

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

BUNGE MILLING, INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	PCB No. 2023-92
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Permit Appeal – Air)
AGENCY	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: See Attached Service List (Via Electronic Filing)

PLEASE TAKE NOTICE that the undersigned filed today with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Respondent’s Response in Opposition to Petitioner’s Motion for Leave to File a Reply and Respondent’s Surreply, copy of which is attached hereto and hereby served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION  
AGENCY

By: /s/Christina L. Nannini  
Christina L Nannini, #6327367  
Assistant Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 782-9031  
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Dated: April 10, 2023

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

BUNGE MILLING, INC.,	)	
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Petitioner,	)	
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v.	)	
	)	PCB No. 2023-92
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Permit Appeal – Air)
AGENCY	)	
	)	
Respondent.	)	

**RESPONDENT’S RESPONSE IN OPPOSITION TO PETITIONER’S MOTION FOR LEAVE TO FILE A REPLY AND RESPONDENT’S SURREPLY**

NOW COMES Respondent, the Illinois Environmental Protection Agency, by and through its attorney, KWAME RAOUL, Attorney General of the State of Illinois, and respectfully submits this Response to Petitioner’s Motion for Leave to File a Reply.

Petitioner fails to show that it would be materially prejudiced without leave to reply because Petitioner concedes that through presently collected information, Petitioner could comply with the contested provisions of the Federally Enforceable State Operating Permit 96020027 (“FESOP”) during the pendency of the appeal. Petitioner’s admitted ability to collect and maintain records in a manner that they argue would establish compliance with the contested conditions renders Petitioner’s Request for a Stay moot.

In addition, Respondent hereby includes its Surreply to the substance of Petitioner’s Reply. Respondent seeks leave to do so because Respondent would be materially prejudiced if unable to Reply to Petitioner’s omission of relevant context with respect to Petitioner’s potential to emit and Petitioner’s incorrect assertion that it is incapable of exceeding its emission limits.

**ARGUMENT**

Petitioner incorrectly states that it is incapable of exceeding its permitted potential to emit and concedes that through presently collected information it can comply with the contested Conditions 12(f), 23(a)(vii), and 23(a)(viii)<sup>1</sup> of the FESOP during the pendency of the appeal. Because Petitioner describes how compliance with the contested conditions is feasible with presently collected information, and because eliminating the averaging period from the FESOP would increase the likelihood of environmental harm, Petitioner's Request for a Stay should be denied.

**A. A stay of the contested permit conditions would increase the likelihood of environmental harm.**

Petitioner's argument that it is "physically incapable of exceeding its permitted [potential to emit] PTE threshold under realistic operating conditions" fails to recognize that the emission limit of 98 tons per year (tpy) is based upon the plant's control devices operating appropriately and as intended. If, at any time, any of these control devices were not operating appropriately and as intended, Petitioner would be capable of exceeding the emission limits of the FESOP.

FESOPs are federally enforceable, that is, the terms and conditions of the permits can be enforced by the United States Environmental Protection Agency (USEPA) under federal law, as well as by Illinois government and the public under state law. These permits establish federally

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<sup>1</sup> Petitioner mistakenly states "that a daily calculation of PM<sub>10</sub> emissions is not possible based on the records currently required to be maintained under the FESOP" pointing to PM and PM<sub>10</sub> emissions from the boilers that are required to be maintained on a monthly basis. See Bunge Reply at page 1, footnote 1. In so doing, Petitioner conflates the daily records required by the FESOP to determine compliance with the emission limits of Conditions 12(a) through (e) with the monthly records required by the FESOP to determine compliance with Conditions 12(g) and (h). While the plant's boilers are subject to emission limits in Conditions 12(g) and (h), compliance is to be determined on a monthly basis as dictated by Condition 12(i). These requirements are separate and apart from the limits of Conditions 12(a) through (e) whereby compliance is to be determined by a the 365-day rolling average as identified in Condition 12(f).

enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.<sup>2</sup>

Petitioner may operate the plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. The permit acts to restrict the plant's potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP contains limitations and requirements to assure that the plant is operated as a non-major source. The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for CO, NO<sub>x</sub> and PM<sub>10</sub>. The potential emissions of other pollutants (e.g., SO<sub>2</sub>, VOM, and Hazardous Air Pollutants) from the plant are small enough that no restrictions are needed to avoid being a major source of these pollutants. In the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be in excess of 100 tpy or more and appropriately considered a major source.

Consistent with the FESOP, Petitioner's application contained proposed permit limitations that would constrain the emissions and production of the source such that its potential emissions would fall below the levels for which a CAAPP would otherwise be required. *See*, CAAPP-200 form included as Attachment A. Petitioner requested a FESOP from the Illinois EPA that would constrain the emissions and production or operation of the source such that potential emissions

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<sup>2</sup> "Potential to emit" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder. *See*, 415 ILCS 5/39.5(1).

would fall below applicability levels and thereby exclude the source from CAAPP. *Id.* Petitioner did not apply for a Lifetime Operating Permit from the Illinois EPA, which would have been appropriate if the plant's PTE for all air pollutants were below 100 tpy. *See* 415 ILCS 5/39; 35 Ill. Adm. Code 201.169. No such application was filed by Petitioner because potential emissions of one or more air pollutants from the plant exceed 100 tons/year.<sup>3</sup>

While the plant's potential to emit one or more air pollutants is 100 tpy or more, Petitioner focuses on the plant's *permitted PTE* repeatedly asserting that the plant is "physically incapable of exceeding its *permitted PTE* threshold [of 98 tpy of PM<sub>10</sub>] under realistic operating conditions" *See* Bunge Reply at page 4 (*emphasis added*). For this reason, Petitioner argues that the Board should grant its requested stay. Permitted PTE is not defined by the Illinois Environmental Protection Act or the Board's regulations, nor is it a term that the Illinois EPA routinely uses. While it is not clear what Petitioner means by *permitted PTE*, the Illinois EPA may establish synthetic minor limits that redefine a source's PTE in a FESOP permit by setting control requirements and emissions limits that are lower than the source's PTE. *See* 415 ILCS 5/39.5(3)(c); *See also, Guidance and Enforceability Requirements for Limiting Potential to Emit through SIP and §112 Rules and General Permits* (January 25, 1995), included as Attachment B.

During the permitting of the plant, Petitioner submitted information to the Illinois EPA proposing an emission limit of 98 tpy for PM<sub>10</sub>. based on the plant's control devices operating appropriately and as intended. *See* Attachment C. Contrary to Petitioner's suggestion, if, at any

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<sup>3</sup> For example, merely considering the potential emissions from the four units at the plant subject to the Corn, Soybean and Products Receiving, Cleaning and Storage New Source Performance Standards (NSPS) for Grain Elevators, 40 CFR 60, Subparts A and DD, the potential emissions from these units is approximately 48 tpy of PM<sub>10</sub>. *See*, 40 CFR 60.302(b) (based on the applicable NSPS of 0.01 grains per dry standard cubic feet). The potential emissions from these units together with the potential emissions of the remaining 130 emission units at the plant exceed 100 tpy or more and would otherwise trigger the applicability of CAAPP. *See*, Conditions 12(a), (b), (c), (d) and (e) of the FESOP.

time, any of these control devices were not operating appropriately and as intended, the plant would be capable of exceeding the emission limits of the FESOP.

The conditions of the FESOP require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. *See* Conditions 12(f), 23(a)(vii), and 23(a)(viii) of the FESOP. Petitioner must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit, the plant's emissions are being properly controlled, and, consequently, will not trigger the requirement to obtain a CAAPP permit. If the Board were to grant Petitioner's requested stay of Conditions 12(f), 23(a)(vii), and 23(a)(viii), the FESOP would no longer provide the necessary terms and conditions by which to ensure that the annual emission limits of the FESOP are enforceable as a practical matter.<sup>4</sup> The Petitioner could wait 365 days to determine the compliance status of each unit at the plant. If any of these control devices were not operating appropriately and as intended during that time, this could be lost on Petitioner as it would be under no obligation to calculate compliance with these limits during that time. The inability to determine compliance with the annual emission limits of the FESOP would result in an increased likelihood of environmental harm.

**B. Petitioner concedes that a method for calculating emissions pursuant to the contested conditions is possible with presently collected information.**

Petitioner claims that it would suffer irreparable harm if the stay is denied because it would require plant personnel to "calculate and catalog actual daily emissions for 135 emission units, 365

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<sup>4</sup> While Petitioner argues that the "level of practical enforceability required of the FESOP emission limits is an issue that goes to the substantive merits of Bunge's appeal" not to "whether granting a stay will result in increased likelihood of environmental harm," Petitioner's argument ignores that without an averaging period, the annual emission limits of Conditions 12(a) through (e) are not enforceable for 365 days. *See*, Bunge Reply at page 3. It necessarily follows that there is an increased risk of environmental harm if neither Bunge nor the Illinois EPA has the ability to determine the compliance status of the plant for an extended period of time.

days a year” and to “equip each of the 135 emission units plantwide with an hour meter and develop a means to monitor and record, on a daily basis, the hours-of-operation data generated by each of those monitors.” Bunge Reply at pages 4 and 5. Later Petitioner concedes that it could “develop a daily approximation of the emissions from all 135 emission units using information presently collected by the Facility.” Bunge Reply at page 7. Petitioner further provides that with the approximation, the emissions would be overstated, but would adequately ensure compliance with the FESOP limits. *Id.* Given Petitioner acknowledges that it currently possesses the requisite information to ensure compliance with the annual limits of the permit consistent with the requirements of Condition 12(f) of the FESOP, a denial of the requested stay of Conditions 12(f), 23(a)(vii), and 23(a)(viii) is unlikely to cause Petitioner irreparable harm.

While the FESOP requires that compliance with the limits in Conditions 12(a) through 12(e) be based on a 365-day rolling total, the FESOP does not dictate the terms or manner by which Petitioner must collect this data. Contrary to Petitioner’s suggestion, nothing in the FESOP requires Petitioner to install an hour meter at each of the 135 emission units at the plant to fulfill the requirement of Condition 12(f). Rather, an operator could simply input the start and end time of a unit’s operations each day in a spreadsheet and then multiply the daily operating hours by the grain loading value for each emission unit to ascertain compliance with the applicable emission limit of Conditions 12(a) through (e) of the FESOP.

Such an approach would be generally consistent with Petitioner’s concession that it could “develop a daily approximation of the emissions from all 135 emission units using information presently collected by the Facility.” Bunge Reply at page 7. Petitioner explains that it could determine “(i) the daily amount of grain throughput from grain receiving, grain shipping, and hominy load out . . .and (ii) the total daily hours of operation of each department at the Facility . .



. “ *Id.* As such, Petitioner acknowledges that it can maintain presently collected information that would ensure compliance with the annual emission limits based on a 365-day rolling total as required pursuant to Condition 12(f).<sup>5</sup> *See also* Conditions 23(a)(vii), and 23(a)(viii). If the stay is denied, Petitioner would not suffer irreparable harm and Petitioner’s appeal would not be rendered moot. In contrast, a stay of the averaging period and the related recordkeeping requirements of the FESOP would make the annual emission limits unenforceable and increase the likelihood of environmental harm during the pendency of the appeal.

For the reasons stated above, the Illinois EPA requests that the Board deny Petitioner’s request to stay Conditions 12(f), 23(a)(vii) and 23(a)(viii) of the FESOP.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: s/Christina L. Nannini  
Christina L. Nannini, #6327367  
Assistant Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 557-0586  
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<sup>5</sup> As previously explained by the Illinois EPA, any stay of the averaging period would leave the annual emission limits for all 135 emission units at the source unenforceable as no other averaging period is provided by Condition 12(f) of the FESOP. While Petitioner requests that compliance with the annual emission limits of the FESOP be based on a 12-month rolling total instead of a 365-day rolling total, the FESOP does not provide this alternative averaging period. Any stay of Condition 12(f) would remove the averaging period from the FESOP and render the annual emission limits unenforceable.



December 2, 2011

Mr. Bob Bernoteit  
Division of Air Pollution Control - Permit Section  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62702

183020ABT  
96020027

Re: FESOP Application  
Bunge – Danville Facility  
Source ID No. 183020ABT

Dear Mr. Bernoteit:

Please find enclosed two copies of the 200CAAPP form as requested by the enclosed incompleteness letter for our FESOP application. The issued FESOP will replace the current Title V permit. This application pertains to the current grain elevator and corn mill.

If you have any questions or require any further information please do not hesitate to contact Robert Henricks at (314) 292-2342 or by email at [robert.henricks@bunge.com](mailto:robert.henricks@bunge.com).

Sincerely,

Dean Hughes  
Eastern Regional Manager – Milling

Enclosure: FESOP 200CAAPP form in duplicate & IEPA letter

RECEIVED

DEC 05 2011

Illinois Environmental Protection Agency  
BUREAU OF AIR  
STATE OF ILLINOIS

Attachment A





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION  
 P.O. BOX 19506  
 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE	
Revision #:	FESOP
Date:	___ / ___ / ___
Page	___ of ___
Source Designation:	_____

1700-0015-2233

<b>APPLICATION FOR CAAPP PERMIT</b> (CHECK ONLY ONE)  <input type="checkbox"/> INITIAL APPLICATION <input checked="" type="checkbox"/> RENEWAL APPLICATION <input type="checkbox"/> SIGNIFICANT MODIFICATION	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER:  183020ABT
	PERMIT #:  96020027
	DATE:

SOURCE INFORMATION		
1) SOURCE NAME: Bunge Milling, Inc.	2) DATE FORM COMPLETED: 12/02/11	
3) SOURCE STREET ADDRESS: 321 E. North Street		
4) CITY: Danville	5) ZIP: 61832	
6) IS THE SOURCE LOCATED WITHIN CITY LIMITS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
7) TOWNSHIP NAME: Danville	8) COUNTY: Vermillion	9) TYPICAL NO. OF EMPLOYEES AT THE SOURCE:
10) ILLINOIS AIR POLLUTION SOURCE ID NO. (IF KNOWN): 183020ABT	11) FEDERAL EMPLOYER IDENTIFICATION NO. (FEIN): 37-0614689	
12) TYPE OF SOURCE AND PRODUCTS PRODUCED: Corn Mill & Grain Elevator		
13) PRIMARY STANDARD INDUSTRIAL CLASSIFICATION (SIC) CATEGORY: Flour & Other Grain Mill Products	14) PRIMARY SIC NO.: 2041 (NAICS #: 311211)	
15a) LATITUDE (DD:MM:SS): 40° 7' 36"	b) LONGITUDE (DD:MM:SS): 87° 37' 24"	
16a) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):
17a) COORDINATE METHOD: 	b) REFERENCE LOCATION: Center of Plant	c) COORDINATE ACCURACY: 1 second
18) SOURCE ENVIRONMENTAL CONTACT PERSON: Eric Silver	19) CONTACT PERSON'S TELEPHONE NO.: (217) 443-9784	

**RECEIVED**  
DEC 05 2011

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1995, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE
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<b>OWNER INFORMATION</b>		
20) NAME: Bunge North America, Inc.		
21) ADDRESS: 11720 Borman Drive		
22) CITY: St. Louis	23) STATE: MO	24) ZIP: 63146-1000
25) OWNER'S AGENT (IF APPLICABLE): NA		

<b>OPERATOR INFORMATION</b>		
26) NAME: SAME AS SOURCE		
27) ADDRESS:		
28) CITY:	29) STATE:	30) ZIP:

<b>BILLING INFORMATION</b>		
31) NAME: Bunge North America, Inc.		
32) ADDRESS: 321 E. North Street		
33) CITY: Danville	34) STATE: IL	35) ZIP: 61832
36) CONTACT PERSON: Dean Hughes	217-442-9782	37) CONTACT PERSON'S TELEPHONE NO.:

<b>APPLICANT INFORMATION</b>	
38) WHO IS THE PERMIT APPLICANT? (CHECK ONE): <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR	39) ALL CORRESPONDENCE TO: (CHECK ONE) <input type="checkbox"/> OWNER <input checked="" type="checkbox"/> SOURCE <input type="checkbox"/> OPERATOR
40) ATTENTION NAME AND/OR TITLE FOR WRITTEN CORRESPONDENCE: Dean Hughes, Eastern Regional Manager - Milling	
41) TECHNICAL CONTACT PERSON FOR APPLICATION: Robert Henricks	42) CONTACT PERSON'S TELEPHONE NO.: 314-292-2342

<b>SUMMARY OF APPLICATION CONTENTS</b>	
NOTE: ITEMS 43 TO 62 WILL BE USED FOR APPLICATION COMPLETENESS DETERMINATION.	
43) DOES THE APPLICATION INCLUDE A TABLE OF CONTENTS?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
44) DOES THE APPLICATION INCLUDE A LIST OF ALL ITEMS AND ACTIVITIES FOR WHICH A PERMIT IS BEING SOUGHT?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
45) DOES THE APPLICATION INCLUDE A PLOT PLAN AND/OR MAP DEPICTING THE AREA WITHIN ONE-QUARTER MILE OF THE SOURCE?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
46) DOES THE APPLICATION INCLUDE A PROCESS FLOW DIAGRAM(S) SHOWING ALL EMISSION UNITS AND CONTROL EQUIPMENT, AND THEIR RELATIONSHIP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
47) DOES THE APPLICATION INCLUDE A COMPLETE PROCESS DESCRIPTION FOR THE SOURCE?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
48a) DOES THE APPLICATION INCLUDE THE APPROPRIATE, COMPLETED FORMS FOR ALL INDIVIDUAL EMISSION UNITS AND AIR POLLUTION CONTROL EQUIPMENT, LISTING ALL APPLICABLE REQUIREMENTS AND PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
b) DOES THE APPLICATION ADDRESS OTHER MODES OF OPERATION FOR WHICH A PERMIT IS BEING SOUGHT?	<input checked="" type="checkbox"/> *NA <input type="checkbox"/> YES <input type="checkbox"/> NO *NOTE: NOT APPLICABLE
c) DOES THE APPLICATION INCLUDE ALL REASONABLY ANTICIPATED OPERATING SCENARIOS FOR WHICH A PERMIT IS BEING SOUGHT?	<input checked="" type="checkbox"/> *NA <input type="checkbox"/> YES <input type="checkbox"/> NO *NOTE: NOT APPLICABLE
49) DOES THE APPLICATION INCLUDE A COMPLETED "FUGITIVE EMISSION" FORM 391-CAAPP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
50) DOES THE APPLICATION INCLUDE A COMPLETED "FEE DETERMINATION FOR CAAPP PERMIT" FORM 292-CAAPP? (NOTE: ANNUAL FEES WILL BE BASED UPON INFORMATION CONTAINED IN THIS FORM.)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
51) DOES THE APPLICATION INCLUDE A COMPLETED "HAZARDOUS AIR POLLUTANT EMISSION SUMMARY" FORM 215-CAAPP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
52) DOES THE APPLICATION INCLUDE THE CALCULATIONS ON WHICH THE FOLLOWING, TO THE EXTENT THEY ARE RELATED TO AIR EMISSIONS, WERE BASED: <ul style="list-style-type: none"><li>• POLLUTANT EMISSION RATES,</li><li>• FUELS AND RAW MATERIALS USAGE, AND</li><li>• CONTROL EQUIPMENT EFFICIENCY?</li></ul>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
53) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT" FORM 293-CAAPP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
54) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE CERTIFICATION" FORM 296-CAAPP?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
55) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE-ADDENDUM FOR NONCOMPLYING EMISSION UNITS" FORM 294-CAAPP FOR ONE OR MORE NONCOMPLIANT EMISSION UNITS FOR WHICH ISSUANCE OF A CAAPP PERMIT IS REQUESTED?	<input checked="" type="checkbox"/> *NA <input type="checkbox"/> YES <input type="checkbox"/> NO *NOTE: NOT APPLICABLE

56) HAS THE APPLICANT RETAINED A COPY OF THIS APPLICATION AT THE SOURCE? (NOTE: IF TRADE SECRET INFORMATION IS NOT BEING SUBMITTED, THEN ONLY THE ORIGINAL APPLICATION NEED BE INITIALLY SUBMITTED, HOWEVER, THE ILLINOIS EPA MAY REQUEST UP TO 4 COPIES OF THE FINAL APPLICATION PRIOR TO PUBLIC NOTICE.)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
57a) DOES THE APPLICATION CONTAIN TRADE SECRET INFORMATION?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
b) IF YES, HAS SUCH INFORMATION BEEN PROPERLY MARKED AND CLAIMED, AND TWO SEPARATE COPIES OF THE APPLICATION SUITABLE FOR PUBLIC INSPECTION BEEN SUBMITTED, IN ACCORDANCE WITH APPLICABLE REGULATIONS?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
58) DOES THE APPLICATION INCLUDE AN EARLY REDUCTION DEMONSTRATION FOR HAZARDOUS AIR POLLUTANTS (HAP) PURSUANT TO SECTION 112(i)(5) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	<input checked="" type="checkbox"/> *NA	<input type="checkbox"/> YES <input type="checkbox"/> NO
*NOTE: NOT APPLICABLE		
59) DOES THE APPLICATION INCLUDE A PROPOSED DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) FOR HAZARDOUS AIR POLLUTANTS PURSUANT TO SECTION 112 OF THE CLEAN AIR ACT AS AMENDED IN 1990?	<input checked="" type="checkbox"/> *NA	<input type="checkbox"/> YES <input type="checkbox"/> NO
*NOTE: NOT APPLICABLE		
60) HAS THE APPLICANT REGISTERED A RISK MANAGEMENT PROGRAM FOR ACCIDENTAL RELEASES PURSUANT TO SECTION 112(r) OF THE CLEAN AIR ACT AS AMENDED IN 1990 OR INTENDS TO COMPLY WITH THIS REQUIREMENT IN ACCORDANCE WITH ITS COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE?	<input checked="" type="checkbox"/> *NA	<input type="checkbox"/> YES <input type="checkbox"/> NO
*NOTE: NOT APPLICABLE		
61a) FOR CAAPP PERMIT RENEWALS, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64?	<input checked="" type="checkbox"/> *NA	<input type="checkbox"/> YES <input type="checkbox"/> NO
*NOTE: NOT APPLICABLE		
b) FOR SIGNIFICANT MODIFICATIONS AND INITIAL CAAPP APPLICATIONS SUBMITTED AFTER APRIL 20, 1998, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64 FOR EMISSION UNITS WITH POST-CONTROL EMISSIONS GREATER THAN OR EQUAL TO THE MAJOR SOURCE THRESHOLD?	<input checked="" type="checkbox"/> *NA	<input type="checkbox"/> YES <input type="checkbox"/> NO
*NOTE: NOT APPLICABLE		
62) FOR SIGNIFICANT MODIFICATIONS, DOES THE APPLICATION INCLUDE A DESCRIPTION OF THE PROPOSED CHANGE(S), INCLUDING ALL PHYSICAL CHANGES IN EQUIPMENT, CHANGES IN THE METHOD OF OPERATION, CHANGES IN EMISSIONS, AND ANY NEW APPLICABLE REQUIREMENTS WHICH WILL APPLY AS A RESULT OF THE PROPOSED CHANGE?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO

NOTE: ANSWERING "NO" TO ANY OF THE ABOVE (ITEMS 43-62, EXCEPT ITEM 57a) MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE.

63) DOES THE APPLICATION REQUEST TO UTILIZE THE OPERATIONAL FLEXIBILITY PROVISIONS AND INCLUDE THE INFORMATION REQUIRED FOR SUCH USE?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
64a) DOES THE APPLICANT HEREBY REQUEST A PERMIT SHIELD FOR THE ENTIRE SOURCE?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
b) IF NO, DOES THE APPLICATION CONTAIN A REQUEST FOR A PERMIT SHIELD FOR SPECIFIC ITEMS ONLY, IN ACCORDANCE WITH THE INSTRUCTIONS FOR A CAAPP PERMIT?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
65) DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF INSIGNIFICANT ACTIVITIES" FORM 297-CAAPP?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
66) DOES THE APPLICATION INCLUDE A DRAWING PROVIDING THE SOURCE LAYOUT?  IF NO, PLEASE NOTE THAT THE ILLINOIS EPA MAY REQUEST SUCH A DRAWING UPON DETAILED REVIEW OF THE APPLICATION.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

67) WHY IS THE APPLICANT APPLYING FOR A CAAPP PERMIT (CHECK ALL THAT APPLY)?

THE POTENTIAL TO EMIT ONE OR MORE AIR POLLUTANTS FOR THE SOURCE IS 100 TONS/YEAR OR GREATER.

THE SOURCE IS AN AFFECTED SOURCE FOR ACID RAIN DEPOSITION.

THE POTENTIAL TO EMIT VOM IS 25 TONS/YEAR OR MORE AND THE SOURCE IS LOCATED IN ONE OF THE FOLLOWING CHICAGO AREA COUNTIES OR TOWNSHIPS:

- COOK COUNTY
- DUPAGE COUNTY
- KANE COUNTY
- LAKE COUNTY
- MCHENRY COUNTY
- WILL COUNTY
- AUX SABLE TOWNSHIP, GRUNDY COUNTY
- GOOSE LAKE TOWNSHIP, GRUNDY COUNTY
- OSWEGO TOWNSHIP, KENDALL COUNTY

NOTE: THE U. S. EPA HAS APPROVED AN EXEMPTION ON NITROGEN OXIDES (NO<sub>x</sub>) EMISSIONS AS AN OZONE PRECURSOR IN THE CHICAGO OZONE NON-ATTAINMENT AREA. THEREFORE THE MAJOR SOURCE THRESHOLD FOR NO<sub>x</sub> EMISSIONS IS 100 TONS/YEAR UNTIL THIS EXEMPTION IS NO LONGER EFFECTIVE. SHOULD THE CURRENT NO<sub>x</sub> EXEMPTION BE NO LONGER EFFECTIVE, THE MAJOR SOURCE THRESHOLD FOR NO<sub>x</sub> EMISSIONS WILL BE 25 TONS/YEAR IN THE ABOVE CHICAGO AREA COUNTIES AND TOWNSHIPS.

THE POTENTIAL TO EMIT AN INDIVIDUAL HAZARDOUS AIR POLLUTANT IS 10 TONS/YEAR OR MORE, OR THE POTENTIAL TO EMIT ALL SOURCE WIDE HAZARDOUS AIR POLLUTANTS IS 25 TONS/YEAR OR MORE, OR MEETS AN APPLICABLE LOWER THRESHOLD.

THE SOURCE CONTAINS EQUIPMENT OR OPERATIONS SUBJECT TO CERTAIN USEPA EMISSION STANDARDS (NSPS AND NESHAP) FOR WHICH USEPA REQUIRES A CAAPP PERMIT.

68a) ARE ACTUAL EMISSIONS OF THE SOURCE BELOW THE APPLICABILITY LEVELS FOR A CAAPP PERMIT?  YES  NO

b) DOES THE APPLICATION CONTAIN PROPOSED PERMIT LIMITATIONS THAT WILL CONSTRAIN THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS OF THE SOURCE WILL FALL BELOW THE LEVELS FOR WHICH A CAAPP PERMIT IS REQUIRED?  YES  NO

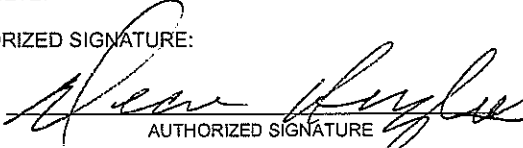
c) DOES THE APPLICANT HEREBY REQUEST A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CONSTRAINING THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS WOULD FALL BELOW APPLICABILITY LEVELS AND THEREBY EXCLUDE THE SOURCE FROM REQUIRING A CAAPP PERMIT?  YES  NO

**SIGNATURE BLOCK**

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

69) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY:  Eastern Regional Manager - Milling

AUTHORIZED SIGNATURE TITLE OF SIGNATORY

Dean Hughes 12, 2, 11

TYPED OR PRINTED NAME OF SIGNATORY DATE



Electronic Filing: Received, Clerk's Office 04/10/2023

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 25 1995

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

SUBJECT: Guidance an Enforceability Requirements for  
Limiting Potential to Emit through SIP and §112 Rules  
and General Permits

FROM: Kathie A. Stein, Director  
Air Enforcement. Division

TO: Director, Air and, Pesticides and Toxics  
Management Division, Regions I and IV  
Director, Air and Waste Management Division,  
Region II  
Director, Air, Radiation and Toxics Division,  
Region III  
Director, Air and Radiation Division,  
Region V  
Director, Air, Pesticides and Toxics Division,  
Region VI  
Director, Air and Toxics Division,  
Regions VII, VIII, IX, and X

Attached is a guidance document developed over the past year by the former Stationary Source compliance Division in coordination with the Air Enforcement Division, Office of Air Quality Planning and Standards, OAR's Office of Policy Analysis and Review, and the Office of General Counsel, as well-as with significant input from several Regions.

A number of permitting authorities have begun discussions with or have submitted programs for review by EPA that would provide alternative mechanisms for limiting potential to emit. Several authorities have submitted SIP rules and at least one State has been developing a state general permit approach.; We believe that this guidance is important to assist the EPA Regions as well as States in approving and developing such approaches.

For additional information regarding this guidance, please contact me or Clara Poffenberger of my staff at (202) 564-8709.

cc: John Rasnic, Director  
Manufacturing, Energy, and Transportation Division Office of Compliance

Air Branch Chiefs, Regions I -X

Attachment B

Enforceability Requirements for Limiting potential to Emit  
Through SIP and §112 Rules and General Permits

Introduction

As several EPA guidance describe, there are several mechanisms available for sources to limit potential to emit. EPA guidance have also describe the importance of practical enforceability or the means used to limit the Potential to Emit. This guidance is intended to provide additional guidance on practical enforceability for such limits. We provide references for guidance an practical enforceability for permits and rules in general and provide guidance in this document for application of the same principles to "limitations established by rule or general permit," as described in the guidance document issued January 25, 1995, entitled "Options for Limiting Potential to Emit (PTE) of a Stationary Source under section 112 and Title V of the Clean Air Act (Act)." The description is as follows:

Limitations established by rules. For less complex plant sites, and for source categories involving relatively few operations that are similar in nature, case-by-case permitting may not be the most administratively efficient approach to establishing federally enforceable restrictions. One approach that has been used is to establish a general rule which creates federally enforceable restrictions at one time for many sources (these rules have been referred to as "prohibitory" or "exclusionary" rules). The concept of exclusionary rules is described in detail in the November 3, 1993 memorandum ["Approaches to Creating Federally Enforceable Emissions Limits," from John S. Seitz]. A specific suggested approach for VOC limits by rule was described in EPA's memorandum dated October 15, 1993 entitled "Guidance for State Rules for Optional Federally Enforceable Emissions Limits Base Upon Volatile Organic Compound (VOC) Use." An example of such an exclusionary rule is a model rule developed for use in California. (The California model rule is attached, along with a discussion of its applicability to other situations - see Attachment 2). Exclusionary rules are included in a State's SIP or 112 program and generally become effective upon approval by the EPA.

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The EPA prefers the term "exclusionary rule" in that this phrase is a less ambiguous description of the overall purpose of these rules.

General permits -A concept similar to the exclusionary rule is the establishment of a general permit for a given source type. A general permit is a single permit that establishes terms and conditions that must be complied with by all sources subject to that permit. The establishment of a general permit could provide for emission limitations in a one-time permitting process, and thus avoid the need to issue separate permits for each source. Although this concept is generally thought of as an element of Title V permit programs there is no reason that a state or local agency could not submit a general permit program as a SIP submittal aimed at creating synthetic minor sources. Additionally FESOP [Federally Enforceable State Operating Permit usually referring to Title I State Operating Permit Programs approved under- the criteria established by EPA in the June 28, 1989 Federal Register notice, 54 FR 27274] programs can include general permits as an element of the FESOP program being approved into the SIP. The advantage of a SIP general permit, when compared to an exclusionary rule, is that upon approval by the EPA of the state's general permit program, a general permit could be written for an additional source type without triggering the need for the formal SIP revision process. (January 25, 1995 Seitz and Van Heuvelen memorandum, page 4.)

#### SIP or §112 Rules

Source-category standards 'approved in the SIP or under 112, if enforceable as a practical matter, can be used as federally enforceable limits on potential to emit. Such provisions require public participation and EPA review. Once a specific source qualifies under the applicability requirements of the source category rule, additional public participation is not required to make the limits federally enforceable as a matter of legal sufficiency since the rule itself underwent public participation and EPA review. The rule must still be enforceable as practical matter in order to be considered federally enforceable. A source that violates this type of rule limiting potential to emit below major source thresholds or is later determined not to qualify for coverage under the rule, could be subject to enforcement action for violation of the rule and for constructing or operating without a proper permit (a. part 70, a New Source Review permit, or operating without meeting §112 requirements, or any combination thereof).

#### General Permits

The title V regulations set out provisions for general permits covering numerous similar sources. The primary purpose of general permits is to provide a permitting alternative where

the normal permitting process would be overly burdensome, such as for area sources under section 112. General permits may be issued to cover any category of numerous similar sources, including major sources, provided that such sources meet certain criteria laid out in 40 CFR part 70. Sources may be issued general permits strictly for the purpose of avoiding classification as major source. In other words, general permits may be used to limit the potential to emit for numerous similar sources. However, general permits must also meet both legal and practical federal enforceable requirements.

With respect to legal sufficiency, the operating permit regulations provide that once the general permit has been issued, after opportunity for public participation and, EPA and affected State review, the permitting authority may grant or deny a source's request to be covered by a general permit without further public participation or EPA or affected State review. The action of granting or denying the source's request is not subject to judicial review. A general permit does not carry a permit shield. A source may be subject to enforcement action for operating without a part 70 permit if the source is later determined not to qualify for coverage under the general permit. Sources covered by general permits must comply with all part 70 requirements.

#### State SIP or 112(1) General Permits

Another mechanism available to limit potential to emit is a general permit program approved into the SIP or under section 112(1), the hazardous air pollutant program authority. This mechanism allows permitting authorities to issue and revise general permits consistent with SIP or 112(1) program requirements without going through the SIP or 112(1) approval process for each general permit or revision of a general permit. The program is also separate from title V, like Title I state operating permits, and issuance and revisions of the permits are to comply with title V procedures.

Once a program is approved, issuing and revising general permits should be significantly less burdensome and time-consuming for State legislative and rulemaking authorities. The EPA review should also be less burdensome and time-consuming. After a program is approved, permitting authorities have the flexibility to submit and issue general permits as needed rather than submitting them all at once as part of a SIP submittal. Given the reduced procedural burden, permitting authorities should be able to issue general permits to small groups or categories or sources rather than attempt to cover broad categories with a generic rule. We anticipate that specific permit requirements or general permits may be readily developed with the assistance of interested industry groups.

The state general permit approach may allow sources to meet the federal the federal enforceability requirements more easily than other approaches. However, to use this approach, states must have a federally enforceable program that provides the state the authority, to issue such permits; to accomplish this, EPA must approve the program into the SIP or pursuant to section. 112(1) of the Clean Air Act.

### Enforceability Principles

In 1989, in response to challenges from the Chemical Manufacturers Association and other industry groups, EPA reiterated its position that controls and limitations used to limit a source's Potential to emit must be federally enforceable. See 54 FR 27274 (June 28, 1989). Federally enforceable limits can be established by Clean Air Act programs such as NSPS, NESHAPs, MACTs, and SIP requirements. However, source-specific limits are generally set forth in permits. Generally, to be considered federally enforceable, the permitting program must be approved by EPA into the SIP and include provisions for public participation. "In addition, permit terms and conditions must be practicably enforceable to be considered federally enforceable. EPA provided specific guidance on federally enforceable permit conditions in a June 13, 1989 policy memo "Limiting Potential to Emit in New Source Permitting" from John Seitz and in the June 28, 1989 Federal Register notice (54 FR 27274) Additional guidance Can also be found in United states v. Louisiana Pacific, 682 F. Supp 1122 (D. Colo. 1987) 682 F. Supp 1141 (D. Colo.1988), which led to these guidance statements and a number of other memoranda covering practicable enforceability as it relates to rolling averages, short-term averages, and emission caps. See "Use of Long Term Rolling Averages to Limit Potential to Emit," from John. B. Rasnic to David Kee, February 24, 1992; "Limiting Potential to Emit;" from Mamie Miller to George Czerniak, August, 1992; "Policy Determination an Limiting Potential to Emit for Koch Refining Company's Clean Fuels Project", from John B. Rasnic to David Kee, March 13, 1992; and "3M Tape Manufacturing Division Plant, St. Paul, Minnesota" from. John B. Rasnic to David Kee, July 14, 1992.

In 1987, EPA laid out enforceability criteria that SIP rules must meet. see "Review of State Implementation Plans and Revisions for Enforceability and Legal Sufficiency," from Michael Alushin, Alan Eckert, and John Seitz, September 3, 1987 (1997 SIP memo). The criteria include clear statements as to applicability, specificity as to the standard that must be met, explicit statements of the compliance time frames (e.g. hourly, daily, monthly, or 12-month averages, etc.), that the time frame and method of compliance employed must be sufficient to protect the standard involved, record keeping requirements must be specified, and equivalency provisions must meet certain requirements.

Based on these precedents this guidance describes six enforceability criteria which a rule or a general permit must meet to make limits enforceable as a practical matter. In general, practical enforceability for a source-specific permit term means that the provision must specify (1) a technically accurate limitation and the portions of the source subject to the limitation; (2) the time period for the limitation (hourly, daily, monthly, annually); and (3) the method to determine compliance including appropriate monitoring, record keeping and reporting. For rules and general permits that apply to categories of sources, practical enforceability additionally requires that the provision (4) identify the categories of sources that are covered by the rule; (5) where coverage is optional, provide for notice to the permitting authority of the source's election to be covered by the rule; and (6) recognize the enforcement consequences relevant to the rule.

This guidance will address requirements (4) and (5) first as they are concepts that are unique to rules and general permits.

A. Specific Applicability

Rules and general permits designed to limit potential to emit must be specific as to the emission units or sources covered by the rule or permit. In other words, the rule or permit must clearly identify the category(ies) of the sources that qualify for the rule's coverage. The rule must apply to categories of sources that are defined specifically or narrowly enough so that specific limits and compliance monitoring can be identified and achieved by all sources in the categories defined.

A rule or general permit that covers a homogeneous group of sources should allow standards to be set that limit potential to emit and provide the specific monitoring requirements. (Monitoring is more fully addressed in section D.) The State can allow for generic control efficiencies where technically sound and appropriate, depending on the extent of the application and ability to monitor compliance with resultant emission limits. Similarly, specific and narrow applicability may allow generic material usage or limits on hours of operation to be sufficient. For example, a rule or general permit that applies to fossil fuel fired boilers of a certain size may allow for limits on material usage, such as fuel-type and quantity. A rule or general permit that applies only to standby diesel generators or emergency generators may allow restrictions on hours of operation to limit potential to emit. The necessary compliance terms (i.e., monitoring or record keeping) associated with any of these limits, such as with hours of operation, can readily be specified in the rule or the general permit itself.

General permits under Title V are assumed to include this

enforceability principle because the Part 70 regulations set out specific criteria that states should consider in developing their general permit provisions (See 57 FR 32278). These factors include requirements that

"categories of sources covered by general permits should be generally homogenous in terms of operations, processes, and emissions. All sources in the category should have essentially similar operations or processes and emit pollutants with similar characteristics."

Another factor stated is "sources should be subject to the same or substantially similar requirements governing operation, emissions, monitoring, reporting, or record keeping." Examples of source categories appropriate for general permits include: degreasers, dry cleaners, small heating systems, sheet fed printers, and VOC storage tanks (see 57 FR 32278).

B. Reporting or Notice to Permitting Authority

The rule or general permit should provide specific reporting requirements as part of the compliance method. Although the compliance method for all sources must include record keeping requirements, the permitting authority may make a determination that reporting requirements for small sources would provide minimal additional compliance assurance. Where ongoing reporting requirements are determined not to be reasonable for a category of sources, the rule or general permit should still provide that the source notify the permitting authority of its coverage by the rule or the permit. In the limited situation where all the sources described in a source category are required to comply with the all of the provisions of a rule or general permit, notice is not needed. However, where there are no reporting requirements and no opt-in provisions, the permitting authority must provide the public with the names and locations of sources subject to the rule or permit.

For Title V general permits, Part 70 requires sources to submit an application for a general permit which must be approved or disapproved by the permitting authority. For SIP or §112 rules and SIP or §112 general permits, in response to receiving the notice or application, the permitting authority may issue an individual permit, or alternatively, a letter or certification. The permitting authority may also determine initially whether it will issue a response for each individual application or notice, and may initially specify a reasonable time period after which a source that has submitted an application or notice will be deemed to be authorized, to operate under the general permit or SIP or §112 rule.



C. Specific Technically Accurate Limits

The rule or general permit issued pursuant to the SIP or §112 must specify technically accurate limits on the potential to emit. The rule or general permit must clearly specify the limits that apply, and include the specific associated compliance monitoring. (The compliance monitoring requirements are discussed further in the next section.) The standards or limits must be technically specific and accurate to limit potential to emit, identifying any allowed deviations.

The 1987 policy on SIP enforceability states that limitations "must be sufficiently specific so that a source is fairly on notice as to the standard it must meet." For example, "alternative equivalent technique" provisions should not be approved without clarification concerning the time period over which equivalency is measured as well as whether the equivalency applies on a per source or per line basis or is facility-wide.

Further, for potential to emit limitations, the standards set must be technically sufficient to provide assurance to EPA and the public that they actually represent a limitation on the potential to emit for the category of sources identified. Any presumption for control efficiency must be technically accurate and the rule must provide the specific parameters as enforceable limits to assure that the control efficiency will be met. For example, rules setting presumptive efficiencies for incineration controls applied to a specific or broad category must state the operating temperature limits or range, the air flow, or any other parameters that may affect the efficiency on which the presumptive efficiency is based. Similarly, material usage limits such as fuel limits, as stated above, require specifying the type of fuel and may require specifying other operating parameters.

A rule that allows sources to submit the specific parameters and associated limits to be monitored may not be enforceable because the rule itself does not set specific technical limits. The submission of these voluntarily accepted limits on parameters or monitoring requirements would need to be federally enforceable. Absent a source-specific permit and appropriate review and public participation of the limits, such a rule is not consistent with the EPA's enforceability principles.

D. Specific compliance Monitoring

The rule must specify the methods to determine compliance. Specifically, the rule must state the monitoring requirements, record keeping requirements, reporting requirements, and test methods as appropriate for each potential to emit limitation; and clarity which methods are used for making a direct determination of compliance with the potential to emit limitations.

"Monitoring" refers to many different types of data collection, including continuous emission or opacity monitoring, and measurements of various of Parameters of process or control devices (e.g. temperature, pressure drop, fuel usage) and record keeping of parameters that been limited ,such as hours of operation, production levels, or raw material usage. Without a verifiable plantwide, verifiable emission limits must assigned to each unit or group of units subject to the subject to he rule or general permit. Where monitoring cannot be used to determine emissions directly, limits on appropriate operating parameters must be established for the units or source, and must the monitoring must be sufficient to yield data form the relevant time period that is representative of the source's compliance with the standard or limit. Continuous emissions monitoring, especially in the case of smaller sources, is not required.

E. Practicably Enforceable Averaging Times

The averaging time for all limits must be practicably enforceable. In other words, the averaging time period must readily allow for determination of compliance. EPA policy expresses a preference toward short term limits, generally daily but not to exceed one month. However, EPA policy allows for rolling limits not to exceed 12 months or 365 days where the permitting authority finds that the limit provides an assurance that compliance can be readily determined and verified. See June 13, 1989 "Guidance on Limiting Potential to Emit," February 24, 1992 memorandum "Use of Long Term Rolling Averages to Limit Potential to Emit" from John Rasnic to David Kee and March 13 1992 "Policy Determination on Limiting Potential to Emit for Koch Refining Company Clean Fuels Project" from John B. Rasnic to David Kee, stating that determinations to allow an annual rolling average versus a shorter term limit must be made on a case by case basis. Various, factors weigh in favor of allowing a long term rolling average, such as historically unpredictable emissions. Other factors may weigh in favor of shorter term limit, such as the inability to set interim limits during the first year. The permitting agency must make a determination as to what monitoring and averaging period is warranted for the particular source-category in light of how close the allowable emissions would be to the applicability threshold.

F. Clearly Recognized Enforcement

Violations of limits imposed by the rule or general permit that limit potential to emit constitute violations of major source requirements. In other words the source would be violating a "synthetic minor" requirement which may result in the source being treated as a major source under Titles I and V. The 1989 Federal Register Notice provides for separate enforcement

and permitting treatment depending on whether the source subsequently chooses to become a major or remain minor. Thus violations of the rule or general permit or violation of the specific conditions of the rule or general permit subjects the source to potential enforcement under the Clean Air Act and state law. The operating permit rule states that notwithstanding the shield provisions of part 70, the source subject to a general permit may be subject to enforcement action for operating without a part 70 permit if the source is later determined not to qualify or the conditions and terms of the general permit. Moreover, violation of any of the conditions of the rule or general permit may result in a different determination of the source's potential to emit and thus may subject the source to major requirements and to enforcement action for failure to comply with major source requirements from the initial determination.

G. Rule Requirements for State General Permit Programs

As discussed above, general permit programs must be submitted to EPA for approval under SIP authority or under section 112(1), or both, depending on its particular pollutant application. SIP and §112(1) approval and rulemaking procedures must be met, including public notice and comment. The specific application of the enforceability principles for establishing State SIP or §112(1) general permit programs require that the rule establishing the program set out these principles as rule requirements. In other words, these principles must be specific rule requirements to be met by each general permit.

The rule establishing the program must require that (1) general permits apply to a specific and narrow category of sources; (2) sources electing coverage under general permits where coverage is not mandatory, provide notice or reporting to the permitting authority; (3) general permits provide specific and technically accurate (verifiable) limits that restrict the potential to emit; (4) general permits contain specific compliance requirements; (5) Limits in general permits are established based on practicably enforceable averaging times; and (6) violations of the permit are considered violations of the state and federal requirements and result in the source being subject to major source requirements.

In addition, since the rule establishing the program does not provide the specific standards to be met by the source, each general permit, but not each application under each general permit, must be issued pursuant to public and EPA notice and comment. The 1989 Federal Register notice covering enforceability of operating permits requires that SIP operating permit programs issue permits pursuant to public and EPA notice and comment. Title V requires that permits, including general permits, be issued subject to EPA objection.

Finally, sources remain liable or compliance with major source requirements if the specific application of a general permit to the source does not limit the source's potential to emit below major source or major modification thresholds. (The limits provided in these mechanisms may actually limit the potential to emit of sources but may not limit the potential to emit for some sources to below the threshold necessary to avoid major source requirements. For example, a general permit for industrial boilers may in fact provide limits that are sufficient to bring a source with only two or three boilers to below the subject thresholds but a source with more than three boilers may have a limited PTE but not limited below the major source threshold.) Also, where the source is required to use another mechanism to limit potential to emit, i.e., a construction permit, the general permit may not be relied upon by the source or the State, to limit potential to emit.

Permits issued pursuant to the approved program, meeting the above requirements, are adequate to provide federally enforceable limits on potential to emit for New Source Review, title V, and §112 programs as long as they are approved pursuant to SIP (section 110) and section 112(1) authorities.

**Barria, German**

---

**From:** Michelle Bublitz <Michelle.Bublitz@bunge.com>  
**Sent:** Wednesday, July 27, 2022 12:37 PM  
**To:** Barria, German  
**Cc:** James Burris  
**Subject:** [External] RE: Waiver - Const.docx  
**Attachments:** 96020027 - Bunge North America Inc - FESOP - 07-05-2022 - Bunge Comments.docx; Danville - FESOP Emission Limits Documentation.docx; FESOP - Emission Unit Comparison FESOP to Actual - July 24, 2022 jb.xlsx

German, please find attached Bunge's comments on the draft FESOP as well as a spreadsheet with our review and comments on appropriate emissions limits for facility sources and emission limit justification information. In addition to our comments included in the word document, please see the following comments:

- Bunge requests that the FESOP indicate that the conditions and limits in the FESOP (once issued) supersede conditions and limits in all previous construction and operating permits.
- The facility is a minor source of hazardous air pollutants
- The two plant boilers are capable of only burning natural gas. They were originally permitted to burn fuel oil and propane as backup but are not longer capable of burning those fuels.
- The proposed emissions limits for the boilers are based on a heat content higher than 1000 Btu/scf. Bunge suggests the limits should be based on a heat content of 1000 Btu/scf
- Remove references to specific filter/cyclone devices in the emission unit description. Replacement of filters/cyclones is exempt from permitted under 201.146(hhh). Would not want a new filter/cyclone to not match what is listed in the permit.
- Bunge's proposed emission limits are based on grain loading factors that are achievable and can be demonstrated. The justification for the grain loading values used to calculate "FESOP PTE" is included on the attached document "Grain Loading-Emission Limit Documentation".
- A comparison of emission unit information and emission limit information in the draft and Bunge's proposed descriptions and limits is attached. A couple of things to note
  - Bunge left this in excel form for each of copying and pasting
  - Columns B-I contain information from the FESOP draft.
  - Columns J, K, and Y-AE were for Bunge's internal comparison purposes
  - Bunge believes that the following information should be used to replace the information in the current draft
    - Columns M, N, P, Q, R, S, T-W
- Bunge strongly requests that IEPA remove the requirement to stack test all of the processing sources at the location within 90 days of permit issuance. This facility has roughly 135 sources that IEPA is proposing to require stack testing within 90 days of permit issuance and then again every 5 years. This is an incredibly onerous requirement and in many cases is not feasible.
  - Bunge is proposing emission limits that are based on reasonable grain loading rates from filters and cyclones.
  - These limits are achievable by well operated and maintained equipment.
  - Many of the sources are in areas that can not accommodate stack testing equipment
  - Many of the sources are not intended to operate in a manner that accommodates stack testing
    - Filter that only operate for a short time during material conveying
    - Bin vent filters

Sincerely,

Michelle

**Michelle Bublitz**

Environmental Director

Phone: 314.292.2652

Mobile: 314.250.3056

[bunge.com](http://bunge.com)

[Linkedin.com/in/michelle-bublitz/](https://www.linkedin.com/in/michelle-bublitz/)

1391 Timberlake Manor Parkway, Chesterfield, MO 63385



**From:** Barria, German <[German.Barria@Illinois.gov](mailto:German.Barria@Illinois.gov)>  
**Sent:** Wednesday, July 20, 2022 3:22 PM  
**To:** James Burris <[James.Burris@bunge.com](mailto:James.Burris@bunge.com)>  
**Cc:** Michelle Bublitz <[Michelle.Bublitz@bunge.com](mailto:Michelle.Bublitz@bunge.com)>  
**Subject:** RE: Waiver - Const.docx

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Hello Jim,

I was told that we will need another waiver, the first of August is coming quick, and although we can put the requirement for a fugitive dust plan in the FESOP of within 90 days of issuance of the FESOP, We still need comments on the draft permit, or a statement that indicates that it is ok to move forward with the draft as is. It is my understanding that there was an inspection recently, we will need to wait for the field inspection report. I will say another waiver until September 1, hopefully we can moved the permits sometime during the month of august though.

*German Barria*

Environmental Protection Specialist,  
IEPA, Bureau of Air, Permit Section, FESOP/LOP Unit  
Phone: 217-785-0767



**Illinois Environmental  
Protection Agency**

**From:** James Burris <[James.Burris@bunge.com](mailto:James.Burris@bunge.com)>  
**Sent:** Thursday, July 7, 2022 7:47 AM  
**To:** Barria, German <[German.Barria@Illinois.gov](mailto:German.Barria@Illinois.gov)>  
**Cc:** Michelle Bublitz <[Michelle.Bublitz@bunge.com](mailto:Michelle.Bublitz@bunge.com)>  
**Subject:** [External] RE: Waiver - Const.docx

German,

Attached is a pdf copy of the signed 90-day waiver letter. It is also being sent via registered mail.

Let me know if you have any questions.

**Jim Burris, PE**

**Phone:** 314-292-2937

**Mobile:** 314-308-3904

1391 Timberlake Manor Parkway  
Chesterfield, MO 63017



**From:** Barria, German <[German.Barria@Illinois.gov](mailto:German.Barria@Illinois.gov)>

**Sent:** Tuesday, July 5, 2022 1:57 PM

**To:** James Burris <[James.Burris@bunge.com](mailto:James.Burris@bunge.com)>

**Subject:** FW: Waiver - Const.docx

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I resending you the template waiver letter.

*German Barria*

Environmental Protection Specialist,  
IEPA, Bureau of Air, Permit Section, FESOP/LOP Unit  
Phone: 217-785-0767



**Illinois Environmental  
Protection Agency**

**From:** Barria, German

**Sent:** Wednesday, June 22, 2022 2:41 PM

**To:** James Burris <[James.Burris@bunge.com](mailto:James.Burris@bunge.com)>

**Subject:** Waiver - Const.docx

Attached is what we will ask a waiver of the 90-days

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Boiler Natural Gas limits are based on a heat content higher than 1,000 Btu/CF. Using 1,000 Btu/CF the annual limits should be:

Boiler (MMBTu/hr)	Fuel Use (MMCF/yr)	CO (tpy)	NOx (tpy)	PM/PM10 (tpy)	SO2 (tpy)	VOC (tpy)
B&W (96.55)	845.8	35.52	21.14	3.21	0.25	2.33
Clayton (27.90)	244.4	10.26	12.22	0.93	0.07	0.67

Changes to emission unit (filter and cyclone) grain loading based on what is achievable and can be demonstrated. Below is the justification for the grain loading values used to calculate FESOP PTE.

Cell F15

Truck Dump No.

Stack Test Nov 15, 1999 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.00165	0.00165	0.0020	0.002

Use 90% CI and expected filter grain loading.

Cell F16/F17

Truck Dump No. 2 (and all other grain receiving baghouses)

Stack Test Feb 22, 2007 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.00017	0.00017	0.00031	0.002
PM10	0.00035	0.00017	0.00031	0.0015

Use 0.002 for PM, expected filter grain loading and because the stack test showed good values, use 0.0015 for PM10 (75% of 0.002).

Cell F18

Vacuum System Filters

Stack Test None

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.001	-	-	0.001

Expected value for vacuum filters.

Cell F19

LTMS Handling Aspiration Filter (grain handling aspiration)

Stack Test Oct 8, 2004 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.00129	0.00129	0.0015	0.0015

Use 90% CI.

Cell F37/F38

Corn Cleaning Filter (three corn cleaning filters)

Stack Test Sep 13, 2000 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP

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PM	0.00063	0.00063	0.0011	0.002
PM10	0.00087	0.00063	0.0011	0.0015

Use 0.002 for PM, expected filter grain loading and because the stack test showed good values, use 0.0015 for PM10 (75% of 0.002).

### Cell F39/F40

Bran/Camas Milling Aspiration

Stack Test Sep 13, 2000 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.00063	0.00034	0.00041	0.002
PM10	0.00087	0.00034	0.00041	0.0015

Use 0.002 for PM, expected filter grain loading and because the stack test showed good values, use 0.0015 for PM10 (75% of 0.002).

### Cell F41/F42

S. Lunchroom Corn Milling Aspiration (use for all dry corn milling processing filters)

Stack Test Sep 14, 2000 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.00063	0.00037	0.00047	0.002
PM10	0.00087	0.00037	0.00047	0.0015

Use 0.002 for PM, expected filter grain loading and because the stack test showed good values, use 0.0015 for PM10 (75% of 0.002).

### Cell F43/F44

Destrehan Esher Wyss Dryer Cyclone Stack Test (use only for whole grain dryer cyclone)

Stack Test Mar 22, 2016 Method 201A/202

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.03597	0.00040	0.00052	0.030
PM10	0.02536	0.00364	0.00432	0.020

Stack Test values from Destrehan look pretty good, but cyclone emission with condensables can be unpredictable, use a realistically expected grain loading.

### Cell F45/F94

One other dry corn mill process cyclone and two specialty milling cyclones

Stack Test None

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.020	-	-	0.020

Use expected cyclone grain loading.

### Cell F95

Two specialty milling filters installed after 2015

Stack Test None

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.0020	-	-	0.0020

Use expected filter grain loading.

### Cell F96/F97 and F192/F193

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S Lunchroom Filter (80 specialty milling filters installed prior to 2015 and 8 hominy feed mill filters)

Stack Test Sep 14, 2000 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.00037	0.00037	0.00047	0.002
PM10	0.00060	0.00037	0.0047	0.0015

Use 0.002 for PM, expected filter grain loading and because the stack test showed good values, use 0.0015 for PM10 (75% of 0.002).

Cell F95

Rail Loadout Filter (single filter only)

Stack Test Feb 10, 2011 Method 5

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM/PM10	0.00067	0.00067	0.00071	0.0020

Use expected filter grain loading.

Cell F96/F497

Tail Stock Dryer Cyclone (use only three dryer cyclones)

Stack Test Sep 13, 2000 Method 5 and 201A/202

Pollutant	AER value	Test Avg	Test 90%CI	FESOP
PM	0.0454	0.0454	0.052	0.0454
PM10	0.00193	0.00193	0.002	0.0020

Pm uses stack test average, PM10 uses expected filter and stack test 90% CI..

<u>IEPA FESOP Draft</u>	Vaues from the IEPA draft FESOP					Calc'd (lb/hr)	Calc'd (tpy)
	<u>Emission Unit Description</u>	<u>Permit Condition</u>	<u>Grain Loading (gr/dscf)</u>	<u>Exhaust Flow (scfm)</u>	<u>Emisison Limits PM/PM10 (lb/hr) (tpy)</u>		
<u>Corn, Soybean &amp; Products Receiving, Cleaning and Storage (Pre-NSPS)</u>							
Truck Dump #1 (5012-0001-0016) controlled by Baghouse Filters APM 40072.10;	17a	0.0017	18,500	0.30	1.20	0.27	1.18
Hoffman Bldg 301 Vacuum (5012-0010-0054) controlled by Baghouse Filters HOFFMAN 48X96;	17a	0.0017	1,000	0.02	0.10	0.01	0.06
West Headhouse Transfer General Aspiration (5012-0005-0029) controlled by Baghouse Filters DD 484RF12;	17a	0.0017	55,000	0.78	3.40	0.80	3.51
Railcar Dump Pit (5012-0004-0016) controlled by Baghouse Filters APM 41120.12;	17a	0.0017	27,000	0.39	1.70	0.39	1.72
Track 6 Vacuum (5012-0010-0047) controlled by Baghouse Filters HOFFMAN 48X96;	17a	0.0017	700	0.01	0.04	0.01	0.04
Cleanings Discharge (4870-0013-0015) controlled by Baghouse Filters BUHLER 16S-6-30;	17a	0.0006	1,900	0.01	0.04	0.01	0.04
Grain Receiving Fugitives	17a					5.40	5.40
						<b>11.88</b>	<b>11.95</b>
<u>Corn, Soybean &amp; Products Receiving, Cleaning and Storage (NSPS):</u>							
Truck Dump #4 & W. Gallery Aspiration (5012-0005-0021) controlled by Baghouse Filters DD 484RF12;	17b	0.0017	36,017	0.52	2.30	0.52	2.30
Cleaning North APM (4870-0013-0001) controlled by Baghouse Filters APM 41216.12;	17b	0.00085	41,000	0.30	1.31	0.30	1.31
Corn Cleaning Bldg 115 #2 (4880-0034-0069) controlled by Baghouse Filters TD 484RF12;	17b	0.00085	57,372	0.42	1.83	0.42	1.83
North St Grain/Meal Truck Dump Pit #2 (5012-0002-0012) controlled by Baghouse Filters DD 48RF12;	17b	0.0017	20,000	0.29	1.28	0.29	1.28
						<b>6.72</b>	<b>6.72</b>
<u>Dry Corn Milling, Processing and Products Handling:</u>							
Bemis Bagging (4870-0010-0055) controlled by Baghouse Filters APM 16019.8;	17c	0.0006	1,660	0.01	0.04	0.01	0.04
Bagging General Aspiration (4870-0010-0030) controlled by Baghouse Filters APM 40020.8;	17c	0.0006	3,400	0.02	0.08	0.02	0.08
Bagging Packer General Aspiration (4870-0013-0019) controlled by Baghouse Filters APM 14042.8;	17c	0.0006	4,400	0.02	0.10	0.02	0.10
Bran Dryer Process (4880-0042-0057) controlled by Baghouse Filters APM 14036.8;	17c	0.0006	2,800	0.01	0.06	0.01	0.06
Bran Sifter Process (4880-0042-0062) controlled by Baghouse Filters APM 10144.8;	17c	0.0006	8,230	0.04	0.19	0.04	0.19
East Meal Dryer/Cooler (4880-0034-0054) controlled by Baghouse Filters APM 40120.10;	17c	0.0006	13,000	0.07	0.29	0.07	0.29
West Meal Dryer (4880-0034-0059) controlled by Baghouse Filters APM 40144.8;	17c	0.0006	13,295	0.07	0.30	0.07	0.30
8th FR DRACCO Screening (4880-0034-0027) controlled by Baghouse Filters DRACO 6MB-60;	17c	0.0006	42,000	0.22	0.95	0.22	0.95
9th FR DRACCO Screening (4880-0034-0001) controlled by Baghouse Filters DRACO 8MB-72;	17c	0.0006	69,500	0.36	1.57	0.36	1.57
Bldg 105 Vacuum (4880-0032-0052) controlled by Baghouse Filters HOFFMAN 36X96;	17c	0.0006	1,500	0.01	0.03	0.01	0.03
Bulk Loading White Goods (4870-0021-0001) controlled by Baghouse Filters DD 484RF12;	17c	0.0006	36,000	0.19	0.81	0.19	0.81
Bldg 104 Vacuum (4870-0015-0016) controlled by Baghouse Filters HOFFMAN 38405A;	17c	0.0006	1,500	0.01	0.03	0.01	0.03
Bran Bin (4880-0042-0054) controlled by Baghouse Filters BUHLER 16S-6-30;	17c	0.0006	1,960	0.01	0.04	0.01	0.04
6th Flr Screening (4880-0008-0028) controlled by Baghouse Filters WIEDENMANN 2X4 LF150-1200;	17c	0.0006	10,000	0.05	0.23	0.05	0.23
West 4th Floor Gravity Tables (4880-0008-0040) controlled by Baghouse Filters WIEDENMANN 2X5 LF225-2250;	17c	0.0006	10,000	0.05	0.23	0.05	0.23

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	South Lunchroom Screening (4880-0034-0010) controlled by Baghouse Filters CD 484RF12;	17c	0.0006	42,000	0.22	0.95	0.22	0.95
	South CD Screening (4880-0034-0042) controlled by Baghouse Filters CD 484RF12;	17c	0.0006	37,500	0.19	0.84	0.19	0.84
	North CD General Aspiration (4880-0034-0048) controlled by Baghouse Filters CD 484RF12;	17c	0.0006	30,000	0.15	0.68	0.15	0.68
	North Lunchroom Screening (4880-0034-0019) controlled by Baghouse Filters CD 484RF12;	17c	0.0006	36,000	0.19	0.81	0.19	0.81
	Pack & Bulk Loading Bldg 115 (4870-0013-0024) controlled by Baghouse Filters TD 484RF12;	17c	0.0006	42,000	0.22	0.95	0.22	0.95
	CAMAS/Bran Bldg 115 (4880-0034-0077) controlled by Baghouse Filters TD 484RF12;	17c	0.0006	45,021	0.23	1.01	0.23	1.01
	Thru/Tail Stock Dryers Bldg 115 (4880-0034-0071) controlled by Baghouse Filters TD 484RF12;	17c	0.0006	56,000	0.29	1.26	0.29	1.26
	Bldg 115 Vacuum (4880-0032-0070) controlled by Baghouse Filters HOFFMAN S54002;	17c	0.0006	825	0.01	0.02	0.004	0.02
	Gravity Table #3 (4880-0044-0070) controlled by Baghouse Filters TORIT CPC-12;	17c	0.0006	6,200	0.03	0.14	0.03	0.14
	Gravity Table #4 (4880-0044-0073) controlled by Baghouse Filters TORIT CPC-12;	17c	0.0006	6,200	0.03	0.14	0.03	0.14
	Gravity Table #5 (4880-0044-0076) controlled by Baghouse Filters TORIT CPC-12;	17c	0.0006	6,200	0.03	0.14	0.03	0.14
	Track 2 Railcar Unloading Secondary Receiver (4870-0005-0003) controlled by Baghouse Filters USS INC. 15CF P/D;	17c	0.0006	440	0.01	0.01	0.002	0.01
X	GERM General Aspiration (4880-0009-0005) controlled by Baghouse Filters APM 16030.4;	17c	0.0006					
	Lab Filter (4932-0001-0001) controlled by Baghouse Filters APM 14106.4;	17c	0.0006	900	0.01	0.02	0.0046	0.02
	AB Fin Product Surge Bin North (4900-0003-0039) controlled by Baghouse Filters MICROPUL 8B;	17c	0.0006	742	0.01	0.02	0.0038	0.02
	AB Fin Product Surge Bin South (4900-0003-0045) controlled by Baghouse Filters MICROPUL 8B;	17c	0.0006	742	0.01	0.02	0.0038	0.02
	1/2 Pulvocron Meal Receiver (4990-0005-0012) controlled by Baghouse Filters BUHLER 9-6-100;	17c	0.0006	380	0.01	0.01	0.002	0.01
	1/2 Pulvocron Visc Flour Receiver (4990-0005-0042) controlled by Baghouse Filters BUHLER 16-8-100;	17c	0.0006	380	0.01	0.01	0.002	0.01
	3/4 Pulvocron Meal Receiver (4990-0002-0010) controlled by Baghouse Filters BUHLER 9-6-100;	17c	0.0006	380	0.01	0.01	0.002	0.01
	9/10 Pulvocron Meal Secondary Receiver (4990-0004-0013) controlled by Baghouse Filters BUHLER 16009.4;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
	7/8 Pulvocron Meal Secondary Receiver (4990-0003-0010) controlled by Baghouse Filters BUHLER 16009.4;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
	#3 Pulvocron (4990-0002-0019) controlled by Baghouse	17c	0.0006	2,904	0.01	0.07	0.01	0.07
	#4 Pulvocron (4990-0002-0022) controlled by Baghouse	17c	0.0006	2,904	0.01	0.07	0.01	0.07
	#5 Pulvocron (4900-0001-0039) controlled by Baghouse	17c	0.0006	2,904	0.01	0.07	0.01	0.07
	#1 Pulvocron (4990-0005-0021) controlled by Baghouse Filter BUHLER 37-8-220;	17c	0.0006	2,904	0.01	0.07	0.01	0.07
	#2 Pulvocron (4990-0005-0024) controlled by Baghouse Filter BUHLER 37-8-220;	17c	0.0006	2,904	0.01	0.07	0.01	0.07
	#7 Pulvocron (4990-0003-0019) controlled by Baghouse Filter APM 16022.8;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
	#8 Pulvocron (4990-0003-0022) controlled by Baghouse Filter APM 16022.8;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
	#9 Pulvocron (4990-0004-0022) controlled by Baghouse Filter APM 16022.8;	17c	0.0006	3,000	0.02	0.07	0.02	0.07

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#10 Pulvocron (4990-0004-0025)) controlled by Baghouse Filter APM 16022.8;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
3/4 Pulvocron Grinder Surge Bin (4990-0002-0008) controlled by Baghouse Filters MICROPUL 2 1/2B;	17c	0.0006	500	0.01	0.01	0.003	0.01
1/2 Pulvocron Grinder Surge Bin (4990-0005-0010) controlled by Baghouse Filters MICROPUL 2 1/2B;	17c	0.0006	500	0.01	0.01	0.003	0.01
9/10 Pulvocron Grinder Surge Bin (4990-0004-0011) controlled by Baghouse Filters APM 16104.4;	17c	0.0006	570	0.01	0.01	0.003	0.01
7/8 Pulvocron Grinder Surge Bin (4990-0003-0008) controlled by Baghouse Filters APM 16104.4;	17c	0.0006	500	0.01	0.01	0.003	0.01
1/2 Flour Surge Bin (4990-0005-0028) controlled by Baghouse Filters MICROPUL 2 1/2B;	17c	0.0006	500	0.01	0.01	0.003	0.01
3/4 Flour Surge Bin (4990-0002-0026) controlled by Baghouse Filters MICROPUL 2 1/2B;	17c	0.0006	500	0.01	0.01	0.003	0.01
7/8 Flour Surge Bin (4990-0003-0026) controlled by Baghouse Filters APM 16104.4;	17c	0.0006	570	0.01	0.01	0.003	0.01
9/10 Flour Surge Bin (4990-0004-0029) controlled by Baghouse Filters APM 16104.4;	17c	0.0006	570	0.01	0.01	0.003	0.01
HIBOND Visc. Flake Roller Mill (4990-0006-0024) controlled by Baghouse Filters APM 15066.8;	17c	0.0006	7,200	0.04	0.16	0.04	0.16
CSM Blended Food Receiver (4820-0001-0029) controlled by Baghouse Filters APM 40070.7;	17c	0.0006	4,077	0.02	0.09	0.02	0.09
Blended Food Packaging (4820-0001-0052) controlled by Baghouse Filters APM 16150.6;	17c	0.0006	10,000	0.05	0.23	0.05	0.23
ALLBOND Visc. Flour General Aspiration (4900-0001-0068) controlled by Baghouse Filters BUHLER 16-8-100;	17c	0.0006	867	0.01	0.02	0.004	0.02
Milk Bins (4820-0003-0007) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	400	0.01	0.01	0.002	0.01
300 Series Binning (4990-0007-0049) controlled by Baghouse Filters MICROPUL 1F1;	17c	0.0006	4,452	0.02	0.10	0.02	0.1
Soy Meal General Aspiration (4990-0001-0002) controlled by Baghouse Filters APM 16022.4;	17c	0.0006	1,435	0.01	0.03	0.01	0.03
Soy Meal Surge Bin (4990-0001-0006) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Meal Bin Cooler (4990-0001-0025) controlled by Baghouse Filters APM 400072.10;	17c	0.0006	9,158	0.05	0.21	0.05	0.21
3/4 Soy Flour Receiver (4990-0002-0043) controlled by Baghouse Filters APM16014.8;	17c	0.0006	700	0.01	0.02	0.004	0.02
Tri Cal Bins (4820-0003-0072) controlled by Baghouse Filters APM 16009.8;	17c	0.0006	780	0.01	0.02	0.004	0.02
5/6 Allond Receiver (4900-0001-0058) controlled by Baghouse Filters APM 16014.8;	17c	0.0006	1,100	0.01	0.02	0.01	0.02
7/8 Soy Flour Receiver (4990-0003-0032) controlled by Baghouse Filters APM 16014.8;	17c	0.0006	1,100	0.01	0.02	0.01	0.02
Bin 308 (4990-0002-0033) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Bin 309 (4990-0002-0036) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Bin 310 (4820-0003-0038) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Bin 508 (4820-0002-0068) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Bin 509 (4820-0002-0072) controlled by Baghouse Filters MICROPUL 6B;	17c	0.0006	509	0.01	0.01	0.003	0.01
9/10 Pulvicron Receiver (4990-0004-0037) controlled by Baghouse Filters BUHLER 16-6-220;	17c	0.0006	700	0.01	0.02	0.004	0.02
Milk Bins (4820-0002-0038) controlled by Baghouse Filters MICROPUL 21-6-220;	17c	0.0006	807	0.01	0.02	0.004	0.02
Milk Bin Bag Dump (4820-0002-0035) controlled by Baghouse Filters APM 14048.6;	17c	0.0006	6,000	0.03	0.14	0.03	0.14

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Blending Batch Bin General Aspiration (4990-0007-0029) controlled by Baghouse Filters BUHLER 25S-6-30;	17c	0.0006	1,250	0.01	0.03	0.01	0.03
Blender General Aspiration (4990-0007-0036) controlled by Baghouse Filters BUHLER 16S-6-30;	17c	0.0006	1,055	0.01	0.02	0.01	0.02
Blender General Aspiration (4990-0007-0032) controlled by Baghouse Filters MICROPUL 36S-8-30;	17c	0.0006	1,645	0.01	0.04	0.01	0.04
CSB Binning General Aspiration (4820-0003-0063) controlled by Baghouse Filters BUHLER 64S-6-20;	17c	0.0006	3,200	0.02	0.07	0.02	0.07
CSB Binning General Aspiration (4820-0003-0059) controlled by Baghouse Filters BUHLER 64S-6-20;	17c	0.0006	2,739	0.01	0.06	0.01	0.06
General Aspiration (4990-0006-0040) controlled by Baghouse Filters BUHLER 9-8-220;	17c	0.0006	742	0.01	0.02	0.004	0.02
#5 SL General Aspiration & #5 Expander (4900-0001-0091) controlled by Baghouse Filters APM 14024.6;	17c	0.0006	3,000	0.02	0.07	0.02	0.07
Fiber Receiver General Aspiration (4990-0011-0001) controlled by Baghouse Filters BUHLER 9-8-220;	17c	0.0006	648	0.01	0.01	0.003	0.01
PCM Binning (4820-0002-0011) controlled by Baghouse Filters MICROPUL 1F1;	17c	0.0006	2,241	0.01	0.05	0.01	0.05
CF Bran Packing Binning (4870-0010-0005) controlled by Baghouse Filters MICROPUL 25-8-220;	17c	0.0006	1,232	0.01	0.03	0.01	0.03
Bldg 111 Vacuum (4900-0005-0035) controlled by Baghouse Filters HOFFMAN 60X120;	17c	0.0006	1,500	0.01	0.03	0.01	0.03
110/210 Receiver General Aspiration (4870-0006-0006) controlled by Baghouse Filters APM 16030.4;	17c	0.0006	1,400	0.01	0.03	0.01	0.03
Fiber Receiver General Aspiration (4990-0011-0029) controlled by Baghouse Filters APM 16019.4;	17c	0.0006	1,000	0.01	0.02	0.01	0.02
Cooling Tower (4990-0001-0029) controlled by Baghouse Filters APM 40072.10;	17c	0.0006	14,000	0.07	0.32	0.07	0.32
Ingredient Bin 601 (4820-0003-0022) controlled by Baghouse Filters MICROPUL 4B;	17c	0.0006	210	0.01	0.01	0.0011	0.0047
Ingredient Bin 602 (4820-0003-0026) controlled by Baghouse Filters MICROPUL 4B;	17c	0.0006	210	0.01	0.01	0.0011	0.0047
Ingredient Bin 603 (4820-0003-0030) controlled by Baghouse Filters MICROPUL 2 1/2 B;	17c	0.0006	210	0.01	0.01	0.0011	0.0047
Ingredient Bin 604 (4820-0003-0034) controlled by Baghouse Filters APM 15105.4;	17c	0.0006	210	0.01	0.01	0.0011	0.0047
Micro Ingredient Dump Filter (4820-0003-0018) controlled by Baghouse Filters APM 15105.4;	17c	0.0006	2,500	0.01	0.06	0.01	0.06
Mixer General Aspiration (4820-0003-0004) controlled by Baghouse Filters BUHLER 25S-6-30;	17c	0.0006	1,500	0.01	0.03	0.01	0.03
3/4 Hammermill (4900-0001-0065) controlled by Baghouse Filters APM 16009.6;	17c	0.0006	1,258	0.01	0.03	0.01	0.03
#3 & #4 Expanders (4900-0001-0006) controlled by Baghouse Filters APM 16009.6;	17c	0.0006	1,017	0.01	0.02	0.01	0.02
Reprocess General Cooler Dryer Roof (4900-0005-0001) controlled by Baghouse Filters CD 376RF10;	17c	0.0006	27,550	0.14	0.62	0.14	0.62
#6 Pulverizer Grinder (4900-0001-0042) controlled by Baghouse Filters BUHLER 37-8-220;	17c	0.0006	2,904	0.01	0.07	0.01	0.07
5/6 Pulverizer AB Finished Product Surge Bin (4900-0001-0046) controlled by Baghouse Filters MICROPUL 4B;	17c	0.0006	570	0.01	0.01	0.003	0.01
Pellet Bins (4900-0002-0032) controlled by Baghouse Filters BUHLER 16S-6-30;	17c	0.0006	705	0.01	0.02	0.004	0.02
Viscosity Flour Receiver (4990-0006-0027) controlled by Baghouse Filters APM 16022.8;	17c	0.0006	2,143	0.01	0.05	0.01	0.05
Conditioning Receiver/Soy Meal Grinder (4990-0011-0010) controlled by Baghouse Filters APM 16014.8;	17c	0.0006	1,350	0.01	0.03	0.01	0.03



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Grind Reject/Scrap Bin (4900-0005-0007) controlled by Baghouse Filters MICROPUL 2 1/2B;	17c	0.0006	500	0.01	0.01	0.003	0.01
Bldg 112 Vacuum (4900-0005-0029) controlled by Baghouse Filters HOFFMAN 36X96;	17c	0.0006	500	0.01	0.01	0.003	0.01
AB Grinder Surge Bin (4900-0001-0030) controlled by Baghouse Filters BUHLER 37-8-220;	17c	0.0006	2,100	0.01	0.05	0.01	0.05
N DAY General Aspiration & #5 Expander (4900-0005-0006) controlled by Baghouse Filters CD 484RF12;	17c	0.0006	36,000	0.19	0.81	0.19	0.81
Blended Foods Filter (4820-0001-0093) controlled by Baghouse Filters DD 124RF10;	17c	0.0006	5,080	0.03	0.11	0.03	0.11
Hominy Truck Loadout Aspiration (4912-0002-0054) controlled by Baghouse Filters DD 484RF12;	17c	0.0006	37,000	0.19	0.83	0.19	0.83
South Hominy Feed (4860-0018-0003) controlled by Baghouse Filters MICROPUL 1F2;	17c	0.0006	15,000	0.08	0.34	0.08	0.34
Secondary Clean Grinding (4860-0022-0017) controlled by Baghouse Filters APM 15030.8;	17c	0.0006	2,000	0.01	0.05	0.01	0.05
Bran Dryer (4860-0024-0003) controlled by Corona Cyclone;	17c	0.0006	6,888	0.04	0.16	0.04	0.16
Track 16 Bulk Rail Loadout (4912-0006-0017) controlled by Baghouse Filters WEIDENMAN LFT 2X7;	17c	0.0006	30,000	0.15	0.68	0.15	0.68
Flaking General Aspiration (4860-0017-0073) controlled by Baghouse Filters APM 40120.8;	17c	0.0006	16,000	0.08	0.36	0.08	0.36
Germ Dusters Aspiration (4860-0023-0001) controlled by Baghouse Filters APM 40120.8;	17c	0.0006	7,400	0.04	0.17	0.04	0.17
Germ Dryer (4860-0017-0003) controlled by DAY CYCLONE HV56;	17c	0.0006	10,000	0.05	0.23	0.05	0.23
Germ Rolls Aspiration (4860-0017-0072) controlled by DAY CYCLONE HV56;	17c	0.0006	5,000	0.03	0.11	0.03	0.11
Fts Dryer Aspiration (4860-0019-0003) controlled by CORONA 15 CYCLONE;	17c	0.0006	6,888	0.04	0.16	0.04	0.16
Pet Bran Kice Lites Filter (4860-0024-0037) controlled by Baghouse Filters MICROPUL;	17c	0.0006	1,600	0.01	0.04	0.01	0.04
Cyclone Receiver - Extrusion Receiver controlled by Baghouse Filters (5&6 Allbond Receiving Filter);	17c	0.02	4,000	0.69	3.00	0.69	3
Cyclone Receiver - 108 A-Bin Receiver controlled by Baghouse Filters (5&6 Allbond Receiving Filter);	17c	0.02	500	0.09	0.38	0.09	0.38
Pneumatic Lift Receiver for Coarse Whole Grain transfer (WG260);	17c	0.02	682	0.12	0.53	0.12	0.51
PCM Hammermill controlled by Filter System (78-03:11);	17c	0.002	7,200	0.12	0.54	0.12	0.54
USG Hammermill controlled by Filter System (78-03:27);	17c	0.002	7,200	0.12	0.54	0.12	0.54
USG Extruder Pellet Transfer controlled by Collection Cyclone (78-08:22);	17c	0.02	4,000	0.69	3.00	0.69	3
All these in One (1) #1 Coarse Gravity Table Aspiration Cyclone Collector (05:68) (17,000 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c	0.002	40,600	0.7	3.05	0.7	3.05
One (1) #3 Fine Gravity Table Aspiration Cyclone Collector (06:88) (17,000 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c					0	0
One (1) #1 Satake Degerminator Cyclone Collector (45:07) (1,400 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c					0	0
One (1) #1 Satake Aspiration Cyclone Collector (45:12) (1,400 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c					0	0
One (1) #2 Satake Degerminator Cyclone Collector (45:09) (1,400 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c					0	0



	One (1) #2 Satake Aspiration Cyclone Collector (45:24) (1,400 dscfm) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c				0	0
	Satake Sifter and Sifter Air Locks controlled by the S 105 Roof Carter-Day Filter (334:86);	17c				0	0
X	One (1) Pneumatic Transfer Line and Cyclone Receiver (45:20) controlled by 8 <sup>th</sup> Floor Donaldson Filter (34:27) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c				0	0
X	One (1) Pneumatic Transfer Line and Cyclone Receiver (23:102) controlled by West MAC Filter (34:01) controlled by the S 105 Roof Carter-Day Filter (334:86);	17c				0	0
						<b>30.95</b>	<b>30.91</b>
<u>Corn Mill Products Storage:</u>							
	Bldg 201/202 Vacuum (4912-0008-0006) controlled by Baghouse Filters HOFFMAN 36X96;	17d	0.0006	700	0.01	0.02	0.004
	Bldg 208 Vacuum (4912-0009-0005) controlled by Baghouse Filters HOFFMAN 36X96;	17d	0.0006	700	0.01	0.02	0.004
	Hominy Feed Bins Aspiration (4750-0029-0074) controlled by Baghouse Filters DONALDSON 276RFW12;	17d	0.0006	21,000	0.11	0.47	0.11
						0.51	0.51
<u>Corn Mill Products Milling and Handling:</u>							
	Hominy Binning (4750-0029-0032) controlled by Baghouse Filters APM 40240.8;	17e	0.0006	30,000	0.15	0.68	0.15
	Hominy Grinder General Aspiration (4750-0029-0001) controlled by Baghouse Filters APM 40224.4;	17e	0.0006	21,000	0.11	0.47	0.11
	Truck Hominy Loadout (4912-0004-0022) controlled by Baghouse Filters 376RF8;	17e	0.0006	34,960	0.18	0.79	0.18
	Rail Hominy/Grain Loadout #1 (4912-0003-0011) controlled by Baghouse Filters 376RF12;	17e	0.0006	34,960	0.18	0.79	0.18
	Long Term Meal System (LTMS) & Rail Meal/Grain Transfer (4750-0033-0001) controlled by Baghouse Filters 376RF8;	17e	0.0006	20,000	0.10	0.45	0.1
	LTMS & Rail Meal/Grain Loadout (4750-0033-0011) controlled by Baghouse Filters MAC 144MCF416;	17e	0.0006	34,600	0.18	0.78	0.18
	Flour Pellet Cooler (4750-0025-0015) controlled by Baghouse Filters MAC Cyclone HE39;	17e	0.0055	8,000	0.38	1.65	0.38
	Hominy Screener General Aspiration (4750-0029-0045) controlled by Baghouse Filters MICROPUL 100S-6-20;	17e	0.0006	7,600	0.04	0.17	0.04
	Hominy Loadout Fugitives	17e				1.90	1.90
	Grain Loadout Fugitives	17e				0.10	0.10
						7.78	7.78
	LTMS Truck/Rail Dump Pit (4750-0033-0000A);	17e				0.03	0.03
	LTMS Truck Loadout (4750-0033-0000B);	17e				0.54	0.54
						0.57	0.57
<u>Boiler House/Grounds:</u>							

One (1) 96.55 mmBtu/hour Natural Gas/Distillate Fuel-Oil Fired Boiler with Low NO <sub>x</sub> Burner (Boiler #1);	3.13	3.13
One (1) 27.90 mmBtu/hour Natural Gas-Fired/Distillate Fuel-Oil Fired Boiler (Clayton Boiler);	0.9	0.9
One (1) 2,168 engine Hp Diesel-Powered Emergency Generator Set (DG-100);	0.08	0.08
One (1) 2,168 engine Hp Diesel-Powered Emergency Generator Set (DG-100);	0.08	0.08
	4.19	4.19
	62.60	62.63

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Actual Values that should be in the FESOP

FALSE means the value calc'd using IEPA data doesn't match IEPA's value		Emisison Unit Number	Source Name	Fugitive Filter Cyclone	Fugitive Filter Cyclone	Grain L PM (gr/dscf)
FALSE	FALSE	5012-0001-0016	Truck Dump #1	APM 40072.10	Filter	0.002
FALSE	FALSE	5012-0010-0054	Hoffman Bldg 301 Vacuum	HOFFMAN 48X96	Filter	0.001
FALSE	FALSE	5012-0005-0029	West Headhouse General Aspiration	DD 484RF12	Filter	0.0015
TRUE	FALSE	5012-0007-0015	Rail Dump Pit and Section D & E General Aspiration	376RF8	Filter	0.0015
TRUE	TRUE	5012-0010-0047	Track 6 Vacuum	HOFFMAN 48X96	Filter	0.001
TRUE	TRUE	4870-0013-0015	Cleanings Discharge	BUHLER 16S-6-30	Filter	0.002
		5012-0000-0000	Grain Receiving Fugitive	Fugitive	Fugitive	
TRUE	TRUE	5012-0005-0021	Truck Dump #4 w/ Gallery General Aspiration	DD 484RF12	Filter	0.002
TRUE	TRUE	4870-0013-0001	Cleaning North APM	APM 41216.12	Filter	0.002
TRUE	TRUE	4880-0034-0069	Bldg 115 Corn Cleaning	TD 484RF12	Filter	0.002
TRUE	TRUE	5012-0002-0012	North Street Truck Dump #2	DD 484RF12	Filter	0.002
TRUE	TRUE	4870-0010-0055	Bemos Bagging	APM 16019.8	Filter	0.002
TRUE	TRUE	4870-0010-0030	Bagging General Aspiration	APM 40020.8	Filter	0.002
TRUE	TRUE	4870-0013-0019	Bagging Packer General Aspiration	APM 14042.8	Filter	0.002
TRUE	TRUE	4880-0042-0057	Bran Dryer Process	APM 14036.8	Filter	0.002
TRUE	TRUE	4880-0042-0062	Bran Sifter Process	APM 10144.8	Filter	0.002
TRUE	TRUE	4880-0034-0054	East Meal Dryer/Cooler	APM 40120.10	Filter	0.002
TRUE	TRUE	4880-0034-0059	West Meal Dryer	APM 40144.8	Filter	0.002
TRUE	TRUE	4880-0034-0027	Bldg 105/115 General Aspiration	DD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0001	Bldg 102/105 General Aspiration	MCF 144-756	Filter	0.002
TRUE	TRUE	4880-0032-0052	Bldg 105 Vacuum	HOFFMAN 36x96	Filter	0.001
TRUE	TRUE	4870-0021-0001	Bulk Loading White Goods	DD 484RF12	Filter	0.002
TRUE	TRUE	4870-0015-0016	Bldg 104 Vacuum	HOFFMAN 38405A	Filter	0.001
TRUE	TRUE	4880-0042-0054	Bran Bin	BUHLER 16S-6-30	Filter	0.002
TRUE	TRUE	4880-0008-0028	Removed From Service	NA	NA	-
TRUE	TRUE	4880-0008-0040	Removed From Service	NA	NA	-

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TRUE	TRUE	4880-0034-0010	South Lunchroom Screening	CD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0042	South CD Screening	CD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0048	North CD General Aspiration	CD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0019	North Lunchroom Screening	CD 484RF12	Filter	0.002
TRUE	TRUE	4870-0013-0024	Packaging and Bulk Loading Bldg 115	TD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0077	Camas/Bran Bldg 115	TD 484RF12	Filter	0.002
TRUE	TRUE	4880-0034-0071	Thru/Tail Stock Dryers Bldg 115	TD 484RF12	Filter	0.002
FALSE	TRUE	4880-0032-0070	Bldg 115 Vacuum	HOFFMAN S54002	Filter	0.001
TRUE	TRUE	4880-0044-0070	Removed From Service	NA	NA	-
TRUE	TRUE	4880-0044-0073	Removed From Service	NA	NA	-
TRUE	TRUE	4880-0044-0076	Removed From Service	NA	NA	-
FALSE	TRUE	4870-0005-0003	Track 2 Railcar Unloading Secondary Receiver	USS INC. 15CF P/D	Filter	0.002
TRUE	TRUE	4880-0009-0005	Removed From Service	NA	NA	-
FALSE	TRUE	4932-0001-0001	Lab Filter	APM 14106.4	Filter	0.002
FALSE	TRUE	4900-0003-0039	Removed From Service	NA	NA	-
FALSE	TRUE	4900-0003-0045	Removed From Service	NA	NA	-
FALSE	TRUE	4990-0005-0012	1/2 Pulvocron Meal Receiver	BUHLER 9-6-100	Filter	0.002
FALSE	TRUE	4990-0005-0042	1/2 Pulvocron Visc Flour Receiver	BUHLER 9-6-100	Filter	0.002
FALSE	TRUE	4990-0002-0010	3/4 Pulvocron Meal Receiver	BUHLER 9-6-100	Filter	0.002
TRUE	TRUE	4990-0004-0013	9/10 Pulvocron Meal Secondary Receiver	BUHLER 16009.4	Filter	0.002
TRUE	TRUE	4990-0003-0010	7/8 Pulvocron Meal Secondary Receiver	BUHLER 16009.4	Filter	0.002
TRUE	TRUE	4990-0002-0019	#3 Pulvocron	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE	4990-0002-0022	#4 Pulvocron	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE	4900-0001-0039	#5 Pulvocron	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE	4990-0005-0021	#1 Pulvocron	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE	4990-0005-0024	#2 Pulvocron	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE	4990-0003-0019	#7 Pulvocron	APM 16022.8	Filter	0.002
TRUE	TRUE	4990-0003-0022	#7 Pulvocron	APM 16022.8	Filter	0.002
TRUE	TRUE	4990-0004-0022	#9 Pulvocron	APM 16022.8	Filter	0.002

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TRUE	TRUE	4990-0004-0025	#10 Pulvocron	APM 16022.8	Filter	0.002
FALSE	TRUE	4990-0002-0008	3/4 Pulvocron Meal Bin	MICROPUL 2 1/2B	Filter	0.002
FALSE	TRUE	4990-0005-0010	1/2 Pulvocron Meal Bin	MICROPUL 2 1/2B	Filter	0.002
FALSE	TRUE	4990-0004-0011	9/10 Pulvocron Meal Bin	APM 16104.4	Filter	0.002
FALSE	TRUE	4990-0003-0008	7/8 Pulvocron Meal Bin	APM 16104.4	Filter	0.002
FALSE	TRUE	4990-0005-0028	1/2 Flour Surge Bin	MICROPUL 2 1/2B	Filter	0.002
FALSE	TRUE	4990-0002-0026	3/4 Flour Surge Bin	MICROPUL 2 1/2B	Filter	0.002
FALSE	TRUE	4990-0003-0026	7/8 Flour Surge Bin	APM 16104.4	Filter	0.002
FALSE	TRUE	4990-0004-0029	9/10 Flour Surge Bin	APM 16104.4	Filter	0.002
TRUE	TRUE	4990-0006-0024	Hibond Visc Flake Roller Mill	APM 15066.8	Filter	0.002
TRUE	TRUE	4820-0001-0029	CSM Blended Food Receiver	APM 40070.7	Filter	0.002
TRUE	TRUE	4820-0001-0052	Blended Food Packaging Aspiration	APM 16150.6	Filter	0.002
FALSE	TRUE	4900-0001-0068	Allbond Visc Four General Aspiration	BUHLER 16-8-100	Filter	0.002
FALSE	TRUE	4820-0003-0007	Milk Bins	MICROPUL 6B	Filter	0.002
TRUE	TRUE	4990-0007-0049	300 Series Binning	MICROPUL 1F1	Filter	0.002
TRUE	TRUE	4990-0001-0002	Soy Meal General Aspiration	APM 16022.4	Filter	0.002
FALSE	TRUE	4990-0001-0006	Soy Meal Surge Bin	MICROPUL 6B	Filter	0.002
TRUE	TRUE	4990-0001-0025	Meal Bin Cooler	APM 40072.10	Filter	0.002
FALSE	TRUE	4990-0002-0043	3/4 Soy Flour Receiver	APM 16014.8	Filter	0.002
FALSE	TRUE	4820-0003-0072	Tri Cal Bins	APM 16009.8	Filter	0.002
TRUE	TRUE	4900-0001-0058	5/6 Allbond Receiver	APM 16014.8	Filter	0.002
TRUE	TRUE	4990-0003-0032	7/8 Soy Flour Receiver	APM 16014.8	Filter	0.002
FALSE	TRUE	4990-0002-0033	Bin 308	MICROPUL 6B	Filter	0.002
FALSE	TRUE	4990-0002-0036	Bin 309	MICROPUL 6B	Filter	0.002
FALSE	TRUE	4820-0003-0038	Bin 310	MICROPUL 6B	Filter	0.002
FALSE	TRUE	4820-0002-0068	Bin 508	MICROPUL 6B	Filter	0.002
FALSE	TRUE	4820-0002-0072	Bin 509	MICROPUL 6B	Filter	0.002
FALSE	TRUE	4990-0004-0037	9/10 Pulvocron Receiver	BUHLER 16-6-220	Filter	0.002
FALSE	TRUE	4820-0002-0038	Milk Bins	MICROPUL 21-6-220	Filter	0.002
TRUE	TRUE	4820-0002-0035	Milk Bin Bag Dump	APM 14048.6	Filter	0.002

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TRUE	TRUE	4990-0007-0029	Blending Batch Bin General Aspiration	BUHLER 25S-6-30	Filter	0.002
TRUE	TRUE	4990-0007-0036	Blending General Aspiration	BUHLER 16S-6-30	Filter	0.002
TRUE	TRUE	4990-0007-0032	Blending General Aspiration	MICROPUL 36S-8-30	Filter	0.002
TRUE	TRUE	4820-0003-0063	CSB Binning General Aspiration	BUHLER 64S-6-20	Filter	0.002
TRUE	TRUE	4820-0003-0059	CSB Binning General Aspiration	BUHLER 64S-6-20	Filter	0.002
FALSE	TRUE	4990-0006-0040	Finished Product General Aspiration	BUHLER 9-8-220	Filter	0.002
TRUE	TRUE	4900-0001-0091	#5 SL General Aspiration & #5 Expander	APM 14024.6	Filter	0.002
FALSE	TRUE	4990-0011-0001	Fiber Receiving General Aspiration	BUHLER 9-8-220	Filter	0.002
TRUE	TRUE	4820-0002-0011	PCM Binning	MICROPUL 1F1	Filter	0.002
TRUE	TRUE	4870-0010-0005	CF Bran Packing Binning	MICROPUL 25-8-220	Filter	0.002
TRUE	TRUE	4900-0005-0035	Bldg 111 Vacuum	HOFFMAN 60X120	Filter	0.001
TRUE	TRUE	4870-0006-0006	110/210 Receiver General Aspiration	APM 16030.4	Filter	0.002
TRUE	TRUE	4990-0011-0029	Fiber Receiving General Aspiration	APM 16019.4	Filter	0.002
TRUE	TRUE	4990-0001-0029	Cooling Tower	APM 40072.10	Filter	0.002
FALSE	FALSE	4820-0003-0022	Ingredient Bin 601	MICROPUL 4B	Filter	0.002
FALSE	FALSE	4820-0003-0026	Ingredient Bin 602	MICROPUL 4B	Filter	0.002
FALSE	FALSE	4820-0003-0030	Ingredient Bin 603	MICROPUL 2 1/2 B	Filter	0.002
FALSE	FALSE	4820-0003-0034	Ingredient Bin 604	APM 15105.4	Filter	0.002
TRUE	TRUE	4820-0003-0018	Micro Ingredient Dump Aspiration	APM 15105.4	Filter	0.002
TRUE	TRUE	4820-0003-0004	Mixer General Aspiration	BUHLER 25S-6-30	Filter	0.002
TRUE	TRUE	4900-0001-0065	3/4 Hammermill	APM 16009.6	Filter	0.002
TRUE	TRUE	4900-0001-0006	#3 & #4 Expanders	APM 16009.6	Filter	0.002
TRUE	TRUE	4900-0005-0001	Reprocessing General Aspiration	CD 376RF10	Filter	0.002
TRUE	TRUE	4900-0001-0042	#5 Pulvocron	BUHLER 37-8-220	Filter	0.002
FALSE	TRUE	4900-0001-0046	5/6 Pulverizer AB Finished Product Surge Bin	MICROPUL 4B	Filter	0.002
FALSE	TRUE	4900-0002-0032	Pellet Bins	BUHLER 16S-6-30	Filter	0.002
TRUE	TRUE	4990-0006-0027	Viscosity Flour Receiver	APM 16022.8	Filter	0.002
TRUE	TRUE	4990-0011-0010	Conditioning Receiver/Soy Meal Grinding	APM 16014.8	Filter	0.002

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FALSE	TRUE		4900-0005-0007	Grind Reject/Scrap Bin	MICROPUL 2 1/2B	Filter	0.002
FALSE	TRUE		4900-0005-0029	Bldg 112 Vacuum	HOFFMAN 36x96	Filter	0.001
TRUE	TRUE		4900-0001-0030	AB Grinder Surge Bin	BUHLER 37-8-220	Filter	0.002
TRUE	TRUE		4900-0005-0006	N CD General Aspiration & #5 Expander	CD 484RF12	Filter	0.002
TRUE	TRUE		4820-0001-0093	Removed From Service and Repurposed as 4880-0048-0012	NA	NA	-
TRUE	TRUE	pending repurpose	4912-0002-0054	Hominy Bulk Truck Loadout Aspiration	DD 484RF12	Filter	0.002
TRUE	TRUE		4860-0018-0003	South Hominy Feed Bin General Aspiration	MICROPUL 1F2	Filter	0.002
TRUE	TRUE		4860-0022-0017	Secondary Clean Grinding	APM 15030.8	Filter	0.002
TRUE	TRUE		4860-0024-0003	Bran Dryer	CORONA 15	Cyclone	0.0454
TRUE	TRUE		4912-0006-0017	Track 16 Rail Loadout	WEIDENMAN LFT 2X7	Filter	0.002
TRUE	TRUE		4860-0017-0073	Germ Dust Aspiration	AERODYNE	Cyclone	0.02
TRUE	TRUE		4860-0023-0001	Feed Mill General Aspiration	APM 40120.8	Filter	0.002
TRUE	TRUE		4860-0017-0003	Germ Dryer	CORONA HV56	Cyclone	0.0454
TRUE	TRUE		4860-0017-0072	Removed From Service	NA	NA	-
TRUE	TRUE		4860-0019-0003	FTS Dryer Aspiration	CORONA HV60	Filter	0.0454
TRUE	TRUE		4860-0024-0037	Pet Bran Kice Lites Aspiration	MICROPUL 36S-6-30	Filter	0.002
TRUE	TRUE		4900-0001-0058	This equipment is part of the 4900-0001-0058 process emission unit. Not a separate emisison unit.	NA	NA	-
TRUE	TRUE		4900-0001-0058	This equipment is part of the 4900-0001-0058 process emission unit. Not a separate emisison unit.	NA	NA	-
TRUE	FALSE		4880-0048-0012	Pneumatic Lift Receiver for WG260 Transfer	BUHLER MGX-60	Cyclone	0.02
TRUE	TRUE		4900-0003-0011	PCM Hammermill	Kice VS64-8	Filter	0.0020
TRUE	TRUE		4900-0008-0027	USG Hammermill	Kice VS64-8	Filter	0.0020
TRUE	TRUE		4900-0008-0022	USG Secondary Extruder Transfer	Kice CHS26	Cyclone	0.0200
TRUE	TRUE	pending project	Not Yet Assigned	This Unit Does Not Yet Exist	Not Yet Assigned		-
TRUE	TRUE	pending project	Same as above	Same as above	Same as above		-
TRUE	TRUE	pending project	Same as above	Same as above	Same as above		-
TRUE	TRUE	pending project	Same as above	Same as above	Same as above		-
TRUE	TRUE	pending project	Same as above	Same as above	Same as above		-

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TRUE	TRUE	pending project	Same as above	Same as above	Same as above	-	
TRUE	TRUE	pending project	Same as above	Same as above	Same as above	-	
TRUE	TRUE		4880-0034-0027	This equipmetn will become part of the 4880-0034-0027 process emission unit. Not a separate emisison unit.	Will not be controlled by the S 105 Carter-Day Filter		
TRUE	TRUE		4880-0034-0001	Will become part of the 4880-0034-0001 process emission unit group. Not a separate emisison unit.	Will not be controlled by the S 105 Carter-Day Filter		
		still in service	4880-0034-0035	South APM Binning	APM 41144.12	Filter	0.0020
			4880-0046-0017	Whole Grain Dryer	KICE HV-26	Cyclone	0.0300
			4880-0046-0028	Whole Grain Hammermill	MAC MSS16	Filter	0.0020
			4880-0046-0042	Whole Grain Aspiration	TD 124RF10		0.0020
			4900-0007-0020	USG Primary Extruder Transfer	Kice CHS26	Cyclone	0.0200
			4860-0018-0044	6th Floor Radar Pulsar	MICROPUL 100S-6-20	Filter	0.0020
		still in service	4750-0029-0015	Feed Mill Conveying General Aspiration	MICROPUL 100S-6-20	Filter	0.0020
		still in service	4750-0029-0027	Round Bin General Aspiration	APM 14072.6	Filter	0.0020
		still in service	4860-0017-0026	Bin 945 Germ Receiver	BUHLER 36S-6-30	Filter	0.0020
		still in service	4860-0018-0007	North Hominy Feed Grinding General Aspiration	MICROPUL 1F2	Filter	0.0020
FALSE	TRUE		4912-0008-0006	Bldg 201/202 Vacuum	HOFFMAN	Filter	0.0010
FALSE	TRUE		4912-0009-0005	Bldg 201/202 Vacuum	HOFFMAN	Filter	0.0010
TRUE	TRUE		4860-0018-0049	Hominy Feed Bins Aspiration	Donaldson 276RFW12	Filter	0.0020
TRUE	TRUE		4750-0029-0032	Hominy Binning	APM 40240.8	Filter	0.0020
TRUE	TRUE		4750-0029-0001	Hominy Grind General Aspiration	MICROPUL 100S-6-20	Filter	0.0020
TRUE	TRUE		4912-0004-0022	Hominy Truck Loadout	376RF8	Filter	0.0020
TRUE	TRUE		4912-0003-0011	Track 15 Bulk Rail Loadout	376RF8	Filter	0.0020
TRUE	TRUE		4750-0025-0015	Removed From Service	NA	NA	
TRUE	TRUE		4750-0025-0015	Removed From Service	NA	NA	
TRUE	TRUE		4750-0025-0015	Removed From Service	NA	NA	
TRUE	TRUE		4750-0029-0045	Hominy Screener General Aspiration	MICROPUL 100S-6-20	Filter	0.0020
			4912-0000-0000	Hominy Loadout Fugitive	Fugitive	Fugitive	
			4912-0000-0001	Grain Loadout Fugitive	Fugitive	Fugitive	
			4750-0025-0015	Removed From Service	NA	NA	
			4750-0025-0015	Removed From Service	NA	NA	



4840-0004-0004	B&W 96.55 MMBtu/hr Natural Gas Boiler	NA	NA
4840-0006-0007	Clayton 27.90 MMBtu/hr Natural Gas Boiler	NA	NA
	Removed From Service	NA	NA
4800-4861-0000	Two 193 HP Emergency Diesel Fire Pumps	NA	NA

**After Pending CCM260 Project**

pending project	4912-0002-0054	CCM260 Process Aspiration	S 105 Carter-Day	filter	0.0020
reused as CCM260 filter	4912-0002-0054	Hominy Bulk Truck Loadout Aspiration	DD 484RF12	filter	0.002
removed	4880-0034-0035	South APM Binning	APM 41144.12	filter	0.0020
removed	4750-0029-0015	Feed Mill Conveying General Aspiration	MICROPUL 100S-6-20	filter	0.0020
removed	4750-0029-0027	Round Bin General Aspiration	APM 14072.6	filter	0.0020
removed	4860-0017-0026	Bin 945 Germ Receiver	BUHLER 36S-6-30	filter	0.0020
removed	4860-0018-0007	North Hominy Feed Grinding General Aspiration	MICROPUL 1F2	filter	0.0020

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Loading PM10 (gr/dscf)	Exhaust Flow (scfm)	Actual PM Max (lb/hr)	PM Max (tpy)	PM10 Max (lb/hr)	PM10 Max (tpy)	These are used to check the data for accuracy	PM Max (tpy)				
0.0015	18,500	0.32	1.39	0.24	1.04	18,500	TRUE	1.39	1.04	TRUE	TRUE
0.001	1,000	0.01	0.04	0.01	0.04	1,000	TRUE	0.04	0.04	TRUE	TRUE
0.0015	55,000	0.71	3.1	0.71	3.1	55,000	TRUE	3.10	3.1	TRUE	TRUE
0.0015	21,600	0.28	1.22	0.28	1.22	21,600	TRUE	1.22	1.22	TRUE	TRUE
0.001	700	0.01	0.03	0.01	0.03	700	TRUE	0.03	0.03	TRUE	TRUE
0.0015	1,900	0.03	0.14	0.02	0.11	1,900	TRUE	0.14	0.11	TRUE	TRUE
			3.01		3.01			3.01	3.01		
			8.93		8.55			8.93	8.55		
0.002	36,017	0.62	2.7	0.62	2.7	36,017	TRUE	2.70	2.7	TRUE	TRUE
0.0015	41,000	0.7	3.08	0.53	2.31	41,000	TRUE	3.08	2.31	TRUE	TRUE
0.0015	57,372	0.98	4.31	0.74	3.23	57,372	TRUE	4.31	3.23	TRUE	TRUE
0.0015	25,109	0.43	1.89	0.32	1.41	25,109	TRUE	1.89	1.41	TRUE	TRUE
			11.98		9.65			11.98	9.65		
0.0015	1,660	0.03	0.12	0.02	0.09	1,660	TRUE	0.12	0.09	TRUE	TRUE
0.0015	3,400	0.06	0.26	0.04	0.19	3,400	TRUE	0.26	0.19	TRUE	TRUE
0.0015	4,400	0.08	0.33	0.06	0.25	4,400	TRUE	0.33	0.25	TRUE	TRUE
0.0015	2,200	0.04	0.17	0.03	0.12	2,200	TRUE	0.17	0.12	TRUE	TRUE
0.0015	6,215	0.11	0.47	0.08	0.35	6,215	TRUE	0.47	0.35	TRUE	TRUE
0.0015	13,000	0.22	0.98	0.17	0.73	13,000	TRUE	0.98	0.73	TRUE	TRUE
0.0015	13,295	0.23	1	0.17	0.75	13,295	TRUE	1.00	0.75	TRUE	TRUE
0.0015	43,700	0.75	3.28	0.56	2.46	43,700	TRUE	3.28	2.46	TRUE	TRUE
0.0015	55,000	0.94	4.13	0.71	3.1	55,000	TRUE	4.13	3.1	TRUE	TRUE
0.001	1,500	0.01	0.06	0.01	0.06	1,500	TRUE	0.06	0.06	TRUE	TRUE
0.0015	36,000	0.62	2.7	0.46	2.03	36,000	TRUE	2.70	2.03	TRUE	TRUE
0.001	1,500	0.01	0.06	0.01	0.06	1,500	TRUE	0.06	0.06	TRUE	TRUE
0.0015	980	0.02	0.07	0.01	0.06	980	TRUE	0.07	0.06	TRUE	TRUE
-	-	-	-	-	-						
-	-	-	-	-	-						

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0.0015	42,826	0.73	3.22	0.55	2.41	42,826	TRUE	3.22	2.41	TRUE	TRUE
0.0015	41,000	0.70	3.08	0.53	2.31	41,000	TRUE	3.08	2.31	TRUE	TRUE
0.0015	33,300	0.57	2.5	0.43	1.88	33,300	TRUE	2.50	1.88	TRUE	TRUE
0.0015	40,000	0.69	3.00	0.51	2.25	40,000	TRUE	3.00	2.25	TRUE	TRUE
0.0015	42,000	0.72	3.15	0.54	2.37	42,000	TRUE	3.15	2.37	TRUE	TRUE
0.0015	45,021	0.77	3.38	0.58	2.54	45,021	TRUE	3.38	2.54	TRUE	TRUE
0.0015	56,000	0.96	4.2	0.72	3.15	56,000	TRUE	4.20	3.15	TRUE	TRUE
0.001	825	0.01	0.03	0.01	0.03	825	TRUE	0.03	0.03	TRUE	TRUE
-	-	-	-	-	-						
-	-	-	-	-	-						
-	-	-	-	-	-						
0.0015	440	0.01	0.03	0.01	0.02	440	TRUE	0.03	0.02	TRUE	TRUE
-	-	-	-	-	-						
0.0015	900	0.02	0.07	0.01	0.05	900	TRUE	0.07	0.05	TRUE	TRUE
-	-	-	-	-	-						
-	-	-	-	-	-						
0.0015	380	0.01	0.03	0	0.02	380	TRUE	0.03	0.02	TRUE	TRUE
0.0015	380	0.01	0.03	0	0.02	380	TRUE	0.03	0.02	TRUE	TRUE
0.0015	380	0.01	0.03	0	0.02	380	TRUE	0.03	0.02	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE

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0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	570	0.01	0.04	0.01	0.03	570	TRUE	0.04	0.03	TRUE	TRUE
0.0015	570	0.01	0.04	0.01	0.03	570	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	570	0.01	0.04	0.01	0.03	570	TRUE	0.04	0.03	TRUE	TRUE
0.0015	570	0.01	0.04	0.01	0.03	570	TRUE	0.04	0.03	TRUE	TRUE
0.0015	7,200	0.12	0.54	0.09	0.41	7,200	TRUE	0.54	0.41	TRUE	TRUE
0.0015	4,077	0.07	0.31	0.05	0.23	4,077	TRUE	0.31	0.23	TRUE	TRUE
0.0015	10,000	0.17	0.75	0.13	0.56	10,000	TRUE	0.75	0.56	TRUE	TRUE
0.0015	867	0.01	0.07	0.01	0.05	867	TRUE	0.07	0.05	TRUE	TRUE
0.0015	400	0.01	0.03	0.01	0.02	400	TRUE	0.03	0.02	TRUE	TRUE
0.0015	4,452	0.08	0.33	0.06	0.25	4,452	TRUE	0.33	0.25	TRUE	TRUE
0.0015	1,435	0.02	0.11	0.02	0.08	1,435	TRUE	0.11	0.08	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	14,000	0.24	1.05	0.18	0.79	14,000	TRUE	1.05	0.79	TRUE	TRUE
0.0015	700	0.01	0.05	0.01	0.04	700	TRUE	0.05	0.04	TRUE	TRUE
0.0015	780	0.01	0.06	0.01	0.04	780	TRUE	0.06	0.04	TRUE	TRUE
0.0015	1,100	0.02	0.08	0.01	0.06	1,100	TRUE	0.08	0.06	TRUE	TRUE
0.0015	1,100	0.02	0.08	0.01	0.06	1,100	TRUE	0.08	0.06	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	500	0.01	0.04	0.01	0.03	500	TRUE	0.04	0.03	TRUE	TRUE
0.0015	700	0.01	0.05	0.01	0.04	700	TRUE	0.05	0.04	TRUE	TRUE
0.0015	867	0.01	0.07	0.01	0.05	867	TRUE	0.07	0.05	TRUE	TRUE
0.0015	6,000	0.10	0.45	0.08	0.34	6,000	TRUE	0.45	0.34	TRUE	TRUE

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0.0015	1,250	0.02	0.09	0.02	0.07	1,250	TRUE	0.09	0.07	TRUE	TRUE
0.0015	1,055	0.02	0.08	0.01	0.06	1,055	TRUE	0.08	0.06	TRUE	TRUE
0.0015	1,645	0.03	0.12	0.02	0.09	1,645	TRUE	0.12	0.09	TRUE	TRUE
0.0015	3,200	0.05	0.24	0.04	0.18	3,200	TRUE	0.24	0.18	TRUE	TRUE
0.0015	2,739	0.05	0.21	0.04	0.15	2,739	TRUE	0.21	0.15	TRUE	TRUE
0.0015	742	0.01	0.06	0.01	0.04	742	TRUE	0.06	0.04	TRUE	TRUE
0.0015	3,000	0.05	0.23	0.04	0.17	3,000	TRUE	0.23	0.17	TRUE	TRUE
0.0015	648	0.01	0.05	0.01	0.04	648	TRUE	0.05	0.04	TRUE	TRUE
0.0015	2,241	0.04	0.17	0.03	0.13	2,241	TRUE	0.17	0.13	TRUE	TRUE
0.0015	1,232	0.02	0.09	0.02	0.07	1,232	TRUE	0.09	0.07	TRUE	TRUE
0.001	1,500	0.01	0.06	0.01	0.06	1,500	TRUE	0.06	0.06	TRUE	TRUE
0.0015	1,400	0.02	0.11	0.02	0.08	1,400	TRUE	0.11	0.08	TRUE	TRUE
0.0015	1,000	0.02	0.08	0.01	0.06	1,000	TRUE	0.08	0.06	TRUE	TRUE
0.0015	14,000	0.24	1.05	0.18	0.79	14,000	TRUE	1.05	0.79	TRUE	TRUE
0.0015	210	0.004	0.02	0.003	0.01	210	TRUE	0.02	0.01	TRUE	TRUE
0.0015	210	0.004	0.02	0.003	0.01	210	TRUE	0.02	0.01	TRUE	TRUE
0.0015	210	0.004	0.02	0.003	0.01	210	TRUE	0.02	0.01	TRUE	TRUE
0.0015	210	0.004	0.02	0.003	0.01	210	TRUE	0.02	0.01	TRUE	TRUE
0.0015	2,500	0.04	0.19	0.03	0.14	2,500	TRUE	0.19	0.14	TRUE	TRUE
0.0015	1,500	0.03	0.11	0.02	0.08	1,500	TRUE	0.11	0.08	TRUE	TRUE
0.0015	1,258	0.02	0.09	0.02	0.07	1,258	TRUE	0.09	0.07	TRUE	TRUE
0.0015	1,017	0.02	0.08	0.01	0.06	1,017	TRUE	0.08	0.06	TRUE	TRUE
0.0015	27,550	0.47	2.07	0.35	1.55	27,550	TRUE	2.07	1.55	TRUE	TRUE
0.0015	2,904	0.05	0.22	0.04	0.16	2,904	TRUE	0.22	0.16	TRUE	TRUE
0.0015	570	0.01	0.04	0.01	0.03	570	TRUE	0.04	0.03	TRUE	TRUE
0.0015	705	0.01	0.05	0.01	0.04	705	TRUE	0.05	0.04	TRUE	TRUE
0.0015	2,143	0.04	0.16	0.03	0.12	2,143	TRUE	0.16	0.12	TRUE	TRUE
0.0015	1,350	0.02	0.1	0.02	0.08	1,350	TRUE	0.10	0.08	TRUE	TRUE



-	-	-	-	-	-						
-	-	-	-	-	-						
0.0015	30,000	0.51	2.25	0.39	1.69	30,000	TRUE	2.25	1.69	TRUE	TRUE
0.0200	1,400	0.36	1.58	0.24	1.05	1,400	TRUE	1.58	1.05	TRUE	TRUE
0.0015	6,000	0.1	0.45	0.08	0.34	6,000	TRUE	0.45	0.34	TRUE	TRUE
0.0015	5,080	0.09	0.38	0.07	0.29	5,080	TRUE	0.38	0.29	TRUE	TRUE
0.0200	4,000	0.69	3.00	0.69	3.00	4,000	TRUE	3.00	3	TRUE	TRUE
0.0015	7,400	0.13	0.56	0.1	0.42	7,400	TRUE	0.56	0.42	TRUE	TRUE
0.0015	7,600	0.13	0.57	0.1	0.43	7,600	TRUE	0.57	0.43	TRUE	TRUE
0.0015	7,134	0.12	0.54	0.09	0.40	7,134	TRUE	0.54	0.4	TRUE	TRUE
0.0015	1,800	0.03	0.14	0.02	0.10	1,800	TRUE	0.14	0.1	TRUE	TRUE
0.0015	14,000	0.24	1.05	0.18	0.79	14,000	TRUE	1.05	0.79	TRUE	TRUE
			<b>120.92</b>		<b>65.20</b>			<b>120.92</b>	<b>65.20</b>		
0.0010	700	0.01	0.03	0.01	0.03	700	TRUE	0.03	0.03	TRUE	TRUE
0.0010	700	0.01	0.03	0.01	0.03	700	TRUE	0.03	0.03	TRUE	TRUE
0.0015	21,000	0.36	1.58	0.27	1.18	21,000	TRUE	1.58	1.18	TRUE	TRUE
			1.64		1.24			1.64	1.24		
0.0015	30,000	0.51	2.25	0.39	1.69	30,000	TRUE	2.25	1.69	TRUE	TRUE
0.0015	21,000	0.36	1.58	0.27	1.18	21,000	TRUE	1.58	1.18	TRUE	TRUE
0.0015	34,960	0.6	2.62	0.45	1.97	34,960	TRUE	2.62	1.97	TRUE	TRUE
0.0020	34,960	0.6	2.62	0.6	2.62	34,960	TRUE	2.62	2.62	TRUE	TRUE
0.0015	7,600	0.13	0.57	0.1	0.43	7,600	TRUE	0.57	0.43	TRUE	TRUE
			6.90		1.02			6.90	1.02		
			0.10		0.10			0.00	0.00		
			16.64		9.01			16.54	8.91		
			0.00		0.00						

	3.21	3.21		
	0.93	0.93		
	0.05	0.04		
	4.19	4.18		
	160.11	93.65	160.01	93.55
<b>Total PTE</b>	<b>164.30</b>	<b>97.83</b>	160.01	93.55

0.0020	40,600	0.7	3.05	0.7	3.05
0.0015	-37,000	-0.63	-2.78	-0.48	-2.08
0.0015	-30,000	-0.51	-2.25	-0.39	-1.69
0.0015	-7,600	-0.13	-0.57	-0.1	-0.43
0.0015	-7,134	-0.12	-0.54	-0.09	-0.40
0.0015	-1,800	-0.03	-0.14	-0.02	-0.10
0.0015	-14,000	-0.24	-1.05	-0.18	-0.79

<b>Post CCM260 Project</b>				
<b>Total PTE</b>	<b>160.02</b>	<b>95.39</b>		



	Emision Unit Number	PM Max (tpy)	PM10 Max (lb/hr)
Yes	5012-0000-0000	0	0
Yes	5012-0001-0016	0.32	0.24
Yes	5012-0002-0012	0.43	0.32
Yes			
Yes			
Yes			
	5012-0005-0021	0.62	0.62
	5012-0005-0029	0.71	0.71
Yes	5012-0007-0015	0.28	0.28
Yes			
Yes	5012-0010-0047	0.01	0.01
Yes	5012-0010-0054	0.01	0.01
		<b>2.38</b>	<b>2.19</b>
Yes	4870-0005-0003	0.01	0.01
Yes	4870-0006-0006	0.02	0.02
Yes	4870-0010-0005	0.02	0.02
Yes	4870-0010-0030	0.06	0.04
Yes	4870-0010-0055	0.03	0.02
Yes	4870-0013-0001	0.7	0.53
Yes	4870-0013-0015	0.03	0.02
Yes	4870-0013-0019	0.08	0.06
Yes	4870-0013-0024	0.72	0.54
Yes	4870-0015-0016	0.01	0.01
Yes	4870-0021-0001	0.62	0.46
Yes	4880-0032-0052	0.01	0.01
Yes	4880-0032-0070	0.01	0.01
	4880-0034-0001	0.94	0.71
	4880-0034-0010	0.73	0.55



Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

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Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

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Actual Values that should be in the FESOP		Filter	Grain Loading	Exhaust	PM	PM	PM10	PM10	
Emulsion Unit Number	Source Name	Filter	PM (gr/ft <sup>3</sup> )	Flow (scfm)	Max (tpy)	Max (lb/yr)	Max (tpy)	Max (lb/yr)	
5012-0001-0016	Truck Dump #1	APM 40072 10	0.002	0.0015	18,500	0.32	1.39	0.24	1.04
5012-0001-0054	Hoffman Bldg 301 Vacuum	HOFFMAN 48196	0.001	0.001	1,000	0.01	0.04	0.01	0.04
5012-0005-0029	West Headhouse General Aspiration	DD 484R12	0.0015	0.0015	55,000	0.21	1.1	0.21	1.1
5012-0007-0015	Rail Dump Pit and Section D & E General Aspiration	375RFB	0.0015	0.0015	21,600	0.18	1.22	0.28	1.22
5012-0010-0047	Track 8 Vacuum	HOFFMAN 48196	0.001	0.001	700	0.01	0.01	0.01	0.01
4870-0015-0015	Chemicals Decoupage	BUHLER 165-6-30	0.002	0.0015	1,900	0.03	0.14	0.02	0.11
5012-0000-0000	Grain Receiver Fugitive	Fugitive					0.01		0.01
							0.93		0.93
5012-0005-0021	Truck Dump #4 w/ Gallery General Aspiration	DD 484R12	0.002	0.002	36,017	0.40	2.7	0.62	2.7
4870-0013-0001	Cleaning North APH	APM 41216 13	0.002	0.0015	41,200	0.7	1.08	0.51	2.11
4880-0034-0069	Bldg 115 Com Cleanmt	TD 484R12	0.002	0.0015	57,372	0.98	4.31	0.74	1.23
5012-0002-0012	North Street Truck Dump #2	DD 484R12	0.002	0.0015	25,109	0.45	1.89	0.32	1.40
							13.98		9.65
4870-0010-0055	Berms Bagging	APM 16019 B	0.002	0.0015	1,660	0.03	0.12	0.02	0.09
4870-0010-0030	Bagging General Aspiration	APM 40020 B	0.002	0.0015	3,400	0.06	0.24	0.04	0.19
4870-0013-0019	Bagging Packer General Aspiration	APM 14042 B	0.001	0.0015	4,400	0.08	0.33	0.06	0.25
4880-0042-0057	Brain Dryer Process	APM 14016 B	0.002	0.0015	2,200	0.04	0.17	0.03	0.12
4880-0042-0062	Brain Sifter Process	APM 10144 B	0.002	0.0015	6,200	0.11	0.47	0.08	0.35
4880-0034-0054	East Meal Dryer/Cooler	APM 40120 10	0.001	0.0015	13,000	0.27	0.98	0.17	0.73
4880-0034-0059	West Meal Dryer	APM 40144 B	0.002	0.0015	13,295	0.23	1	0.17	0.75
4880-0034-0027	Bldg 105/115 General Aspiration	DD 484R12	0.001	0.0015	43,700	0.75	1.28	0.56	1.46
4880-0034-0001	Bldg 102/105 General Aspiration	MCF 144-756	0.002	0.0015	55,000	0.94	4.13	0.71	1.1
4880-0012-0052	Bldg 105 Vacuum	HOFFMAN 16496	0.001	0.001	1,500	0.01	0.06	0.01	0.06
4870-0021-0001	Bulk Loading White Goods	DD 484R12	0.002	0.0015	36,000	0.62	2.7	0.46	2.01
4870-0015-0016	Bldg 104 Vacuum	HOFFMAN 18405A	0.001	0.001	1,500	0.01	0.06	0.01	0.06
4880-0042-0054	Brain Bin	BUHLER 165-6-30	0.002	0.0015	980	0.02	0.07	0.01	0.06
4880-0008-0028	Removed From Service	NA							
4880-0008-0040	Removed From Service	NA							
4880-0034-0010	South Luncheon Screening	CD 484R12	0.002	0.0015	42,816	0.73	3.22	0.55	2.41
4880-0034-0042	South CD Screening	CD 484R12	0.002	0.0015	41,000	0.70	3.08	0.53	2.31
4880-0034-0048	North CD General Aspiration	CD 484R12	0.002	0.0015	33,300	0.57	2.5	0.43	1.88
4880-0034-0019	North Luncheon Screening	CD 484R12	0.002	0.0015	40,000	0.69	3.00	0.51	2.25
4870-0013-0024	Packaging and Bulk Loading Bldg 115	TD 484R12	0.002	0.0015	42,000	0.72	3.15	0.54	2.37
4880-0034-0077	Cams/Bran Bldg 115	TD 484R12	0.002	0.0015	45,000	0.77	3.38	0.58	2.54
4880-0034-0071	Thru/Fall Stock Dryers Bldg 115	TD 484R12	0.002	0.0015	56,000	0.96	4.2	0.72	3.13
4880-0012-0070	Bldg 115 Vacuum	HOFFMAN 554002	0.001	0.001	825	0.01	0.01	0.01	0.01
4880-0044-0070	Removed From Service	NA							
4880-0044-0071	Removed From Service	NA							
4880-0044-0076	Removed From Service	NA							
4870-0005-0005	Frick 2 Railcar Unloading Secondary Receiver	USS INC 15CF P/D	0.002	0.0015	440	0.01	0.01	0.01	0.01
4880-0009-0005	Removed From Service	NA							
4912-0001-0001	Lab Filter	APM 14106 4	0.001	0.0015	900	0.02	0.07	0.01	0.05
4900-0003-0019	Removed From Service	NA							
4900-0003-0045	Removed From Service	NA							
4990-0005-0012	1/2 Pulvocron Meal Receiver	BUHLER 9-6-100	0.001	0.0015	380	0.01	0.01	0	0.02
4990-0005-0042	1/2 Pulvocron Visc Flour Receiver	BUHLER 9-6-100	0.002	0.0015	380	0.01	0.01	0	0.02
4990-0002-0010	1/4 Pulvocron Meal Receiver	BUHLER 9-6-100	0.002	0.0015	380	0.01	0.01	0	0.02
4990-0004-0013	9/10 Pulvocron Meal Secondary Receiver	BUHLER 16009 4	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0003-0010	7/8 Pulvocron Meal Secondary Receiver	BUHLER 16009 4	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0002-0019	#3 Pulvocron	BUHLER 37-B-220	0.002	0.0015	2,904	0.05	0.22	0.04	0.16
4990-0002-0022	#4 Pulvocron	BUHLER 37-B-220	0.002	0.0015	2,904	0.05	0.22	0.04	0.16
4990-0001-0018	#5 Pulvocron	BUHLER 37-B-220	0.002	0.0015	2,904	0.05	0.22	0.04	0.16
4990-0005-0021	#1 Pulvocron	BUHLER 37-B-220	0.002	0.0015	2,904	0.05	0.22	0.04	0.16
4990-0005-0024	#2 Pulvocron	BUHLER 37-B-220	0.002	0.0015	2,904	0.05	0.22	0.04	0.16
4990-0003-0019	#7 Pulvocron	APM 16022 B	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0003-0022	#7 Pulvocron	APM 16022 B	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0004-0023	#9 Pulvocron	APM 16022 B	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0004-0024	#10 Pulvocron	APM 16022 B	0.002	0.0015	3,000	0.05	0.21	0.04	0.17
4990-0007-0008	1/4 Pulvocron Meal Bin	MICROPUL 2 1/2 78	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0005-0010	1/2 Pulvocron Meal Bin	MICROPUL 2 1/2 78	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0004-0011	9/10 Pulvocron Meal Bin	APM 16104 4	0.002	0.0015	570	0.01	0.04	0.01	0.03
4990-0003-0008	7/8 Pulvocron Meal Bin	APM 16104 4	0.002	0.0015	570	0.01	0.04	0.01	0.03
4990-0005-0028	1/2 Flour Surge Bin	MICROPUL 2 1/2 78	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0002-0026	3/4 Flour Surge Bin	MICROPUL 2 1/2 78	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0001-0026	7/8 Flour Surge Bin	APM 16104 4	0.002	0.0015	570	0.01	0.04	0.01	0.03
4990-0004-0029	9/10 Flour Surge Bin	APM 16104 4	0.002	0.0015	570	0.01	0.04	0.01	0.03
4990-0006-0024	Hobond Visc Flake Roller Mill	APM 15066 B	0.002	0.0015	7,200	0.12	0.54	0.09	0.41
4820-0001-0029	CSM Blended Food Receiver	APM 40070 7	0.002	0.0015	4,077	0.07	0.31	0.05	0.23
4820-0001-0057	Blended Food Packaging Aspiration	APM 16150 6	0.002	0.0015	10,000	0.17	0.75	0.13	0.56
4900-0001-0068	Albond Visc Four General Aspiration	BUHLER 16-B-100	0.002	0.0015	867	0.01	0.07	0.01	0.05
4820-0003-0007	MAR Bins	MICROPUL 68	0.002	0.0015	400	0.01	0.01	0.01	0.02
4990-0007-0049	300 Series Binning	MICROPUL 171	0.002	0.0015	4,652	0.08	0.33	0.06	0.25
4990-0001-0007	Soy Meal General Aspiration	APM 16022 4	0.002	0.0015	1,435	0.02	0.11	0.02	0.08
4990-0001-0006	Soy Meal Surge Bin	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0001-0025	Meal Bin Cooler	APM 40072 10	0.002	0.0015	14,000	0.24	1.05	0.18	0.79
4990-0002-0043	1/4 Soy Flour Receiver	APM 16014 B	0.002	0.0015	700	0.01	0.05	0.01	0.04
4820-0001-0072	Tn Cal Bins	APM 16009 B	0.002	0.0015	780	0.01	0.06	0.01	0.04
4990-0001-0051	Soy Meal Receiver	APM 16014 B	0.002	0.0015	1,100	0.02	0.08	0.01	0.06
4990-0001-0012	7/8 Soy Flour Receiver	APM 16014 B	0.002	0.0015	1,100	0.02	0.08	0.01	0.06
4990-0002-0011	Bin 306	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0002-0016	Bin 309	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4820-0003-0018	Bin 310	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4820-0002-0048	Bin 508	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4820-0002-0072	Bin 509	MICROPUL 68	0.002	0.0015	500	0.01	0.04	0.01	0.03
4990-0004-0017	9/10 Pulvocron Receiver	BUHLER 16-6-220	0.002	0.0015	700	0.01	0.05	0.01	0.04
4820-0002-0018	MAR Bins	MICROPUL 71-4-730	0.002	0.0015	867	0.01	0.07	0.01	0.05
4820-0002-0015	MAR Bin Bag Dump	APM 14048 6	0.002	0.0015	6,000	0.10	0.45	0.03	0.34
4990-0007-0029	Blending Batch Bin General Aspiration	BUHLER 155-6-30	0.002	0.0015	1,250	0.02	0.09	0.02	0.07
4990-0007-0016	Blending General Aspiration	BUHLER 165-6-30	0.002	0.0015	1,055	0.02	0.08	0.01	0.06
4990-0007-0012	Blending General Aspiration	MICROPUL 365-B-30	0.002	0.0015	1,645	0.03	0.12	0.02	0.09
4820-0003-0063	CSB Binning General Aspiration	BUHLER 645-6-70	0.002	0.0015	3,200	0.05	0.24	0.04	0.18
4820-0003-0058	CSB Binning General Aspiration	BUHLER 645-6-30	0.002	0.0015	2,739	0.05	0.21	0.04	0.15
4990-0006-0040	Finished Product General Aspiration	BUHLER 9-B-220	0.002	0.0015	742	0.01	0.06	0.01	0.04
4990-0001-0091	85 S1 General Aspiration & S1 Expander	APM 14024 6	0.002	0.0015	3,000	0.05	0.23	0.04	0.17

Item ID	Description	Equipment	Type	Filter	0002	00015	648	003	005	001	004
4990-0011-0001	Fiber Receiving General Aspiration	BUHLER 9 B-220	Filter	0002	00015	648	003	005	001	004	
4820-0002-0011	PCM Binning	MICROPUL 1F1	Filter	0002	00015	2,841	004	017	003	011	
4870-0010-0005	CF Bran Pacing Binning	MICROPUL 25-B-220	Filter	0002	00015	1,212	002	009	002	007	
4900-0005-0015	Blldg 113 Vacuum	HOFFMAN 60X120	Filter	0001	0001	1,500	001	006	001	006	
4870-0006-0006	110/210 Receiver General Aspiration	APM 16030 4	Filter	0002	00015	1,400	002	011	002	008	
4990-0011-0029	Fiber Receiving General Aspiration	APM 18018 4	Filter	0002	00015	1,000	002	008	001	006	
4990-0001-0029	Cooling Tower	APM 40072 10	Filter	0002	00015	14,000	074	105	018	079	
4820-0001-0022	Ingredient Bin 601	MICROPUL 4B	Filter	0002	00015	210	0004	002	0001	001	
4820-0001-0026	Ingredient Bin 602	MICROPUL 4B	Filter	0002	00015	210	0004	002	0001	001	
4820-0001-0030	Ingredient Bin 603	MICROPUL 2 L21 B	Filter	0002	00015	210	0004	002	0001	001	
4820-0001-0034	Ingredient Bin 604	APM 15105 4	Filter	0002	00015	210	0004	002	0001	001	
4820-0001-0038	Micro Ingredient Dump Aspiration	APM 15105 4	Filter	0002	00015	2,500	004	019	003	014	
4820-0001-0004	Alber General Aspiration	BUHLER 255-6-30	Filter	0002	00015	1,500	003	011	002	008	
4900-0001-0065	3/4 Hammermill	APM 16009 6	Filter	0002	00015	1,258	002	009	002	007	
4900-0001-0008	#5 B Mill Expanders	APM 16009 6	Filter	0002	00015	1,017	002	008	001	006	
4900-0005-0001	Reprocessing General Aspiration	CD 376AF10	Filter	0002	00015	27,550	047	207	015	155	
4900-0001-0042	#5 Pulverizer	BUHLER 17-8-220	Filter	0002	00015	2,904	005	022	004	016	
4900-0001-0046	5/8 Pulverizer AB Finished Product Surge Bin	MICROPUL 4B	Filter	0002	00015	570	001	004	001	003	
4900-0001-0032	Pellet Bins	BUHLER 165-6-30	Filter	0002	00015	795	001	005	001	004	
4980-0006-0017	Viscosity Flour Receiver	APM 16022 8	Filter	0002	00015	2,141	004	016	003	012	
4990-0011-0010	Conditioning Receiver/Soy Meal Grinding	APM 16014 8	Filter	0002	00015	1,350	002	011	002	008	
4900-0005-0007	Grind Reject/Scrap Bin	MICROPUL 2 L21B	Filter	0002	00015	500	001	004	001	003	
4900-0005-0029	Blldg 113 Vacuum	HOFFMAN 36x96	Filter	0001	0001	500	0	002	0	002	
4900-0001-0030	AB Grinder Surge Bin	BUHLER 17-8-220	Filter	0002	00015	2,100	004	016	003	012	
4900-0005-0006	N CD General Aspiration & #5 Expander	CD 484AF 12	Filter	0002	00015	36,000	062	277	046	203	
4820-0001-0093	Removed From Service and Repurposed as 4880-0048-0012	NA	NA								
pending repurpose 4912-0002-0054	Hominy Bulk Truck Loadout Aspiration	DO 484F 12	Filter	0002	00015	17,000	061	278	048	208	
4860-0018-0003	South Hominy Feed Bin General Aspiration	MICROPUL 1F2	Filter	0002	00015	15,000	026	118	019	084	
4860-0027-0017	Secondary Clean Grinding	APM 15030 8	Filter	0002	00015	2,000	003	015	003	011	
4860-0024-0003	Bran Dryer	CORDONA 15	Cyclone	00454	0002	6,888	268	1174	012	052	
4912-0008-0017	Track 16 Rail Loadout	WEDENMAN LFT 2x7	Filter	0002	00015	30,000	051	238	039	169	
4860-0017-0073	Germ Dust Aspiration	AERODYNE	Cyclone	002	002	7,400	127	556	127	556	
4860-0021-0001	Feed Mill General Aspiration	APM 40120 6	Filter	0002	00015	16,000	027	112	021	009	
4860-0017-0003	Germ Dryer	CORDONA HV56	Cyclone	00454	0002	10,000	189	1704	017	075	
4860-0017-0072	Removed From Service	NA	NA								
4860-0019-0003	FTS Dryer Aspiration	CORDONA HV60	Filter	00454	0002	6,888	268	1174	012	052	
4860-0024-0017	Pet Bran Rice Lites Aspiration	MICROPUL 365-6-30	Filter	0002	00015	1,600	003	012	002	009	
4900-0001-0058	This equipment is part of the 4900-0001-0058 process emission unit. Not a separate emission unit.	NA	NA								
4900-0001-0058	This equipment is part of the 4900-0001-0058 process emission unit. Not a separate emission unit.	NA	NA								
4880-0048-0012	Pneumatic Lift Receiver for WQ240 Transfer	BUHLER MGX-60	Cyclone	002	002	682	012	053	012	051	
4900-0001-0011	Kae V564-8	Kae V564-8	Filter	00020	00020	6,500	011	049	011	049	
4900-0008-0027	USG Hammermill	Kae V564-8	Filter	00020	00020	6,500	011	049	011	049	
4900-0008-0027	USG Secondary Extruder Transfer	Kae CH526	Cyclone	00200	00200	4,000	009	100	009	100	
pending project	Not Yet Assigned	This Unit Does Not Yet Exist	Not Yet Assigned								
pending project	Same as above	Same as above	Same as above								
pending project	Same as above	Same as above	Same as above								
pending project	Same as above	Same as above	Same as above								
pending project	Same as above	Same as above	Same as above								
pending project	Same as above	Same as above	Same as above								
pending project	Same as above	Same as above	Same as above								
4880-0014-0027	This equipment will become part of the 4880-0014-0027 process emission unit. Not a separate emission unit.	Will not be controlled by the S 105 Carter-Day Filter									
4880-0014-0001	Will become part of the 4880-0014-0001 process emission unit group. Not a separate emission unit.	Will not be controlled by the S 105 Carter-Day Filter									
still in service 4880-0034-0015	South APM Binning	APM 41144 12	Filter	00020	00015	30,000	051	225	039	169	
4880-0046-0017	Whole Grain Dryer	KCE HV-26	Cyclone	00300	00200	1,400	016	158	024	105	
4880-0046-0028	Whole Grain Hammermill	MAC MS516	Filter	00020	00015	6,000	011	045	008	034	
4880-0046-0042	Whole Grain Aspiration	TD 124AF 10	Filter	00020	00015	5,080	009	038	007	029	
4900-0007-0020	USG Primary Extruder Transfer	Kae CH526	Cyclone	00200	00200	4,000	009	100	009	100	
4860-0018-0044	6th Floor Radial Pulver	MICROPUL 1005-6-20	Filter	00020	00015	7,400	013	056	011	042	
4750-0029-0015	Feed Mill Conveying General Aspiration	MICROPUL 1005-6-20	Filter	00020	00015	7,400	013	057	011	043	
4750-0029-0027	Round Bin General Aspiration	APM 14072 6	Filter	00020	00015	2,134	012	054	009	040	
4860-0017-0026	Bin 945 Germ Receiver	BUHLER 165-6-30	Filter	00020	00015	1,800	003	014	002	010	
4860-0018-0007	North Hominy Feed Grinding General Aspiration	MICROPUL 1F2	Filter	00020	00015	14,000	024	105	018	079	
								138.92		85.20	
4912-0008-0006	Blldg 201/202 Vacuum	HOFFMAN	Filter	00010	00010	700	001	003	001	002	
4912-0009-0005	Blldg 201/202 Vacuum	HOFFMAN	Filter	00010	00010	700	001	003	001	002	
4860-0018-0049	Hominy Feed Bins Aspiration	Donaldson 276AF W32	Filter	00020	00015	21,000	036	158	027	118	
								164		124	
4750-0029-0032	Hominy Binning	APM 40240 B	Filter	00020	00015	30,000	051	225	039	169	
4750-0029-0001	Hominy Grind General Aspiration	MICROPUL 1005-6-20	Filter	00020	00015	21,000	036	158	027	118	
4912-0004-0022	Hominy Truck Loadout	376AF 8	Filter	00020	00015	34,960	06	262	045	197	
4912-0001-0011	Track 15 Bulk Rail Loadout	376AF 8	Filter	00020	00020	34,960	06	262	046	201	
4750-0025-0015	Removed From Service	NA	NA								
4750-0025-0015	Removed From Service	NA	NA								
4750-0025-0015	Removed From Service	NA	NA								
4750-0029-0045	Hominy Screener General Aspiration	MICROPUL 1005-6-20	Filter	00020	00015	7,400	013	057	011	041	
4612-0000-0000	Hominy Loadout Fugitive	Fugitive	Fugitive					6.90		1.02	
4612-0000-0001	Grain Loadout Fugitive	Fugitive	Fugitive					0.10		0.10	
								16.64		9.01	
4750-0025-0015	Removed From Service	NA	NA								
4750-0025-0015	Removed From Service	NA	NA								
								0.00		0.00	





**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 10, 2023, she caused to be served by electronic mail, a true and correct copy of the following instruments entitled Notice of Filing and Respondent's Response in Opposition to Petitioner's Motion for Leave to File a Reply and Respondent's Surreply to:

Thor W. Ketzback  
Nora J. Faris  
Bryan Cave Leighton Paisner  
161 N. Clark Street, Suite 4300  
Chicago, IL 60601  
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Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, IL 62794-9274  
carol.webb@illinois.gov

/s/Lilia M. Brown  
Lilia M. Brown  
Environmental Bureau

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Certificate of Service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

/s/Lilia M. Brown  
Lilia M. Brown  
Environmental Bureau