

March 28, 2005

File Code: 4560

FID# 111081520

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

Dale Dranchenberg  
V.P. Operation  
Didion Milling Inc.  
501 South Williams Street  
Cambria, WI 53923

Re: Didion Milling Inc., Cambria, Wisconsin. Draft Permit Comments on Permit 02-RV-166 and 02-RV-166-Op.

Dear Mr. Dranchenberg:

The Department has received and reviewed the comments submitted by RSV Engineering, Inc., dated March 17, 2005, on the proposed draft permit. The Department has also received and reviewed the additional information submitted by you, on March 23, 2005 via e-mail. This letter summarizes the Department's response to Didion's comments.

Comment #1: NSPS does not apply to the North truck/rail unloading building filter, P01, S01. Eliminate/modify the following conditions from the final permit.

- Condition A.1.b.(4) – Compliance (stack) emission testing for P01, S01
- Condition A.2.b.(1) – Visible emission compliance testing for P01, S01

[Reason: Didion will monitor the pressure drop range pursuant to s. NR 439.055(1), Wis. Adm. Code. Didion believes monitoring the pressure drop range will assure compliance with permit emission and opacity limits.]

- Modify condition A.2.a.(1) from visible emission opacity limit of 0% to 20% for P01, S01
- Eliminate all of condition A.3. – fugitive emission opacity requirements for P01, S01

[Reason: Didion believes NSPS does not apply because no modification occurred under NSPS]

Response: Didion provided additional information to the Department on March 22, 2005 that indicates that Didion did not add any new equipment or replacement grain handling equipment and did not add the ability to unload grain to additional silos/bins. The north truck/rail unload pit was constructed in 1990 to unload grain to silos/bins 106 and W1-E8. In 2003 Didion constructed an enclosure as well as a baghouse to reduce fugitive emissions.

Here is my understanding of Process P01. The process (P01) includes rail car unloading and truck unloading operations. There were two dumping areas prior to 1999. One for the truck unloading and another for the railcar unloading. It is not very clear to me based on your response (3/23/2005) that both the rail car unloading and truck unloading areas are now enclosed and the exhaust from both these enclosures are also being controlled by the baghouse (S01).

Based on your response (3/23/2005), I am assuming that Didion:

- has constructed enclosures at the rail car unloading area
- is exhausting the emissions from the railcar unloading to the baghouse S01
- has not added any new equipment or replacement grain handling equipment at the rail car unloading
- did not add the ability to unload grain to additional silos/bins also from the rail car unloading operations.

If this is true then the Department concludes that NSPS does not apply to P01, S01. A condition in the final permit will require Didion to unload grain from trucks and railcars to silos/bins 1 - 6 and W1 – E8 only.

Process P01, S01 is still subject to ss. NR 415.04, NR 415.05 and NR 431.05, Wis. Adm. Code requirements.

The PM/PM10 emission limits established in the draft permit is to ensure that the process P01, S01 meets the NR 415 requirements and to ensure that the project is minor under Part 70 and PSD programs and also to ensure that the national ambient air quality standards for PM10 will be attained and maintained.

The Department has issued permits, to facilities that have processes that are not subject to NSPS, in which:

- Compliance (stack) emission testing and visible emissions compliance testing has been required for truck/rail unloading operations and
- Appropriate limits and conditions have been established for fugitive dust control under s. NR 415.04, Wis. Adm. Code from the facility's operation.

In order to ensure that the Process P01, S01 will meet the PM/PM10 emission limit, compliance (stack) emission testing and visible emissions compliance testing under conditions A.1.b.(4) and A.2.b.(1) will be required in the final permit. Initial compliance emission test is required by the Department to determine compliance with the emission limitations. Monitoring of the pressure drop range for the baghouse is required to monitor the operation of the source and the baghouse during normal operation. The North truck/rail unloading operation is also subject to fugitive emissions requirements under s. NR 415, Wis. Adm. Code. Condition A.2.a.(1) in the permit will be revised to reflect the following requirements.

### Part I. Applicable Limitations

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

Pollutant	a. Limitations	b. Compliance Demonstration	c. Test Methods, Recodkeeping and Monitoring
3. Fugitive Emissions	(1) No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]	(1) The permittee shall comply with the requirements established in I.Q.2.a.(1) for demonstrating compliance with the limitations in I.A.3. (a)(1) [s. 285.65(3), Wis. Stats.]	(1) The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recodkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]

Note: I. Q. 2. of the final permit covers requirements for Source of Fugitive Dust – Total Facility. I have included the proposed final permit as part of attachment to this letter.

Note: If the rail car unloading area is not enclosed then please explain the railcar unloading process and how the emissions are controlled? Also if the grain from the railcar will be unloaded to silos/bins other than silos/bins #s 1-6 and W1 - E8 then please provide this information as soon as possible. If any changes did occur for the railcar unloading operation then please provide this information as soon as possible. If changes did take place then the Department will have to review this information to ensure that NSPS does not apply to the railcar unloading operation and also to make sure the limits and conditions established in the proposed draft final permit are still valid.

Comment #2: NSPS does not apply to P11 (S11) North Filters, P12 (S12) Mill Bins Transfer Filter - Baghouse, P14 (S14) RCPF Hammermill Filter, P19(S21) Mill Operations Filter. Eliminate the following compliance (stack) emission testing and visible emissions compliance testing conditions from the final permit.

- Condition D.1.b.(5) – Compliance (stack) emission testing for P11, S11
- Condition D.1.b.(1) – Visible emission compliance testing for P11, S11
- Condition E.1.b.(5) – Compliance (stack) emission testing for P12, S12
- Condition F.1.b.(5) – Compliance (stack) emission testing for P14, S14
- Condition H.1.b.(5) – Compliance (stack) emission testing for P19, S21

[Reasons: Didion will monitor the pressure drop range pursuant to s. NR 439.055(1), Wis. Adm. Code.

Didion believes monitoring the pressure drop range will assure compliance with permit emission and opacity limits.].

Response: The Department's review (Preliminary Determination dated July 8, 2004) did not conclude that the processes P11 (S11) North Filters, P12 (S12) Mill Bins Transfer Filter - Baghouse, P14 (S14) RCPF Hammermill Filter, P19(S21) Mill Operations Filter were subject to NSPS requirements. The Department's review concluded that these processes are subject to ss. NR 415.04, NR 415.05 and NR 431.05, Wis. Adm. Code requirements. The PM/PM10 emission limits established in the draft permit is to ensure that the processes meet the s. NR 415 requirements and to ensure that the project is minor under Part 70 and PSD programs and also to ensure that the national ambient air quality standard for PM<sub>10</sub> will be attained and maintained.

The Department has issued permits, to facilities that have processes that are not subject to NSPS, in which compliance (stack) emission testing and visible emissions compliance testing has been required for grain and product material handling operations. The Department has also issued permits where appropriate limits and conditions have been established for fugitive dust control from the facility's operation.

During our meeting on March 18, 2005 we discussed the need for compliance (stack) emission testing. Initial compliance emission test is required by the Department to determine compliance with the emission limitations. Monitoring of the pressure drop range for the baghouse is required to monitor the operation of the source and the baghouse during normal operation.

We also discussed that several processes at Didion may be accessible to perform the stack test than the ones identified in the proposed draft permit. I suggested that Didion propose processes, (for compliance stack emission testing if the stack testing is still required by the Department in the final permit), that contribute the largest predicted amount of particulate matter in the modeling results. In your letter dated March 22, 2005 you identified Processes #s P11, S11, North filters, P10, S10, South filters and P20, S22 Mill/germ recovery/toasting/grinding filter as the ones contributing the largest predicted amount of particulate matter in the modeling results. You also suggested that if any process stacks require compliance stack testing in the permit, two of these three Processes P11, P10, P20 would be most logical. Thus the final permit will have compliance (stack) testing and compliance visible emissions testing requirements included for the processes P11 and P20. The Department in its final permit will not require compliance (stack) emission testing on Processes P12, P14, and P19.

Processes P11 (S11) North Filters, P12 (S12) Mill Bins Transfer Filter - Baghouse, P14 (S14) RCPF Hammermill Filter, P19(S21) Mill Operations Filter are subject to fugitive emissions requirements under s. NR 415.04, Wis. Adm. Code. Thus the final permit when issued will have fugitive dust emission requirements for these processes similar to the requirements established for the North Truck/Rail unloading building filter, P01, S01. Please see my response to comment #1.

Comment #3: DMI is continuing to evaluate whether P15, S17, South Truck Unload is subject to NSPS or not. At the present time no further comments are provided.

Response: The Department believes that South Truck Unload, P15/S17 is subject to NSPS and the limits and conditions established in the draft permit will remain unchanged. Also South Truck Unload, P15, S17 is subject to fugitive emissions requirements under s. NR 415.04, Wis. Adm. Code. Thus the final permit when issued will have fugitive dust emission requirements in the permit similar to the requirements established for the North Truck/Rail unloading building filter, P01, S01. Please see my response to comment #1.

NSPS requirements for this operation are found in s. NR 440.47(3) and (4), Wis. Adm. Code. The final permit when issued will reflect these requirements.

Comment #4: For Process P16, F18, Grain Dryer No.3. Eliminate/Modify the following conditions from the final permit.

- Condition L.1.b.(1) – Compliance (stack) Emission Testing for P23/s25.
- Modify condition L.2.b.(1) demonstrating opacity compliance for P16/F18 using the maximum throughput and AP-42 emission factors.

Response: 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)1., Wis. Adm. Code). S. NR 440.47(4), Wis. Adm. Code requires a source to demonstrate compliance with the 0% opacity limit in s. NR 440.47(3)(a)1 using US EPA Method 9 and the procedures in s. NR 440.11, Wis. Adm. Code to determine the opacity.

The proposed draft permit established the following requirements for visible emission limits.

- 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.
- 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).

If the grain dryer is subject to NSPS, the Department does not have the authority to waive the NSPS emission limits and compliance demonstration requirements. A variance from meeting/compliance with the NSPS requirements need to be obtained from US EPA, Region V. Please copy the Department on any variance request made to US EPA. The final permit will not include the compliance (stack) PM/PM10 emission testing for the grain dryer.

The final permit will include

- a condition that the permittee shall use the throughput information along with AP-42 emission factors to demonstrate compliance of the PM/PM10 emission limit (based on your proposal in the March 17, 2005 letter).
- Fugitive dust emission requirements in the final permit will be established similar to the requirements established for the North Truck/Rail unloading building filter, P01/S01. Please see my response to comment #1.

Comment #5: Storage silos testing is not NSPS requirements. Eliminate the following conditions from the final permit.

- Condition J.1.b.(1) – Compliance (stack) emission testing for P22, S24
- Condition K.1.b.(1) – Compliance (stack) emission testing for P23, S15
- Condition J.2.b.(1) – Compliance visible emission testing for P22, S24
- Condition K.3.b.(1) – Compliance visible emission testing for P23, S25
- Modify condition J.2.a.(1) from a visible emission opacity limit of 0% to 20% for P22/S24
- Eliminate all of condition J.3. – Fugitive emission opacity requirements for P22/S24.
- Move condition K.2.b.(2) to K.3.b. – during normal operations, the requirements in I.K.1.b.(2) shall be used to demonstrate compliance with the visible emission limit.
- Eliminate all of condition K.2. – Visible emission requirements NSPS stacks and non-stacks.

[Reasons: The storage silos do not require capture and control systems, and therefore do not have process emissions. The cost to stack test all the storage silos would be cost prohibitive. The storage silos are not subject to NSPS. ]

Response: The Storage silos (P23, P22) are not subject to NSPS. The emissions from P22 and P23 are still subject to ss. NR 415.04, NR 415.05 and NR 431.05, Wis. Adm. Code requirements. The storage silo vents are considered stack discharge points. The PM/PM10 emission limits established in the proposed permit is to ensure that the emissions from the storage vents meets the s. NR 415 requirements and to ensure that the project is minor under Part 70 and PSD programs and also to ensure that the national ambient air quality standard for PM<sub>10</sub> will be attained and maintained.

I have reviewed several permits issued by the Department for the grain storage and handling facilities. These facilities employ baghouses to control emissions from for the storage of grain and transfer of grain from the storage. Didion intends to have a total of 46 storage silos. Didion does not employ baghouse to control emissions from the storage of grain and transfer of grain from the storage. The exhaust velocity from the silo vents ranges from 11 m/sec to 30.56 m/sec. About 24 silos (each of them) have an exhaust velocity of 30.56 m/sec. Currently the silos have rain hats at the top of the silos. Some of the silos may have vents at the bottom of the storage silos. Any permit issued by the Department will require Didion to exhaust only from the top vents of the silos. The emissions from the top vents of the storage silos were only modeled to demonstrate that the air quality standards would be attained and maintained.

The final permit will have a requirement that the exhaust flow from all these silos will be vertical and totally unobstructed. In your letter dated March 22, 2005, you have indicated that Didion intends to hinge the rain hats in such a way that any time the exhaust fans are running the hats will open automatically. Didion feels that they can accomplish these changes within 45 day-period. In the mean time when the silos are operating currently and when the final permit is issued (prior to completing the modification), the Department expects Didion to manually remove the rain hats so the flow from these silos is vertical and totally unobstructed. Also this requirement will be included in the final permit.

The Department believes that PM/PM10 compliance stack testing at least needs to be performed on two storage silos and the final permit will reflect the permittee to perform compliance stack emission testing on silo 10 and Bin 20 based on the information provided by Didion on March 28, 2005. This is assuming that all the silos/bins identified in P22 and P23 store grain. If any silos/bins listed under P22 or P23 include silos/bins where product (flour, grits, etc) is stored then it makes sense to have a stack test for PM/PM10 done for one of this silo/bin storing product instead of Bin 20. You can let me know which silo/bin you are willing to test so I can include this silo/bin number instead of bin 20 when the final permit is issued.

The emissions from the storage silos are also subject to fugitive emissions requirements under s. NR 415.04, Wis. Adm. Code. The final permit when issued will have fugitive dust emission requirements similar to the requirements established for the North Truck/Rail unloading building filter, P01/S01. Please see my response to comment #1.

The final permit will also require Didion to for P22 and P23:

- The permittee shall demonstrate compliance with the hourly emission rates using maximum throughputs and emission factors developed based on stack test.
- The permittee shall keep the following records:
  - (a) Maximum silo/bin capacities and maximum throughputs in tons.
  - (b) emissions factor based on stack test.

Comment #6: TSP monitoring requirements should be eliminated.

Response: TSP monitoring requirements will be included in the final permit.

Comment #7: Emission testing shall be conducted within 90 days after the start of initial operation instead of the testing to be conducted within 90 days of the permit issuance.

Response: Currently the proposed raft permit indicates that the testing shall be conducted within 90 days after

the start of initial operation. The final permit will also indicate that the testing shall be conducted within 90 days after the start of initial operation

I hope I have addresses all your comments. Should you have any questions on this letter, I am available on March 30 to discuss. Please call me at 608-267-2015. I like to issue the final permit on March 31, 2005.

Sincerely,

Raj Vakharia, Review Engineer  
Permits and Stationary Source Modeling Section  
Bureau of Air Management

Cc: Marcia Penner – LS/5  
Jeffrey C Hanson/Steve Dunn – AM/7  
Dean Packard – SCR  
Sloat Mike – SCR, Reedsburg Service Center

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FILE CODE: 4530-1

Mr. John Didion  
Preident  
Didion Milling Inc.  
101 South William Street  
Cambria, WI 53923

Dear Mr. Didion:

Your application for an air pollution control construction permit has been processed in accordance with s. 285.61, Wis. Stats.

The enclosed permit is issued to provide authorization for your source to construct and initially operate a grain elevator/dry corn milling operation at 101 South William Street, Cambria, Wisconsin in accordance with the requirements and conditions set forth within Parts I and II of the permit. Please read it carefully. This permit expires 18 months from the date of the issuance of this permit. The source(s) covered in this permit may not operate after this permit expires unless a complete operating permit application for the source(s) has been submitted. Compliance information required to complete the operation permit application for the source(s) included in this construction permit should be submitted at least 4 months prior to the permit expiration date.

Enclosed with the permit is a bill for the cost of reviewing and acting upon your air pollution control permit. This bill is due and payable within 30 days of the date of the issuance of the permit. The remittance should be made payable to Wisconsin Department of Natural Resources and returned to the address on the bill. Please return one copy of the bill with your payment.

A copy of this permit should be available at the source for inspection by any authorized representative of the Department. Questions about this permit should be directed to Wisconsin Department of Natural Resources, Air Program, South Central Regional, Reedsberg Service Center, P. O. Box 281, Reedsburg, WI 53959.

#### NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes establish time periods within which requests to review Department decisions must be filed.

To request a contested case hearing pursuant to s. 285.81, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for a contested case hearing on the Secretary of the Department of Natural Resources. Any such petition for hearing shall set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired.

For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Wis. Stats.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

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

cc: Air Enforcement Branch - EPA, Region V  
SCR Air Program, Reedsberg Service Center

Enclosure





Date: May 2, 2005

File Code: 4560

To: Lloyd Eagan – AM/7

From: Raj Vakharia – AM/7

Subject: Summary of the hearing for Didion Milling - Permit 02-RV-166.

Didion Milling Inc., 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 at 501 South William Street, Cambria, Columbia County, WI.

The Bureau of Air Management of the DNR analyzed these materials and 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.

On July 14, 2004, a notice was published in the Portage Daily Register soliciting written comments from the public on the proposed project and the DNR's analysis and preliminary determination and giving the opportunity to request a public hearing. The DNR received written comments on the proposed project including several requests for a public hearing. DNR determined that there was significant public interest in holding a hearing under ss. 285.61(7), and 285.62(5), Wis. Stats.

The public hearing was held:

Tuesday, October 5, 2004 at 5:30 PM  
Cambria Village Hall  
Community Room  
115 W. Edgewater Street  
Cambria, Wisconsin

Attending the hearing were Raj Vakharia, Marcia Penner, Mike Sloat and Dean Packard from the DNR and concerned citizens. The company was represented by their consultant, Amy Litscher, RSV Engineering. Marcia Penner summarized the hearing procedures and the purpose of the hearing. Raj Vakharia then summarized the Department's review and its findings.

This memo summarizes the Comments/Questions received at the hearing from the concerned citizens and the department's response.

Sara Lloyd (W1631 Hwy P, Cambria, WI)

She indicated that:

- she is in opposition for the expansion and urged the DNR not to issue Didion a permit and asked the DNR to follow up on the existing violations.
- she has concerns that the source is already built without a permit.
- she has concerns about the air emissions from the facility and expressed her concerns regarding the ability of DNR to enforce.
- Didion is not a very good neighbor in Cambria.

- Didion may have more silos built than proposed on the application.

She asked the following questions:

- When is the operation permit going to be issued?
- When is the compliance checked?

I provided answers to her questions. I also indicated to Ms. Lloyd that Didion had received an exemption from construction permit requirements from the Department (Paul Yeung to John Didion) on May 26, 1999 for the following equipment based on the information submitted by Didion on its exemption request (the emissions from these processes were shown to be below the level required for a construction permit, less than 5.7 pounds per hour of particulate matter and 3.4 pounds per hour of PM-10).

- five new permanent grain silos with 900,000 bushels capacity
- a new grain dryer
- a new truck unloading/loading station
- a new mill grain cleaning operation filter
- a new mill grit thermoprocessing
- a mill flour operation filter
- a mill germ recovery and grinding filter
- a mill mix and blend filter and
- a mill finished product dryer.

I also mailed Ms. Lloyd the application information (table that summarizes the numbers of silos built/proposed to be built and the dates of the construction of the silos already built and proposed to be built) that summarizes the number of silos the proposed permit covers.

I informed Ms. Lloyd that the operation permit will be issued to Didion after they have completed their construction and have demonstrated compliance with the permit limits and conditions. An inspection of the facility's compliance will be done prior to the Department's issuance of the operation permit.

John Miller (307 Mary Street, P. O. Box 385, Cambria, WI)

He indicated that:

- he is in opposition and Didion should not be able to get a permit, when the existing Violations have not been taken care of.
- DNR should settle violations first before issuing them a construction permit.

He asked the following questions:

- What is the existing level of emissions?
- Will there be less or more nuisance dust? Cars are covered with dust when they are milling.
- What will be the fuel fired in the boilers?
- What about the action on National level to lower PM2.5 and how does it affect this project?

I mailed Mr. Miller the emission inventory update (EIU) which summarizes the emissions reported by Didion Milling for 2003. I informed Mr. Miller that the boilers only fire natural gas and the emissions from the boilers and all the other sources at the facility were modeled (air quality modeling analysis) to ensure that the proposed project will not violate the ambient air quality standards for any criteria pollutants including PM10. For ensuring compliance with PM2.5

standards, EPA's guidance was followed. I also informed Mr. Miller that complaints about fugitive dust issues should be filed with the compliance engineer, DNR in the Reedsburg Service Center.

John Domino (203 E. Edgewater, Cambria, WI)

He indicated:

- that Didion don't care what they do. Don't care about the community.
- Didion to be classic example of non-compliance.
- that he has concerns about them (Didion) self reporting on their compliance status.
- DNR should closely look into what this company does.
- DNR approved/allowed seven silos and there are 30 silos built out there.
- that an air quality monitor needs to be installed at Cambria

He asked the following questions:

- Will their standards be raised or lowered (more or less emissions)?

I informed Mr. Domino that the proposed permit will make the allowable emission lower than what they would have been allowed to emit without a permit.

Dalls Bucholz (216 W. 1<sup>st</sup> Street, Cambria, WI)

He indicated that:

- he was concerned about them building without a permit.
- DNR should apply fines.
- Didion should stop business until fines are dealt with.
- people see red dust.

He asked the following questions:

- Do they have to lower emissions or can they emit at the same level?
- Are there certain procedures if they exceed allowable rates?
- Can there be testing done off property?
- Can a permit not be issued?

I indicated to Mr. Bucholz that Didion is required to meet the emission limits that have been set in the permit. These limits are based on applicable requirements under NR 415, Wis. Adm. Code and the protection of the air quality standards (air quality modeling analysis). The facility will verify the emission limits for several processes by performing initial stack test. If the stack test results show that they meet the limit then they are in compliance of the permit for these processes. The facility will also be required to monitor pressure drop range to ensure that the baghouses are working properly. The baghouses are used to capture particulate matter emissions. There is no way to do testing at the property boundary except to install a TSP monitor. If they see dust problem they need to contact the compliance engineer. The Department is required by the statutes to issue them a permit if they meet the permitting criteria in the statutes.

The Department also received comments from Didion on the proposed draft permit. The Department's response to the comments are summarized in a memo. Didion's comments and the Department's response to Didion's comments is included as part of the attachment 1.

The Department has worked with Didion since February 2005 to resolve their comments. The Department's effort in resolving the comments (via e-mails) is included as part of the attachment 2. All the issues with Didion has been resolved as far as we can go.

The DNR in its review concluded that the proposed project when constructed and operated consistent with the application and subsequent information submitted will be able to meet the emission limits and conditions included in the draft permit. I recommend that the final permit be issued.

cc. Reedsburg Service Center Air Program



**BEFORE THE DEPARTMENT OF NATURAL RESOURCES  
AIR MANAGEMENT PROGRAM  
FINDINGS OF FACT  
CONCLUSIONS OF LAW  
AND DECISION**

**Findings of Fact**

The Department of Natural Resources (DNR) finds that:

- 1) Didion Milling Inc., 501 South Williams Street, Cambria, Wisconsin, has applied for an air pollution control construction permit. The authorized representative of the facility is John Didion, President.
- 2) Didion Milling Inc., submitted an air pollution control permit application and plans and specifications and any additional information describing the air pollution source between November 22, 2002 and May 9, 2005.
- 3) DNR has reviewed Didion Milling Inc.'s air permit application, plans, specifications and other information available to DNR.
- 4) DNR has prepared an analysis and a Preliminary Determination on the approvability of the permit application.
- 5) This permit is for the construction of an air pollution source.
- 6) DNR has complied with the procedures set forth in s. 285.61, Wis. Stats.
- 7) The proposed air pollution source meets all of the applicable criteria in s. 285.63, Wis. Stats.
- 8) DNR has complied with the requirements of s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code.

**Conclusions of Law**

DNR concludes that:

- 1) DNR has authority under s. 285.11(1), Wis. Stats., to promulgate rules contained in chs. NR 400-499, Wis. Adm. Code, including but not limited to rules containing emission limits, compliance schedules and compliance determination methods.
- 2) DNR has the authority under ss. 285.11(1), (5), and (6), 285.27 (1) and (2) and 285.65, Wis. Stats., and chs. NR 400-499, Wis. Adm. Code, to establish emission limits for sources of air pollution.
- 3) DNR has the authority to issue air pollution control permits and to include conditions in such permits under ss. 285.60, 285.61, 285.63 and 285.65, Wis. Stats.
- 4) The emission limits included in this permit are authorized by ss. 285.65, Wis. Stats., and chs. NR 400-499, Wis. Adm. Code.

- 5) DNR is required to comply with s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code, in conjunction with issuing an air pollution control permit.

### **Decision**

Didion Milling Inc., is authorized to construct and initially operate a grain elevator/dry corn milling operation described in the plans and specifications dated between November 22, 2002 and May 9, 2005 in conformity with the emission limits, monitoring, recordkeeping and reporting requirements and specific and general conditions set forth in this permit.



AIR POLLUTION CONTROL CONSTRUCTION PERMIT

EI FACILITY NO. 111081520

PERMIT NO. 02-RV-166

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.

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 initially operate a grain elevator/dry corn milling operation described in the plans and specifications dated between November 22, 2002 and May 9, 2005 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 12th day of May, 2005.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By /s/ Steve Dunn for

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

**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 <sub>10</sub> Emissions	<p><b>(1)</b> The emissions may not exceed 0.55 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S01.<sup>1</sup> [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> Compliance emission tests shall be conducted within 90 days of permit issuance to demonstrate compliance with the PM &amp; PM<sub>10</sub> 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 of permit issuance, 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> <li><b>(d)</b> a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</li> </ul>

<sup>1</sup> *1 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*

**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
2. Visible Emissions	<p><b>(1)</b> The permittee may not discharge from S01, P01 into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05(1), Wis. Adm. Code]</p>	<p><b>(5)</b> 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><b>(6)</b> This process shall unload grain only to silo/bins 1-6 and W1-W8. [s. 285.65(7), Wis. Stats.] This condition is established so this process is not subject to NSPS.</p> <p><b>(1)</b> A visible emissions compliance test shall be performed simultaneous with the PM &amp; PM<sub>10</sub> emissions test required in I.A.1.b.(4). [s. NR 439.07(1), Wis. Adm. Code]</p> <p><b>(2)</b> 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><b>(e)</b> 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><b>(4)</b> 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><b>(5)</b> The permittee shall keep appropriate records to demonstrate compliance with condition I.A.1.b.(6). [s. 285.65(3), Wis. Stats.]</p> <p><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.A.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a.(1) for demonstrating compliance with the limitations in I.A.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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 PM<sub>10</sub> Emissions</p>	<p>(1) The emissions may not exceed 0.10 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S08.<sup>2</sup></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 &amp; PM<sub>10</sub> 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"> <li>(a) installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li>(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;</li> <li>(c) a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> <li>(d) a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</li> </ul>

**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
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<sup>2</sup> 2 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.

<p>2. Visible Emissions</p>	<p><b>(1)</b> 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><b>(1)</b> 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><b>(e)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.B.1.c.(2)&amp;(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</p>	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a.(1) for demonstrating compliance with the limitations in I.B.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2. a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]</p>

**C. P10/S10 - South Filters: Grain Milling**

<b>POLLUTANT</b>	<b>a. LIMITATIONS</b>	<b>b. COMPLIANCE DEMONSTRATION</b>	<b>c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING</b>
<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 1.23 lbs/hr of PM and PM<sub>10</sub> from the baghouse stack S10.<sup>3</sup> [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>

<sup>3</sup> *3 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*



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

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2. Visible Emissions	<p><b>(1)</b> 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><b>(1)</b> 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><b>(d)</b> 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><b>(e)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.C.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a.(1) for demonstrating compliance with the limitations in I.C.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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
<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 1.23 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S11.<sup>4</sup> [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>

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

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
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<sup>4</sup> *4 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*

2. Visible Emissions	<p><b>(1)</b> 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><b>(5)</b> Compliance emission tests shall be conducted within 90 days of permit issuance to demonstrate compliance with the visible emission limit when process 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 of permit issuance, 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><b>(1)</b> A visible emissions compliance test shall be performed simultaneous with the PM &amp; PM<sub>10</sub> emissions test required in I.D.1.b.(3). [s. NR 439.07(1), Wis. Adm. Code]</p> <p><b>(2)</b> 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><b>(d)</b> 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><b>(e)</b> 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><b>(4)</b> 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.</p> <p><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.D.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.D.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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
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<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 0.22 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S12.<sup>5</sup> [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>
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*5 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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><b>(1)</b> 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><b>(1)</b> 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><b>(d)</b> 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><b>(e)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.E.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.E.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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 PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 0.17 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S14<sup>6</sup>. [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>

<sup>6</sup> *6 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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) 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 or an alternate method approved in writing by the Department, 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)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p>(1) No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.F.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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 PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 0.55 lb/hr of PM and 0.55 lb/hr of PM<sub>10</sub> from the baghouse stack S15.<sup>7</sup> [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><b>(2)</b> 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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> Compliance emission tests shall be conducted within 90 days of permit issuance to demonstrate compliance with the PM &amp; PM<sub>10</sub> 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 of permit issuance, 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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. Please note compliance with the test methods and procedures to meet the NSPS requirements are identified in s. NR 440.47(4), Wis. Adm. Code. [s. NR 440.47(4)(b)1., and (c), Wis. Adm. Code, s. NR 439.06(1m), Wis. Adm. Code]</p> <p><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>

**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

<sup>7</sup> *7 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*



		<p><b>(5)</b> 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><b>(d)</b> 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><b>(e)</b> 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><b>(4)</b> 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>
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**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 fugitive gases which exhibit greater than 5% opacity. [s. NR 440.47(3)(b)2., Wis. Adm. Code]</p> <p>(2) The permittee may not discharge into atmosphere any gases from stack S15, P15 which exhibit greater than 0% 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 &amp; PM<sub>10</sub> 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 440.47(4)(b)3., Wis. Adm. Code, s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The records required in I.G.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emissions	<p>(1) No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.G.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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
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<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 1.23 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S21<sup>8</sup>. [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> <li><b>(d)</b> a maintenance schedule for the equipment based on the manufacturer's recommendations, but at intervals no less frequent than once per year; and</li> <li><b>(e)</b> 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]</li> </ul>
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<sup>8</sup> *8 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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><b>(1)</b> 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><b>(1)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p> <p><b>(2)</b> The records required in I.H.1.c.(2)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive Emission	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.H.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [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 PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 1.23 lb/hr of PM and PM<sub>10</sub> from the baghouse stack S22<sup>9</sup>. [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><b>(1)</b> The facility shall operate the baghouse at all times the process is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(3)</b> 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><b>(4)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> 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><b>(3)</b> 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"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> </ul>

<sup>9</sup> *9 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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>(5) Compliance emission tests shall be conducted within 90 days after the start of initial operation to demonstrate compliance with the PM &amp; PM<sub>10</sub> 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) 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>(2) A visible emissions compliance testing shall be performed simultaneous with the PM and PM10 emission test required in I. I. 1.b.(5). [s. NR 439.07(1), Wis. Adm. Code]</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 or an alternate method approved in writing by the Department 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)&amp;(3) shall be used as recordkeeping and monitoring requirements for the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>
3. Fugitive emissions	<p>(1) No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2. a. (1) for demonstrating compliance with the limitations in I.I.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]</p>

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

<b>POLLUTANT</b>	<b>a. LIMITATIONS</b>	<b>b. COMPLIANCE DEMONSTRATION</b>	<b>c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING</b>
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<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 0.72 lb/hr of PM and 0.058 lb/hr of PM<sub>10</sub> 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 PM<sub>10</sub> from each of the stacks S24C, S24D, S24E.<sup>10</sup> [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><b>(1)</b> The permittee shall install simple fabric filter on all the silo vents – “socks” identified in this process within 90 days from the date the permit is issued. [s. 285.65(7), Wis. Stats.]</p> <p><b>(2)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> The permittee shall keep the following records:</p> <ul style="list-style-type: none"> <li>(a) Maximum silo/bin capacities and maximum throughputs in tons.</li> <li>(b) emissions factor based on AP-42.</li> <li>(c) Manufacturer specifications information of the simple fabric filter – “socks”. [s. 285.65(3), Wis. Stats.]</li> </ul> <p><b>(3)</b> The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the simple fabric filter – “socks”. This plan shall include the following:</p> <ul style="list-style-type: none"> <li><b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;</li> <li><b>(b)</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;</li> <li><b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;</li> <li><b>(d)</b> a maintenance schedule for the equipment based on the manufacturer’s recommendations, but at intervals no less frequent than once per year; and</li> <li><b>(e)</b> 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]</li> </ul> <p><b>(4)</b> The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the simple fabric filter – “socks”. 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>
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<sup>10</sup> *10 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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><b>(1)</b> The permittee may not discharge from each stack S24A, S24B, S24C, S24D and S24E into the atmosphere any gases which exhibit greater than 20% opacity. [s. NR 431.05(1), Wis. Adm. Code]</p>	<p><b>(1)</b> During normal operations, the requirements in I.J.1.b.(2) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.J.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2. a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]</p>

**K. P23, S25A – S25AO, Storage Bins and Handling**

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
<p>1. Particulate Matter (PM) and PM<sub>10</sub> Emissions</p>	<p><b>(1)</b> The emissions may not exceed 0.078 lb/hr of PM and 0.006 lb/hr of PM<sub>10</sub> 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 PM<sub>10</sub> 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 PM<sub>10</sub> 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 PM<sub>10</sub> 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 PM<sub>10</sub> from the stack S25AH.</p>	<p><b>(1)</b> 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><b>(2)</b> The permittee shall install simple fabric filter on all the silo vents – “socks” identified in this process within 90 days from the date the permit is issued. (b) [s. 285.65(7), Wis. Stats.]</p>	<p><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> The permittee shall keep the following records:  <b>(a)</b> Maximum silo/bin capacities and maximum throughputs in tons.  <b>(b)</b> emissions factor based on AP-42. [s. 285.65(3), Wis. Stats.]</p> <p><b>(3)</b> The facility shall prepare and implement a Malfunction, Prevention and Abatement Plan for the simple fabric filter – “socks”. This plan shall include the following:  <b>(a)</b> installation, maintenance and routine calibration procedures for the control equipment instrumentation;  <b>(b)</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;  <b>(c)</b> a requirement that a copy of the operation and maintenance manual for the control equipment be maintained on site;  <b>(d)</b> a maintenance schedule for the equipment based on the manufacturer’s recommendations, but at intervals no less frequent than once per year; and  <b>(e)</b> 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><b>(4)</b> The permittee shall keep records of all inspections, checks and any maintenance or repairs performed on the simple fabric filter – “socks”. 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>

**K. P23, S25A – S25AO, Storage Bins and Handling**

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
	[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.]. <sup>11</sup>		

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<sup>11</sup> *11 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*

**K. P23, S25 , (S25A – S25AO), Storage Bins and Handling [CONTINUED]**

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
2 . Visible Emissions	<p>0<b>(1)</b> 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><b>(1)</b> During normal operation, the requirements in I.K.1.b.(1) shall be used to demonstrate compliance with the visible emissions limit. [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> Whenever compliance testing is required, USEPA Method 9 shall be used or an alternate method approved in writing by the Department shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>
3. Fugitive Emissions	<p><b>(1)</b> No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (1) for demonstrating compliance with the limitations in I.K.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p><b>(1)</b> The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]</p>

**L. P16, F18, Grain Dryer No. 3**

POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING
1. Particulate Matter (PM) and PM <sub>10</sub> Emissions	<b>(1)</b> The emissions may not exceed 9.39 lb/hr of PM and 2.39 lb/hr of PM <sub>10</sub> from F18. <sup>12</sup> [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.]	<b>(1)</b> 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><b>(1)</b> Whenever compliance emission testing for PM &amp; PM<sub>10</sub> 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><b>(2)</b> The permittee shall keep the following records:</p> <p>(a) Maximum capacities and maximum throughputs in tons.</p> <p>(b) AP-42 emissions factor.</p> <p>[s. 285.65(3), Wis. Stats.]</p>

<sup>12</sup> *12 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. 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) (a) 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>(b) The permittee may not discharge from P16, F18 into atmosphere any gases which exhibit greater than 20% opacity from any column plate perforation not exceeding 2.4 mm diameter (ca. 0.094 inch) [s. 285.65(3), Wis. Stats.]</p>	<p>(1) Compliance emission tests shall be conducted within 90 days of permit issuance to demonstrate compliance with the visible emission limit in I.L.2.a.(1)(a) 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 of permit issuance, 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 and the procedures in s. NR 440.11, Wis. Adm. Code shall be used to determine the opacity. [s. NR 440.47(4), Wis. Adm. Code, s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>
3. Fugitive Emissions	<p>(1) No person may cause, allow or permit any material to be handled, transported or stored without taking precaution to prevent particulate matter from becoming airborne. [s. NR 415.04, Wis. Adm. Code]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a.(1) for demonstrating compliance with the limitations in I.L.3.(a)(1) [s. 285.65(3), Wis. Stats.]</p>	<p>(1) The permittee shall comply with the requirements established in I.Q.2.a. (2) – (4) for demonstrating compliance with recordkeeping and monitoring requirements. [s. 285.65(3), Wis. Stats.]</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 PM<sub>10</sub> Emissions</p> <p>2. Visible Emissions</p>	<p>(1) The emissions may not exceed 0.064 lb/hr of PM and PM<sub>10</sub> from S15.<sup>13</sup> [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 &amp; PM<sub>10</sub> 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 or an alternate method approved in writing by the Department, shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]</p>

<sup>13</sup> *13 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*



**N. B02, S16, Boiler No. 2**

<b>POLLUTANT</b>	<b>a. LIMITATIONS</b>	<b>b. COMPLIANCE DEMONSTRATION</b>	<b>c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING</b>
1. Particulate Matter (PM) and PM <sub>10</sub> Emissions	(1) The emissions may not exceed 0.048 lb/hr of PM and PM <sub>10</sub> from S16. <sup>14</sup> [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 <sub>10</sub> 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 or an alternate method approved in writing by the Department shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]

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<sup>14</sup> *14 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*

**O. B03, S26, Boiler No. 3**

<b>POLLUTANT</b>	<b>a. LIMITATIONS</b>	<b>b. COMPLIANCE DEMONSTRATION</b>	<b>c. REFERENCE TEST METHODS, MONITORING AND RECORDKEEPING</b>
1. Particulate Matter (PM) and PM <sub>10</sub> Emissions	(1) The emissions may not exceed 0.15 lb/hr of PM and PM <sub>10</sub> from S26. <sup>15</sup> [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 <sub>10</sub> 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 or an alternate method approved in writing by the Department shall be used. [s. NR 439.06(9)(a)1., Wis. Adm. Code]

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<sup>15</sup> *15 The facility has elected to meet this limit in order to attain and maintain the national ambient air quality standard for PM<sub>10</sub>. This restriction also ensures that this project is minor under Part 70 and PSD.*

**P. Conditions Specific to the Construction Permit**

<b>CONDITION TYPE</b>	<b>a. SPECIFIC CONDITIONS</b>
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 Regional, Reedsberg Service Center, P. O. Box 281, 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 for sources not yet constructed.</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 for sources covered by this permit and not yet constructed.</p> <p>(c) Notice of the actual date of initial startup shall be submitted within 15 days of the initial startup for sources not yet constructed.</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 Requirements	<p>(1) The stack height for the stacks shall be as listed in the attached table. (pages 35-37)</p> <p>(2) The stack inside diameter at the outlet for the stacks shall be as listed in the attached table. (pages 35-37)</p> <p>(3) The facility shall keep and maintain on site technical drawings, blueprint or equivalent records of the physical stack parameters.</p> <p>(4) The exhaust from each stack shall be vertical and totally unobstructed except for the fabric filter socks on P22 and P23.</p> <p>(5) The permittee shall install appropriate mechanical system to open the rain hats on stacks that have rain hats when the processes are operating. The permittee shall let the South Central Regional, Reedsberg Service Center, P. O. Box 281, Reedsburg, WI 53959 know in writing when the mechanical systems on all the existing stacks are in place. The permittee will install mechanical systems to open the rain hat on all new stacks and silos. The permittee shall keep and maintain appropriate records of installation of mechanical systems on the stacks and silos.</p> <p>(6) In the absence of the mechanical system in place, the permittee shall manually remove the rain hats when the processes are in operation.</p> <p>(7) The permittee will not exhaust emissions from any vents from the storage silos that are not located at the top of the storage silos. The emissions from the vents on the top of the storage silos were evaluated in the air quality modeling analysis to ensure that the air quality standards would not be exceeded.</p> <p>[s. 285.65(3), Wis. Stats., 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
6. Malfunction, Prevention and Abatement Plan	(1) The facility shall submit the Malfunction, Prevention and Abatement Plan to Department's SCR, Reedsburg Service Center, P. O. Box 281, Reedsburg, WI 53959. [s. 285.65(3), Wis. Stats.]	
7. Reporting	(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>(1) Submit to the Wisconsin Department of Natural Resources, South Central Regional, Reedsburg Service Center, P. O. Box 281, 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 Regional, Reedsburg Service Center, P. O. Box 281, 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>

**Q. Conditions Specific to the Facility**

CONDITION TYPE	a. SPECIFIC CONDITIONS
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<p>1. TSP Monitoring</p>	<p><b>(1)</b> A total suspended particulate (TSP) ambient air monitor shall be installed and operated within 60 days of the issuance of the construction permit according to guidance provided by the Department's Ambient Air Monitoring Section of the Bureau of Air Management as found in the Air Monitoring Comparability Program guidelines for a period of thirty six (36) months. If the Ambient Air Monitor cannot be installed and operated within 60 days of the permit issuance, the permit holder may request in writing, a specific extension of time and the Department must approve the extension of time to install and operate the ambient air monitor.</p> <p>The Department's approval is required for the selected site prior to start up of the monitor. If any exceedance of the secondary 24-hour average total suspended particulate standard of 150 ug/m<sup>3</sup> is detected by the monitor, the Permittee shall submit a written report for the Department's South Central Region, Air Management Section within 15 days of its occurrence.</p> <p>The report shall specify what activities took place during the exceedance period, if any on-site meteorological station is installed with the TSP monitor then the wind speed and wind direction recorded on those meteorological instruments during the exceedance period shall also be reported.</p> <p>This condition is necessary to show that the TSP ambient air quality standards is not violated.</p> <p>Additional control technology or operation restrictions may be requested by the Department if violations of the Ambient Air Quality Standards for TSP is detected by the monitor. [ss. 285.65(3) and s. 285.65(10), Wis. Stats.]</p>
<p>2. Fugitive Dust from the total facility</p>	<p><b>(1)</b> The permittee shall develop and follow a fugitive dust control plan for the facility's operation. The fugitive dust control plan shall identify the specific measures to be taken, when needed and frequency needed to maintain emission in compliance with the emission limits. The permittee shall submit the fugitive dust plan to the Department's SCR, Reedsburg Service Center, P. O. Box 281, Reedsburg, WI 53959 [s. 285.65(3), Wis. Stats.] See Note 1</p> <p><b>(2)</b> The permittee shall keep a log of any other precautions taken to prevent and control fugitive dust at the facility as part of the recordkeeping required in this permit. [s 285.65(3), Wis. Stats., s. NR 439.04(1)(a) and (d), Wis. Adm. Code]</p> <p><b>(3)</b> The permittee shall implement the fugitive dust control plan whenever the facility is in operation. [s. 285.65(3), Wis. Stats.]</p> <p><b>(4)</b> The facility shall keep daily records of all precautions taken to prevent fugitive dust plan. [s. NR 439.04(1)(d), Wis. Adm. Code]</p>

Note 1: The permittee shall work with the compliance engineer for this facility in the development of the fugitive dust control plan.

DIDION MILLING – CAMBRIA Stack Parameters					
ID	LOCATION (M)	HEIGHT (M)	DIAM (M)	VELOCITY (M/S)	TEMP (K)
<b>S01</b>	157, 46	9.75	0.49	20.21	294.0
<b>S08</b>	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
<b>S15</b>	95, 23	9.14	0.41	0.1	416.4
<b>S16</b>	95, 19	9.14	0.41	0.1	416.4
<b>S17</b>	162, -27	30.48	0.50	19.24	305.0
<b>S21</b>	79, 14	28.04	0.61	29.11	305.0
<b>S22</b>	84, 19	28.04	0.76	18.63	305.0
<b>S24A</b>	130, -5	36.60	0.61	30.56	294.0
<b>S24B</b>	150, -5	36.60	0.61	30.56	294.0
<b>S24C</b>	178, -5	36.60	0.61	30.56	294.0
<b>S24D</b>	194, -5	36.60	0.61	30.56	294.0
<b>S24E</b>	211, -5	36.60	0.61	30.56	294.0
<b>S25A</b>	97, -2	36.60	0.61	19.56	294.0
<b>S25B</b>	111, -2	36.60	0.61	19.56	294.0
<b>S25C</b>	97, -16	36.60	0.61	19.56	294.0
<b>S25D</b>	111, -16	36.60	0.61	19.56	294.0
<b>S25E</b>	97, -29	36.60	0.61	19.56	294.0
<b>S25F</b>	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

<b>S25M</b>	178, 31	36.60	0.61	30.56	294.0
<b>S25N</b>	195, 31	36.60	0.61	30.56	294.0
<b>S25O</b>	212, 31	36.60	0.61	30.56	294.0
<b>S25P</b>	229, 31	36.60	0.61	30.56	294.0
<b>S25Q</b>	247, 31	36.60	0.61	30.56	294.0
<b>S25R</b>	264, 31	36.60	0.61	30.56	294.0
<b>S25S</b>	282, 31	36.60	0.61	30.56	294.0
<b>S25T</b>	300, 31	36.60	0.61	30.56	294.0
<b>S25U</b>	178, 14	36.60	0.61	30.56	294.0
<b>S25V</b>	195, 14	36.60	0.61	30.56	294.0
<b>S25W</b>	212, 14	36.60	0.61	30.56	294.0
<b>S25X</b>	229, 14	36.60	0.61	30.56	294.0
<b>S25Y</b>	247, 14	36.60	0.61	30.56	294.0
<b>S25Z</b>	264, 14	36.60	0.61	30.56	294.0
<b>S25AA</b>	282, 14	36.60	0.61	30.56	294.0
<b>S25AB</b>	300, 14	36.60	0.61	30.56	294.0
<b>S25AC</b>	229, -5	36.60	0.61	30.56	294.0
<b>S25AD</b>	247, -5	36.60	0.61	30.56	294.0
<b>S25AE</b>	264, -5	36.60	0.61	30.56	294.0
<b>S25AF</b>	282, -5	36.60	0.61	30.56	294.0
<b>S25AG</b>	300, -5	36.60	0.61	30.56	294.0
<b>S25AH</b>	143, 26	36.60	0.61	3.07	294.0
<b>S25AI</b>	143, 28	36.60	0.61	0.80	294.0
<b>S25AJ</b>	147, 27	36.60	0.61	0.80	294.0
<b>S25AK</b>	147, 26	36.60	0.61	0.80	294.0
<b>S25AL</b>	144, 22	36.60	0.61	0.80	294.0
<b>S25AM</b>	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
<b>S26</b>	95, 14	9.14	0.41	5.86	416.5

Volume Source



ID	LOCATION (M)	HEIGHT (M)	SIGMA Y (M)	SIGMA Z (M)	
<b>F18</b>	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 PM<sub>10</sub>, SO<sub>2</sub>, and NO<sub>x</sub> increment

