

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings)
against **CARGILL INCORPORATED**, a)
corporation organized under the laws of the)
State of Michigan and doing business at 110)
East Sherwood Street, City of Decatur,)
County of Van Buren, State of Michigan)
)

AQD No. 41-2014

SRN: M3654

STIPULATION FOR ENTRY OF FINAL ORDER
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) against Cargill Incorporated (Company), a Minnesota corporation doing business at 110 East Sherwood Street in the City of Decatur, Michigan, with State Registration Number (SRN) M3654. The MDEQ alleges that the Company is in violation of Title 40 Code of Federal Regulations Part 60, Subpart DD Standards of Performance for Grain Elevators and Permit to Install No. 103-13. Specifically, the MDEQ alleges that the Company failed to perform emission testing on the South Receiving Pit 2 and North Rail Loadout 1 in a timely manner, as cited herein and in Violation Notice dated February 13, 2014. The Company and MDEQ stipulate to the termination of this proceeding by entry of this Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.
2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.
3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.
4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.

5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.

8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Permit

1. Permit to Install No. 103-13, and any subsequent permit revision, shall be attached hereto as Exhibit A of this Consent Order.

B. Control Program and Installation Schedule

1. By the effective date of this Consent Order, the Company shall have begun on-site installation of the required air pollution control device(s) and associated equipment for the South Receiving Pit 2 and within fifteen (15) days of the effective date of this Consent Order shall notify the AQD Kalamazoo District Supervisor in writing that this installation has begun.

2. By June 23, 2014, the Company shall begin on-site installation of the required air pollution control device(s) and associated equipment for the North Rail Loadout 1 and shall notify the AQD Kalamazoo District Supervisor in writing that this installation has begun.

3. By June 30, 2014, the Company shall have completed the installation of the appropriate air pollution control equipment the South Receiving Pit 2 and notified the AQD Kalamazoo District Supervisor in writing that the installation of the appropriate air pollution control equipment has been completed and operation of the equipment has commenced in accordance with the provisions of Exhibit A.

4. By August 31, 2014, the Company shall have completed the installation of the appropriate air pollution control equipment the North Rail Loadout 1 and notified the AQD Kalamazoo District Supervisor in writing that the installation of the appropriate air pollution control equipment has been completed and operation of the equipment has commenced in accordance with the provisions of Exhibit A.

C. RECORDKEEPING, REPORTING, AND TESTING

1. By September 15, 2014, the Company shall have completed emission testing for particulate matter for the South Receiving Pit 2 and North Rail Loadout 1 in accordance with methods and procedures approved by the AQD Kalamazoo District Supervisor to demonstrate compliance with the emission limitations specified in Exhibit A.

2. Not less than thirty (30) days prior to testing, the Company or his authorized agent, shall submit a complete test plan to the AQD Kalamazoo District Supervisor and the Technical Programs Unit Supervisor in accordance with the requirements specified in Exhibit B.

3. Not less than seven (7) days prior to testing, the Company or his authorized agent, shall notify the AQD Kalamazoo District Supervisor and the Technical Programs Unit Supervisor, in writing, of the time and place of the tests and who shall conduct them. A representative of the AQD shall have the opportunity to witness the tests.

4. By November 15, 2014, the Company shall submit to the AQD Kalamazoo District Supervisor and Technical Programs Unit Supervisor a test report, which includes the test data and results, in accordance with the requirements specified in Exhibit B.

GENERAL PROVISIONS

10. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

11. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

12. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of \$12,000.00, which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall include the "Payment Identification Number AQD40048" on the front of the check and/or in the cover letter with the payment. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

13. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.C.1 of this Consent Order, the Company is subject to a stipulated fine of up to \$3,000.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.B.1, 9.B.2, 9.B.3, 9.B.4, 9.C.2, 9.C.3, or 9.C.4 of this Consent Order, the Company is subject to a stipulated fine of up to \$2,500.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with any other paragraph or provision of this Consent Order, the Company is subject to a stipulated fine of up to \$1,000.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909 8157. To ensure proper credit, all payments shall include the "Payment Identification Number AQD40048-S" on the front of the check and/or in the cover letter with the payment. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

14. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

15. To ensure timely payment of the settlement amount assessed in paragraph 12 and any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest payment shall be determined at a rate of interest that is equal to one percent (1%) plus the average interest rate paid at auctions of 5-year United States treasury notes during the six months immediately preceding July 1 and January 1, as certified by the state treasurer, compounded annually, and using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

16. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 12. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

17. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

18. This Consent Order shall remain in full force and effect for a period of at least one (1) year. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD

Grand Rapids District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

19. In the event the Company sells or transfers the facility, with SRN M3654, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Kalamazoo District Office Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, the Company must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Kalamazoo District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

20. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

21. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

22. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facility located at 110 East Sherwood Street, Decatur, Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

CARGILL INCORPORATED

Michael Borrie Plant Manager
Print Name and Title

[Signature] Date: 6/24/14
Signature

The above signatory subscribed and sworn to before me this 24th day of June, 2014.

JAYME LYNNELL FRABE
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF VAN BUREN
My Commission Expires December 14, 2017
Acting in the County of Van Buren

[Signature]
Notary Public

Approved as to Content:

[Signature]
G. Vinson Hellwig, Chief
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Approved as to Form:

[Signature]
Neil Gordon, Section Head
ENVIRONMENTAL REGULATION SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 7/10/14

Dated: 7-7-2014

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY


G. Vinson Hellwig, Chief
Air Quality Division

Effective Date: 7/10/14

AQD No. 41-2014

Exhibit A

Permit to Install

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

August 16, 2013

**PERMIT TO INSTALL
103-13**

**ISSUED TO
Cargill, Inc.**

**LOCATED AT
110 East Sherwood Street
Decatur, Michigan**

**IN THE COUNTY OF
Van Buren**

**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 Environmental Quality. 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:

August 9, 2013

DATE PERMIT TO INSTALL APPROVED:

August 16, 2013

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfuction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
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	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

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 Environmental Quality, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(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.

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 R 336.1301, 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 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 R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUGRAINRECEIVING	Truck unloading operations consisting of (2) receiving pits at the North Elevator and (2) receiving pits at the South Elevator. 42,500 bushels/hr total capacity. Equipment and emission control details are listed in Appendix B.	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.	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.	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.	FGGRAIN
EUGRAINSTORAGE	Grain storage consisting of (7) dry grain silos and (2) wet grain silos at the North Elevator and (10) dry grain silos and (2) wet grain silos at the South Elevator. 4,798,000 bushels total capacity. Equipment details are listed in Appendix B.	FGGRAIN
EUGRAINDRYERN	22.5 MMBtu/hr natural gas-fired column grain dryer at the North Elevator. 4,000 bushels/hr capacity.	FGDRYERS
EUGRAINDRYERS	22.5 MMBtu/hr natural gas-fired column grain dryer at the South Elevator. 4,000 bushels/hr capacity.	FGDRYERS
EUDRYFERTILIZER	Dry fertilizer distribution facility including a 3,500 ton capacity storage building, 100 ton/hr capacity blender, and 100 ton/hr capacity truck loading/unloading operation.	NA
EULIQUIDFERTLZR	Liquid fertilizer distribution facility including (1) 1,200,000 gallon storage tank, (1) 1,000,000 gallon storage tank, (4) 20,000 gallon storage tanks, and (1) 27,000 gal/hr capacity loading/unloading operation.	NA
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.	NA
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 336.1290.		

The following conditions apply to: EUDRYFERTILIZER

DESCRIPTION: Dry fertilizer distribution facility including a 3,500 ton capacity storage building, 100 ton/hr capacity blender, and 100 ton/hr capacity truck loading/unloading operation.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Control methods include equipment enclosures or enclosed within a building, drop chutes and/or pant legs for transfer points.

I. EMISSION LIMITS

1. Visible emissions from the EUDRYFERTILIZER truck loading area, truck unloading area, storage building, blender, unloading trucks with the front end loader, loading trucks from the fertilizer scale and conveyor, and loading the blender feed hopper shall not exceed 10 percent opacity. **(R 336.1301, 40 CFR 52.21(c) & (d))**
2. Visible emissions from any material storage piles maintained under EUDRYFERTILIZER 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 LIMITS

1. The permittee shall not process more than 15,000 tons of material through EUDRYFERTILIZER per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1301, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall take the necessary actions to minimize the freefall drop distance when unloading fertilizer on a truck into the storage building, loading fertilizer on a truck, or loading fertilizer into the blender feed hopper with a front end loader. **(R 336.1301, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep all doors of the storage building closed when not loading or unloading fertilizer. **(R 336.1301, 40 CFR 52.21(c) & (d))**
3. The permittee shall not operate the fertilizer distribution facility unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, and all material handling operations specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, has been implemented and is maintained. **(R 336.1301, R 336.1371)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the amount of fertilizer processed through EUDRYFERTILIZER on a continuous basis. **(R 336.1205, R 336.1301, 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))**

NA

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, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep monthly records of the amount of material processed through EUDRYFERTILIZER. Further the permittee shall 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 material processed on file and make them available to the Department upon request. **(R 336.1205, 40 CFR 52.21(c) & (d))**
3. 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 EUDRYFERTILIZER. 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

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply to: EULIQUIDFERTLZR

DESCRIPTION: Liquid fertilizer distribution facility including (1) 1,200,000 gallon storage tank, (1) 1,000,000 gallon storage tank, (4) 20,000 gallon storage tanks, and (1) 27,000 gal/hr capacity loading/unloading operation.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The permittee shall not process more than 12,000 tons (2.3 million gallons) of material through EULIQUIDFERTLZR per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1225)**

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the amount of liquid fertilizer processed through EULIQUIDFERTLZR on a continuous basis. **(R 336.1205, R 336.1225)**

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. 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 336.1225)**
2. The permittee shall keep monthly records of the amount of material processed through EULIQUIDFERTLZR. Further the permittee shall 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 material processed on file and make them available to the Department upon request. **(R 336.1205, R 336.1225)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply to: EUTRUCKTRAFFIC

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 LIMITS

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 LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

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 PARAMETERS

NA

V. TESTING/SAMPLING

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

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

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.	EUGRAINRECEIVING, EUTRUCKLOADING, EURAILLOADING, EUGRAINHANDLING, EUGRAINSTORAGE
FGDRYERS	(2) 22.5 MMBtu/hr natural gas-fired column grain dryers. 8,000 bushels/hr combined capacity.	EUGRAINDRYERN, EUGRAINDRYERS

The following conditions apply to: FGGRAIN

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

Emission Units: EUGRAINRECEIVING, EUTRUCKLOADING, EURAILLOADING, EUGRAINHANDLING, EUGRAINSTORAGE

POLLUTION CONTROL EQUIPMENT: Particulate emission controls are to be installed/implemented on EUGRAINRECEIVING, EUTRUCKLOADING, EURAILLOADING, and EUGRAINHANDLING

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lbs per 1000 lbs of gas ^a	Test Protocol*	Each FGGRAIN exhaust stack (On and after the date that any particulate controls are installed)	GC 13	R 336.1331
2. PM	0.01 gr/dscf	Test Protocol*	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 * Test protocol shall specify averaging time					

3. Visible emissions (fugitive) from each NSPS DD affected unit in EUGRAINRECEIVING 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 LIMITS

1. The permittee shall not process more than 8 million bushels (224,000 tons) of grain individually through each EUGRAINRECEIVING and EUGRAINHANDLING per 12-month rolling time period as determined at the end of each calendar month prior to particulate controls being installed/implemented on all in-use receiving pits and all in-use grain handling operations. Alternatively, if grain is sent to FGDRYERS for further processing, the permittee shall not process more grain individually through each EUGRAINRECEIVING and EUGRAINHANDLING than shown in the table below. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

Amount of grain sent to FGDRYERS	Amount of grain allowed to be processed through EUGRAINRECEIVING/EUGRAINHANDLING
0 MMbushels/yr (0 tpy)	8 MMbushels/yr (224,000 tpy)
0.75 MMbushels/yr (21,000 tpy)	7.5 MMbushels/yr (210,000 tpy)
1.5 MMbushels/yr (42,000 tpy)	7 MMbushels/yr (196,000 tpy)
2.25 MMbushels/yr (63,000 tpy)	6.5 MMbushels/yr (182,000 tpy)
3 MMbushels/yr (84,000 tpy)	6 MMbushels/yr (168,000 tpy)
3.75 MMbushels/yr (105,000 tpy)	5.5 MMbushels/yr (154,000 tpy)
5 MMbushels/yr (140,000 tpy)	5 MMbushels/yr (140,000 tpy)

2. The permittee shall not process more than 20 million bushels (560,000 tons) of grain individually through each EUGRAINRECEIVING and EUGRAINHANDLING per 12-month rolling time period as determined at the end of each calendar month after particulate controls are installed/implemented on all in-use receiving pits and all in-use grain handling operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
3. The permittee shall not process more than 800,000 bushels (22,400 tons) of grain through EUTRUCKLOADING per 12-month rolling time period as determined at the end of each calendar month prior to particulate controls being installed/implemented on all in-use truck load-out operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
4. The permittee shall not process more than 5 million bushels (140,000 tons) of grain through EUTRUCKLOADING per 12-month rolling time period as determined at the end of each calendar month after particulate controls are installed/implemented on all in-use truck load-out operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
5. The permittee shall not process more than 8 million bushels (224,000 tons) of grain through EURAILLOADING per 12-month rolling time period as determined at the end of each calendar month prior to particulate controls being installed/implemented on all in-use rail load-out operations. **(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 EURAILLOADING per 12-month rolling time period as determined at the end of each calendar month after particulate controls are installed/implemented on all in-use rail load-out operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
7. The permittee shall not process more than 8 million bushels (224,000 tons) of grain through EUGRAINSTORAGE per 12-month rolling time period as determined at the end of each calendar month prior to particulate controls being installed/implemented on all in-use grain receiving and unloading operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
8. 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 after particulate controls are installed/implemented on all in-use grain receiving and unloading operations. **(R 336.1205, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

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 quick 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 PARAMETERS

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))**
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))**

1. Within 60 days after achieving maximum production rate, but not later than 180 days after commencement of trial operation, 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. After any area's particulate controls are installed that include exhausting through a stack and within 60 days after achieving the maximum production rate, but not later than 180 days after commencement of trial operation, 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)**

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))**
2. 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))**
3. Prior to particulate controls being installed/implemented on the in-use receiving pits, the permittee shall keep daily records of the amount of grain processed individually through each EUGRAINRECEIVING and EUGRAINHANDLING. Further the permittee shall 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))**
4. On and after the date that particulate controls are installed/implemented on the in-use receiving pits, the permittee shall keep monthly records of the amount of grain processed individually through each EUGRAINRECEIVING and EUGRAINHANDLING. Further the permittee shall 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 monthly records of the amount of grain processed individually through each EUTRUCKLOADING, EURAILLOADING, and EUGRAINSTORAGE. Further the permittee shall 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))**

6. 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. Within 30 days after completion of the installation/implementation of any particulate controls on any portion of FGGRAIN, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. This notification shall also include updating any applicable portions of the equipment list in Appendix B. Completion of the installation/implementation is considered to occur not later than commencement of trial operation of the control device/measure. **(R 336.1201(7)(a))**
2. 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 RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

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. Within 45 days of issuance of this permit, 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:

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

The following conditions apply to: FGDRYERS

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

Emission Units: EUGRAINDRYERN, EUGRAINDRYERS

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lbs per 1000 lbs of gas ^a	Test Protocol*	Each FGDRYERS exhaust stack	GC 13	R 336.1331
^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 LIMITS

1. The permittee shall not process more than 5 million bushels (140,000 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 RESTRICTIONS

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. DESIGN/EQUIPMENT PARAMETERS

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))

NA

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. Prior to particulate controls being installed/implemented on the in-use grain receiving pits and grain handling operations, the permittee shall keep daily records of the amount of grain processed through FGDRYERS. Further the permittee shall 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))**
3. On and after the date that particulate controls are installed/implemented on the in-use grain receiving pits and grain handling operations, the permittee shall keep monthly records of the amount of grain processed through FGDRYERS. Further the permittee shall 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))**

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 RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

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:

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

APPENDIX A
Nuisance Minimization Plan
Fugitive Dust

I. 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 side board, 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.

APPENDIX B - Grain Elevator Equipment List

Equipment Description	ID	Size/Capacity	Date Installed	NSPS DD Subject	Control Device
North Receiving Pit 1	NR1	5,000 Bu/hr	3/2009	NO	TBD
North Receiving Pit 2	NR2	7,000 Bu/hr	3/2009	NO	TBD
South Receiving Pit 1	SR1	10,000 Bu/hr	3/2009	NO	TBD
South Receiving Pit 2	SR2	20,000 Bu/hr	6/2012	YES	TBD
EUGRAINRECEIVING	-	42,500 Bu/hr	-	-	-
North Truck Load-out 1	NTL1	15,000 Bu/hr	9/2011	NO	TBD
South Truck Load-out 1	STL1	10,000 Bu/hr	3/2009	NO	TBD
South Truck Load-out 2	STL2	15,000 Bu/hr	3/2010	NO	TBD
EUTRUCKLOADING	-	30,000 Bu/hr	-	-	-
North Rail Load-out 1	NRL1	30,000 Bu/hr	12/2011	YES	TBD
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	B9	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	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	B3	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	-	4,798,000 Bu	-	-	-
EUGRAINHANDLING	-	42,500 Bu/hr	-	YES	TBD
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

AQD No. 41-2014

Exhibit B
Stack Testing

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
FORMAT FOR SUBMITTAL OF SOURCE EMISSION TEST PLANS AND REPORTS
December 2013**

INTRODUCTION

The source emission test is often the ultimate determination of compliance. The results of a test are of great significance to both the regulatory agency and the source. Since the results may determine the course of future enforcement discussions between the agency and the source, it is important that the test be performed in a valid and representative manner. The complex nature of the various sampling methods places great responsibility on both agency and testing personnel to assure each test is an accurate representation of a source's actual emissions.

The objective of this document is to describe the Air Quality Division's (AQD's) technical submittal requirements for a source test. The format described applies to the requirements of the Michigan Department of Environmental Quality (MDEQ) Rule 1001 (4), federal regulations (Part 60-New Source Performance Standards, Part 61- National Emission Standards for Hazardous Air Pollutants (NESHAP), Part 63-Maximum Achievable Control Technology) and to any other emission test submitted for reasons such as a permit requirement, for a consent order, consent judgment, or at the request of the AQD.

TEST PLAN SUBMITTAL

In order to establish uniform requirements and help ensure proper test methods and procedures are employed, **the information specified below should be submitted to the appropriate AQD district office (DO) and the Technical Programs Unit (TPU) in Lansing**, at least 30 days prior to the scheduled test date. A complete submittal will minimize the possibility of a test rejection as a result of improper sampling or data collection methods.

Testing shall be performed in strict accordance with the procedures specified in Title 40 of the Code of Federal Regulations, Part 60 (Standards of Performance for New Stationary Sources, Appendix A, as amended), Part 61 (NESHAP, Appendix B), and Part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans, Appendix M); and the MDEQ Rules, Part 10, Intermittent Testing and Sampling. Any variations in the sampling or analytical procedures must be described in the test plan and receive approval from the AQD prior to testing. If state or federal test methods are not available for the pollutants of concern or the nature of the test site makes it impractical to use them, other methods may be proposed as necessary.

While the specific items in the test plan will vary depending on the source and pollutants of interest, the following format should be utilized:

- 1) Identification and a brief description of the source to be tested. The description should include:
 - a) Names, addresses, and contact information for the facility and consultant/personnel who will be performing the test. Expected test date(s).
 - b) Type of industrial process or combustion facility.
 - c) Type and quantity of raw and finished materials used in the process.
 - d) Description of any cyclical or batch operations, which would tend to produce variable emissions with time.
 - e) Basic operating parameters used to regulate the process.
 - f) Rated capacity of the process. Process capacity can be demonstrated by calculating an average and maximum production rate using facility records. Based on these figures the facility shall include a production rate to be maintained during emission testing.

- 2) A brief description of any air pollution control equipment associated with the process:
 - a) Type of control device.
 - b) Operating parameters.
 - c) Rated capacity and efficiency.
 - d) Any maintenance activity on the air pollution control equipment within the last three months.
- 3) Applicable facility SRN, permit number and emission limits for the process to be tested.
- 4) Identify all pollutants to be measured.
- 5) Describe in detail the sampling and analysis procedures, including the applicable standard methods reference. Provide a description of the sampling train(s) to be used, including schematic diagrams if appropriate. Justify any proposed sampling or analytical modifications.
- 6) The number and length of sampling runs, which will constitute a complete test.
- 7) Dimensioned sketch showing all sampling ports in relation to breeching and to upstream and downstream disturbances or obstructions of gas flow.
- 8) Estimated flue gas conditions such as temperature, moisture, and velocity.
- 9) Projected process operating conditions during which the tests will be run (e.g., production rate). **These conditions should match the operating conditions stated in the facility's permit or facility operations shall be at the maximum routine operating conditions during the test.**
- 10) A description of any process or control equipment data to be collected during the test period. This should include any permit required information used to demonstrate the acceptable operations of emissions control processes and production rates.
- 11) A description of any monitoring data to be collected during the test period and subsequently reported (e.g., stationary continuous emission monitor data).
- 12) Field quality assurance/quality control (QA/QC) procedures (e.g., field blanks, sample storage, and transport methods) and chain of custody procedures.
- 13) Laboratory QA/QC procedures utilized as part of the testing (e.g., manner and frequency of blanks, spikes, and standards). This should include analysis of audit samples where required as a component of the approved test method.

If the source operates under a Renewable Operating Permit (ROP), certification by a responsible official, as defined in the Michigan Air Pollution Control Rule 336.1118(j), using the Renewable Operating Permit Certification (ROPC) form (EQP 5736), must be included with the test plan and cover letter. This form shall certify that the testing will be conducted in accordance with the attached test plan and that the facility will be operated in compliance with permit conditions or at the maximum routine operating conditions for the facility.

EMISSION TEST REPORTING

The emission test report should contain all pertinent data concerning the test program. In addition to reporting the results, it should include descriptions of the source, the sampling and

analytical methodologies, the process operating conditions, and all raw field data, laboratory analytical data, and calculation methods. Since the report will serve as evidence to both the agency and the source as a demonstration of the compliance status of the facility, it is important it be complete in content and adequate in quality. Its contents should be presented in an understandable and organized manner. **The information listed below shall be submitted to the appropriate AQD DO and the TPU** by the date specified in an applicable air use permit, consent order, consent judgment, or state or federal regulation. Otherwise, pursuant to the MDEQ Rule 1001(4), a complete test report shall be submitted to the AQD within 60 days following the last date of testing. In the event that the test report is not complete, additional information will be requested for submittal. If the information is not received following two written requests to the facility, the test results may be rejected by the AQD.

While the exact format of the report and the applicable information necessary will vary depending on the source and the pollutants of interest, the following format should be utilized.

- 1) Introduction:
 - a) Identification, location, and dates of tests.
 - b) Purpose of testing.
 - c) Brief description of source.
 - d) Names, addresses, and telephone numbers of the contacts for information regarding the test and the test report, and names and affiliation of all personnel involved in conducting the testing.
- 2) Summary of Results:
 - a) Operating data (e.g., production rate, fuel type, or composition).
 - b) Applicable permit number, State Registration Number (SRN), and Emission Unit ID or designation for the source.
 - c) Results expressed in units consistent with the emission limitation applicable to the source, and comparison with emission regulations.
- 3) Source Description:
 - a) Description of process, including operation of emission control equipment.
 - b) Process flow sheet or diagram (if applicable).
 - c) Type and quantity of raw and finished materials processed during the tests.
 - d) Maximum and normal rated capacity of the process.
 - e) A description of process instrumentation monitored during the test.
- 4) Sampling and Analytical Procedures:
 - a) Description of sampling train(s) and field procedures.
 - b) Description of recovery and analytical procedures.
 - c) Dimensioned sketch showing all sampling ports in relation to breeching and to upstream and downstream disturbances or obstructions of gas flow.
 - d) A sketch of cross-sectional view of stack indicating traverse point locations and exact stack dimensions.
- 5) Test Results and Discussion:
 - a) Detailed tabulation of results including process operating conditions and flue gas conditions.
 - b) Discussion of significance of results relative to operating parameters and emission regulations.
 - c) Discussion of any variations from normal sampling procedures or operating conditions, which could have affected the results.
 - d) Documentation of any process or control equipment upset condition, which occurred during the testing.

- e) Description of any major maintenance performed on the air pollution control device(s) during the three month period prior to testing.
- f) In the event of a re-test, a description of any changes made to the process or air pollution control device(s) since the last test.
- g) Results of any quality assurance audit sample analyses required by the reference method.
- h) Calibration sheets for the dry gas meter, orifice meter, pitot tube, and any other equipment or analytical procedures, which require calibration.
- i) Sample calculations of all the formulas used to calculate the results.
- j) Copies of all field data sheets, cyclonic flow checks, including any pre-testing, aborted tests, and/or repeat attempts.
- k) Copies of all laboratory data including QA/QC (e.g. blanks, spikes, standards).

If the source operates under an ROP, certification by a responsible official, as defined in the Michigan Air Pollution Control Rule 336.1118(j), using the ROPC form (EQP 5736), must be included with the emission test results and cover letter. This form shall certify that the testing was conducted in accordance with the approved test plan and that the facility operating conditions were in compliance with permit requirements or were at the maximum routine operating conditions for the facility.

REFERENCES

¹ Michigan Department of Environmental Quality Rules, Part 10, Intermittent Testing and Sampling.

² United States Environmental Protection Agency, Plant Inspection Workshop-Techniques for Evaluating Performance of Air Pollution Control Equipment: Observing Compliance Tests, February 1981.

Mailing Address for the Technical Programs Unit

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