

**ANALYSIS AND PRELIMINARY DETERMINATION FOR THE CONSTRUCTION AND
OPERATION PERMITS FOR THE GRAIN ELEVATOR/DRY
CORN MILLING OPERATION
FOR
DIDION MILLING INC.
TO BE LOCATED AT
501 SOUTH WILLIAMS STREET
CAMBRIA, COLUMBIA COUNTY, WISCONSIN**

Permit #s 02-RV-166 and 02-RV-166-OP

Facility I.D. #111081520

This review was performed by the Wisconsin Department of Natural Resources, Bureau of Air Management, P.O. Box 7921, Madison, Wisconsin 53707, (608)266-7718 in accordance with Chapter 285, Wis. Stats., and Sections NR 400 to NR 499, Wis. Adm. Code.

Reviewed by: Raj Vakharia Initials: /
s/ RV

Date:
7/08/
2004

Calculations checked by: POY Date: 07/08/04

Preliminary Determination Approved by:	Signature	Date
Construction Permit Unit Leader or District Designee	Dean Packard /s/ Jeffrey C Hanson for Dean Packard	7/08/2004
Stationary Source Modeling Supervisor	John Roth	7/08/2004
Compliance Section	Mike Sloat	7/08/2004

cc: DNR, South Central Region Air Program, Reedsburg Service Center
Jane Morgan Memorial Library, 109 W. Edgewater Street, Cambria, WI 53923

INTRODUCTION

Stationary sources that are not specifically exempt from the requirement to obtain a construction permit under s. 285.60 (5), Wis. Stats, or ch. NR 406, Wis. Adm. Code may not commence construction, reconstruction, replacement, relocation or modification unless a construction permit for the project has been issued by the Department of Natural Resource's (DNR's) Air Management Program. Owners or operators subject to the construction permit requirements must submit a construction and operation permit application to the DNR. The application is reviewed following the provisions set forth in ss. 285.60 to 285.65, Wis. Stats. The criteria for permit issuance vary depending on whether the source is major or minor and whether the source is locating in an attainment or nonattainment area.

Subject sources are to be reviewed with respect to the equipment and facility description provided in the application and for the resulting impact upon the air quality. The review ensures compliance with all applicable rules and statutory requirements. The plan review will show why the source(s) should be approved, conditionally approved, or disapproved. It will encompass emission calculations and an air quality analysis using U.S. EPA models, if applicable. As a precautionary note, the emission estimates are based on U.S. EPA emission factors (AP-42) or theoretical data and can vary from actual stack test data.

The sources included in this construction permit are also required to obtain an operation permit under s. 285.60(1)(b), Wis. Stats. This review constitutes the Department's review of applications for both the construction permit and the operation permit for these units. This review may be updated when the compliance demonstration information is received. An operation permit may be issued after the applicant demonstrates that the sources included in the construction permit are in compliance with the applicable rules, emission limits and the conditions.

GENERAL APPLICATION INFORMATION

Owner/Operator:	Didion Milling Inc. 501 South Williams Street Cambria, WI 53923
Contact:	John Didion CEO, Chairman of the Board Phone Number: 920-348-5969
Responsible Official:	Dow Didion President (920) 348-5969
Submitted By:	RSV Engineering, Inc. 112 South Main Street Jefferson, WI 53549 (920) 674-3411

Date of Complete Application: May 5, 2004

PROJECT DESCRIPTION

Didion Milling, Inc., is a grain milling company and the operation at the mill includes grain receiving, storage, milling, packaging and shipping. Didion Milling, Inc., has submitted an air pollution control permit application to cover the existing facility's operation, additional permanent grain and product storage equipment in the elevator and additional equipment in the Mill.

This project is undertaken to improve Didion's ability to handle its product milled corn and to fulfill customer demands for clean, high-quality product. Didion Milling replaced a 1.5 million bushel open air flat storage area with five upright concrete silos. Didion provided the following information with their application (Dated August 22, 2002, from Didion to Pam Kober; September 13, 2004, October 21, 2002, from Didion to Mike Sloat). This information is included as part of the Attachment 1.

Construction dates for silos and major process equipment (Table 1).

The rated storage capacity of each silo (Table 1).

A figure showing the emission points indicating which points are controlled and which are uncontrolled (Figure 1 and Table 2).

Figures 2, 3 and 4 showing the process diagram of the facility's operation.

The Equipment at the facility includes:

Receiving and unloading area for grain;
Grain conveying and storage;
Grain milling equipment;
Product packaging equipment; and
Boilers.

The emission units consist of the following:

SOI, P01: North truck/rail unload building filter: grain receiving

SOS, P08: Mill truck bulk loadout building filter: product loadout (including dried grain which cannot be processed at the facility)

510,P10: South filters: grain milling

511,PI 1: North filters: grain milling

512,P12: Mill bins transfer filter: grain transfer

514,P14: Raw corn processing facility hammerfill filter: grain milling

515,B01: Boiler #1

516,B02: Boiler #2

S17, P15: South truck unload/loading building filter: grain receiving F18,

PI6: Fugitive: grain dryer #3: grain drying

521,PI9: Mill flour operations filter: grain milling

522,P20: Mill/germ recovery/toasting/grinding filter: grain milling

524,P22: Raw grain storage silos: grain storage

525,P23: Product in process bins: product tempering. This includes storage of dried grain

526,B03: Boiler #3

Based on the application information, maximum theoretical emissions of particulate matter from the expansion exceed the general exemption level of 5.7 pounds per hour of particulate matter (s. NR 406.04(2)(c), Wis. Adm. Code). Therefore a construction permit is required for this project.

The maximum capacity for this plant is greater than 1 million bushels for the raw grain and dried grain. Didion can store raw grain as received in silos identified as Process P22. The total capacity of these silos is 946,200 bushels. The dried grain is stored in storage silos/bins identified as part of P23 and the total storage capacity of these bins is greater than 893,208 bushels. This information obtained from the Table 1, information provided by Didion to Mike Sloat, dated September 13, 2002). The total capacity for storage for the raw and dried grain is over a million bushels.

There are NSPS requirements for the truck unloading station, truck-loading station, rail car loading/unloading station, grain dryers and all grain handling operation. The NSPS standards apply to the facility if the facility meets the definition of a "grain storage elevator" or "grain terminal elevator." (Please also see the rule applicability section).

Grain Elevator means any plan or installation at which grain is unloaded, handled, cleaned, dried, stored or loaded, (s. NR 440.47(2)(h), Wis. Adm. Code).

Grain handling operations include bucket elevators or legs, scale hoppers, and surge bins, turn heads, scalpers, cleaners, trippers and the headhouse and other such equipment, (s. NR 440.47(2)(f), Wis. Adm. Code)

The facility is subject to NSPS requirements under s. NR 440.47, Wis. Adm. Code. The process effected/subject to NSPS requirements are Processes #s P01, P15, P16, P22 and P23 (Please also see the source description and rule applicability section).

SOURCEDESCRIPTION

Didion Milling, Inc., consists of grain receiving, storage, milling, packaging and shipping. The following information obtained from Didion's air permit application.

1. Boiler #B01, Kewaunee Boiler

Maximum rating: 8.37 mmBtu/hr Mnfg.
Kewaunee Boiler Corporation Model
number: H35-200-GO Date of
construction; 1995

Fuel: Natural gas

Heating value: 1,000 Btu/ft³
Maximum hourly consumption: 0.00837 mmft³
Actual yearly consumption: 73.32 mmft³

Stack #S15:

Height (ft): 30
Diameter (ft): 1.33
Flow rate (m/s): 5.86
Temp (oF): 290
Discharge direction: Up
Equipped with rain hat: No

2. Boiler #B02, Kewaunee Boiler

Maximum rating: 6.278 mmBtu/hr Mnfg.
Kewaunee Boiler Corporation Model
number: H35-150-GO

Fuel: natural gas

Heating value: 1a Btu/ft³
Maximum hourly consumption: 0.00628 muftis
Actual yearly consumption: 55.00 mmft³

Stack #S16:

Height (ft): 30
Diameter (ft): 1.33
Flow rate (m/s): 5.86
Temp(oF): 290
Discharge direction: Up
Equipped with rain hat: No

3. Boiler #B03, Kewaunee Boiler

Maximum rating: 20 mmBtu/hr

Mnfg. Kewaunee Boiler Corporation

Model number: NA

Fuel: natural gas

Heating value: 1,000 Btu/ftS

Maximum hourly consumption: 0.0200 mmft³

Actual yearly consumption: 175.20 mmftS

Stack #S26:

Height (ft): 30

Diameter (ft): 1.33

Flow rate (m/s): 5.86

Temp (oF): 290

Discharge direction: Up

Equipped with rain hat: No

4. P01, North truck/rail unloading filter: grain receiving

Date of construction: 2003

Construction of the north truck and rail raw materials unload area is currently underway at the DMI facility. Currently, trucks and cars pull over the top of a grated dump pit and dump their load into the collection pit. The dust collection system when activated will collect the displaced air from this activity to a filter system. During the plant visit on May 28, 2003, the baghouse was not operative and not capable to collect the dust generated from the unloading process. The fugitive emissions from this process currently are not controlled.

When the baghouse becomes operative, the filters will separate the dust from the air return it to Surge Bin or PCPF Hammer mill system. Grain exits the dump pit by drag flight conveyor and is directed to intended vessel for further processing. When construction is complete, unloading of all railcars and trucks in this area will take place indoors. The baghouse is expected to have a collected capture efficiency of 99.9%.

Grain receiving from truck and rail

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Kice) for area where grain is received from railcars and trucks. Baghouse installed in June 2003. The material collected in the baghouse (corn mill feed) is pneumatically conveyed to corn mill feed surge tank or directly to the corn mill feed hammer mill. The corn mill feed a high-energy dairy feed is sold to the farmers and used as dairy rations.

Pressure drop across the filters: 2 to 5 inches of water
Maximum inlet gas flow rate: 4,200 acfm
Bag cloth area (ft²): 420
Air to cloth ratio: 10:1

The baghouse filter will control emissions from Process #P01.

Stack #S01:

Height (ft): 32
Diameter (ft): 1.6
Flow rate (acfm): 8,000
Temp (oF): 69.5
Discharge direction: Up
Equipped with rain hat: No

5. P08, Mill truck bulk loadout building filter (includes grain handling): product loadout

The dried grain and raw grain that cannot be used at the facility to make products can be sold to farmers for animal feed. This grain can be shipped out through truck or rail car.

Date of construction: 2004

When construction is complete, the mill truck bulk loadout area will be fully enclosed. At that time, all trucks will be loaded with product inside the enclosure. Trucks that receive final product at the DMI facility are enclosed. Similar to the baghouse for the north truck/rail unload area, the capture efficiency of the baghouse for this building is estimated to be 99.9%. The material collected is returned into the stream that is being loaded out, via rotary air lock.

Bulk loadout of product to truck - filter
Throughput: 7 tons/hour, avg; 10 tons/hr, max

Baghouse:-

Baghouse (Kice) for area where feed grade product is loaded into trucks. Baghouse proposed to be installed in 2004.

Pressure drop across the filters: 2 to 5 inches of water
Maximum inlet gas flow rate: 1,800 acfm
Bag cloth area (ft²): 187
Air to cloth ratio: 9.6:1
The baghouse filter will control emissions from Process #P08.

The material (corn meal or corn grits) collected in the baghouse is combined back via rotary airlock during operation to the mill bulk loadout. The corn mill and grits are mainly used in the food industry for snack foods and brewing.

Stack #S08:

Height (ft): 32

Diameter (ft): 1.6

Flow rate (acfm): 1,500 Temp

(oF): 69.5

Discharge direction: Up

Equipped with rain hat: No

6. P10, South Filters: grain milling

Date of construction: 1992

Air filters for exhaust from various portions of the mill

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Buhler) used for various milling operations on the south side of the mill. Baghouse installed in 1992. The product (corn bran) collected in the baghouse is transferred pneumatically to the bran processing system. The corn bran is sold as dietary fiber and used in the baking and snack food markets.

Pressure drop across the filters: 2 to 5 inches of water

Maximum inlet gas flow rate: 21,000 acfm

Bag cloth area (ft²): 2325

Air to cloth ratio: 9.0:1

The baghouse filter will control emissions from Process #P10.

Stack #S10:

Height (ft): 84

Diameter (ft): 3 x 2.2

Flow rate (acfm): 18,000

Temp(F): 90

Discharge direction: Up

Equipped with rain hat: No

7. P11, North filters: grain milling

Date of construction: 1992

Air filters for exhaust from various portions of the mill

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Buhler) used for various milling operations on the north side of the mill. Baghouse installed in 1992. The material collected in the baghouse (corn bran) is transferred pneumatically to the bran processing system. The corn bran is sold as dietary fiber and used in the baking and snack food markets.

Pressure drop across the filters: 2 to 5 inches of water
Maximum inlet gas flow rate: 22,000 acfm
Bag cloth area (ft²): 2325
Air to cloth ratio: 9.5:1
The baghouse filter will control emissions from Process #P11.

Stack #S11:

Height (ft): 84
Diameter (ft): 4x4
Flow rate (acfm): 18,000
Temp (oF): 90
Discharge direction: Up
Equipped with rain hat: No

8. P12, Mill bins transfer filter: grain transfer

Date of construction: 1992

Exhaust filter on mill transfer system
Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Flex-Clean) used for area that transfers milled product to product storage bins. Installed in 1992. The material (Hi fat corn flour) collected in the baghouse is transferred by gravity to surge tank prior to extrusion. The high fat corn flour is blended with other ingredients for export foods. The high fat corn flour is also used in the food industry for breading and batters.

Pressure drop across the filters: 2 to 5 inches of water
Maximum inlet gas flow rate: 5,300 acfm
Bag cloth area (ft²): 963
Air to cloth ratio: 5.5:1
The baghouse filter will control emissions from Process #P12.

Stack #S12:

Height (ft): 96
Diameter (ft): 1.0
Flow rate (acfm): 3,200
Temp (F): 69.5
Discharge direction: Up
Equipped with rain hat: No

9. P14, RCPF Hammermill filter: grain milling

Date of construction: 1992

Hammermill filter in RCPF1

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Buhler) used for raw corn processing Hammermill cyclone; hammermills ate impact grinders with swinging or stationary steel bars forcing ingredients against a circular screen or solid serrated section designated as a striking plate; material is held in the grinding chamber until it is reduced to the size of the openings in the screen. Installed in 1992. The material (corn mill feed) collected in the baghouse is transferred by gravity to corn mill feed holding bin. The corn mill feed is a direct replacement for corn in dairy rations.

Pressure drop across the filters: 2 to 5 inches of water

Maximum inlet gas flow rate: 3,500 acfm

Bag cloth area (ft²): 480

Air to cloth ratio: 7.3:1

The baghouse filter will control emissions from Process #P14.

Stack #S14:

Height (ft): 126
Diameter (ft): 1.0
Flow rate (acfm): 2,500
Temp(oF): 90
Discharge direction: Up

Equipped with rain hat: No

10. PI5, South truck unload/loading building filter: grain receiving

Date of construction: 1992

Grain/product receiving/loading by truck filter

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Flex-Clean) for area where raw material is received from trucks and where product is loaded into trucks. Installed in June 2003. The material (corn mill feed) collected in the baghouse is pneumatically conveyed to the corn mill feed surge tank or directly to the corn mill feed hammer mill. The corn mill feed is a direct replacement for corn in dairy rations.

Pressure drop across the filters: 2 to 5 inches of water

Maximum inlet gas flow rate: 8,000 acfm

Bag cloth area (ft²): 1,151

Air to cloth ratio: 6.9:1

The baghouse filter will control emissions from Process #P15.

Stack #S17:

Height (ft): 100

Diameter (ft): 1.64

Flow rate (acfm): 8,000

Temp(oF): 90

Discharge direction: Up

Equipped with rain hat: No

11. PI6, Grain drying

Date of construction: 1999

Drying of grain

Throughput: 84 tons/hr, avg; 140 tons/hr, max

Process fuel usage: Natural gas

Maximum heat input to the process: 19.34 mmBtu/hr

Avg usage: 0.019 mmft³/hr; 0.019 mmft³/hr

12. P19, Mill flour operations filter: grain milling

Date of construction: 2003

Mill flour operations filter

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Baghouse:-

Baghouse (Mac) for area that processes finely ground combination of starch and fiber into flour. Installed in 2002. The material (corn mill and flour) collected in the baghouse is pneumatically conveyed to the mill product bins. The corn mill and flour are mainly used in the food industry for snack foods and breadings.

Pressure drop across the filters: 2 to 5 inches of water

maximum inlet gas flow rate: 18,000 acfm

Bag cloth area (ft²): 2,575

Air to cloth ratio: 7.0:1

The baghouse filter will control emissions from Process #P19.

Stack #S21:

Height (ft): 92

Diameter (ft): 2.0

Flow rate (acfm): 18,000

Temp (F): 90

Discharge direction: Up

Equipped with rain hat: No

13. P20, Mill/Germ recovery/toasting/grinding filter: grain milling

Date of construction: 2002

Mill and grain recovery, toasting, and grinding filter Throughput:

5,400 tons/month, avg; 32,250 tons/month, max

Baghouse: -

Baghouse (Flex-Clean) for area where germ is separated from corn kernel and milled. Installed in 2002.

The material (corn germ) collected in the baghouse will gravity flow to germ processing system through P23.

The processed germ are mainly used in the baking and oil extraction industry.

Pressure drop across the filters: 2 to 5 inches of water

Maximum inlet gas flow rate: 18,000 acfm

Bag cloth area (ft²): 2,511

Air to cloth ratio: 7.2:1

The baghouse filter will control emissions from Process #P20.

Stack #S22:

Height (ft): 92

Diameter (ft): 2.5

Flow rate (acfm): 18,000

Temp (oF): 90

Discharge direction: Up

Equipped with rain hat: No

14. P22, Raw grain storage silos: grain storage

Date of construction: 2001

Grain storage

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Stack #S24:

Height (ft): 120

Diameter (ft): 2.0

Flow rate (m/s): 30.56

Temp (oF): 69.5

Discharge direction: Up

Equipped with rain hat: No

15. P23, Product in process bins: product tempering Date

of construction: 2004

Product tempering

Throughput: 5,400 tons/month, avg; 32,250 tons/month, max

Stack #S25:

Height (ft): 120

Diameter (ft): 2.0

Flow rate (m/s): 30.56

Temp(oF): 69.5

Discharge direction: Up

Equipped with rain hat: No

CROSS MEDIA IMPACTS

The operations will generate particulate emissions which will be captured by the new baghouse control system. Also there may be some fugitive emission generated from the facility's operation.

EMISSION CALCULATIONS

Didion Milling, Inc., has provided emission calculation information from the facility's operation. I have verified this information and the information is included as part of the attachment 2.

The PM/PMIO emissions for Processes #s POI, P08, PIO, P11, P12, P14, P15, P19 and P20 are based on 0.008 gr/acf output of the filter (mnfg. guarantee) times maximum fan rating in scfm and 8,760 hours per year of operation. The PM/PMIO emissions for P22 and P23 are based on AP-42 emission factors and maximum throughput. The PM/PMIO emissions for P16 are based on AP-42 emission factor and maximum throughput.

The emissions from the fuel combustion in the boilers are based on AP-42 emission factors and maximum fuel usage.

The following table summarizes the potential emissions from the facility's operation.

Pollutant	Lbs/hr	TPY
PM	23.03	48.98
PM10	9.81	33.31
Carbon Monoxide	4.53	19.86
Nitrogen Oxides	5.40	23.65
Sulfur Dioxide	0.03	0.14
Organic Compounds	0.30	1.30

The applicable limit for the processes at the facility is the more restrictive of s. NR 415.05(1)(o) - 0.40 lb/1000 Ibs gas or s. NR 415.05(2), Wis. Adm. Code - E - 3.59(P)⁰⁶².

The facility is electing to limit PM10 emissions to less than 100 tons per year, thus avoid the need to be subject to major source review under Prevention of Significant deterioration (PSD) and be subject to PSD BACT.

The following table summarizes the potential/allowable PM/PM10 emissions from each of the processes.

Include the table here from the application.

WISCONSIN HAZARDOUS AIR POLLUTANT (NR 445) REVIEW

No HAPs are expected to be emitted from the facility's grain handling and corn milling operation.

Boilers B01, B02 and BOS - Under s. NR 445.04, Wis. Adm. Code, emissions from the combustion of group 1 virgin fossil fuels, which includes natural gas, propane are exempt from the hazardous air pollutant limits contained in s. NR 445.04, Wis. Adm. Code.

COMPLIANCE AND TECHNOLOGY REVIEW

Processes #s P01, P08, P10, P11, P12, P14, P15, P16, P19, P20, P22 and P23 PM, PM-

10 emissions are expected to be emitted from the above processes.

PM emissions from most of the facility's operation will be controlled using baghouses. The grain (raw and dried) and product storage silos (P22 and P23) do not have baghouses. Specifications for the baghouses included in the equipment specifications. Didion provided information on the baghouses and what happens to the material collected in those baghouses in their submittal dated April 14, 2003. This information is included as part of the Attachment 3. The facility has indicated that they expect an control efficiency of 99.9%. control efficiency.

Didion has requested the PM limits, as identified in the emission summary table and in the air quality modeling analysis, to ensure that emissions from the facility's operation will be below corresponding NR 405 thresholds for PM10 - BACT. Thus the proposed facility will not be subject to major modification to a major source.

Didion has indicated that the baghouses used are considered part of the process operations. The material collected by the baghouses is primarily added to an appropriate product-milling stream and sold by Didion. The Table which is included as part of the attachment 3 includes where the baghouse collected material is returned. Didion has also provided flow diagrams of how the processes works (Information submitted on April 14, 2003). This information is also included as part of the Attachment 3. A Table included as part of the Attachment 3 also outlines which baghouses are located inside the buildings and which have bypass stacks. No processes would shut down if any baghouses had brief malfunctions. None of the material collected is disposed of as waste or sent to a third party for recycling.

Limiting the potential emissions from this process effectively restricts emissions below the NR 405 permitting thresholds for PM and PM-10 respectively.

The facility will monitor the pressure drop range across the baghouse once for every 8 hours of operation or once per day, whichever yields the greatest numbers of measurements per s. NR 439.055(2)(b), WAC.

The facility will be required to perform stack tests on several processes to demonstrate compliance with the PM emission limits and also with the NSPS requirements. The maximum capacity for this plant is greater than 1 million bushels for the raw grain and dried grain. Didion can store raw grain as received in silos identified as Process P22. The total capacity of these silos is 946,200 bushels. The dried grain is stored in storage silos/bins identified as part of P23 and the total storage capacity of these bins is greater than 893,208 bushels. This information obtained from the Table provided by Didion to Mike Sloat, dated September 13, 2002. Didion has submitted information that shows it meets the definition of a grain storage elevator.

There are NSPS requirements for the truck unloading station, truck-loading station, rail car loading/unloading station, grain dryers and all grain handling operation. The NSPS standards apply to the facility if the facility meets the definition of a "grain storage elevator" or "grain terminal elevator." (Please also see the rule applicability section).

Grain Elevator means any plan or installation at which grain is unloaded, handled, cleaned, dried, stored or loaded. (s. NR440.47(2)(h), Wis. Adm. Code).

Grain handling operations include bucket elevators or legs, scale hoppers, and surge bins, turn heads, scalpers, cleaners, trippers and the headhouse and other such equipment, (s. NR 440.47(2)(f), Wis. Adm. Code)

The facility is subject to NSPS requirements under s. NR 440.47, Wis. Adm. Code. The process effected/subject to NSPS requirements are Processes #s P01, P15, P16, P22 and P23 (Please also see the source description and rule applicability section).

Boilers #s B01, B02 and BO3

Emissions from none of the boilers are controlled. Didion will be required to keep records of the type of fuel used to fire each boiler and also perform weekly inspections for proper operation of each boiler.

AIR QUALITY REVIEW

John Roth completed an air quality modeling analysis on for particulate matter for stacks associated with the grain handling and the corn milling operation. The Industrial Source Complex Short-Term (ISCT3) model was used in the analysis. A copy of the memo is included as part of the attachment 4.

The results of the modeling analysis demonstrates that all applicable air quality standard will be attained and maintained when the facility is permitted with specific emission rates and specific stack parameters required in the permit. Please see the permit for a description of those requirements.

The following table summarizes the modeling analysis results.

	Modeling Analysis results (all concentrations in ug/m ³)		
	TSP-24 hr	PMio-24 hr	PM10-annual
New Source Impact	-	1.57	0.08
PSD Increment	-	30.0	17.0
% Consumed	-	5.2	0.5
All Source Impact	56.4	56.4	11.5
Background	76.0	58.0	27.0
Total Concentration	132.4	114.4	38.5

NAAQS	150.0	150.0	50.0
% NAAQS	88.3	76.3	77.0

EMISSIONS FROM NEW EQUIPMENT OR MODIFICATION

Please see the table in the emission calculations.

FACILITY AND PROJECT CLASSIFICATION

1. Existing Facility Status:

The existing facility is minor source for PSD purposes because the potential emissions for PM/PM10 are less than 249 tons per year..

2. Project Status:

The proposed facility will be a minor source for PSD and Part 70 purposes because the emissions of PM/PM10 will be less than 100 tons per year.

3. Facility Status After Completion of Project:

Didion Milling, Inc., will be a minor source for PSD and Part 70 after the permit is issued because the emissions of PM/PM10 below 100 tons per year.

4. Summary:

NSR Applicability	Existing Facility		Proposed Project		Facility After Project	
	Major	Minor	Major	Minor	Major	Minor
PSD		NA		X		X
Non-Attainment		NA		X		X
H2(g)		Na		X		X

Part 70 Applicability	Existing Facility			Facility After Project		
	Part 70	FESOP (Syn. Minor)	non-part 70	Part 70	FESOP (Syn. Minor)	non-part 70
Status					X	

ENVIRONMENTAL ANALYSIS

For this project, PM/PM10 controlled emissions are less than 100 TPY. This project is classified as a Type III action under Chapter NR 150, Wis. Adm. Code. As a result, the Department is not required to prepare an environmental assessment for this project.

RULE APPLICABILITY

Didion, Milling, Inc., is located in Columbia County, which is currently designated as attainment area for all the pollutants. The facility is a synthetic minor source for PSD purposes and a synthetic minor source for Part 70 purposes because the potential emissions of each criteria pollutant is less than 100 tons per year each.

The facility is subject to s. NR 440.47, Wis. Adm. Code, which is the New Source Performance Standards for Grain Elevators. This is because the proposed gar in elevator storage capacity is greater 1 million bushels.

NSPS requirements for Grain Elevators are identified in s. NR 440.47, Wis. Adm. Code.

The NSPS req. for Grain Elevators apply to each truck unloading, rail car unloading, grain dryer and all grain handling operations at Didion.

- Column dryer is defined in s. NR 440.47(2)(b), Wis. Adm. Code
- Grain handling operation is defined in s. NR 440.47(2)(f), Wis. Adm. Code
- Grain loading station is defined in s. NR 440.47(2)(g), Wis. Adm. Code
- Grain unloading operation is defined in s. NR 440.47(2)(j), Wis. Adm. Code

Based on the information submitted in the application, the following processes are subject to NSPS requirements.

- 1)P01, SOI, North truck/rail unloading
- 2)P15, S17, South truck unloading/loading
- 3)P22, S24 (S24A - S24E, a total of 5 stacks or exhaust points) Grain storage (includes gain handling operation based on the process flow diagram submitted in the November 2002 application)
- 4)P23, S25 (S25A - S25AO), a total of 46 stacks or exhaust points), dried grain storage (includes gain handling operation). Please note P23 covers all the product storage including dried grain. The only bins/silos used for storage that have to meet the NSPS limits are the bins/silos designated for storing dried grain.

5)P16, F18, Grain dryer 3

Emission calculations for each of the processes were provided in Tables 2-7 of the air permit application dated November 2002.

The emission factors for PM/PM10 used in the calculations in the application for P01 North truck/rail unloading, P15 south truck unloading/loading, were based on 0.008 gr/dscf (vendor guarantee information). The NSPS req. under s. NR 440.47, Wis. Adm. Code for these processes is as follows:

Limit PM emissions to 0.023 g/dscm (0.010 gr/dscf) and 0% opacity (s. NR 440.47(3)(b), Wis. Adm. Code from the stack and fugitive emissions from the individual truck unloading, rail car unloading station to 5% opacity. Based on the proposed allowable hourly emission rate, Didion is expected to meet the NSPS limit of 0.010 gr/dscf based on baghouse vendor's guarantees.

The emission factors for PM for P22, grain storage and material handling, P23 dried grain storage and material handling were based on 0.027 lb/ton (AP42) and for PM10 for P22 and P23 were based on 0.0022 LB/ton (AP-42). The NSPS req. under s. NR 440.47, Wis. Adm. Code for these processes is as follows:

Limit PM emissions to 0.023 g/dscm (0.010 gr/dscf) and visible emissions to 0% opacity (s. NR 440.47(3)(b), Wis. Adm. Code from the stack and fugitive emissions from any grain handling operation to 0% opacity. It appears to me based on the information provided in table 7 of the air permit application dated November 2002, the emission rates for each of the processes P22 and P23 is well below the NSPS limit of 0.010 gr/dscf. Thus it appears that Didion is expected to meet the NSPS limits.

The emission factors for PM for P16, grain dryer #3 were based on 0.07 LB/ton (AP42) and for PM10 for P16 were based on 0.016 LB/ton (AP-42). The NSPS req. under s. NR 440.47, Wis. Adm. Code for this process is as follows:

0% opacity from any column dryer with column plate perforation exceeding 2.4mm diameter (0.094 inch) (s. NR 440.47(3)(a)l., Wis. Adm. Code.

The emission limits for all the processes in the rough draft permit are based on the emission rates provided in table 2-7 of the air permit application, dated November 2002 and the air quality modeling analysis performed by the Department based on the emission rates provided in Tables 2-7 of the air permit application dated November 2002.

The PM emissions from the facility's operation (those not subject to NSPS) are subject to the lesser of the two following particulate matter emission limitations:

Under NR 415.05, Wis. Adm. Code, the PM emission limitation for the P31 is either 0.4 per 1000 lbs gas under NR 415.05(l)(o), Wis. Adm. Code, or 3.59(P)⁰⁶² under NR 415.05(2), Wis. Adm. Code.

Didion Milling, Inc., has requested PM/PM10 limits to ensure that emissions from the proposed construction will be below corresponding NR 405 thresholds for PM/PM10; Limiting the potential emissions from the facility's operation effectively restricts emissions below the 100 tons per year NR 405 permitting thresholds for PM and PM-10 respectively.

Also at this emission rate the air quality standards are expected to be protected.

Visible Emissions

The facility will be subject to 20% opacity limits under s. NR 431.05, WAC. Some of the sources that are subject to NSPS have visible emission limits of 0% to 5% opacity depending on the source. (Please see the draft permit)

Boilers B01, B02, BOS will burn natural gas. The heat input capacity of each of the Boilers B01 and B02 is less than 10 mmBtu per hour and the boilers are therefore not subject to s. NR 440.207, Wis. Adm. Code, new source performance standards (NSPS) for small industrial-commercial-institutional steam generating units constructed after June 9, 1989.

The heat input capacity of the Boiler BOS is between 10 mmBtu/hr and 100 mmBtu/hr. Thus this boiler is subject to s. NR 440.207, Wis. Adm. Code, new source performance standards (NSPS) for small industrial-commercial-institutional steam generating units constructed after June 9, 1989.

Also because each boiler was constructed after April 1, 1972, each is subject to s. NR 415.06(2)(a), Wis. Adm. Code, a particulate matter emission limit of 0.15 pounds of particulate matter per million BTU heat input. However, in order to meet the NAAQS for particulate matter, the following limits will be set.

Section NR 431.05, Wis. Adm. Code, also requires an opacity limit of 20% for emission units constructed after April 1, 1972.

There are no specific NO, CO, VOC or lead emission limitations for fuel burning equipment firing natural gas.

NEW SOURCE PERFORMANCE STANDARDS (NSPS) APPLICABILITY

For proposed construction of a source:

1. Is the proposed source in a source category for which there is an existing or proposed NSPS? Yes. Please see the rule applicability.
2. Is the proposed source an affected facility? Yes.

For the proposed modification of an existing source:

1. Is the existing source, which is being modified, in a source category for which there is an existing or proposed NSPS? Not applicable.
2. Is the existing source, which is being modified, an affected facility (prior to modification)? Not applicable.

3. Does the proposed modification constitute a modification under NSPS to the existing source? Not applicable.

4. Will the existing source be an affected facility after modification? Not applicable.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) APPLICABILITY

Part 61 NESHAPS:

J

1. Will the proposed new or modified source emit a pollutant controlled under an existing or proposed NESHAPS? No.

2. Is the proposed new or modified source subject to an existing or proposed NESHAPS?

No

Part 63 NESHAPS:

1. Is the proposed project subject to s. 112(g) of the Clean Air Act? No.

PRECONSTRUCTION MONITORING ANALYSIS

Not Applicable

ADDITIONAL IMPACTS ANALYSIS

Not Applicable

CRITERIA FOR PERMIT APPROVAL

Section 285.63, Wis. Stats., sets forth the specific language for permit approval criteria. The Department finds that:

1. The source will meet emission limitations.

2. The source will not cause nor exacerbate a violation of an air quality standard or ambient air increment.

3. The source is operating or seeks to operate under an emission reduction option. Not Applicable.

4. The source will not preclude the construction or operation of another source for which an air pollution control permit application has been received.

DETERMINATION

The preliminary determination of the DNR Air Management Program is that this project when constructed or modified and operated consistent with the application and subsequent information submitted will be able to meet the emission limits and conditions included in the attached Draft Permit. A final decision regarding emission limits and conditions will be made after the Department has reviewed and evaluated all comments received during the comment period. The proposed emission limits and other proposed conditions in the Draft Permit are written in the same form that they will appear in the construction permit and, where applicable, the operation permit. These proposed conditions may be changed as a result of public comments or further evaluation by the Department.

PERMIT FEE CALCULATION		
FEES:		
1	minor source permit application review (\$2,300)	2,300
2	Review of 15 emission units (\$400 per unit)	6,000
3	The permit application is for a PSD or NAA minor source or minor modification to a major PSD or NAA source whose projected air quality impact requires a detailed air quality modeling analysis. (\$700)	700
4	The permit application is for a source which requires a stack test. (PM and visible emissions)	2,300
5	The application is for a source which requires specific permit conditions to limit the facility potential to emit in order to make the source or modification a PSD, NAA or Part 70 minor source or a PSD or NAA minor modification. (\$2,100)	2,100
TOTAL FEE		13,400
CREDIT(S)		
1	The applicant publishes the newspaper notice (\$150)	150
2	The initial fee submitted with the application (\$1000 or \$500 prior to July 1, 1995)	1,350
TOTAL AMOUNT DUE		11,900

Attachment 1

Attachment 2

Attachment 3

Attachment 4

DRAFT AIR POLLUTION CONTROL CONSTRUCTION PERMIT
DRAFT AIR POLLUTION CONTROL OPERATION PERMIT

EI FACILITY NO. 111081520

PERMIT NOS. 02-RV-166 and 02-RV-166-OP

STACK NO.(S). S01, S08, S10, S11, S12, S14, S15, S16, S17, S21, S22, S24, S25, S26

SOURCE NO.(S). P01, P08, P10, P11, P12, P14, B01, B02, P15, P16, P19, P20, P22, P23, B03

THIS CONSTRUCTION PERMIT EXPIRES EIGHTEEN (18) MONTHS FROM THE DATE OF ISSUANCE OR WHEN THE OPERATION PERMIT IS ISSUED FOR THE EMISSION UNITS INCLUDED IN THIS PERMIT, WHICHEVER COMES FIRST.

THIS OPERATION PERMIT EXPIRES SIXTY (60) MONTHS FROM THE DATE OF ISSUANCE.

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Didion Milling Inc.

Street Address: 501 South Williams Street
Cambria, Wisconsin

Responsible Official & Title: John Didion - President

is authorized to construct and operate a grain elevator/dry corn milling operation described in the plans and specifications dated between November 22, 2002 and May 5, 2004 in conformity with the conditions herein. This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Madison, Wisconsin this ____ day of _____.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By _____ DRAFT

Public Notices and Final permits may be signed by the Air Leaders or by the Permit Unit Supervisors except for PSD or NAA major source permits or for permits where a public hearing has been held. These permits will continue to be signed by Don Theiler. The signature block selected here will be used on the public notice and on the draft and final permit pages. If a permit is to be signed by Don Theiler, Don's signature may be inserted in place of the supervisor's signature on the final permit page.

The merge command in WPWin 6.0 is Alt-Enter (Endfield) if you are using the WPW6.x keyboard. In WP 5.1/5.2, the merge/endfield command is designated by the F9 key. Dean Packard, Supervisor
South Central Region Air Management Program

Note: Part II contains general requirements for all stationary sources. Part II is not attached to the Draft Permit and is available upon request.

PART I
APPLICABLE LIMITATIONS AND REQUIREMENTS

A. P01/S01 – North Truck/Rail Unload Building Filter: Grain Receiving

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	<p>(1) The emissions may not exceed 0.55 lb/hr of PM and PM₁₀ from the baghouse stack S01.¹ [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p> <p>(2) The emissions may not exceed 0.010 grains per dry standard cubic foot of exhaust from S01. [s. NR 440.47(3)(b)1., Wis. Adm. Code]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the PM & PM₁₀ emission limit when process P01 is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test (s). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site; (d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and

A. P01/S01 - North Truck/Rail Unload Building Filter: Grain Receiving [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
-----------	----------------	-----------------------------	---

¹ 1 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

<p>2. Visible Emissions</p>	<p>(1) The permittee may not discharge from S01, P01 into the atmosphere any gases which exhibit greater than 0% opacity to meet NSPS. [s. NR 440.47 (3)(b)2., Wis. Adm. Code]</p>	<p>(5) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65 (3), Wis. Stats.]</p> <p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.A.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) During normal operations, the requirements in I.A.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1) (d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.A.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
<p>3. Fugitive Emissions (non stack)</p>	<p>(1) The permittee may not discharge from P01 into atmosphere any gases which exhibit greater than 5% opacity. [s. NR 440.47 (3)(c)1., Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.A.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) During normal operations, the requirements in I.A.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.A.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

B. P08/S08 - Mill Truck Bulk Loadout Building Filter: Product Loadout

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 0.10 lb/hr of PM and PM₁₀ from the baghouse stack S08.²</p> <p>[s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site; (d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and

B. P08/S08 - Mill Truck Bulk Loadout Building Filter: Product Loadout [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
-----------	----------------	-----------------------------	---

² 2 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

<p>2. Visible Emissions</p>	<p>(1) The permittee may not discharge from S08, P08 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) During normal operations, the requirements in I.B.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.B.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
-----------------------------	--	---	--

C. P10/S10 - South Filters: Grain Milling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	<p>(1) The emissions may not exceed 1.23 lbs/hr of PM and PM₁₀ from the baghouse stack S10.³ [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

C. P10/S10 – South Filters: Grain Milling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING

³ 3 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

<p>2. Visible Emissions</p>	<p>(1) The permittee may not discharge from S10, P10 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) During normal operations, the requirements in I.C.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.C.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
-----------------------------	---	--	--

D. P11/S11 – North Filters: Grain Milling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	<p>(1) The emissions may not exceed 1.23 lb/hr of PM and PM₁₀ from the baghouse stack S11.⁴ [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

D. P11/S11 – North Filters: Grain Milling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING

⁴ *4 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

<p>2. Visible Emissions</p>	<p>(1) The permittee may not discharge from S11, P11 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(5) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process P11 or P12, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.D.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) During normal operations, the requirements in I.D.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.D.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
-----------------------------	---	--	---

E. P12/S12 – Mill Bins Transfer Filter – Baghouse for areas that transfers milled product to product storage bins

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 0.22 lb/hr of PM and PM₁₀ from the baghouse stack S12.⁵ [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

⁵ *5 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

E. P12/S12 – Mill Bins Transfer Filter – Baghouse for areas that transfers milled product to product storage bins [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from S12, P12 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process P12 or P11, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(1) During normal operations, the requirements in I.E.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.E.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

F. P14/S14 – RCPF Hammermill Filter – Grain Milling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 0.17 lb/hr of PM and PM₁₀ from the baghouse stack S14⁶. [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055 (5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

⁶ *6 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

F. P14/S14 – RCPF Hammermill Filter – Grain Milling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from S14, P14 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process P14, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(1) During normal operations, the requirements in I.F.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.F.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

G. P15/S17 – South Truck Unload/Loading Building Filter: Grain Receiving

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 0.55 lb/hr of PM and 0.55 lb/hr of PM₁₀ from the baghouse stack S15.⁷ [s. NR 415.05 (1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65 (3), Wis. Stats.]</p> <p>(2) The emissions may not exceed 0.010 grains per dry standard cubic foot of exhaust from stack S15. [s. NR 440.47(3)(b)1., Wis. Adm. Code]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the PM & PM₁₀ emission limit when process P15 is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

G. P15/S17 - South Truck Unload/loading Building Filter: Grain Receiving [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
		<p>(5) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p>

⁷ 7 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

G. P15/S17 - South Truck Unload/loading Building Filter: Grain Receiving [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from S15, P15 into the atmosphere any gases which exhibit greater than 0% opacity to meet NSPS. [s. NR 440.47(3)(b)2., Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.G.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) During normal operations, the requirements in I.G.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.G.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions (non stack)	<p>(1) The permittee may not discharge from P15 into atmosphere any gases which exhibit greater than 5% opacity. [s. NR 440.47 (3)(c)1., Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.G.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) During normal operations, the requirements in I.G.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.G.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

H. P19/S21 – Mill flour operations Filter– Grain Milling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 1.23 lb/hr of PM and PM₁₀ from the baghouse stack S21⁸. [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65 (3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055(5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site; (d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and (e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]

⁸ *8 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

H. P19/S21 – Mill flour operation filter – Grain Milling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from S21, P19 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process P16, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(1) During normal operations, the requirements in I.H.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.H.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

I. P20/S22 – Mill/Germ Recovery/Toasting/Grinding Filter – Grain Milling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 1.23 lb/hr of PM and PM₁₀ from the baghouse stack S22⁹. [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p>	<p>(1) The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The facility shall install, calibrate, operate and maintain the instrumentation necessary to monitor the pressure drop across the baghouse. [s. NR 439.055(1) and (4), Wis. Adm. Code]</p> <p>(3) The pressure drop across the baghouse shall be maintained within the range of 2.0-5.0 inches of water column. [s. 285.65(3), Wis. Stats.]</p> <p>(4) The baghouse shall be inspected once per month for any leaks or tears. [s. NR 439.055 (5), Wis. Adm. Code and s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The facility shall monitor and record the pressure drop across the baghouse at least once for each 8 hours of operation of any process or once per day of operation, whichever yields the greater number of measurements. [s. NR 439.055(2)(b)1., Wis. Adm. Code]</p> <p>(3) The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the baghouse. This plan shall include the following:</p> <ul style="list-style-type: none"> (a) installation, maintenance and routine calibration procedures for the control equipment instrumentation; (b) a requirement that instrumentation calibration shall take place at the frequency specified by the manufacturer but not less than once per year plus an inspection and/or calibration whenever instrumentation anomalies are noted; (c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;

⁹ *9 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

I. P20/S22 – Mill/Germ Recovery/Toasting/Grinding Filter – Grain Milling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from S21, P19 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) During normal operations, the requirements in I.I.1.b.(1)-(3) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</p> <p>(e) a requirement that a copy of the plan shall be kept at the plant and shall be updated once every other year. [s. NR 439.11, Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the baghouse. These records shall include the date of action and a description of any corrective actions taken. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.I.1.c.(2)&(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>

J. P22, S24A, S24B, S24C, S24D, S24E, Raw Grain Storage Silos – Grain Storage and Grain Handling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	<p>(1) The emissions may not exceed 0.72 lb/hr of PM and 0.058 lb/hr of PM₁₀ from each of the stacks S24A, S24B and the emissions may not exceed 0.67 lb/hr of PM and 0.054 lb/hr of PM₁₀ from each of the stacks S24C, S24D, S24E.¹⁰ [s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05 (2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.]</p> <p>(2) The emissions may not exceed 0.010 grains per dry standard cubic foot of exhaust from each of the stacks S24A, S24B, S24C, S24D and S24E. [s. NR 440.47(3)(b)1., Wis. Adm. Code]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the PM & PM₁₀ emission limit when process P22, S24A or P23, S25A, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) The permittee shall demonstrate compliance with the hourly emission rates using maximum throughputs and AP-42 emission factors. [s. 285.65 (3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The permittee shall keep the following records:</p> <p>(a) Maximum silo/bin capacities and maximum throughputs in tons.</p> <p>(b) AP-42 emissions factor. [s. 285.65(3), Wis. Stats.]</p>

¹⁰ 10 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

J. P22, S24A, S24B, S24C, S24D, S24E, Raw Grain Storage Silos – Grain Storage and Grain Handling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from each stack S24A, S24B, S24C, S24D and S24E into the atmosphere any gases which exhibit greater than 0% opacity to meet NSPS. [s. NR 440.47(3)(b)2., Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.J.1.b.(1). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>
3. Fugitive Emissions (non stack)	<p>(1) The permittee may not discharge from process P22 into atmosphere any gases which exhibit greater than 0% opacity. [s. NR 440.47 (3)(c)2, Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.J.1.b.(1). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>

K. P23, S25A – S25AO, Product in Process Bins and Grain Handling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 0.078 lb/hr of PM and 0.006 lb/hr of PM₁₀ from each of the stacks S25A – S25F, S25K, S25L and the emissions may not exceed 0.044 lb/hr of PM and 0.003 lb/hr of PM₁₀ from each of the stacks S25G – S25J and the emissions may not exceed 0.12 lb/hr of PM and 0.009 lb/hr of PM₁₀ from each of the stacks S25M – S25AG and the emissions may not exceed 0.003 lb/hr of PM and 0.0002 lb/hr of PM₁₀ from each of the stacks S25AI – S25AO and the emissions may not exceed 0.012 lb/hr of PM and 0.0009 lb/hr of PM₁₀ from the stack S25AH.</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the PM & PM₁₀ emission limit when process P23, S25A, or P22, S24 is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(2) The permittee shall demonstrate compliance with the hourly emission rates using maximum throughputs and AP-42 emission factors. [s. 285.65 (3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The permittee shall keep the following records: (c) Maximum silo/bin capacities and maximum throughputs in tons. (d) AP-42 emissions factor. [s. 285.65(3), Wis. Stats.]</p>

K. P23, S25A – S25AO, Product in Process Bins and Grain Handling

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
	<p>[s. NR 415.05(1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65(3), Wis. Stats.].¹¹</p> <p>(2) The emissions may not exceed 0.010 grains per dry standard cubic foot of exhaust from Stacks for bins/silos storing dried grain. [s. NR 440.47(3)(b) 1., Wis. Adm. Code] Note 1</p>		

Note 1: These are the only bins/silos subject to NSPS under s. NR 440.47, Wis. Adm. Code.

¹¹ *11 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

K. P23, S25 , (S25A – S25AO), Product in Process Bins and Grain Handling [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>2. Visible Emissions from the stack and non stack for stacks subject to NSPS</p>	<p>(1) The permittee may not discharge from each stack S into the atmosphere any gases which exhibit greater than 0% opacity to meet NSPS. [s. NR 440.47(3)(b)2., Wis. Adm. Code; s. NR 440.47(3)(c)2., Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.K.1.b.(1). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>
<p>3. Visible Emissions from the stacks not subject to NSPS</p>	<p>(1) The permittee may not discharge from each stack into atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p>	<p>(1) A visible emissions compliance test shall be performed simultaneous with the PM & PM₁₀ emissions test required in I.K.1.b.(1). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>

L. P16, F18, Grain Dryer No. 3

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p>	<p>(1) The emissions may not exceed 9.39 lb/hr of PM and 2.39 lb/hr of PM₁₀ from F18.¹² [s. NR 415.05 (1)(n), Wis. Adm. Code and s. NR 415.05(2), Wis. Adm. Code, and s. 285.65 (3), Wis. Stats.]</p>	<p>(1) For any column dryer with column perforation exceeding 2.4 mm diameter (0.94 inch), compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process P16, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p>

¹² 12 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

L. P16, F18, Grain Dryer No. 3 [CONTINUED]

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p>(1) The permittee may not discharge from P16, F18 into the atmosphere any gases which exhibit greater than 0% opacity from any column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch) to meet NSPS. [s. NR 440.47(3)(a)1., Wis. Adm. Code]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the visible emission limit when process #P16, is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. If the compliance emission tests cannot be conducted within 90 days after the start of initial operation, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test (s). [s. NR 439.07(1), Wis. Adm. Code]</p>	<p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>

M. **B01, S15, Boiler No. 1**

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM₁₀ Emissions</p> <p>2. Visible Emissions</p>	<p>(1) The emissions may not exceed 0.064 lb/hr of PM and PM₁₀ from S15.¹³ [s. 285.65(3), Wis. Stats.]</p> <p>(1) The permittee may not discharge from B01, S15 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05., Wis. Adm. Code]</p>	<p>(1) The permittee shall determine the hourly emission rate using fuel consumption record and AP-42 emission factor. [s. 285.65(3), Wis. Stats.]</p> <p>(2) The permittee may fire only natural gas. [s. 285.65(3), Wis. Stats.]</p> <p>(1) The permittee may fire only natural gas in the boilers. [s. 285.65(3), Wis. Stats.]</p>	<p>(1) Whenever compliance emission testing for PM & PM₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code]</p> <p>(2) The permittee shall retain on site plans, and specifications that indicate the boiler's fuel design capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>

¹³ *13 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.*

N. B02, S16, Boiler No. 2

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	(1) The emissions may not exceed 0.048 lb/hr of PM and PM ₁₀ from S16. ¹⁴ [s. 285.65(3), Wis. Stats.]	(1) The permittee shall determine the hourly emission rate using fuel consumption record and AP-42 emission factor. [s. 285.65(3), Wis. Stats.] (2) The permittee may fire only natural gas. [s. 285.65(3), Wis. Stats.]	(1) Whenever compliance emission testing for PM & PM ₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code] (2) The permittee shall retain on site plans, and specifications that indicate the boiler's fuel design capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code]
2. Visible Emissions	(1) The permittee may not discharge from B02, S16 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05., Wis. Adm. Code]	(1) The permittee may fire only natural gas in the boilers. [s. 285.65(3), Wis. Stats.]	(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]

¹⁴ 14 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

O. B03, S26, Boiler No. 3

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM ₁₀ Emissions	(1) The emissions may not exceed 0.15 lb/hr of PM and PM ₁₀ from S26. ¹⁵ [s. 285.65(3), Wis. Stats.]	(1) The permittee shall determine the hourly emission rate using fuel consumption record and AP-42 emission factor. [s. 285.65(3), Wis. Stats.] (2) The permittee may fire only natural gas. [s. 285.65(3), Wis. Stats.]	(1) Whenever compliance emission testing for PM & PM ₁₀ is required, USEPA Method 5, including backhalf (Method 202) shall be used to demonstrate compliance or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(1m), Wis. Adm. Code] (2) The permittee shall retain on site plans, and specifications that indicate the boiler's fuel design capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code]
2. Visible Emissions	(1) The permittee may not discharge from B03, S26 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05., Wis. Adm. Code]	(1) The permittee may fire only natural gas in the boilers. [s. 285.65(3), Wis. Stats.]	(1) Whenever compliance testing is required, USEPA Method 9 shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]

¹⁵ 15 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM₁₀. This restriction also ensures that this project is minor under Part 70 and PSD.

P. Conditions Specific to the Construction Permit

CONDITION TYPE	a. SPECIFIC CONDITIONS
1. Compliance Testing	<p>(1) Whenever stack testing is required:</p> <p>(a) The Department shall be informed at least 20 working days prior to any stack testing so a Department representative can witness the testing. At the time of notification a compliance emission test plan shall also be submitted to the Department for approval. When approved by the department, another USEPA approved Method may be substituted for the recommended test method. [s. NR 439.07(2), Wis. Adm. Code]</p> <p>(b) Two copies of the report on the tests shall be submitted to the Department for evaluation within 60 days following the tests. [s. NR 439.07(9), Wis. Adm. Code]</p>

P. Conditions Specific to the Construction Permit

CONDITION TYPE	a. SPECIFIC CONDITIONS
2. Construction Progression	<p>(1) The permittee shall inform the Wisconsin Department of Natural Resources, South-central Region Air Program, South Central Regional, Reedsberg Service Center, 344 S. Willow Street, Reedsburg, WI 53959 in writing of the completion of specific stages of construction for the emissions unit covered in this permit. The permittee shall submit a notice of the following:</p> <p>(a) Notice of commencing construction shall be submitted within 15 days of the start of construction.</p> <p>(b) Notice of intent to initially operate the source(s) covered by this permit, 30 days prior to the anticipated date of initial operation.</p> <p>(c) Notice of the actual date of initial startup shall be submitted within 15 days of the initial startup.</p> <p>[s. NR 439.03(1), Wis. Adm. Code]</p>
3. Expiration of the Construction Permit	<p>(1) This construction permit expires 18 months after the date of issuance. Construction or modification and an initial operation period for equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit conditions is authorized for each emissions unit covered in this permit. Please note that the sources covered by this permit are required to meet all emission limits and conditions contained in the permit at all times, including during the initial operation period. If 18 months is an insufficient time period for construction or modification, equipment shakedown, testing and Department evaluation of operation, the permit holder may request and the Department may approve in writing an extension of this permit. [ss. 285.65(1)(a)2 and 285.66(1), Stats.]</p>
4. Stack Parameters	<p>(1) The stack height for the stacks shall be as listed in the attached table.</p> <p>(2) The stack inside diameter at the outlet for the stacks shall be as listed in the attached table.</p> <p>(3) The facility shall keep and maintain on site technical drawings, blueprint or equivalent records of the physical stack parameters. [s. NR 439.06(3)(a), Wis. Adm. Code]</p>
5. Completion of Operation Permit Application	<p>(1) Compliance information required to complete the Operation Permit for the emission units included in this permit shall be submitted to the DNR at least 4 months prior to the expiration of the Construction Permit. Operation of the source(s) covered by this permit after this permit expires is prohibited until an operating permit for the source(s) has been issued by the Department. [s. 285.60(1)(b)1., Wis. Stats.]</p>

P. Conditions Specific to the Construction Permit

CONDITION TYPE	a. SPECIFIC CONDITIONS	b. COMPLIANCE DEMONSTRATION
<p>6. Reporting</p>	<p>(1) The facility shall submit periodic reports upon the issuance of the operation permit. [s. NR 407.09(1)(c)3., Wis. Adm. Code]</p>	<p>(1) Submit to the Wisconsin Department of Natural Resources, South-central Region Air Program, South Central Regional, Reedsberg Service Center, 344 S. Willow Street, Reedsburg, WI 53959, a report detailing the results of the recordkeeping and/or monitoring required to demonstrate compliance, as described in section D. of Part II of this permit. This report shall be submitted by March 1, for the previous January 1 through December 31, for each year the operation permit is in effect. [s. NR 439.03(1)(b) and (2), Wis. Adm. Code]</p> <p>(2) Submit certification of compliance with state and federal air regulations to the Department of Natural Resources, South-central Region Air Program, South Central Regional, Reedsberg Service Center, 344 S. Willow Street, Reedsburg, WI 53959, by March 1, for the period from January 1 to December 31 of the previous year, of each year the permit is in effect. The content of the submittal is described in section N. of Part II of this permit. [s. NR 439.03(1)(c), Wis. Adm. Code]</p>

DIDION MILLING – CAMBRIA
Stack Parameters

ID	LOCATION (M)	HEIGHT (M)	DIAM (M)	VELOCITY (M/S)	TEMP (K)
S01	157, 46	9.75	0.49	20.21	294.0
S08	81, 49	9.75	0.49	3.79	294.0
S10	74, 26	25.60	0.88	13.97	305.0
S11	80, 26	25.60	1.22	7.28	305.0
S12	83, 36	29.26	0.31	20.67	294.0
S14	149, 22	38.40	0.31	16.15	305.0
S15	95, 23	9.14	0.41	0.1	416.4
S16	95, 19	9.14	0.41	0.1	416.4
S17	162, -27	30.48	0.50	19.24	305.0
S21	79, 14	28.04	0.61	29.11	305.0
S22	84, 19	28.04	0.76	18.63	305.0
S24A	130, -5	36.60	0.61	30.56	294.0
S24B	150, -5	36.60	0.61	30.56	294.0
S24C	178, -5	36.60	0.61	30.56	294.0
S24D	194, -5	36.60	0.61	30.56	294.0
S24E	211, -5	36.60	0.61	30.56	294.0
S25A	97, -2	36.60	0.61	19.56	294.0
S25B	111, -2	36.60	0.61	19.56	294.0
S25C	97, -16	36.60	0.61	19.56	294.0
S25D	111, -16	36.60	0.61	19.56	294.0
S25E	97, -29	36.60	0.61	19.56	294.0
S25F	111, -29	36.60	0.61	19.56	294.0
S25G	133, 34	36.60	0.61	11.00	294.0
S25H	148, 34	36.60	0.61	11.00	294.0
S25I	136, 18	36.60	0.61	11.00	294.0
S25J	148, 18	36.60	0.61	11.00	294.0
S25K	162, 34	36.60	0.61	19.56	294.0

DIDION MILLING - CAMBRIA
Stack Parameters

ID	LOCATION (M)	HEIGHT (M)	DIAM (M)	VELOCITY (M/S)	TEMP (K)
S25L	162, 20	36.60	0.61	19.56	294.0
S25M	178, 31	36.60	0.61	30.56	294.0
S25N	195, 31	36.60	0.61	30.56	294.0
S25O	212, 31	36.60	0.61	30.56	294.0

S25P	229, 31	36.60	0.61	30.56	294.0
S25Q	247, 31	36.60	0.61	30.56	294.0
S25R	264, 31	36.60	0.61	30.56	294.0
S25S	282, 31	36.60	0.61	30.56	294.0
S25T	300, 31	36.60	0.61	30.56	294.0
S25U	178, 14	36.60	0.61	30.56	294.0
S25V	195, 14	36.60	0.61	30.56	294.0
S25W	212, 14	36.60	0.61	30.56	294.0
S25X	229, 14	36.60	0.61	30.56	294.0
S25Y	247, 14	36.60	0.61	30.56	294.0
S25Z	264, 14	36.60	0.61	30.56	294.0
S25AA	282, 14	36.60	0.61	30.56	294.0
S25AB	300, 14	36.60	0.61	30.56	294.0
S25AC	229, -5	36.60	0.61	30.56	294.0
S25AD	247, -5	36.60	0.61	30.56	294.0
S25AE	264, -5	36.60	0.61	30.56	294.0
S25AF	282, -5	36.60	0.61	30.56	294.0
S25AG	300, -5	36.60	0.61	30.56	294.0
S25AH	143, 26	36.60	0.61	3.07	294.0
S25AI	143, 28	36.60	0.61	0.80	294.0
S25AJ	147, 27	36.60	0.61	0.80	294.0
S25AK	147, 26	36.60	0.61	0.80	294.0
S25AL	144, 22	36.60	0.61	0.80	294.0
S25AM	141, 27	36.60	0.61	0.80	294.0
DIDION MILLING - CAMBRIA Stack Parameters					
ID	LOCATION (M)	HEIGHT (M)	DIAM (M)	VELOCITY (M/S)	TEMP (K)
S25AN	141, 27	36.60	0.61	0.80	294.0
S25AO	144, 39	36.60	0.61	0.80	294.0
S26	95, 14	9.14	0.41	5.86	416.5
Volume Source					
ID	LOCATION (M)	HEIGHT (M)	SIGMA Y (M)	SIGMA Z (M)	
F18	168, 5	26.21	1.77	6.10	

Note: Stacks S01, S08, S15, S16, S17, S21, S22, S24A-S24E, S25A-S25F, S25M-S25AG, S26, and F18 consume PM₁₀, SO₂, and NO_x increment

BEFORE THE DEPARTMENT OF NATURAL RESOURCES AIR MANAGEMENT PROGRAM

Wisconsin Department of Natural Resources Air Pollution Control Permit Preliminary Analysis on an Air Pollution Control Permit to construct and operate at Cambria, Wisconsin.

Air Pollution Construction Permit Nos. 02-RV-166 and 02-RV-166-OP

Didion Milling Inc., 510 South Williams Street, Cambria, WI has submitted to the Department of Natural Resources (DNR) an air pollution control permit application to construct and operate a grain elevator/dry corn milling operation located at 501 South William Street, Cambria, Columbia County, WI.

The Bureau of Air Management of the Department has analyzed these materials and has made a preliminary determination that construction and the initial operation of this air pollution source should meet applicable criteria for permit approval as stated in secs. 285.63 and 285.64, Wis. Stats., including both the emissions limits and the ambient air standards and that the application is approvable. These preliminary determinations does not constitute approval from the Air Management Program or any other DNR sections which may also require a review of the project.

The DNR hereby solicits written comments from the public regarding the preliminary determinations to approve the construction and an operation permit. These comments will be considered in the DNR's final decisions regarding this modification and operation. Information, including the draft permit and the DNR's preliminary analysis regarding this renewal, is available for public inspection at the Department of Natural Resources Bureau of Air Management Headquarters, Seventh Floor, 101 South Webster, Madison, Wisconsin, the and at the South Central Regional, Reedsberg Service Center, 344 S. Willow Street, Reedsburg, WI 53959 and at Jane Morgan Memorial Library, 109 W. Edgewater Street, Cambria, WI 53923, or contact Raj Vakharia, Permit Review Engineer at (608) 267-2015. This information is also available for downloading from the internet using a World Wide Web browser at: http://www.dnr.state.wi.us/org/aw/air/permits/APM_toc.Htm.

Interested persons wishing to comment on the preliminary determinations should submit written comments within 30 days to: Wisconsin Department of Natural Resources, Bureau of Air Management, 101 S. Webster Street, Madison, WI 53705, Attn: Raj Vakharia.

A public hearing may be requested by individuals if the preliminary determination is of significant concern to them. The request for hearing should indicate the interest of the party filing the request and reasons why a hearing is warranted. The Department may then hold a public hearing if it determines that there is a significant public interest in holding a hearing.

Reasonable accommodation, including the provision of informational material in an alternative format, will be provided for qualified individuals with disabilities upon request.

Dated at Madison, Wisconsin on July 8, 2004.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By /s/ Jeffrey C Hanson for Dean Packard
Dean Packard, Supervisor
South Central Region Air Management Program

July 8, 2004

FILE CODE: 4560
FID # : 111081520
PERMIT #: 02-RV-166 and 02-RV-166-OP

John Didion
Didion Milling Inc.
501 South Williams Street
Cambria, WI 53923

Dear Mr. Didion:

The Bureau of Air Management of the Department of Natural Resources has preliminarily reviewed the air pollution control permit application regarding the proposed construction and operation of a grain elevator/dry corn milling operation located in Cambria, Wisconsin.

The Bureau of Air management has prepared an analysis of the proposed projects and has made a preliminary determination that it is approvable. The proposed permit limitations and conditions are included in the attached Draft Permit.. The estimate of the fees that will be charged when the modification permit is issued is as follows:

PERMIT FEE CALCULATION		
FEES:		
1	Minor source permit application review (\$2,300)	2,300
2	Review of 15 emission units (\$400 per unit)	6,000
3	The permit application is for a PSD or NAA minor source or minor modification to a major PSD or NAA source whose projected air quality impact requires a detailed air quality modeling analysis. (\$700)	700
4	The permit application is for a source which requires a stack test. (PM and visible emissions)	2,300
5	The application is for a source which requires specific permit conditions to limit the facility potential to emit in order to make the source or modification a PSD, NAA or Part 70 minor source or a PSD or NAA minor modification. (\$2,100)	2,100
TOTAL FEE		13,400
CREDIT(S)		
1	The applicant publishes the newspaper notice (\$150)	150
2	The initial fee submitted with the application (\$1000 or \$500 prior to July 1, 1995)	1,350
TOTAL AMOUNT DUE		11,900

This is only an estimate of the application fee. This could be changed as a result of further work being required on the application prior to issuing the permit or due to issuance after the effective date of the current s. NR

410.03, Wis. Adm. Code. When you receive your construction permit you will receive the final bill for the application fee.

The Department will now accept public comments on the proposed project as required by ss. 285.61(6) and (7) and 285.62(4) and (5), Wis. Stats. Comments will be received for 30 days after publication of a Class I Legal notice. Please review the Draft Permits and provide your comments within the same 30-day period.

The public input, if any, will also be reviewed to note if significant public interest in the project exists and whether a public hearing is warranted. If a hearing is warranted, it would be held within 60 days from the end of the public comment period. Finally, all public input will be used to render a final decision within another 60 days unless compliance with Wisconsin's Environmental Policy Act requires a longer time.

Please be advised that this is only a preliminary determination. If you have any questions regarding this matter, please feel free to contact me at 608-267-2015.

Sincerely,

/s/ Raj Vakharia

Raj Vakharia, Review Engineer
Permits & Stationery Source Modeling Section
Air Management Engineer

Attachments

cc: Mike Sloat, SCR, Reedsburg Service Center, P.O. Box 281, Reedsburg, WI 53959

FILE CODE: 4560-1
FID #: 111081520
PERMIT #: 02-RV-166 and 02-RV-166-OP

Jane Morgan Memorial Library
109 W. Edgewater Street
Cambria, WI 53923

Dear Librarian:

By Wisconsin law, the Department of Natural Resources is required to allow thirty (30) days of public comment, starting on the day of public notice, on draft air pollution modification and operation permits. In addition, the public notices related to such permits are sent to a public library located in the area of the facility requesting the permit.

Enclosed is the public notice, the preliminary determination and the draft permit for Didion Milling Inc., located in Columbia County, Wisconsin. Please retain these documents in the library for sixty (60) days for public viewing. Thank you.

Sincerely,

/s/ Raj Vakharia

Raj Vakharia, Review Engineer
Permits & Stationary Source Modeling Section
Air Management Engineer

cc: Mike Sloat, SCR, Reedsburg Service Center, P.O. Box 281, Reedsburg, WI 53959

