEIVINGN	-	12,000 Bu/hr	-	-	-
South Receiving Pit 1	SR1	10,000 Bu/hr	3/2009	NO	Dust Collector
South Receiving Pit 2	SR2	20,000 Bu/hr	6/2012	YES	Dust Collector
EUGRAINRECEIVINGS	-	30,000 Bu/hr	-	-	-
North Truck Load-out 1	NTL1	15,000 Bu/hr	9/2011	NO	NA
South Truck Load-out 1	STL1	10,000 Bu/hr	3/2009	NO	NA
South Truck Load-out 2	STL2	15,000 Bu/hr	3/2010	NO	NA
EUTRUCKLOADING	-	30,000 Bu/hr	-	-	-
North Rail Load-out 1	NRL1	30,000 Bu/hr	12/2011	YES	Dust Collector
EURAILLOADING	-	30,000 Bu/hr	-	-	-
North Dry Silo	B300	270,000 Bu	6/2008	NA	NA
North Dry Silo	B400	270,000 Bu	6/2008	NA	NA
North Dry Silo	B100	165,000 Bu	6/2007	NA	NA
North Dry Silo	B200	165,000 Bu	6/2007	NA	NA
North Dry Silo	B42	42,000 Bu	3/2007	NA	NA
North Dry Silo	B39	39,000 Bu	3/2007	NA	NA
North Dry Silo	B27	27,000 Bu	3/2007	NA	NA
North Wet Silo	W100	30,000 Bu	6/2009	NA	NA
North Wet Silo	W200	30,000 Bu	6/2012	NA	NA
South Dry Silo	B7	560,000 Bu	6/2010	NA	NA
South Dry Silo	B8	560,000 Bu	6/2010	NA	NA
South Dry Silo	В9	560,000 Bu	6/2011	NA	NA
South Dry Silo	B10	560,000 Bu	6/2011	NA	NA
South Dry Silo	B11	560,000 Bu	TBD	NA	NA
South Dry Silo	B12	560,000 Bu	TBD	NA	NA
South Dry Silo	B5	230,000 Bu	6/2012	NA	NA
South Dry Silo	B1	165,000 Bu	3/2009	NA	NA
South Dry Silo	B2	165,000 Bu	9/2008	NA	NA
South Dry Silo	В3	165,000 Bu	3/2009	NA	NA
South Dry Silo	B4	165,000 Bu	3/2009	NA	NA
South Wet Silo	W1	40,000 Bu	3/2009	NA	NA
South Wet Silo	W2	30,000 Bu	3/2011	NA	NA
EUGRAINSTORAGE	-	5,358,000 Bu	-	-	-
EUGRAINHANDLING	-	42,500 Bu/hr	-	YES	Dust Collector
North Grain Dryer	DryerN	22.5 MMBtu/hr 4,000 Bu/hr	6/2009	NO	NA
South Grain Dryer	DryerS	22.5 MMBtu/hr 4,000 Bu/hr	3/2009	NO	NA