
TABLE OF CONTENTS

Permit Signature Page..... i

Table Of Contents ii

Abbreviations iii

Permit Conditions:

I. General Conditions 1

II. Specific Conditions 3

III. Specific Conditions for Affected Emission Points:

(A) Grain Receiving and Processing
DM01, DM04, and DM04A A-1

(B) Degermination
DM39 B-1

(C) Alcohol Production
DM05 C-1

(D) Organic Liquid Process and Storage Tanks
DM40-DM48 and DM54 D-1

(E) Ethanol Loadout
DM09 E-1

(F) Feed Production
DM07A-H, DM08A-C, DM10, DM11, and DM12 F-1

(G) Emergency Equipment
DM50A-D, DM51, DM52, DM53A, and DM53B G-1

(H) Equipment Leaks
DM91 H-1

(I) Cooling Tower
DM13-DM20, DM20A, DM20B, and DM20C I-1

(J) Haul Roads
DM90 J-1

ABBREVIATIONS, SYMBOLS, and UNITS OF MEASURE

| | | | |
|------------------|--|-------------------|--|
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources | NO ₂ | Nitrogen Dioxide |
| BACT | Best Available Control Technology | NO _x | Nitrogen Oxides |
| bhp | Brake Horsepower | NSPS | New Source Performance Standard |
| BMP | Best Management Practice | NSR | New Source Review |
| btu | British Thermal Unit | PAL | Plant-wide Applicability Limit |
| bu | Bushel | Pb | Lead (chemical abbreviation) |
| CAA | Clean Air Act | PbR | Permit-by-Rule |
| CE | Control Equipment | PEMS | Parametric Emissions Monitoring System |
| CEM | Continuous Emissions Monitor | PM | Particulate Matter |
| CEMS | Continuous Emissions Monitoring System | PM ₁₀ | Particulate Matter with and aerodynamic diameter equal to or less than 10 microns |
| cf | Cubic feet | PM _{2.5} | Particulate Matter with and aerodynamic diameter equal to or less than 2.5 microns |
| CFR | Code of Federal Regulations | ppb | Parts per Billion |
| CO | Carbon Monoxide | ppm | Parts per Million |
| CO ₂ | Carbon Dioxide | ppmv | Parts per Million by volume |
| CP | Construction Permit | ppmvd | Parts per Million by volume, dry basis |
| DGS | Distiller's Grains with Solubles | PSD | Prevention of Significant Deterioration |
| DDGS | Dry Distillers Grains with Solubles | PTE | Potential to Emit |
| dscf | Dry Standard Cubic Feet | RVP | Reid Vapor Pressure |
| dscfm | Dry Standard Cubic Feet per Minute | RATA | Relative Accuracy Test Audit |
| EMIS | Emergency Management Information System | RMP | Risk Management Plan |
| EPA | Environmental Protection Agency | RTO | Regenerative Thermal Oxidizer |
| EQC | Environmental Quality Council | scf | Standard Cubic Feet |
| EP | Emission Point | SIC | Standard Industrial Classification |
| ESP | Electrostatic Precipitator | SIP | State Implementation Plan |
| EU | Emission Unit | SO ₂ | Sulfur Dioxide |
| FID | Facility Identification Number | SO _x | Sulfur Oxides |
| FDCP | Fugitive Dust Control Plan | TDS | Total Dissolved Solids |
| FGR | Flue Gas Recirculation | TO | Thermal Oxidizer |
| FIP | Federal Implementation Plan | TO/HRSG | Thermal Oxidizer with Heat Recovery Steam Generator |
| FR | Federal Register | tpy | Tons per year |
| ft | Feet | TRS | Total Reduced Sulfur |
| FTIR | Fourier Transform Infrared | TSP | Total Suspended Particulate Matter |
| H ₂ S | Hydrogen Sulfide | ULNB | Ultra Low NO _x Burner |
| HAP | Hazardous Air Pollutant | UST | Underground Storage Tank |
| hp | Horsepower | UTM | Universal Transverse Mercator |
| hr | Hour | VHAP | Volatile Hazardous Air Pollutant |
| LDAR | Leak Detection and Repair | VMT | Vehicle Miles Traveled |
| LNB | Low NO _x Burner | VOC | Volatile Organic Compound |
| MACT | Maximum Achievable Control Technology | WDGS | Wet Distiller's Grains with Solubles |
| Mgal | One Thousand gallons | | |
| MMBtu | One Million British Thermal Units | | |
| MMscf | One Million Standard Cubic Feet | | |
| MSDS | Material Safety Data Sheet | | |
| MW | Megawatt | | |
| NAAQS | National Ambient Air Quality Standards | | |
| NDEQ | Nebraska Department of Environmental Quality | | |
| NESHAP | National Emission Standards for Hazardous Air Pollutants | | |

I. GENERAL CONDITIONS

- (A) This permit is not transferable to another source or location. {Chapter 17}
- (B) Holding of this permit does not relieve the owner or operator of the source from the responsibility to comply with all applicable portions of the Nebraska Air Quality Regulations and any other requirements under local, State, or Federal law. Any permit noncompliance shall constitute a violation of the Nebraska Environmental Protection Act and the Federal Clean Air Act, and is grounds for enforcement action or permit revocation. {Chapter 41 & Chapter 17, Section 011}
- (C) Application for review of plans or advice furnished by the Director will not relieve the owner or operator of legal compliance with any provision of these regulations, or prevent the Director from enforcing or implementing any provision of these regulations. {Chapter 37}
- (D) Any owner or operator who failed to submit any relevant facts or who submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. If the owner or operator wishes to make changes at the source that will result in change(s) to values, specifications, and/or locations of emission points that were indicated in the permit application (or other supplemental information provided by the owner or operator and reviewed by the NDEQ in issuance of this permit), the owner or operator must receive approval from the NDEQ before the change(s) can be made. In addition, any modification which may result in an adverse change to the air quality impacts predicted by atmospheric dispersion modeling (such as changes in stack parameters or increases in emission rates, potential emissions, or actual emissions) shall have prior approval from the NDEQ. The owner or operator shall provide all necessary information to verify that there are no substantive changes affecting the basis upon which this permit was issued. Information may include, but not be limited to, additional engineering, modeling and ambient air quality studies. {Chapter 17, Section 006, 007, & 008}
- (E) Approval to construct, reconstruct and/or modify the source will become invalid if a continuous program of construction is not commenced within 18 months after the date of issuance of the construction permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable period of time. {Chapter 17, Section 012}
- (F) The owner/operator of the source shall provide the following notifications to the NDEQ:
- (1) The date construction, reconstruction or modification commenced as defined in Chapter 1, Section 031. Notification shall be postmarked no later than 30 days after such date and include a summary description of whether the requirement was met through: {Chapter 17, Section 012}
- (a) Initiating physical on-site construction activities of a permanent nature that meet the definition of “begin actual construction”, or
- (b) Entering into binding agreements or contractual obligations. If this option is used, the notice shall also include a brief summary of each binding agreement or contractual obligation entered into, the date of the agreement or contract, and why it cannot be cancelled or modified without substantial loss to the owner or operator.

-
- (2) The date of initial startup of operations postmarked within 15 days after such date. {Chapter 7, Section 002.03}
- (G) The owner or operator shall allow the NDEQ, EPA or an authorized representative, upon presentation of credentials to: {Neb. Rev. Statute §81-1504}
- (1) Enter upon the owner or operator's premises at reasonable times where a source subject to this permit is located, emissions-related activity is conducted or records are kept, for the purpose of ensuring compliance with the permit or applicable requirements;
- (2) Have access to and copy, at reasonable times, any records, for the purpose of ensuring compliance with the permit or applicable requirements;
- (3) Inspect at reasonable times any facilities, pollution control equipment, including monitoring and air pollution control equipment, practices, or operations, for the purpose of ensuring compliance with the permit or applicable requirements;
- (4) Sample or monitor at reasonable times substances or parameters for the purpose of ensuring compliance with the permit or applicable requirements.
- (H) When requested by the NDEQ, the owner or operator shall submit completed emission inventory forms for the preceding year to the NDEQ by March 31 of each year. {Chapter 6}
- (I) Open fires are prohibited except as allowed by Chapter 30.
- (J) Particulate Matter – General Requirements: {Chapter 32}
- (1) The owner or operator shall not cause or permit the handling, transporting or storage of any material in a manner, which allows particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the property line.
- (2) The owner or operator shall not cause or permit the construction, use, repair or demolition of a building, its appurtenances, a road, a driveway, or an open area without applying all reasonable measures to prevent particulate matter from becoming airborne and remaining visible beyond the property line. Such measures include, but not limited to, paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and planting and maintenance of vegetative ground cover.
- (K) If and when the Director declares an air pollution episode as defined in Chapter 38, Sections 003.01B, 003.01C, or 003.01D, the owner or operator shall immediately take all required actions listed in Title 129, Appendix I until the Director declares the air pollution episode terminated.
- (L) This permit may be revised (reopened and reissued) or revoked for cause in accordance with Title 129 and Title 115, Rules of Practice and Procedure. Conditions under which this permit will be revised or revoked for cause, include but are not limited to: {Chapter 15, Section 006}
- (1) A determination by the Director, or the Administrator of EPA that:
-

-
- (a) the permit must be revised to ensure compliance with the applicable requirements;
 - (b) the permit contains a material mistake or that inaccurate statements were made in the emissions standards or other terms or conditions of the permit.
- (2) The existence at the source of unresolved noncompliance with applicable requirements or a term or condition of the permit, and refusal of the owner or operator to agree to an enforceable schedule of compliance to resolve the noncompliance;
 - (3) The submittal by the owner or operator of false, incomplete, or misleading information to the NDEQ or EPA;
 - (4) A determination by the Director that the source or activity endangers human health or the environment and that the danger cannot be removed by a revision of the permit; or
 - (5) The failure of the owner or operator to pay a penalty owed pursuant to court order, stipulation and agreement, or order issued by the Administrator of the EPA.

II. SPECIFIC CONDITIONS

- (A) Recordkeeping: Records of all measurements, results, inspections, and observations as required to ensure compliance with all applicable requirements shall be maintained on-site as follows:
 - (1) All calculations and records required throughout this permit shall be completed no later than the fifteenth (15th) day of each calendar month and shall include all information through the previous calendar month, unless otherwise specified in this permit.
 - (2) All records required throughout this permit shall be kept for a minimum of five years and shall be clear and readily accessible to Department representatives, unless otherwise specified in this permit.
 - (3) Copies of all notifications, reports, test results, and plans.
 - (4) Calibration records for all operating parameter monitoring equipment.
 - (5) Operation and Maintenance manuals detailing proper operation and maintenance of all permitted emission units, required control equipment, and required monitoring equipment shall be kept for the life of the equipment.
 - (6) Records documenting equipment failures, malfunctions, or other variations, including date and time of occurrence, remedial action taken, and when corrections were made to each piece of permitted equipment, required control equipment, and required monitoring equipment.
- (B) All permitted emission units, control equipment, and monitoring equipment shall be properly installed, operated, and maintained.
- (C) Any emissions due to malfunctions, unplanned shutdowns, and ensuing start-ups that are, or may be, in excess of applicable emission limits shall be reported to the NDEQ in accordance with Chapter 35, Section 005.

- (D) The performance tests required in the permit shall be completed and submitted to the NDEQ as follows: {Chapter 34}
- (1) Performance tests shall be conducted while operating at full capacity within sixty (60) days after reaching the maximum capacity, but not more than 180 days after the start-up of operations of each unit, unless otherwise specified by the NDEQ.
 - (2) Testing shall be conducted according to the methodologies found in Title 129, Chapter 34, Section 002, or other NDEQ approved methodologies.
 - (3) Performance tests shall be conducted for a minimum of three (3) one hour runs unless another run time is specified by the applicable Subpart or as deemed appropriate by the NDEQ.
 - (4) The owner or operator of a source shall provide the NDEQ at least thirty (30) days written notice prior to testing to afford the NDEQ an opportunity to have an observer present. The owner or operator shall also provide the NDEQ with an emissions testing protocol at least thirty (30) days prior to testing.
 - (5) The owner or operator shall monitor the operating parameters for process and control equipment during the performance testing required in the permit.
 - (6) A written copy of the test results signed by the person conducting the test shall be provided to the NDEQ within forty-five (45) days of completion of the test and will, at a minimum, contain the following items:
 - (a) A description of the source’s operating parameters (i.e. production rates, firing rates of combustion equipment, fuel usage, etc.), control equipment parameters (i.e. baghouse fan speeds, scrubber liquid flow rates, etc.), and ambient conditions (i.e. weather conditions, etc.) during testing.
 - (b) Copies of all data sheets from the test run(s).
 - (c) A description and explanation of any erroneous data or unusual circumstance(s) and the cause for such situation.
 - (d) A final conclusion section describing the outcome of the testing.
- (E) The following conditions apply to the verification of NAAQS modeling analysis: {Chapter 4}
- (1) The stack dimensions of the following emission points shall be constructed as indicated below:

| Emission Point ID# | Emission Point Name | Minimum Stack Height (m) | Stack Exit Point Maximum Inside Diameter (m) |
|---------------------------|---|---------------------------------|---|
| DM01 | Dry Mill Receiving Baghouse | 44.99 | 1.40 |
| DM04 | Grain Conveying, Milling, and Classification Vent | 48.01 | 1.80 |
| DM04A | Flour Conveyor Baghouse | 34.99 | 0.50 |

| Emission Point ID# | Emission Point Name | Minimum Stack Height (m) | Stack Exit Point Maximum Inside Diameter (m) |
|---------------------------|---------------------------------|---------------------------------|---|
| DM10 | Byproduct Conveying Baghouse | 45 | 0.6 |
| DM11 | Byproduct Storage Baghouse | 45 | 0.5 |
| DM12 | Byproduct Loadout Baghouse | 30 | 0.6 |
| DM39 | Degermination Scrubber | 85 | 2.1 |
| DM05 | Fermentation RTO | 30.5 | 1.7 |
| DM09 | Denatured Ethanol Loadout Flare | 11 | 0.6 |
| DM07A | Natural Gas Fired DDGS Dryer #1 | 65 | 1.2 |
| DM07B | Natural Gas Fired DDGS Dryer #2 | 65 | 1.2 |
| DM07C | Natural Gas Fired DDGS Dryer #3 | 65 | 1.2 |
| DM07D | Natural Gas Fired DDGS Dryer #4 | 65 | 1.2 |
| DM07E | Natural Gas Fired DDGS Dryer #5 | 65 | 1.2 |
| DM07F | Natural Gas Fired DDGS Dryer #6 | 65 | 1.2 |
| DM07G | Natural Gas Fired DDGS Dryer #7 | 65 | 1.2 |
| DM07H | Natural Gas Fired DDGS Dryer #8 | 65 | 1.2 |
| DM08A | DDGS Cooling Baghouse #1 | 45 | 1.3 |
| DM08B | DDGS Cooling Baghouse #2 | 45 | 1.3 |
| DM08C | DDGS Cooling Baghouse #3 | 45 | 1.3 |
| DM13-20C | Dry Mill Cooling Tower | 13.7 | 12.5 |

A site survey (using 1422' MSL as basis for ground level to measure stack heights), or similar documentation containing the as-built stack dimensions, shall be maintained on-site and kept for the life of the source. If stack dimensions do not comply with the table above, the owner or operator shall notify the NDEQ prior to start-up of any emission unit and, if requested, submit a revised air dispersion modeling analysis to the NDEQ to ensure that the source will not interfere with the attainment or maintenance of the ambient air quality standards in Chapter 4.

- (2) The owner or operator shall sufficiently restrict public access to the source at the ambient air boundary relied upon in the air dispersion modeling analysis for the NAAQS compliance demonstration. The vertices of the boundary shall be located at the coordinates indicated below:

| Fence-line Vertex ID# | UTM X (m) | UTM Y (m) |
|------------------------------|------------------|------------------|
| NW | 642,005 | 4,586,995 |
| NE | 643,500 | 4,587,040 |
| SE | 643,558 | 4,584,725 |
| SW-1 | 642,488 | 4,585,260 |
| SW-2 | 642,475 | 4,585,980 |
| SW-3 | 642,023 | 4,585,995 |

A site survey, or similar documentation containing the locations of the boundary vertices, shall be maintained on-site and kept for the life of the source. If the boundary dimensions do not comply with the table above, the owner or operator shall notify the NDEQ prior to start-up of any emission unit and, if requested, submit a revised air dispersion modeling analysis to the NDEQ to ensure that the source will not interfere with the attainment or maintenance of the ambient air quality standards in Chapter 4.

III.(A) Specific Conditions for Grain Receiving and Processing

- (1) Permitted Emission Points: The source is permitted to construct the emission points and associated emission units identified in the following table:

| Emission Point ID# | Required Control Equipment ID# and Control Equipment Description | Emission Unit Description |
|---------------------------|---|----------------------------------|
| DM01 | DM01: Dry Mill Receiving Baghouse | EU-DM01A: Rail Unloading |
| | | EU-DM01B: Truck Unloading |
| DM04 | DM04: Grain Conveying and Milling Baghouse | EU-DM04-1: Grain Conveying |
| | | EU-DM04-2: Grain Cleaning |
| | | EU-DM04-3: Hammermilling |
| | | EU-DM04-4: Grain Classification |
| DM04A | DM04A: Flour Conveyor Baghouse | EU-DM04A: Flour Conveyor |

- (2) Emission Limitations and Testing Requirements:

Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Initial performance testing, if required, shall be conducted in accordance with Specific Condition II.(D).

| Emission Point ID# | Pollutant | Permitted Limit | Averaging Period | Basis for Permit Limit | Initial Performance Testing Required (Yes/No) |
|---------------------------|---------------------|------------------------|-----------------------------|-------------------------------|--|
| DM01 | PM/PM ₁₀ | 0.004 gr/dscf | 3-hr or test method average | Chapter 19 | Yes |
| DM04 | PM/PM ₁₀ | 0.004 gr/dscf | 3-hr or test method average | Chapter 19 | Yes |
| DM04A | PM/PM ₁₀ | 0.004 gr/dscf | 3-hr or test method average | Chapter 19 | Yes |

- (3) Operational and Monitoring Requirements and Limitations

- (a) Emissions from the emission units identified in Condition III.(A)(1) shall be controlled by pollution control equipment as follows: EU-DM01A and EU-DM01B shall be controlled by DM01; EU-DM04-1, EU-DM04-2, EU-DM04-3, EU-DM04-4 shall be controlled by DM04; and EU-DM04A shall be controlled by DM04A. {Chapters 19 and 20}
- (b) Operation and maintenance of each baghouse shall be in accordance with the following requirements: {Chapters 19 and 20}
- (i) The baghouse shall be operated and be controlling emissions at all times when the associated emission units are in operation.
- (ii) The baghouse shall be equipped with an operational pressure differential indicator. Pressure differential indicator readings shall be recorded at least once each day that the associated baghouse is operating.

- (iii) Baghouse filter bags are to be inspected and/or replaced as often as necessary to ensure proper operation or more frequently as indicated by pressure differential indicator readings or other indication of bag failure.
 - (iv) Observations at least once each day during daylight hours of baghouse operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is needed. If corrective action is required, it shall occur immediately.
 - (v) The owner or operator shall maintain an on-site inventory of spare bags of each type used to ensure rapid replacement in the event of bag failure.
- (c) Grain receiving operations, by truck, identified in Condition III.(A)(1) shall be located inside a building and all hopper bottom trucks shall utilize choke feed practices during receipt of grain. Grain receiving operations, by rail, identified in Condition III.(A)(1) shall be located inside a building that is fitted with plastic strip curtains on the entrances and exits. {Chapters 19 and 20}

(4) Applicable NSPS, NESHAP, and MACT Requirements:

The affected facilities associated with the following emission points are subject to the NSPSs listed below: DM01, DM04, and DM04A.

| Applicable Standard | Title | Rule Citation |
|----------------------------|--------------------|---|
| NSPS, Subpart A | General Provisions | Chapter 18, Sec. <u>001.01</u> 40 CFR 60.1 |
| NSPS, Subpart DD | Grain Elevators | Chapter 18, Sec. <u>001.19</u> 40 CFR 60.300 |

(5) Reporting and Recordkeeping Requirements:

- (a) Records documenting the date, time, and pressure differential reading for each day the associated baghouse is in operation.
- (b) Filter replacement records including the date the filter replacement occurred and the type of filter installed.
- (c) Records documenting the date, time, observations, and corrective actions taken for each day the associated baghouse is in operation.
- (d) For affected facilities subject to NSPS, Subpart DD, notifications and record keeping as required by 40 CFR 60.7.

III.(B) Specific Conditions for Degermination

- (1) Permitted Emission Points: The source is permitted to construct the emission points and associated emission units identified in the following table:

| Emission Point ID# | Required Control Equipment ID# and Control Equipment Description | Emission Unit Description |
|--------------------|--|---------------------------|
| DM39 | DM39: Degermination Wet Scrubber | EU-DM39A: Germ Dryer #1 |
| | | EU-DM39B: Germ Dryer #2 |
| | | EU-DM39C: Germ Dryer #3 |
| | | EU-DM39D: Germ Dryer #4 |
| | | EU-DM39E: Germ Cooler #1 |
| | | EU-DM39F: Germ Cooler #2 |

- (2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Initial performance testing, if required, shall be conducted in accordance with Specific Condition II.(D).

| Emission Point ID# | Pollutant | Permitted Limit | Averaging Period | Basis for Permit Limit | Initial Performance Testing Required (Yes/No) |
|--------------------|---------------------|---|--|------------------------|---|
| DM39 | PM/PM ₁₀ | 10.24 lb/hr | 3-hr or test method average | Chapter 19 | Yes |
| | SO ₂ | 11.92 lb/hr | 3-hr or test method average | Chapter 19 | Yes |
| | VOC | 6.18 lb/hr ^[1] | 3-hr or test method average | Chapter 19 | Yes |
| | HAP | 50% Control Efficiency or 20.0 ppmvd for combined HAPs ^[2] | Speciation and Quantification of HAP composition at inlet and outlet | Chapter 27 | Yes |

^[1]Expressed as mass of VOC

^[2]Limitation shall be complied with in accordance with Specific Conditions III.(B)(2)(b) and III.(B)(2)(c).

- (b) A weighted average of the control efficiency for the combined HAPs shall be calculated using the following equation:

$$Efficiency = \left(1 - \frac{\sum C}{\sum U}\right) \times 100$$

Where: Efficiency = the combined HAP control efficiency

C = the controlled (outlet) individual HAP emission rates

U = the uncontrolled (inlet) individual HAP emission rates

- (c) If the HAP limitation cannot be achieved, ADM shall submit a revised HAP BACT analysis and a significant construction permit revision request to the Department within

forty-five (45) days of submitting the test results to the Department. The HAP limitation may be subject to revisions after the opportunity for public comment.

(3) Operational and Monitoring Requirements and Limitations

- (a) Emissions from the emission units identified in Condition III.(B)(1) shall be controlled by pollution control equipment as follows: EU-DM39A and EU-DM39B shall be controlled by DM39. {Chapters 19}
- (b) Operation and maintenance of each scrubber shall be in accordance with the following requirements: {Chapters 19 and 27}
 - (i) The scrubber shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (ii) The scrubber shall be equipped with devices capable of continuously monitoring operating parameters including, at a minimum, the scrubbing liquid temperature, scrubbing liquid flow rate, and pressure differential. Operating parameter readings shall be recorded at least once each day the scrubber is in operation.
 - (iii) All monitored operating parameters of the scrubber shall be maintained at the levels recorded during the most recent performance test that demonstrated compliance with the permitted emissions limits. Alternative levels may be used providing the facility can justify that better emissions control is being achieved. Normal operating parameters, or operating parameter ranges, that demonstrate compliance with the permitted emissions limits, with appropriate averaging periods shall be submitted with the source's operating permit application.
 - (iv) Observations at least once each day during daylight hours of scrubber operation shall be conducted to determine whether there are leaks, noise, or other indications that corrective action is necessary. If corrective action is required, it shall occur immediately.

(4) Applicable NSPS, NESHAP, and MACT Requirements:

The Department has not identified any NSPS, NESHAP, or MACT requirements that apply to the emission points or emission units listed in Condition III.(B)(1).

(5) Reporting and Recordkeeping Requirements:

- (a) Records documenting the date, time, temperature and flow rate of scrubbing liquid, and the pressure differential reading for each day the associated scrubber is in operation.
- (b) Records documenting the date, time, observations, and corrective actions taken for each day the associated scrubber is in operation.

III.(C) Specific Conditions for Fermentation, Distillation, and Nitrogen Stripping

(1) Permitted Emission Points:

- (a) The source is permitted to construct the emission points and associated emission units identified in the following table:

| Emission Point ID# | Required Control Equipment ID# and Description | Emission Unit Description |
|-----------------------------------|---|---|
| DM05 | DM05: Fermentation RTO | EU-DM05G: Two Slurry Mix Tanks |
| | | EU-DM05H: Two Pre-Cook Tanks |
| | | EU-DM05I: Two Barometric Condensers |
| | | EU-DM05J: Ten Liquefaction Tanks |
| | | EU-DM05K: Two Evaporator Feed Tanks |
| | | EU-DM05L: Two Decanter (Centrifuge) Feed Tanks |
| | | EU-DM05M: Centrate Tank |
| | | EU-DM05N: Six Evaporators |
| | | EU-DM05O: One CDS (30% DS Product) Tank |
| | | EU-DM05P: One Waste Water Transfer Tank |
| | | EU-DM05Q: One Evaporator (Contaminate) Condensate Tank |
| | | EU-DM05R: Seven Temper Tanks |
| | | EU-DM05S: Three Grind Tanks |
| | | EU-DM05T: One Recycle Tank |
| | | EU-DM05U: One Evaporator Product Tank |
| | | EU-DM05V: One Process Water Tank |
| | | EU-DM05F: Nitrogen Stripper Scrubber |
| | | DM05D/E: Distillation and Dehydration Vent Gas Scrubber |
| DM05B/C: CO ₂ Scrubber | | |
| EU-DM05A: Propagators | | |
| DM05D/E ^[1] | DM05D/E: Distillation and Dehydration Vent Gas Scrubber | EU-DM05D: Distillation Equipment |
| | | EU-DM05E: Dehydration Equipment |
| DM05B/C ^[1] | DM05B/C: CO ₂ Scrubber | EU-DM05B: Fermentation Tanks |
| | | EU-DM05C: Two Beerwells |

^[1] Emissions from DM05D/E: Distillation and Dehydration Vent Gas Scrubber and DM05B/C: CO₂ Scrubber are required to be controlled by DM05: Fermentation RTO.

- (b) The source is permitted to construct the following emissions unit identified in the following table at the maximum capacity and using the fuel types listed:

| Emission Point ID# | Emission Unit ID# and Description | Maximum Capacity (MMBtu/hr) | Permitted Fuel Types |
|---------------------------|--|------------------------------------|-----------------------------|
| DM05 | DM05: Fermentation RTO | 18.0 | Natural Gas |

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Initial performance testing, if required, shall be conducted in accordance with Specific Condition II.(D).

| Emission Point ID# | Pollutant | Permitted Limit | Averaging Period | Basis for Permit Limit | Initial Performance Testing Required (Yes/No) |
|---------------------------|------------------|---|---|-------------------------------|--|
| DM05 | SO ₂ | 2.91 lb/hr | 3-one hour test runs or test method average | Chapter 19 | Yes |
| | VOC | 98% Control Efficiency or 10 ppmv as VOC ^[1] | 3-one hour test runs or test method average | Chapter 19 | Yes |
| | VOC | 8.4 lb/hr ^[2] | 3-one hour test runs or test method average | Chapter 19 | Yes |

^[1] Control Efficiency as measured across the RTO (DM05); or concentration as measured at RTO exhaust

^[2] Expressed as mass of VOC

Emissions limitations and testing requirements in accordance with NESHAP, Subpart FFFF.

(3) Operational and Monitoring Requirements and Limitations

- (a) Emissions from the emission units identified in Condition III.(C)(1) shall be controlled by pollution control equipment as follows: EU-DM05B and C shall be controlled by DM05B/C, EU-DM05D and E shall be controlled by DM05D/E, and EU-DM05A, DM05B/C, DM05D/E, and EU-DM05F though EU-DM05V shall be controlled by DM05. {Chapters 19 and 27}
- (b) Operation and maintenance of each scrubber shall be in accordance with the following requirements: {Chapters 19 and 27}
- (i) The scrubber shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (ii) The scrubber shall be equipped with devices capable of continuously monitoring operating parameters including, at a minimum, the scrubbing liquid temperature, scrubbing liquid flow rate, and pressure differential. Operating parameter readings shall be recorded at least once each day the scrubber is in operation.
 - (iii) All monitored operating parameters of the scrubber shall be maintained at the levels recorded during the most recent performance test that demonstrated compliance with the permitted emissions limits. Alternative levels may be used providing the facility can justify that better emissions control is being achieved. Normal operating parameters, or operating parameter ranges, that demonstrate compliance with the permitted emissions limits, with appropriate averaging periods shall be submitted with the source's operating permit application.

- (iv) Observations at least once each day during daylight hours of scrubber operation shall be conducted to determine whether there are leaks, noise, or other indications that corrective action is necessary. If corrective action is required, it shall occur immediately.
- (c) Operation and maintenance of each RTO shall be in accordance with the following requirements {Chapters 19, 27, and 28}:
 - (i) The RTO shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (ii) The RTO shall be equipped with a device capable of continuously monitoring and recording the temperature of the thermal oxidation combustion chamber(s).
 - (iii) All monitored operating parameters of the RTO shall be maintained at the levels recorded during the most recent performance test that demonstrated compliance with the permitted emissions limits. Alternative levels may be used provided the owner or operator can justify that better emissions control is being achieved. Prior to compliance being demonstrated the combustion chamber temperature shall not be operated below 1,400 degrees Fahrenheit. Combustion chamber temperature shall be averaged hourly from a minimum of one cycle of sampling, analyzing, and data recording for each successive fifteen minute period. Normal operating parameters, or operating parameter ranges, that demonstrate compliance with the permitted emissions limits, with appropriate averaging periods shall be submitted with the source’s operating permit application.
 - (iv) Observations at least once each day during daylight hours of RTO operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is necessary. If corrective action is required, it shall occur immediately.

(4) Applicable NSPS, NESHAP, and MACT Requirements:

The following emission units are subject to the NESHAPs listed below: DM05J, DM05K, DM05L, DM05M, DM05N, DM05O, DM05P, DM05Q, DM05R, DM05S, DM05T, DM05U, DM05V, DM05F, DM05D/E, DM05B/C, and DM05A.

| Applicable Standard | Title | Rule Citation |
|----------------------|--|--|
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. <u>001.01</u> Requirements Begin at 40 CFR 63.1 |
| NESHAP, Subpart FFFF | Miscellaneous Organic Chemical Manufacturing (MON) | Chapter 28, Sec. <u>001.78</u> Requirements Begin at 40 CFR 63.2430 |

(5) Reporting and Recordkeeping Requirements:

- (a) Records documenting the date, time, temperature and flow rate of scrubbing liquid, and the pressure differential reading for each day the associated scrubber is in operation.

- (b) Records documenting the date, time, observations, and corrective actions taken for each day the associated scrubber is in operation.
- (c) Records documenting the date, time, and hourly-average temperatures for each day the associated RTO is in operation.
- (d) Records documenting the date, time, observations, and corrective actions taken for each day the associated RTO is in operation.
- (e) Reporting and recordkeeping as required by 40 CFR 63.2430.

III.(D) Specific Conditions for Organic Liquid Process and Storage Tanks

- (1) Permitted Emission Points: The source is permitted to construct the storage and process tanks identified in the following table at the capacities and for the storage of the products listed:

| Emission Point ID# & Tank ID# | Maximum Storage Capacity (gallons) | Product Stored in Tank |
|--|---|-------------------------------------|
| DM40 ^[1] | 500,000 | Alcohol Reclaim - Denatured Ethanol |
| DM41 | 500,000 | 200 Proof Day Tank #1 |
| DM42 | 500,000 | 200 Proof Day Tank #2 |
| DM43 ^[1] | 500,000 | Alcohol QC Tank - Denatured Ethanol |
| DM44 ^[1] | 2,000,000 | Denatured Ethanol Storage #1 |
| DM45 ^[1] | 2,000,000 | Denatured Ethanol Storage #2 |
| DM46 ^[1] | 2,000,000 | Denatured Ethanol Storage #3 |
| DM47 | 8,225 | Corrosion Inhibitor |
| DM48 ^[1] | 500,000 | Denaturant Storage |
| DM54 | 100,000 | 190 Proof Tank |

^[1] Subject to Subpart Kb

- (2) Emission Limitations and Testing Requirements:

Refer to NSPS, Subpart Kb and NESHAP, Subpart FFFF for any specific emission limitations and testing requirements that may apply to the tanks listed above, as appropriate.

- (3) Operational and Monitoring Requirements and Limitations:

- (a) The corrosion inhibitor tank (DM47) shall be installed with a fixed roof and use submerged loading when transferring corrosion inhibitor into the tank. {Chapters 19 and 27}
- (b) Tanks DM41, DM42, and DM54 shall each be equipped with a fixed roof in combination with an internal floating roof, in accordance with the specifications in 40 CFR 60.112b(a)(1). {Chapters 19 and 27}
- (c) Tanks DM41, DM42, and DM54 are subject to the inspection requirements as described in 40 CFR 60.113b(a). {Chapter 27}
- (d) Tanks DM40, DM43, DM44, DM45, DM46, and DM48 are subject to all applicable requirements of NSPS, Subpart Kb. {Chapter 18}
- (e) The process tanks (DM41, DM42, and DM54) shall not have any direct product loadout capability/operations. All process tanks must loadout to additional processing equipment, other process tanks, or to the storage tanks at the facility.

(4) Applicable NSPS, NESHAP, and MACT Standards:

The following standards apply to DM40, DM43, DM44, DM45, DM46, and DM48:

| Applicable Standard | Title | Rule Citation |
|----------------------------|---|--|
| NSPS, Subpart A | General Provisions | Chapter 18, Sec. <u>001.01</u> 40 CFR 60.1 |
| NSPS, Subpart Kb | Volatile Organic Liquid Storage Vessels (Including Liquid Storage Vessels) | Chapter 18, Sec. <u>001.62</u> 40 CFR 60.110b |

The following standards apply to DM40, DM41, DM42, DM43, DM44, DM45, DM46, DM47, DM48, and DM54:

| Applicable Standard | Title | Rule Citation |
|----------------------------|--|--|
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. <u>001.01</u> Requirements Begin at 40 CFR 63.1 |
| NESHAP, Subpart FFFF | Miscellaneous Organic Chemical Manufacturing (MON) | Chapter 28, Sec. <u>001.78</u> Requirements Begin at 40 CFR 63.2430 |

(5) Reporting and Recordkeeping Requirements:

(a) The following apply to EU's DM40, DM43, DM44, DM45, DM46, and DM48:

(i) Notifications and record keeping as required by 40 CFR 60.7.

(ii) Reporting and recordkeeping as required by 40 CFR 60.115b.

(b) The following requirements apply to DM41, DM42, and DM54:

Records of inspections conducted in accordance with Condition III.(D)(3)(c).

(c) The following apply to EU's DM40, DM41, DM42, DM43, DM44, DM45, DM46, DM47, DM48, and DM54:

Reporting and recordkeeping as required by 40 CFR 63.2430.

III.(E) Specific Conditions for Ethanol Loadout

- (1) Permitted Emission Points: The source is permitted to construct the emission points and associated emission units identified in the following table at the capacity and using the fuel types listed:

| Emission Point ID# | Control Equipment ID# and Description | Emission Unit (EU) ID# and Description | Maximum Capacity | Permitted Fuel Type |
|---------------------------|--|---|------------------------------|--|
| DM09A | DM09A: Ethanol Loadout Flare #1 | EU-DM09: Rail Loadout | 720,000 gallons/hour loadout | Denatured Ethanol Vapors and Natural Gas |
| DM09B | DM09B: Ethanol Loadout Flare #2 | | | |

- (2) Emission Limitations and Testing Requirements:

Refer to NESHAP, Subpart FFFF for any emission limitations and testing requirements that may apply to DM09A and DM09B.

- (3) Operational and Monitoring Requirements and Limitations:

- (a) The source shall use submerged or bottom loading when transferring liquid product from the storage tanks to tanker trucks and railcars. {Chapters 19 and 27}
- (b) Truck and rail loadout of liquid product from EU-DM09 shall be controlled by a closed vapor recovery system with an enclosed flare at all times liquid product loadout is occurring. {Chapters 19 and 27}
- (c) When ethanol loadout is occurring, a flame shall be present at the flare. The facility must install an appropriate safety device or flame monitoring system to ensure that truck and rail loadout cannot occur without the presence of a flame. {Chapters 19 and 27}

- (4) Applicable NSPS, NESHAP, and MACT Requirements:

The following standards apply to DM09:

| Applicable Standard | Title | Rule Citation |
|----------------------------|--|--|
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. <u>001.01</u> Requirements Begin at 40 CFR 63.1 |
| NESHAP, Subpart FFFF | Miscellaneous Organic Chemical Manufacturing (MON) | Chapter 28, Sec. <u>001.78</u> Requirements Begin at 40 CFR 63.2430 |

- (5) Reporting and Recordkeeping Requirements:

- (a) Reporting and recordkeeping as required by 40 CFR 63.2430.

III.(F) Specific Conditions for Feed Production

(1) Permitted Emission Points:

(a) The source is permitted to construct the emission points and associated emission units identified in the following table:

| Emission Point ID# | Required Control Equipment ID# and Description | Emission Unit ID# and Description |
|---------------------------|---|--|
| DM07A | DM07A: Natural Gas Combustor #1 | EU-DM07A: DDGS Dryer #1 |
| DM07B | DM07B: Natural Gas Combustor #2 | EU-DM07B: DDGS Dryer #2 |
| DM07C | DM07C: Natural Gas Combustor #3 | EU-DM07C: DDGS Dryer #3 |
| DM07D | DM07D: Natural Gas Combustor #4 | EU-DM07D: DDGS Dryer #4 |
| DM07E | DM07E: Natural Gas Combustor #5 | EU-DM07E: DDGS Dryer #5 |
| DM07F | DM07F: Natural Gas Combustor #6 | EU-DM07F: DDGS Dryer #6 |
| DM07G | DM07G: Natural Gas Combustor #7 | EU-DM07G: DDGS Dryer #7 |
| DM07H | DM07H: Natural Gas Combustor #8 | EU-DM07H: DDGS Dryer #8 |
| DM08A | DM08A: DDGS Cooling Baghouse #1 | EU-DM08A: DDGS Cooler #1 |
| DM08B | DM08B: DDGS Cooling Baghouse #2 | EU-DM08B: DDGS Cooler #2 |
| DM08C | DM08C: DDGS Cooling Baghouse #3 | EU-DM08C: DDGS Cooler #3 |
| DM10 | DM10: Feed/Germ Conveying Baghouse | EU-DM10: Feed/Germ Conveyor |
| DM11 | DM11: Feed/Germ Storage Baghouse | EU-DM11: Feed/Germ Storage |
| DM12 | DM12: Feed/Germ Loadout Baghouse | EU-DM12: Feed/Germ Loadout |

(b) The source is permitted to construct the following emission units identified in the following table at the capacities and using the fuel types listed:

| Emission Point ID# | Emission Unit ID# and Description | Capacity (MMBtu/hr) | Permitted Fuel Types |
|---------------------------|--|----------------------------|-----------------------------|
| DM07A | DM07A: Natural Gas Combustor #1 | 93.7 | Natural Gas |
| DM07B | DM07B: Natural Gas Combustor #2 | 93.7 | Natural Gas |
| DM07C | DM07C: Natural Gas Combustor #3 | 93.7 | Natural Gas |
| DM07D | DM07D: Natural Gas Combustor #4 | 93.7 | Natural Gas |
| DM07E | DM07E: Natural Gas Combustor #5 | 93.7 | Natural Gas |
| DM07F | DM07F: Natural Gas Combustor #6 | 93.7 | Natural Gas |
| DM07G | DM07G: Natural Gas Combustor #7 | 93.7 | Natural Gas |
| DM07H | DM07H: Natural Gas Combustor #8 | 93.7 | Natural Gas |

(2) Emission Limitations and Testing Requirements:

Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Initial performance testing, if required, shall be conducted in accordance with Specific Condition II.(D).

| Emission Point ID# | Pollutant | Permitted Limits per Emission Point | Averaging Period | Basis for Permit Limit | Initial Performance Testing Required (Yes/No) |
|--|-------------------------|--|--|-------------------------------|--|
| DM07A DM07B DM07C DM07D DM07E DM07F DM07G DM07H | PM/PM ₁₀ | 2.80 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| | SO _x | 0.37 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| | NO _x | 0.04 lb/MMBtu | 3-hour or test method average | Chapter 19 | Yes |
| | CO | 0.11 lb/MMBtu | 3-hour or test method average | Chapter 19 | Yes |
| | VOC | 5.16 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| | HAP | N/A | Speciation and Quantification of HAP composition at outlet | Chapter 27 | Yes |
| | DM08A DM08B DM08C | PM/PM ₁₀ | 0.004 gr/dscf | 3-hour or test method average | Chapter 19 |
| SO _x | | 4.49 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| VOC | | 12.89 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| HAP | | N/A | Speciation and Quantification of HAP composition at outlet | Chapter 27 | Yes |
| DM10 DM11 DM12 | PM/PM ₁₀ | 0.004 gr/dscf | 3-hour or test method average | Chapter 19 | Yes |
| | HAP | N/A | 3-hour or test method average | Chapter 27 | Yes |
| DM10 | VOC | 1.43 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| DM11 | VOC | 1.15 lb/hr | 3-hour or test method average | Chapter 19 | Yes |
| DM12 | VOC | 1.43 lb/hr | 3-hour or test method average | Chapter 19 | Yes |

(3) Operational and Monitoring Requirements and Limitations:

- (a) Emissions from EU-DM07A shall be controlled by DM07A, EU-DM07B shall be controlled by DM07B, EU-DM07C shall be controlled by DM07C, EU-DM07D shall be controlled by DM07D, EU-DM07E shall be controlled by DM07E, EU-DM07F shall be controlled by DM07F, EU-DM07G shall be controlled by DM07G, and EU-DM07H shall be controlled by DM07H. The emissions from EU-DM08A shall be controlled by DM08A, EU-DM08B shall be controlled by DM08B, EU-DM08C shall be controlled by DM08C, EU-DM10 shall be controlled by DM10, EU-DM11 shall be controlled by DM11, and EU-DM12 shall be controlled by DM12.

- (b) Operation and maintenance of each combustor (DM07A, DM07B, DM07C, DM07D, DM07E, DM07F, DM07G, and DM07H) shall be in accordance with the following requirements: {Chapter 19}
- (1) The combustor shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (2) The combustor shall be equipped with a device capable of continuously monitoring and recording the temperature of the thermal oxidation combustion chamber(s).
 - (3) All monitored operating parameters of the combustor shall be maintained at the levels recorded during the most recent performance test that demonstrated compliance with the permitted emissions limits. Alternative levels may be used provided the owner or operator can justify that better emissions control is being achieved. Prior to compliance being demonstrated, the combustion chamber temperature shall not be operated below 1,500 degrees Fahrenheit. Combustion chamber temperature shall be averaged hourly from a minimum of one cycle of sampling, analyzing, and data recording for each successive fifteen minute period. Normal operating parameters, or operating parameter ranges, that demonstrate compliance with the permitted emissions limits, with appropriate averaging periods shall be submitted with the source's operating permit application.
 - (4) Observations at least once each day during daylight hours of combustor operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is necessary. If corrective action is required, it shall occur immediately.
- (c) Operation and maintenance of each baghouse shall be in accordance with the following requirements: {Chapter 19}
- (1) The baghouse shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (2) The baghouse shall be equipped with an operational pressure differential indicator. Pressure differential indicator readings shall be recorded at least once each day that the associated baghouse is operating.
 - (3) Baghouse filter bags are to be inspected and/or replaced as often as necessary to ensure proper operation or more frequently as indicated by pressure differential indicator readings or other indication of bag failure.
 - (4) Observations at least once each day during daylight hours of baghouse operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is needed. If corrective action is required, it shall occur immediately.
 - (5) The owner or operator shall maintain an on-site inventory of spare bags of each type used to ensure rapid replacement in the event of bag failure.

(4) Applicable NSPS, NESHAP, and MACT Requirements:

The following standards apply to the Natural Gas Combustors (DM07A, DM07B, DM07C, DM07D, DM07E, DM07F, DM07G, and DM07H):

| Applicable Standard | Title | Rule Citation |
|----------------------------|---|---|
| NSPS, Subpart A | General Provisions | Chapter 18, Sec. <u>001.01</u> 40 CFR 60.1 |
| NSPS, Subpart Dc | Small Industrial, Commercial, Institutional Steam Generation Units | Chapter 18, Sec. <u>001.52</u> 40 CFR 60.40c |

(5) Reporting and Recordkeeping Requirements:

- (a) Records documenting the date, time, and hourly-average temperatures for each day the associated combustor is in operation.
- (b) Records documenting the date, time, observations, and corrective actions taken for each day the associated combustor is in operation.
- (c) Records documenting the date, time, and pressure differential reading for each day the associated baghouse is in operation.
- (d) Filter replacement records including the date the filter replacement occurred and the type of filter installed.
- (e) Records documenting the date, time, observations, and corrective actions taken for each day the associated baghouse is in operation.
- (f) Notifications and record keeping as required by 40 CFR 60.7
- (g) Reporting and recordkeeping as required by 40 CFR 60.48c

III.(G) Specific Conditions for Emergency Equipment

- (1) Permitted Emission Points: The source is permitted to construct the emission points and associated emission units identified in the following table at the capacities and using the fuel types listed:

| Emission Point ID# | Emission Unit ID# and Description | Capacity (HP) | Permitted Fuel Type |
|---------------------------|--|----------------------|----------------------------|
| DM50A | EU-DM50A: Fire Water Pump Engine #1 | 460 | Diesel Fuel |
| DM50B | EU-DM50B: Fire Water Pump Engine #2 | 460 | Diesel Fuel |
| DM50C | EU-DM50C: Fire Water Pump Engine #3 | 460 | Diesel Fuel |
| DM50D | EU-DM50D: Fire Water Pump Engine #4 | 460 | Diesel Fuel |
| DM51 | EU-DM51: Emergency Generator #1 | 134 | Diesel Fuel |
| DM52 | EU-DM52: Emergency Generator #2 | 201 | Diesel Fuel |
| DM53A | EU-DM53A: Emergency Generator #3 | 804 | Diesel Fuel |
| DM53B | EU-DM53B: Emergency Generator #4 | 804 | Diesel Fuel |

- (2) Emission Limitations and Testing Requirements:

Refer to NSPS, Subpart IIII and NESHAP, Subpart ZZZZ for emission limitations and testing requirements that apply to the emergency fire water pump engines and generators.

- (3) Operational and Monitoring Requirements and Limitations:

- (a) Emission Units DM50A, DM50B, DM50C, DM51, DM52, DM53A, and DM53B shall each be limited to 500 operating hours per any period of twelve (12) consecutive calendar months. At no time during the first eleven (11) months after start-up shall each engine’s total operating hours exceed 500 hours. {Chapter 19}

Each emergency fire water pump engine and emergency generator shall be equipped with a non-resettable hour meter to record the operating hours.

- (b) The sulfur content of the diesel fuel combusted in the emergency equipment shall not exceed 0.05% by weight. {Chapters 18, 19, and 24}

- (4) Applicable NSPS, NESHAP, and MACT Requirements:

The following standards may apply to the emergency fire water pump engines and emergency generators:

| Applicable Standard | Title | Rule Citation |
|----------------------------|---|--|
| NSPS, Subpart A | General Provisions | Chapter 18, Sec. <u>001.01</u> 40 CFR 60.1 |
| NSPS, Subpart IIII | Stationary Compression Ignition Internal Combustion Engines | Chapter 18, Sec. <u>001.76</u> 40 CFR 60.4200 |
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. 001.01 40 CFR 63.1 |

| Applicable Standard | Title | Rule Citation |
|----------------------|--|--|
| NESHAP, Subpart ZZZZ | Stationary Reciprocating Internal Combustion Engines | Chapter 28, Sec. <u>001.88</u> 40 CFR 63.6580 |

(5) Reporting and Recordkeeping Requirements:

- (a) Fuel receipts for the diesel fuel from the supplier for the fuel combusted in the fire pump engines and generators. Fuel receipts shall state the sulfur content, by weight, in the distillate fuel.
- (b) Hours of operation for the emergency generator and the emergency firewater pump engine for each calendar month and for each period of 12 consecutive calendar months.
- (c) Notifications and recordkeeping as required by 40 CFR 60.7.
- (d) Recordkeeping as required by 40 CFR 60.4214.
- (e) Initial notification requirements of 40 CFR 63.6645(d) and reporting in accordance with 40 CFR 63.6640(e) and 40 CFR 63.6645(d), as applicable.

III.(H) Specific Conditions for Equipment Leaks (DM91):

(1) Permitted Emission Points:

Each valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, flange, or other connector in VOC service and any device or system considered an “affected facility” by NSPS, Subpart VV and/or NESHAP, Subpart FFFF located throughout the ethanol plant.

(2) Emission Limitations and Testing Requirements:

Emission limitations and testing requirements as established by 40 CFR 60 Subpart VV and 40 CFR 63 Subpart FFFF.

(3) Operational and Monitoring Requirements and Limitations:

Operational and Monitoring Requirements and Limitations as established by 40 CFR 60 Subpart VV and 40 CFR 63 Subpart FFFF.

(4) Applicable NSPS, NESHAP, and MACT Standards

| Applicable Standard | Title | Rule Citation |
|----------------------------|---|--|
| NSPS, Subpart A | General Provisions | Chapter 18, Sec. <u>001.01</u> 40 CFR 60.1 |
| NSPS, Subpart VV | Equipment Leaks in the Synthetic Organic Chemicals Manufacturing Industry | Chapter 18, Sec. <u>001.14</u> 40 CFR 60.480 |
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. <u>001.01</u> Requirements Begin at 40 CFR 63.1 |
| NESHAP, Subpart FFFF | Miscellaneous Organic Chemical Manufacturing (MON) | Chapter 28, Sec. <u>001.78</u> Requirements Begin at 40 CFR 63.2430 |

(5) Reporting and Recordkeeping Requirements:

- (a) Notifications and record keeping as required by 40 CFR 60.7.
- (b) Record keeping and reporting as required by 40 CFR 60.486 and 40 CFR 60.487.
- (c) Reporting and recordkeeping as required by 40 CFR 63.2430.
- (d) Records including the date in which leak detection testing occurred, which valves, pumps, seals, open-ended lines, flanges, connectors, etc. were tested, and name of the individual who conducted the testing.
- (e) The owner or operator shall submit a semi-annual leak detection and repair report every six (6) calendar months to the Department. The initial semi-annual report shall be submitted beginning six (6) months after the initial startup date [60.487(a)]. Subsequent reports for each six (6) calendar month reporting period shall be submitted within 45 days

following June 30 and December 31 of each year. Each report must be certified by a responsible official and include the following items:

- (i) Date and time testing occurred;
- (ii) Name of individual who conducted the testing; and
- (iii) Additional information required to be reported to the Department in accordance with 40 CFR 60.480.

III.(I) Specific Conditions for the Cooling Towers (FS-05)

- (1) Permitted Emission Points: The source is permitted to construct the emission points and associated emission unit identified in the following table with the number of cooling tower cells and at the circulation rate listed:

| Emission Point ID# | Emission Unit Description | Number of Cooling Tower Cells | Maximum Circulation Rate (gal/hr) |
|-------------------------------------|----------------------------------|--------------------------------------|--|
| DM13 thru DM20, DM20A, DM20B, DM20C | Dry Mill Ethanol Cooling Tower | 11 | 9,900,000 |

- (2) Emission Limitations and Testing Requirements:

The cooling towers identified above are not subject to any emissions limitations. Testing shall be conducted to ensure compliance with the TDS limitation established and is discussed below.

- (3) Operational and Monitoring Requirements and Limitations:

- (a) Drift loss from each cooling tower listed in Condition III.(I)(1) shall be limited to 0.0005 percent. Verification of drift loss shall be by manufacturer’s guarantee. Manufacturer’s drift loss guarantee shall be kept on site and readily available to Department representatives, upon request, for the life of the unit. {Chapter 19}
- (b) TDS concentration of the cooling water in each cooling tower pool of the Dry Mill Ethanol Cooling Tower shall not exceed 3,000 ppm. A representative TDS sample shall be collected and tested from each cooling tower pool a minimum of once per calendar month. The test method used to determine TDS concentration shall be in accordance with an EPA approved method and be documented. {Chapter 19}

- (4) Applicable NSPS, NESHAP, and MACT Requirements:

| Applicable Standard | Title | Rule Citation |
|----------------------------|--|--|
| NESHAP, Subpart A | General Provisions | Chapter 28, Sec. <u>001.01</u> Requirements Begin at 40 CFR 63.1 |
| NESHAP, Subpart FFFF | Miscellaneous Organic Chemical Manufacturing (MON) | Chapter 28, Sec. <u>001.78</u> Requirements Begin at 40 CFR 63.2430 |

- (5) Reporting and Recordkeeping Requirements:

- (a) TDS concentration in cooling water for each pool for each sampling event and test method used.
- (b) Reporting and recordkeeping as required by 40 CFR 63.2430.

III.(J) Specific Conditions for Haul Roads (DM90)

- (1) Permitted Emission Points: All on-site haul roads with production-related truck traffic shall be paved. The paved haul roads shall comply with the following conditions. {Chapters 19, 20, and 32}
- (2) Emission Limitations and Testing Requirements:
 - (a) The haul road silt loading shall not exceed 3.0 g/m². {Chapter 19}
- (3) Operational and Monitoring Requirements and Limitations:
 - (a) The owner or operator shall develop, maintain, and implement a Fugitive Dust Control Plan (FDCP) to control emissions from haul roads to comply with General Condition I.(J) and Condition III.(J)(2)(a). At a minimum, the requirements of the plan shall include that all paved haul roads shall be cleaned, using a vacuum sweeper, a minimum of three (3) times per week unless weather events are deemed not to warrant such cleaning.
 - (b) For each day of operation, the owner or operator shall conduct a survey of the plant property and haul roads to determine if visible fugitive emissions are being generated and leaving plant property. Implementation of fugitive dust control shall be taken upon observation of visible fugitive emissions leaving plant property or more frequency in accordance with the FDCP. Documentation of all corrective actions and daily surveys shall be maintained in a log that shall accompany the FDCP.
- (4) Applicable NSPS, NESHAP, and MACT Requirements:

At this time the Department has not identified any NSPS, NESHAP, or MACT requirements that apply to the emission points or emission units listed in Condition III.(J)(1).
- (5) Reporting and Recordkeeping Requirements:
 - (a) The FDCP shall be kept onsite and a copy shall be submitted to the NDEQ within thirty (30) days after initial startup of operations.
 - (b) Records documenting use of fugitive dust control measures on haul roads.
 - (c) Records of haul road visible emissions checks taken daily during operation and a description of corrective action taken, if needed.
 - (d) Records documenting when silt load testing was completed and the results of each testing.

Fact Sheet Attachment: Facility Process Information

Archer Daniels Midland Company - Dry Mill Facility ID #39285

Process Data

| | | |
|---|-------------|---------------------------------------|
| Maximum Capacity (Anhydrous Ethanol Produced) | 400,000,000 | gallons per year |
| Grain to Ethanol Conversion Factor | 2.7 | gallons of Ethanol per bushel of corn |
| Grain Density: | 56 | lb/bushel for Corn |
| Total Grain Receiving Throughput: | 4,148,148 | ton/yr = 473.5 ton/hr |
| | 4,148,148 | ton/yr = 148,148,148 bu/yr |
| DDGS produced by a Bushel of Grain | 17 | lb DDGS/bushel of Corn |
| Dryers are capable of drying % of WDGS | 100% | |
| DDGS Generated (10% Moisture) | 1,259,259 | ton/yr |
| DDGS Generated (Dry Basis) | 1,133,333 | ton/yr |
| 100% MDGS Generated (40% Moisture) | 1,888,889 | ton/yr |

ADM will produce a modified feed by mixing the wet cake (65%) with dry feed (12%) in an approximate 50-50 blend to yield a 40% moisture final product.

Maximum Production/Throughputs

| | | |
|---|-------------|--------------|
| Product #1: Denatured Ethanol (95% Ethanol, 5% Denaturant) | 421,052,632 | gallons/year |
| Product #2: WDGS | 1,888,889 | tons/year |
| Product #3: DDGS | 1,259,259 | tons/year |
| Raw Material #1: Grain | 4,148,148 | tons/year |
| Raw Material #2: Denaturant | 21,052,632 | gallons/year |
| Anhydrous Ethanol Produced | 400,000,000 | gallons/year |

Additional Information

Grain Receiving Information

| | | |
|---|-------|-----------|
| Maximum Truck Pit Grain Receiving Rate | 1,120 | tons/hour |
| Maximum Rail Pit Grain Receiving Pit Rate | 1,680 | tons/hour |

Byproduct (Feed/Germ) Loadout Information

| | lbs obtained per bushel corn | tons obtained per year |
|--------------------------------------|---------------------------------|---------------------------|
| Byproduct Loading Throughput | | |
| Germ Yield | 3.6 | 266,666.7 |
| Gluten Meal Yield | 2.4 | 177,777.8 |
| Fiber Yield | 9.0 | 666,666.7 |
| Total Byproduct Loadout | 15.0 | 1,111,111 |
| Maximum Truck Byproduct Loadout Rate | 800 | tons/hour |
| Maximum Rail Byproduct Loadout Rate | 200 | tons/hour |

Fact Sheet Attachment: Grain Receiving and Processing

Archer Daniels Midland Company - Dry Mill
Facility ID #39285

PM/PM₁₀ Emissions from Grain Receiving and Processing

| Emission Point ID# | Control Equipment ID | Unit Name | (A) | (B) | Controlled PM/PM ₁₀ Emissions | |
|--------------------|----------------------|---|------------------------------|--|--|----------------------------------|
| | | | Air Flow Rate ^[1] | Emission Factor & Permitted BACT Limit | (C) ^[2] (lb/hour) | (D) ^[3] (ton/year) |
| | | | dscf/min | grains/dscf | | |
| DM01 | DM01 | Dry Mill Receiving Baghouse | 55,000 | 0.004 | 1.89 | 8.26 |
| DM04 | DM04 | Grain Conveying and Milling Baghouse ^[4] | 90,200 | 0.004 | 3.09 | 13.55 |
| DM04A | DM04A | Flour Conveyor Baghouse | 8,000 | 0.004 | 0.27 | 1.20 |

^[1]Flow Rates provided by source in application materials

^[2](A) x (B) x 60 (minutes/hour) / 7,000 (grains/pound)

^[3](C) x 8,760 (hours/year) / 2,000 (lbs/ton)

^[4]Conveying and Cleaning Baghouse (DM02) and Grain Milling and Classification Baghouse (DM04) previously permitted have been combined into a single emission point

Note: The BACT limits of 0.004 grains/dscf for Emission Points DM01 and DM04 were established in CP06-0005

Note: Emission Point DM04A is a new emissions point and BACT is being established through this permitting action

PM/PM₁₀ Fugitive Emissions from Grain Receiving

| Emission Point ID# | Emission Point Description | (A) | (B) | (C) | Emission Factors ^[2] | | PM Emissions | | PM ₁₀ Emissions | |
|--------------------|---|-------------------|-------------------|-----|-----------------------------------|------------------|--------------|--------------------|----------------------------|--------------------|
| | | Hourly Throughput | Annual Throughput | | Percent Uncaptured ^[1] | (D) | (E) | (F) ^[3] | (G) ^[4] | (H) ^[5] |
| | | (tons/hour) | (tons/year) | | PM | PM ₁₀ | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) |
| DM38/38 | Truck Grain Receiving Fugitives - Straight Trucks | 224 | 829,630 | 1% | 0.18 | 0.059 | 0.40 | 0.75 | 0.13 | 0.24 |
| DM38/38 | Truck Grain Receiving Fugitives - Hopper Trucks | 896 | 3,318,519 | 1% | 0.035 | 0.0078 | 0.31 | 0.58 | 0.07 | 0.13 |
| DM37/38 | Rail Grain Receiving Fugitives | 1,680 | 4,148,148 | 1% | 0.032 | 0.0078 | 0.54 | 0.66 | 0.13 | 0.16 |

^[1]1% uncaptured used in order to be consistent with previous permitting action

^[2]Emission Factors are from AP-42 Section 9.9.1 (5/2003)

^[3](A) x (C) x (D)

^[4](B) x (C) x (D) / 2,000 (lbs/ton)

^[5](A) x (C) x (E)

^[6](B) x (C) x (E) / 2,000 (lbs/ton)

Total Emissions from Grain Receiving and Processing

| | | |
|--|-------|-----------|
| Particulate Matter (PM) | 24.33 | tons/year |
| Particulate Matter (PM ₁₀) | 23.38 | tons/year |

Fact Sheet Attachment: Degermination

**Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM39**

Emission Units Routed to Degermination Wet Scrubber

Four (4) Steam Heated Germ Dryers
 Two (2) Germ Coolers - Cooled by Ambient Air

Conversion Factors

1 lb-mol = 385.5 dscf @ 68 F, 1 atm

Emissions exiting DM39 from Germ Drying

(A) Flow Rate Exiting One (1) Germ Dryer (provided by source): 7,424 dscf/minute
 445,440 dscf/hour

(B) Flow Rate Exiting Four (4) Germ Dryers^[1]: 29,696 dscf/minute
 1,781,760 dscf/hour

| Pollutant | (C) Uncontrolled Emission Factor ^[2] | Uncontrolled PM/PM ₁₀ Emissions | | (F) Control Efficiency | Controlled PM/PM ₁₀ Emissions | |
|--|---|--|----------------------------------|------------------------------|--|----------------------------------|
| | grains/dscf | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) | (%) ^[5] | (G) ^[6] (lb/hour) | (H) ^[7] (ton/year) |
| Particulate Matter (PM) | 0.01 | 2.55 | 11.15 | 0% | 2.55 | 11.15 |
| Particulate Matter (PM ₁₀) | 0.01 | 2.55 | 11.15 | 0% | 2.55 | 11.15 |

| Pollutant | (I) Uncontrolled Emissions ^[2] | (J) Molecular Weight | Uncontrolled Emissions | | (M) Control Efficiency | Controlled Emissions | |
|--|---|----------------------------|---------------------------------|----------------------------------|------------------------------|----------------------------------|-----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (K) ^[8] (lb/hour) | (L) ^[9] (ton/year) | (%) ^[5] | (N) ^[10] (lb/hour) | (O) ^[11] (ton/year) |
| Sulfur Dioxide (SO ₂) | 10.00 | 64.06 | 2.96 | 12.97 | 0% | 2.96 | 12.97 |
| Nitrogen Oxides (NO _x) ^[12] | 0.00 | 46.01 | 0.00 | 0.00 | 0% | 0.00 | 0.00 |
| Carbon Monoxide (CO) ^[12] | 0.00 | 28.01 | 0.00 | 0.00 | 0% | 0.00 | 0.00 |
| Volatile Organic Compounds (VOC) | 100.00 | 46.00 | 21.26 | 93.12 | 80% | 4.25 | 18.62 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 6.00 | 44.05 | 1.22 | 5.35 | 50% | 0.61 | 2.68 |
| Acrolein | 5.00 | 56.06 | 1.30 | 5.67 | 50% | 0.65 | 2.84 |
| Formaldehyde | 10.00 | 30.03 | 1.39 | 6.08 | 50% | 0.69 | 3.04 |
| Methanol | 10.00 | 32.04 | 1.48 | 6.49 | 50% | 0.74 | 3.24 |
| Total HAPs | - | - | 5.39 | 23.59 | - | 2.69 | 11.80 |

Fact Sheet Attachment: Degermination Drying and Cooling

**Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM39**

Emissions exiting DM39 from Germ Cooling

(A) Flow Rate Exiting One (1) Germ Cooler (provided by source): 44,863 dscf/minute
 2,691,780 dscf/hour

(B) Flow Rate Exiting Two (2) Germ Coolers: 89,726 dscf/minute
 5,383,560 dscf/hour

| Pollutant | (C) Uncontrolled Emission Factor ^[2] | Uncontrolled PM/PM ₁₀ Emissions | | (F) Control Efficiency | Controlled PM/PM ₁₀ Emissions | |
|--|---|--|----------------------------------|------------------------------|--|----------------------------------|
| | grains/dscf | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) | (%) ^[5] | (G) ^[6] (lb/hour) | (H) ^[7] (ton/year) |
| Particulate Matter (PM) | 0.01 | 7.69 | 33.69 | 0% | 7.69 | 33.69 |
| Particulate Matter (PM ₁₀) | 0.01 | 7.69 | 33.69 | 0% | 7.69 | 33.69 |

| Pollutant | (I) Uncontrolled Emissions ^[2] | (J) Molecular Weight | Uncontrolled Emissions | | (M) Control Efficiency | Controlled Emissions | |
|---|---|----------------------------|---------------------------------|----------------------------------|------------------------------|----------------------------------|-----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (K) ^[8] (lb/hour) | (L) ^[9] (ton/year) | (%) ^[5] | (N) ^[10] (lb/hour) | (O) ^[11] (ton/year) |
| Sulfur Dioxide (SO ₂) | 10.00 | 64.06 | 8.95 | 39.18 | 0% | 8.95 | 39.18 |
| Nitrogen Oxides (NO _x) | 0.00 | 46.01 | 0.00 | 0.00 | 0% | 0.00 | 0.00 |
| Carbon Monoxide (CO) | 0.00 | 28.01 | 0.00 | 0.00 | 0% | 0.00 | 0.00 |
| Volatile Organic Compounds (VOC) | 15.00 | 46.00 | 9.64 | 42.21 | 80% | 1.93 | 8.44 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 4.00 | 44.05 | 2.46 | 10.78 | 50% | 1.23 | 5.39 |
| Acrolein | 3.00 | 56.06 | 2.35 | 10.29 | 50% | 1.17 | 5.14 |
| Formaldehyde | 5.50 | 30.03 | 2.31 | 10.10 | 50% | 1.15 | 5.05 |
| Methanol | 5.00 | 32.04 | 2.24 | 9.80 | 50% | 1.12 | 4.90 |
| Total HAPs | - | - | 9.35 | 40.97 | - | 4.68 | 20.48 |

Total Emissions from Germ Drying and Cooling (DM39)

| Pollutant | Controlled Emissions | | Permitted BACT Limits for DM39 | |
|---|----------------------|------------|--------------------------------|------------|
| | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) |
| Particulate Matter (PM) | 10.24 | 44.83 | 10.24 | 44.85 |
| Particulate Matter (PM ₁₀) | 10.24 | 44.83 | 10.24 | 44.85 |
| Sulfur Dioxide (SO ₂) | 11.91 | 52.15 | 11.92 | 52.21 |
| Volatile Organic Compounds (VOC) | 6.18 | 27.07 | 6.18 | 27.07 |
| Individual Hazardous Air Pollutants (HAP) | | | | |
| Acetaldehyde | 1.84 | 8.06 | 50% Control | 8.06 |
| Acrolein | 1.82 | 7.98 | | 7.98 |
| Formaldehyde | 1.85 | 8.09 | | 8.09 |
| Methanol | 1.86 | 8.14 | | 8.14 |
| Total HAPs | 7.37 | 32.28 | | 32.28 |

^[1](A) x 4

^[2]Uncontrolled Emission Factors and Emissions provided by source in application materials and based on design specifications

^[3](B) (dscf/minute) x (C) x 60 (mins/hr) / 7,000 (grains/lb)

^[4](E) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

^[5]Wet Scrubber Control Efficiency provided in application materials

^[6](D) x (1 - (F))

^[7](E) x (1-(F))

^[8]((I) / 1,000,000) x (J) x (B) (dscf/hour) / 385.5 (dscf/lb-mol)

^[9](K) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

^[10](K) x (1-(M))

^[11](L) x (1-(M))

^[12]NO_x and CO emissions are not expected from these dryers because they are steam-heated
 Note: H₂SO₄ emissions are not expected because no SO₂ will form due to the low temperature
 Note: Lead (Pb) emissions are not expected because no lead is present in the process

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05

Emission Units Routed to Fermentation RTO

Process Tanks and Vents

| | |
|---|---|
| Two Slurry Mix Tanks (DM05G) | One CDS (30% DS Product) Tank (DM05O) |
| Two Pre-Cook Tanks (DM05H) | One Waste Water Transfer Tank (DM05P) |
| Two Barometric Condensers (DM05I) | One Evaporator (Contaminate) Condensate (DM05Q) |
| Ten Liquefaction Tanks (DM05J) | Seven Tempers (DM05R) |
| Two Evaporator Feeds (DM05K) | Three Grind (DM05S) |
| Two Decanter (Centrifuge) Feeds (DM05L) | One Recycle (DM05T) |
| Centrate Tank Vent (DM05M) | One Evaporator Product Tank (DM05U) |
| Six Evaporators (DM05N) | One Process Water Tank (DM05V) |

Nitrogen Stripper Scrubber Vent (DM05F)

Distillation and Dehydration Vent Gas Scrubber (DM05D/DM05E)

CO₂ Scrubber (DM05B and DM05C)

Propagators (DM05A)

Conversion Factors

1 lb-mol = 385.5 dscf @ 68 F, 1 atm
 mass VOC/mass C = 2.0926 from Midwest Scaling Protocol

Process Tank and Vent (DM05G - DM05V) Emissions being sent to Fermentation RTO

| Pollutant | Uncontrolled Emissions ⁽¹⁾ | |
|---|---------------------------------------|------------|
| | (lb/hour) | (ton/year) |
| Sulfur Dioxide (SO ₂) | 2.05 | 8.96 |
| Nitrogen Oxides (NO _x) | 1.44 | 6.30 |
| Volatile Organic Compounds (VOC) | 41.96 | 183.80 |
| Individual Hazardous Air Pollutants (HAP) | | |
| Acetaldehyde | 6.11 | 26.75 |
| Acrolein | 12.83 | 56.20 |
| Formaldehyde | 8.86 | 38.82 |
| Methanol | 1.15 | 5.03 |
| Total HAPs | 28.95 | 126.80 |

Nitrogen Stripper Scrubber (DM05F) Emissions being sent to Fermentation RTO

(A) Flow Rate Exiting Nitrogen Stripper Scrubber (provided by source): 483 dscf/minute
 28,980 dscf/hour

| Pollutant | (B) Uncontrolled Emissions ⁽²⁾ | (C) Molecular Weight | Uncontrolled Emissions | | (F) Control Efficiency | Controlled Emissions | |
|--|--|-------------------------|---------------------------------|----------------------------------|---------------------------|---------------------------------|----------------------------------|
| | (ppmv.d) | (lb/lb-mol) | (D) ⁽³⁾ (lb/hour) | (E) ⁽⁴⁾ (ton/year) | (%) ⁽⁵⁾ | (G) ⁽⁶⁾ (lb/hour) | (H) ⁽⁷⁾ (ton/year) |
| Sulfur Dioxide (SO ₂) | 47.55 | 64.06 | 0.23 | 1.00 | 90% | 0.02 | 0.10 |
| Volatile Organic Compounds (VOC) as Carbon | 100,000.00 | 12.00 | 90.21 | 395.12 | - | - | - |
| Volatile Organic Compounds (VOC) as VOC | - | - | 188.77 | 826.83 | 95% | 9.44 | 41.34 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 500.00 | 44.05 | 1.66 | 7.25 | 15% | 1.41 | 6.16 |
| Methanol | 10,000.00 | 32.04 | 24.09 | 105.50 | 95% | 1.20 | 5.27 |
| Total HAPs | - | - | 25.74 | 112.75 | - | 2.61 | 11.44 |

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05 (continued)

Distillation and Dehydration Vent Gas Scrubber (DM05D/DM05E) Emissions being sent to Fermentation RTO

(A) Flow Rate Exiting D&D Vent Gas Scrubber (provided by source): 1,210 dscf/minute
 72,600 dscf/hour

| Pollutant | (B) Uncontrolled Emissions ^[2] | (C) Molecular Weight | Uncontrolled Emissions | | (F) Control Efficiency | Controlled Emissions | |
|--|--|-------------------------|---------------------------------|----------------------------------|---------------------------|---------------------------------|----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) | (%) ^[5] | (G) ^[6] (lb/hour) | (H) ^[7] (ton/year) |
| Sulfur Dioxide (SO ₂) | 47.55 | 64.06 | 0.57 | 2.51 | 90% | 0.06 | 0.25 |
| Volatile Organic Compounds (VOC) as Carbon | 100,000.00 | 12.00 | 225.99 | 989.85 | - | - | - |
| Volatile Organic Compounds (VOC) as VOC | - | - | 472.91 | 2,071.35 | 95% | 23.65 | 103.57 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 500.00 | 44.05 | 4.15 | 18.17 | 15% | 3.53 | 15.44 |
| Methanol | 10,000.00 | 32.04 | 60.34 | 264.29 | 95% | 3.02 | 13.21 |
| Total HAPs | - | - | 64.49 | 282.46 | - | 6.54 | 28.66 |

CO₂ Scrubber (DM05A, DM05B, and DM05C) Emissions being sent to Fermentation RTO

Emissions from Beerwells (DM05C) being sent to CO₂ Scrubber

| Pollutant | Uncontrolled Emissions ^[1] | |
|---|---------------------------------------|------------|
| | (lb/hour) | (ton/year) |
| Sulfur Dioxide (SO ₂) | 0.08 | 0.34 |
| Volatile Organic Compounds (VOC) | 6.16 | 26.97 |
| Individual Hazardous Air Pollutants (HAP) | | |
| Acetaldehyde | 0.14 | 0.60 |
| Acrolein | 0.25 | 1.11 |
| Formaldehyde | 0.24 | 1.06 |
| Methanol | 0.02 | 0.07 |
| Total HAPs | 0.65 | 2.83 |

Emissions from Fermenters (DM05B) being sent to CO₂ Scrubber

(A) Flow Rate Exiting Fermenters (entering CO₂ Scrubber) (provided by source): 47,781 dscf/minute
 2,866,860 dscf/hour

| Pollutant | (B) Uncontrolled Emissions ^[2] | (C) Molecular Weight | Uncontrolled Emissions | |
|--|--|-------------------------|---------------------------------|----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) |
| Sulfur Dioxide (SO ₂) | 5.03 | 64.06 | 2.40 | 10.50 |
| Volatile Organic Compounds (VOC) as Carbon | 30,000.00 | 12.00 | 2,677.22 | 11,726.24 |
| Volatile Organic Compounds (VOC) as VOC | - | - | 5,602.36 | 24,538.33 |
| Individual Hazardous Air Pollutants (HAP) | | | | |
| Acetaldehyde ^[8] | 6.55E-02 | 44.05 | 26.83 | 117.51 |
| Acrolein ^[8] | 8.07E-04 | 56.06 | 0.33 | 1.45 |
| Formaldehyde ^[8] | 4.55E-04 | 30.03 | 0.19 | 0.82 |
| Methanol ^[8] | 1.31E-02 | 32.04 | 5.37 | 23.53 |
| Total HAPs | - | - | 32.72 | 143.30 |

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05 (continued)

CO₂ Scrubber (DM05B and DM05C) Emissions being sent to Fermentation RTO

| Pollutant | (I) Emission Factor ^[9] | PM/PM ₁₀ Emissions | |
|--|---------------------------------------|----------------------------------|-----------------------------------|
| | grains/dscf | (J) ^[10] (lb/hour) | (K) ^[11] (ton/year) |
| Particulate Matter (PM) | 0.004 | 1.64 | 7.18 |
| Particulate Matter (PM ₁₀) | 0.004 | 1.64 | 7.18 |

| Pollutant | Uncontrolled Emissions from Beerwells | | Uncontrolled Emissions from Fermenters | | (L) Control Efficiency | Controlled Emissions | |
|--|---------------------------------------|------------|--|------------|---------------------------|----------------------------------|-----------------------------------|
| | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) | (%) ^[5] | (M) ^[12] (lb/hour) | (N) ^[12] (ton/year) |
| Sulfur Dioxide (SO ₂) | 0.08 | 0.34 | 2.40 | 10.50 | 90% | 0.25 | 1.08 |
| Volatile Organic Compounds (VOC) as Carbon | - | - | 2,677.22 | 11,726.24 | - | - | - |
| Volatile Organic Compounds (VOC) as VOC | 6.16 | 26.97 | 5,602.36 | 24,538.33 | 95% | 280.43 | 1,228.26 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 0.14 | 0.60 | 26.83 | 117.51 | 15% | 22.92 | 100.39 |
| Acrolein | 0.25 | 1.11 | 0.33 | 1.45 | 15% | 0.50 | 2.17 |
| Formaldehyde | 0.24 | 1.06 | 0.19 | 0.82 | 15% | 0.36 | 1.59 |
| Methanol | 0.02 | 0.07 | 5.37 | 23.53 | 15% | 4.58 | 20.06 |
| Total HAPs | 0.65 | 2.83 | 32.72 | 143.30 | 15% | 28.36 | 124.22 |

350932.83 gallon/yr ethanol

Emissions from Propagators (DM05A) being sent to Fermentation RTO

(A) Flow Rate Exiting Propagators (entering CO₂ Scrubber) (provided by source):
 10,512 dscf/minute
 630,720 dscf/hour

| Pollutant | (B) Uncontrolled Emissions ^[2] | (C) Molecular Weight | Uncontrolled Emissions | |
|--|--|-------------------------|---------------------------------|----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) |
| Sulfur Dioxide (SO ₂) | 5.03 | 64.06 | 0.53 | 2.31 |
| Volatile Organic Compounds (VOC) as Carbon | 1,437.50 | 12.00 | 28.22 | 123.62 |
| Volatile Organic Compounds (VOC) as VOC | - | - | 59.06 | 258.68 |
| Individual Hazardous Air Pollutants (HAP) | | | | |
| Acetaldehyde ^[8] | 6.55E-02 | 44.05 | 5.9024 | 25.85 |
| Acrolein ^[8] | 8.07E-04 | 56.06 | 0.0727 | 0.32 |
| Formaldehyde ^[8] | 4.55E-04 | 30.03 | 0.0410 | 0.18 |
| Methanol ^[8] | 1.31E-02 | 32.04 | 1.1819 | 5.18 |
| Total HAPs | - | - | 7.20 | 31.53 |

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05 (continued)

Process Emissions emitted from Fermentation RTO

| Pollutant | Uncontrolled Emissions from Process Tanks and Vents | | Controlled Emissions from N ₂ Stripper Scrubber | | Controlled Emissions from D&D Vent Gas Scrubber | | Emissions from Propagators | |
|---|---|------------|--|------------|---|------------|----------------------------|------------|
| | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) |
| Particulate Matter (PM) | - | - | - | - | - | - | - | - |
| Particulate Matter (PM ₁₀) | - | - | - | - | - | - | - | - |
| Sulfur Dioxide (SO ₂) | 2.05 | 8.96 | 0.02 | 0.10 | 0.06 | 0.25 | 0.53 | 2.31 |
| Nitrogen Oxides (NO _x) | 1.44 | 6.30 | - | - | - | - | - | - |
| Volatile Organic Compounds (VOC) as VOC | 41.96 | 183.80 | 9.44 | 41.34 | 23.65 | 103.57 | 59.06 | 258.68 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | | |
| Acetaldehyde | 6.11 | 26.75 | 1.41 | 6.16 | 3.53 | 15.44 | 5.90 | 25.85 |
| Acrolein | 12.83 | 56.20 | - | - | - | - | 0.07 | 0.32 |
| Formaldehyde | 8.86 | 38.82 | - | - | - | - | 0.04 | 0.18 |
| Methanol | 1.15 | 5.03 | 1.20 | 5.27 | 3.02 | 13.21 | 1.18 | 5.18 |
| Total HAPs | 28.95 | 126.80 | 2.61 | 11.44 | 6.54 | 28.66 | 7.20 | 31.53 |

| Pollutant | Controlled Emissions from CO ₂ Scrubber | | (L) Control Efficiency | Controlled Process Emissions emitted from Fermentation RTO | |
|---|--|------------|------------------------|--|--------------------------------|
| | (lb/hour) | (ton/year) | (%) ^[5] | (M) ^[12] (lb/hour) | (N) ^[12] (ton/year) |
| Particulate Matter (PM) | 1.64 | 7.18 | 0% | 1.64 | 7.18 |
| Particulate Matter (PM ₁₀) | 1.64 | 7.18 | 0% | 1.64 | 7.18 |
| Sulfur Dioxide (SO ₂) | 0.25 | 1.08 | 0% | 2.90 | 12.71 |
| Nitrogen Oxides (NO _x) | - | - | 0% | 1.44 | 6.30 |
| Volatile Organic Compounds (VOC) as VOC | 280.43 | 1,228.26 | 98.0% | 8.30 | 36.35 |
| Individual Hazardous Air Pollutants (HAP) | | | | | |
| Acetaldehyde | 22.92 | 100.39 | 98% | 0.80 | 3.49 |
| Acrolein | 0.50 | 2.17 | 98% | 0.27 | 1.17 |
| Formaldehyde | 0.36 | 1.59 | 98% | 0.19 | 0.81 |
| Methanol | 4.58 | 20.06 | 98% | 0.22 | 0.98 |
| Total HAPs | 28.36 | 124.22 | 98% | 1.47 | 6.45 |

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05 (continued)

Combustion Emissions emitted from Fermentation RTO

| | | |
|--------------------------------------|------|----------|
| (O) Total Heat Input Capacity | 18.0 | MMBtu/hr |
| (P) Potential Natural Gas Throughput | 0.02 | MMscf/hr |
| | 154 | MMscf/yr |

NOTE: Conversion Factor: 1 MMscf = 1,020 MMBtu from AP-42 Table 1.4-1, Footnote a

| Pollutant | (Q) Emission Factor ^[13] (lb/MMscf) | (R) Emission Rate ^[15] (lbs/hr) | (S) Emission Rate ^[16] (lbs/year) | (T) Emission Rate ^[17] (tons/year) |
|--|--|--|--|---|
| Particulate Matter (PM) | 7.6 | 0.13 | 1171.74 | 0.59 |
| Particulate Matter (PM ₁₀) | 7.6 | 0.13 | 1171.74 | 0.59 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.01 | 92.51 | 0.05 |
| Nitrogen Oxides (NO _x) ^[14] | 0.02 | 0.36 | 3153.60 | 1.58 |
| Carbon Monoxide (CO) ^[14] | 0.1 | 1.80 | 15768.00 | 7.88 |
| Volatile Organic Compounds (VOC) | 5.5 | 0.10 | 847.97 | 0.42 |
| Individual Hazardous Air Pollutants (HAP) | | | | |
| Benzene | 0.0021 | 3.70E-05 | 3.24E-01 | 1.62E-04 |
| Dichlorobenzene | 0.0012 | 2.11E-05 | 1.85E-01 | 9.25E-05 |
| Hexane | 1.8 | 3.17E-02 | 2.78E+02 | 1.39E-01 |
| Lead Compounds | 0.0005 | 8.80E-06 | 7.71E-02 | 3.85E-05 |
| Naphthalene | 0.00061 | 1.07E-05 | 9.40E-02 | 4.70E-05 |
| Polycyclic Organic Matter (POM) | 0.000882 | 1.55E-06 | 1.36E-02 | 6.80E-06 |
| Toluene | 0.0034 | 5.98E-05 | 5.24E-01 | 2.62E-04 |
| Arsenic Compounds (ASC) | 0.0002 | 3.52E-06 | 3.08E-02 | 1.54E-05 |
| Beryllium Compounds (BEC) | 0.000012 | 2.11E-07 | 1.85E-03 | 9.25E-07 |
| Cadmium Compounds (CDC) | 0.0011 | 1.94E-05 | 1.70E-01 | 8.48E-05 |
| Chromium Compounds (CRC) | 0.0014 | 2.46E-05 | 2.16E-01 | 1.08E-04 |
| Cobalt Compounds (COC) | 0.000084 | 1.48E-06 | 1.30E-02 | 6.48E-06 |
| Manganese Compounds (MNC) | 0.00038 | 6.69E-06 | 5.86E-02 | 2.93E-05 |
| Mercury Compounds (HGC) | 0.00026 | 4.58E-06 | 4.01E-02 | 2.00E-05 |
| Nickel Compounds (NIC) | 0.0021 | 3.70E-05 | 3.24E-01 | 1.62E-04 |
| Selenium Compounds (SEC) | 0.000024 | 4.22E-07 | 3.70E-03 | 1.85E-06 |
| Total HAPs | - | 0.03 | 279.59 | 0.14 |

Fact Sheet Attachment: Fermentation Regenerative Thermal Oxidizer (RTO)

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM05 (continued)

Total Emissions Emittted from Fermentation RTO

| Pollutant | Controlled Process Emissions emitted from Fermentation RTO | | Combustion Emissions emitted from Fermentation RTO | | Total Emissions emitted from Fermentation RTO | |
|---|--|------------|--|------------|---|------------|
| | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) | (lb/hour) | (ton/year) |
| Particulate Matter (PM) | 1.64 | 7.18 | 0.13 | 0.59 | 1.77 | 7.76 |
| Particulate Matter (PM ₁₀) | 1.64 | 7.18 | 0.13 | 0.59 | 1.77 | 7.76 |
| Sulfur Dioxide (SO ₂) | 2.90 | 12.71 | 0.01 | 0.05 | 2.91 | 12.75 |
| Nitrogen Oxides (NO _x) | 1.44 | 6.30 | 0.36 | 1.58 | 1.80 | 7.88 |
| Carbon Monoxide (CO) | - | - | 1.80 | 7.88 | 1.80 | 7.88 |
| Volatile Organic Compounds (VOC) | 8.30 | 36.35 | 0.10 | 0.42 | 8.40 | 36.78 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 0.80 | 3.49 | - | - | 0.80 | 3.49 |
| Acrolein | 0.27 | 1.17 | - | - | 0.27 | 1.17 |
| Benzene | - | - | 3.70E-05 | 1.62E-04 | 3.70E-05 | 1.62E-04 |
| Dichlorobenzene | - | - | 2.11E-05 | 9.25E-05 | 2.11E-05 | 9.25E-05 |
| Formaldehyde | 0.19 | 0.81 | - | - | 0.19 | 0.81 |
| Hexane | - | - | 3.17E-02 | 1.39E-01 | 3.17E-02 | 1.39E-01 |
| Lead Compounds | - | - | 8.80E-06 | 3.85E-05 | 8.80E-06 | 3.85E-05 |
| Methanol | 0.22 | 0.98 | - | - | 0.22 | 0.98 |
| Naphthalene | - | - | 1.07E-05 | 4.70E-05 | 1.07E-05 | 4.70E-05 |
| Polycyclic Organic Matter (POM) | - | - | 1.55E-06 | 6.80E-06 | 1.55E-06 | 6.80E-06 |
| Toluene | - | - | 5.98E-05 | 2.62E-04 | 5.98E-05 | 2.62E-04 |
| Arsenic Compounds (ASC) | - | - | 3.52E-06 | 1.54E-05 | 3.52E-06 | 1.54E-05 |
| Beryllium Compounds (BEC) | - | - | 2.11E-07 | 9.25E-07 | 2.11E-07 | 9.25E-07 |
| Cadmium Compounds (CDC) | - | - | 1.94E-05 | 8.48E-05 | 1.94E-05 | 8.48E-05 |
| Chromium Compounds (CRC) | - | - | 2.46E-05 | 1.08E-04 | 2.46E-05 | 1.08E-04 |
| Cobalt Compounds (COC) | - | - | 1.48E-06 | 6.48E-06 | 1.48E-06 | 6.48E-06 |
| Manganese Compounds (MNC) | - | - | 6.69E-06 | 2.93E-05 | 6.69E-06 | 2.93E-05 |
| Mercury Compounds (HGC) | - | - | 4.58E-06 | 2.00E-05 | 4.58E-06 | 2.00E-05 |
| Nickel Compounds (NIC) | - | - | 3.70E-05 | 1.62E-04 | 3.70E-05 | 1.62E-04 |
| Selenium Compounds (SEC) | - | - | 4.22E-07 | 1.85E-06 | 4.22E-07 | 1.85E-06 |
| Total HAPs | 1.47 | 6.45 | 3.19E-02 | 1.40E-01 | 1.51 | 6.59 |

¹¹Emissions calculated by source, full calculations in application material;
¹²Emissions provided by source in application materials, based on worst-case scenarios and design estimate
¹³(B) / 1,000,000) x (C) x (A) (dscf/hour) / 385.5 (dscf/lb-mol); For VOC as C to VOC, VOC as Carbon (lb/hr) x 2.0926 (Midwest Scaling Factor)
¹⁴(D) x 8,760 (hrs/yr) / 2,000 (lbs/ton)
¹⁵Control Efficiencies provided by source and based on control equipment design
¹⁶(D) x (1-(F))
¹⁷(E) x (1-(F))
¹⁸Emission Factor in grains/dscf; (D) = (B) x (A) (dscf/hour) / 7,000 grains/dscf
¹⁹Emission Factor based on outlet concentration of CO₂ Scrubber
¹¹⁰(I) x (A) for Fermenters [47,781 dscf/minute] x 60 (mins/hr) / 7,000 (grains/dscf)
¹¹¹(J) x 8,760 (hrs/yr) / 2,000 (lbs/ton)
¹¹²SUM of Emissions x (1-(L))
¹¹³Emission Factors from AP-42 Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4 (7/98) unless otherwise specified
¹¹⁴Emission Factors in units of lb/MMBtu, provided by the source based on vendor information; (R) = (O) x (Q)
¹¹⁵(P) (MMscf/hr) x (Q)
¹¹⁶(R) x 8,760 (hrs/yr)
¹¹⁷(S) / 2,000 (lbs/ton)

Fact Sheet Attachment: Ethanol Liquid Loadout

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM09

| | | |
|---------------------------------|--------|----------|
| Anhydrous Ethanol Loading Rate: | 400.00 | MMgal/yr |
| Denaturant Loading Rate: | 21.05 | MMgal/yr |
| Denatured Ethanol Loading Rate: | 421.05 | MMgal/yr |

Vapor Recovery Control Efficiency provided in Application

| | Rail loadout |
|-----------------------------|--------------|
| Capture efficiency: | 100.0% |
| Control efficiency: | 98.0% |
| Overall control efficiency: | 98.0% |

Material Physical Data

| | Gasoline (RVP-13) | Ethanol | Denaturant (Natural Gasoline) |
|---|-------------------|---------|-------------------------------|
| Molecular weight (M, lbs/lbs-mole) | 62 | 46.07 | 62 |
| Temperature (T, deg R) ^[1] | 540 | 540 | 540 |
| Vapor pressure (P, psia) | 9.91 | 1.27 | 9.91 |
| Liquid molecular weight (ML) | 92 | 46 | 92 |
| Density (D, lb/gal) | 5.6 | 6.6 | 5.6 |
| Liquid Mole Fraction (X) ^[2] | N/A | 0.98 | 0.02 |

^[1]Temperatures from TANKS 4.09d, average ambient temperature for Grand Island, NE

^[2]Liquid Mole Fraction (X) was calculated as follows, where V = loading rate:

$$X = \frac{\left(\frac{D * V}{ML} \right)}{\left(\frac{D_{ethanol} * V_{ethanol}}{ML_{ethanol}} \right) + \left(\frac{D_{denaturant} * V_{denaturant}}{ML_{denaturant}} \right)}$$

Hazardous Air Pollutant Weight Fractions

| Individual HAPs | HAP Weight Fraction or Denatured Ethanol Vapor Composition (wt%) | | |
|------------------|--|----------|------------|
| | Gasoline | Ethanol | Denaturant |
| Acetaldehyde | N/A | 1.29% | N/A |
| Benzene | 2.50E-03 | N/A | 0.29% |
| Carbon disulfide | 2.00E-05 | N/A | 2.00E-05 |
| Cumene | 1.00E-04 | N/A | 1.00E-04 |
| Ethyl benzene | 5.00E-05 | N/A | 5.00E-05 |
| n-Hexane | 5.00E-02 | N/A | 1.21% |
| Methanol | N/A | 0.18% | N/A |
| Toluene | 5.00E-03 | N/A | 0.18% |
| Xylene | 5.00E-04 | N/A | 5.00E-04 |
| Total HAPs | 5.82E-02 | 1.47E-02 | 1.75E-02 |

Saturation Factors

S_{normal dedicated, submerged loading} = 0.6 Saturation factor

Rail loadout is assumed to be in dedicated railcars, which previous load was denatured ethanol.

VOC Emissions

Denatured Ethanol Emission Factor Calculations

| | Railcar Loadout Uncontrolled Emission Factor (lbs VOC/Mgal) | Railcar Loadout Controlled Emission Factor (lbs VOC/Mgal) |
|--------------------------|---|---|
| EF _{gasoline} | N/A | N/A |
| EF _{ethanol} | 0.794 | 0.0159 |
| EF _{denaturant} | 0.186 | 0.0037 |
| EF _{voc} | 0.980 | 0.0196 |

VOC emission factor equation from AP-42, Section 5.2.2 - Loading Losses (1/1995)

EF = 12.46*S^{0.75}*P*MT*(1-ef/100)*X = lbs/Mgal per component

EF_{gasoline} emission factors assumes S = S_{normal} - S_{clean cargo} and do not use the Liquid Mole Fraction (X) in the equations.

Fact Sheet Attachment: Ethanol Liquid Loadout

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285
 Emission Point ID Number: DM09

Total VOC Emission Calculations from Denatured Ethanol Loadout

| Loadout Type/Material | (A) Denatured Ethanol Loaded Out (Mgal/year) | (B) Uncontrolled Emission Factor (lbs VOC/Mgal) | (C)=(A)x(B)/2000 Total VOC Emissions (tons/year) | (D) Capture Efficiency (%) | (E)=(C)*(D) Captured VOC Emissions (tons/year) | (F)=(C)-(E) Uncaptured VOC Emissions (tons/year) | (G) Control Efficiency (%) | (H)=(E)x[1-(G)] Captured and Controlled VOC Emissions (tons/year) | (I)=(F)+(H) Total VOC Emissions |
|-----------------------------|---|---|--|-------------------------------------|--|---|----------------------------------|---|---------------------------------------|
| 100% Loadout By Rail | | | 206.32 | | 206.32 | 0.00 | | 4,126.3 | 4.13 |
| Rail Loadout | | | | | | | | | |
| Ethanol | 421,053 | 0.794 | 167.16 | 100.00% | 167.16 | 0.00 | 98.0% | 3,343.2 | 3.34 |
| Denaturant | | 0.186 | 39.16 | 100.00% | 39.16 | 0.00 | 98.0% | 0.7832 | 0.78 |

Controlled Hazardous Air Pollutant Emissions assuming 100% Rail Loadout

| Hazardous Air Pollutant | Rail Loadout (ton/yr) | | Maximum Controlled HAP Emissions (tons/year) |
|-------------------------|--------------------------|------------|--|
| | Ethanol | Denaturant | |
| Acetaldehyde | 4.31E-02 | N/A | 4.31E-02 |
| Benzene | N/A | 2.27E-03 | 2.27E-03 |
| Carbon disulfide | N/A | 1.57E-05 | 1.57E-05 |
| Cumene | N/A | 7.83E-05 | 7.83E-05 |
| Ethyl benzene | N/A | 3.92E-05 | 3.92E-05 |
| n-Hexane | N/A | 9.48E-03 | 9.48E-03 |
| Methanol | 6.02E-03 | N/A | 6.02E-03 |
| Toluene | N/A | 1.41E-03 | 1.41E-03 |
| Xylene | N/A | 3.92E-04 | 3.92E-04 |
| Total HAPs | 0.06 | | 0.06 |

Fact Sheet Attachment: Liquid Loadout Flare

**Archer Daniels Midland Company - Dry Mill
Facility ID #39285
Emission Point ID Number: DM09**

(A) Maximum Denatured Ethanol Loadout^[1] 720,000 gallons/hour
421,052,632 gallons/year

(B) lbs VOC / Mgal Denatured Ethanol Load Out 0.980 lb/Mgal

Flare Information (Captured Loadout Vapors)

(C) Heating Value of Captured Vapor^[1] 19.0 Btu/gal Liquid Denatured Ethanol Loaded
(D) Density of Denatured Ethanol (Liquid @ 27°F) 6.5030 lb/gallon Liquid
(E) Hourly Captured VOC Vapors^[2] 705.60 lb VOC/hr
(F) Hourly Captured Rate^[3] 108.5 gallons/hr
(G) Hourly MMBtu/hr from Captured Vapor^[4] 0.0021 MMBtu/hr
(H) Annual Captured Denatured Ethanol Vapors^[5] 206.32 ton VOC/yr
(I) Annual Captured Rate^[6] 63,452 gallons/year
(J) Annual MMBtu from Captured Vapor^[7] 1.21 MMBtu/yr

Supplemental Fuel Information

(K) Hourly MMBtu/hr from Supplemental Fuel 11.00 MMBtu/hr
(L) Annual MMBtu from Supplemental Fuel^[8] 96,360 MMBtu/yr

Pilot Information

(M) Hourly MMBtu/hr from Pilot 0.055 MMBtu/hr
(N) Annual MMBtu from Pilot^[8] 481.800 MMBtu/yr

MMscf/hr from Natural Gas

(O) Hourly MMscf/hr from Natural Gas^[9] 0.011 MMscf/hr
(P) Annual MMscf/yr from Natural Gas^[10] 94.943 MMscf/yr

MMBtu/hr and MMscf/hr from Natural Gas and Denatured Ethanol Vapors

(Q) Total MMBtu/hr^[11] 11.057 MMBtu/hr
(R) Total MMscf/hr^[12] 0.011 MMscf/hr

(S) Total MMBtu/year^[13] 96,843.006 MMBtu/yr
(T) Total MMscf/year^[13] 94.944 MMscf/yr

| Pollutant | (U) Emission Factor (lb/MMscf) ^[14] | (V) Emission Rate (lbs/hr) ^[15] | (W) Emission Rate (tons/year) ^[16] |
|--|--|--|---|
| Particulate Matter (PM) | 7.6 | 0.0824 | 0.3608 |
| Particulate Matter (PM ₁₀) | 7.6 | 0.0824 | 0.3608 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.0065 | 0.0285 |
| Nitrogen Oxides (NO _x) ^[17] | 0.15 | 1.66 | 7.26 |
| Carbon Monoxide (CO) ^[17] | 0.35 | 3.87 | 16.95 |
| Individual Hazardous Air Pollutants (HAP) | | | |
| Benzene | 0.0021 | 2.28E-05 | 9.97E-05 |
| Dichlorobenzene | 0.0012 | 1.30E-05 | 5.70E-05 |
| Formaldehyde | 0.075 | 8.13E-04 | 3.56E-03 |
| Hexane | 1.8 | 1.95E-02 | 8.54E-02 |
| Lead Compounds | 0.0005 | 5.42E-06 | 2.37E-05 |
| Naphthalene | 0.00061 | 6.61E-06 | 2.90E-05 |
| Polycyclic Organic Matter (POM) | 0.000882 | 9.56E-07 | 4.19E-06 |
| Toluene | 0.0034 | 3.69E-05 | 1.61E-04 |
| Arsenic Compounds (ASC) | 0.0002 | 2.17E-06 | 9.49E-06 |
| Beryllium Compounds (BEC) | 0.00012 | 1.30E-07 | 5.70E-07 |
| Cadmium Compounds (CDC) | 0.0011 | 1.19E-05 | 5.22E-05 |
| Chromium Compounds (CRC) | 0.0014 | 1.52E-05 | 6.65E-05 |
| Cobalt Compounds (COC) | 0.000084 | 9.10E-07 | 3.99E-06 |
| Manganese Compounds (MNC) | 0.00038 | 4.12E-06 | 1.80E-05 |
| Mercury Compounds (HGC) | 0.00026 | 2.82E-06 | 1.23E-05 |
| Nickel Compounds (NIC) | 0.0021 | 2.28E-05 | 9.97E-05 |
| Selenium Compounds (SEC) | 0.000024 | 2.60E-07 | 1.14E-06 |
| Total HAPs | - | 2.05E-02 | 8.96E-02 |

^[1]Information based on manufacturer information and was submitted with application materials

^[2](A) / 1,000 x (B)

^[3](E)/(D)

^[4](F) x (C) / 1,000,000 (Btu/MMBtu)

^[5](A) / 1,000 x (B) / 2,000 (lb/ton)

^[6](H) x 2,000 (lbs/ton) / (D)

^[7](I) x (C) / 1,000,000 (Btu/MMBtu)

^[8]MMBtu/hr x 8,760 (hours/yr)

^[9](K) + (O) / 1,020 (Btu/scf)

^[10][(L) + (N)] / 1,020 (Btu/scf)

^[11](G) + (K) + (M)

^[12]MMBtu/hr / 1,020 (Btu/scf)

^[13](J) + (L) + (N)

^[14]Emission Factors from AP-42 Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4 (7/98) unless otherwise specified

^[15]For PM, PM10, and SO2: (V) = (R) x (U). For NOx and CO: (V) = (Q) x (U). For HAPs: (V) = (O) x (U).

^[16]For PM, PM10, and SO2: (V) = (T) x (U) / 2,000. For NOx and CO: (V) = (S) x (U) / 2,000. For HAPs: (V) = (P) x (U) / 2,000.

^[17]Emission Factor in units of lb/MMBtu and provided in application materials

Fact Sheet Attachment: 30% DS Liquid Loadout

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Number: DM09

| | | |
|---------------------------------|---------|----------|
| Anhydrous Ethanol Loading Rate: | 0.00375 | MMgal/yr |
| Water Loading Rate: | 7.49625 | MMgal/yr |
| 30% DS Loading Rate: | 7.50 | MMgal/yr |

Material Physical Data

| | Ethanol | Water |
|---|----------|--------|
| Molecular weight (M, lbs/lbs-mole) | 46 | 18 |
| Temperature (T, deg R) ^[1] | 540 | 540 |
| Vapor pressure (P, psia) | 1.27 | 0.51 |
| Liquid molecular weight (ML) | 46 | 18 |
| Density (D, lb/gal) | 6.53 | 8.34 |
| Liquid Mole Fraction (X) ^[2] | 0.00E+00 | 0.9998 |

^[1]Temperatures from TANKS 4.09d, average ambient temperature for Grand Island, NE

^[2]Liquid Mole Fraction (X) was calculated as follows, where V = loading rate:

$$X = \frac{\left(\frac{D * V}{ML} \right)}{\left(\frac{D_{ethanol} * V_{ethanol}}{ML_{ethanol}} \right) + \left(\frac{D_{denaturant} * V_{denaturant}}{ML_{denaturant}} \right)}$$

Saturation Factors

Saturation factor 1.45

30% DS Emission Factor Calculations

| | Railcar Loadout Uncontrolled Emission Factor (lbs Vapor/Mgal) |
|-----------------------|--|
| EF _{ethanol} | 0.000 |
| EF _{water} | 0.307 |
| EF _{vapor} | 0.307 |

VOC emission factor equation from AP-42, Section 5.2.2 - Loading Losses (1/1995)

EF = 12.46*S*P*M/T*(1-eff/100)*X = lbs/Mgal per component

EF_{gasoline} emission factors assumes S = S_{normal} - S_{clean cargo} and do not use the Liquid Mole Fraction (X) in the equations.

Total VOC Emission Calculations from 30% DS Loadout

| Loadout Type/Material | (A) Denatured Ethanol Loaded Out (Mgal/year) | (B) Uncontrolled Factor (lbs Vapor/Mgal) | (C) Vapor Composition (wt.%) | (D)=(A)x(B)x(C)/2000 Total VOC Emissions (tons/year) |
|-----------------------------|---|--|------------------------------------|--|
| 100% Loadout By Rail | | | | 0.00115 |
| Rail Loadout | | | | |
| Ethanol | 7,500 | 0.307 | 0.1% | 0.00115 |
| Water | | | 99.9% | 0.00 |

Fact Sheet Attachment: DDGS Drying and Cooling Operations

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Number: DM07A through DM07H and DM08A through DM08C

Conversion Factors

1 lb-mol = 385.5 dscf @ 68 F, 1 atm

DDGS Drying Emissions (DM07A, DM07B, DM07C, DM07D, DM07E, DM07F, DM07G, and DM07H)

(A) Flow Rate Exiting One (1) DDGS Dryers (provided by source): 1,568 dscf/minute
 (19,213) 94,080 dscf/hour

(B) Flow Rate Exiting Eight (8) DDGS Dryers⁽¹⁾: 12,544 dscf/minute
 752,640 dscf/hour

| Pollutant | (C) Uncontrolled Emission Factor ⁽²⁾ | Uncontrolled PM/PM ₁₀ Emissions from One (1) DDGS Dryer | | Uncontrolled PM/PM ₁₀ Emissions from All (8) DDGS Dryers | |
|--|--|--|----------------------------------|---|----------------------------------|
| | grains/dscf | (D) ⁽³⁾ (lb/hour) | (E) ⁽⁴⁾ (ton/year) | (F) ⁽⁵⁾ (lb/hour) | (G) ⁽⁶⁾ (ton/year) |
| Particulate Matter (PM) | 0.156 | 2.10 | 9.18 | 16.77 | 73.47 |
| Particulate Matter (PM ₁₀) | 0.156 | 2.10 | 9.18 | 16.77 | 73.47 |

| Pollutant | (H) Uncontrolled Emissions ⁽²⁾ | (I) Molecular Weight | Uncontrolled Emissions from One (1) DDGS Dryer | | Uncontrolled Emissions from All (8) DDGS Dryers | |
|---|--|-------------------------|--|----------------------------------|---|-----------------------------------|
| | (ppmv.d) | (lb/lb-mol) | (J) ⁽⁷⁾ (lb/hour) | (K) ⁽⁸⁾ (ton/year) | (L) ⁽⁹⁾ (lb/hour) | (M) ⁽¹⁰⁾ (ton/year) |
| Sulfur Dioxide (SO ₂) | 20.00 | 64.06 | 0.31 | 1.37 | 2.50 | 10.96 |
| Volatile Organic Compounds (VOC) | 20747.85 | 46.00 | 232.92 | 1,020.18 | 1,863.35 | 8,161.46 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 776.25 | 44.05 | 8.34 | 36.55 | 66.76 | 292.40 |
| Acrolein | 82.80 | 56.06 | 1.13 | 4.96 | 9.06 | 39.69 |
| Formaldehyde | 495.75 | 30.03 | 3.63 | 15.91 | 29.07 | 127.31 |
| Methanol | 185.40 | 32.04 | 1.45 | 6.35 | 11.60 | 50.80 |
| Total HAPs | - | - | 14.56 | 63.78 | 116.48 | 510.20 |

Routing DDGS Drying Emissions through Eight (8) Natural Gas Fired Combustors

Natural Gas Combustion Emissions

(N) Heat Input Capacity for One (1) Combustor 93.7 MMBtu/hr
 (O) Natural Gas Throughput for One (1) Combustor 0.09 MMscf/hr
 805 MMscf/yr

NOTE: Conversion Factor: 1 MMscf = 1,020 MMBtu from AP-42 Table 1.4-1, Footnote a

| Pollutant | (P) Emission Factor ⁽¹⁴⁾ (lb/MMscf) | Emission Rates for One (1) Combustor | | Emission Rates for All (8) Natural Gas Combustors | |
|--|--|--|---|---|---|
| | | (Q) Emission Rate ⁽¹²⁾ (lbs/hr) | (R) Emission Rate ⁽¹³⁾ (tons/year) | (S) Emission Rate ⁽¹⁴⁾ (lbs/hr) | (T) Emission Rate ⁽¹⁵⁾ (tons/year) |
| Particulate Matter (PM) | 7.6 | 0.70 | 3.06 | 5.59 | 24.47 |
| Particulate Matter (PM ₁₀) | 7.6 | 0.70 | 3.06 | 5.59 | 24.47 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.06 | 0.24 | 0.44 | 1.93 |
| Nitrogen Oxides (NO _x) ⁽¹⁶⁾ | 0.04 | 3.75 | 16.42 | 29.98 | 131.33 |
| Carbon Monoxide (CO) ⁽¹⁶⁾ | 0.11 | 10.31 | 45.14 | 82.46 | 361.16 |
| Volatile Organic Compounds (VOC) | 5.5 | 0.51 | 2.21 | 4.04 | 17.71 |
| Individual Hazardous Air Pollutants (HAP) | | | | | |
| Benzene | 0.0021 | 1.93E-04 | 8.45E-04 | 1.54E-03 | 6.76E-03 |
| Dichlorobenzene | 0.0012 | 1.10E-04 | 4.83E-04 | 8.82E-04 | 3.86E-03 |
| Hexane | 1.8 | 1.65E-01 | 7.25E-01 | 1.32E+00 | 5.80E+00 |
| Lead Compounds | 0.0005 | 4.60E-05 | 2.01E-04 | 3.68E-04 | 1.61E-03 |
| Naphthalene | 0.00061 | 5.61E-05 | 2.46E-04 | 4.48E-04 | 1.96E-03 |
| Polycyclic Organic Matter (POM) | 0.000882 | 8.11E-06 | 3.55E-05 | 6.48E-05 | 2.84E-04 |
| Toluene | 0.0034 | 3.12E-04 | 1.37E-03 | 2.50E-03 | 1.09E-02 |
| Arsenic Compounds (ASC) | 0.0002 | 1.84E-05 | 8.05E-05 | 1.47E-04 | 6.44E-04 |
| Beryllium Compounds (BEC) | 0.000012 | 1.10E-06 | 4.83E-06 | 8.82E-06 | 3.86E-05 |
| Cadmium Compounds (CDC) | 0.0011 | 1.01E-04 | 4.43E-04 | 8.09E-04 | 3.54E-03 |
| Chromium Compounds (CRC) | 0.0014 | 1.29E-04 | 5.64E-04 | 1.03E-03 | 4.51E-03 |
| Cobalt Compounds (COC) | 0.000084 | 7.72E-06 | 3.38E-05 | 6.18E-05 | 2.70E-04 |
| Manganese Compounds (MNC) | 0.00038 | 3.49E-05 | 1.53E-04 | 2.79E-04 | 1.22E-03 |
| Mercury Compounds (HGC) | 0.00026 | 2.39E-05 | 1.05E-04 | 1.91E-04 | 8.37E-04 |
| Nickel Compounds (NIC) | 0.0021 | 1.93E-04 | 8.45E-04 | 1.54E-03 | 6.76E-03 |
| Selenium Compounds (SEC) | 0.000024 | 2.21E-06 | 9.66E-06 | 1.76E-05 | 7.73E-05 |
| Total HAPs | - | 0.17 | 0.73 | 1.33 | 5.84 |

Fact Sheet Attachment: DDGS Drying and Cooling Operations

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285

Emission Point ID Number: DM07A through DM07H and DM08A through DM08C

Controlled DDGS Dryer Process Emissions

| Pollutant | Uncontrolled Emissions from One (1) DDGS Dryer | | (W) Control Efficiency (%) ⁽¹⁷⁾ | Controlled Emissions from One (1) DDGS Dryer | | Controlled Emissions from ALL DDGS Dryers | |
|---|--|----------------|--|--|--------------------------------|---|---------------------------------|
| | (U) (lb/hour) | (V) (ton/year) | | (X) ⁽¹⁸⁾ (lb/hour) | (Y) ⁽¹⁹⁾ (ton/year) | (Z) ⁽²⁰⁾ (lb/hour) | (AA) ⁽²¹⁾ (ton/year) |
| Particulate Matter (PM) | 2.10 | 9.18 | 0% | 2.10 | 9.18 | 16.77 | 73.47 |
| Particulate Matter (PM ₁₀) | 2.10 | 9.18 | 0% | 2.10 | 9.18 | 16.77 | 73.47 |
| Sulfur Dioxide (SO ₂) | 0.31 | 1.37 | 0% | 0.31 | 1.37 | 2.50 | 10.96 |
| Volatile Organic Compounds (VOC) as VOC | 232.92 | 1,020.18 | 98% | 4.66 | 20.40 | 37.27 | 163.23 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 8.34 | 36.55 | 98% | 0.17 | 0.73 | 1.34 | 5.85 |
| Acrolein | 1.13 | 4.96 | 98% | 0.02 | 0.10 | 0.18 | 0.79 |
| Formaldehyde | 3.63 | 15.91 | 98% | 0.07 | 0.32 | 0.58 | 2.55 |
| Methanol | 1.45 | 6.35 | 98% | 0.03 | 0.13 | 0.23 | 1.02 |
| Total HAPs | 14.56 | 63.78 | 98% | 0.29 | 1.28 | 2.33 | 10.20 |

Total Emissions associated with DDGS Drying

| Pollutant | Controlled Emissions from One (1) DDGS Dryer | | Combustion Emissions for One (1) Combustor | | Total Emissions from One (1) Combustor | | Total Emissions from All Combustors | |
|---|--|------------|--|-------------|--|-------------|-------------------------------------|-------------|
| | (lb/hour) | (ton/year) | (lbs/hr) | (tons/year) | (lbs/hr) | (tons/year) | (lbs/hr) | (tons/year) |
| Particulate Matter (PM) | 2.10 | 9.18 | 0.70 | 3.06 | 2.80 | 12.24 | 22.36 | 97.94 |
| Particulate Matter (PM ₁₀) | 2.10 | 9.18 | 0.70 | 3.06 | 2.80 | 12.24 | 22.36 | 97.94 |
| Sulfur Dioxide (SO ₂) | 0.31 | 1.37 | 0.06 | 0.24 | 0.37 | 1.61 | 2.94 | 12.89 |
| Nitrogen Oxides (NO _x) | - | - | 3.75 | 16.42 | 3.75 | 16.42 | 29.98 | 131.33 |
| Carbon Monoxide (CO) | - | - | 10.31 | 45.14 | 10.31 | 45.14 | 82.46 | 361.16 |
| Volatile Organic Compounds (VOC) | 4.66 | 20.40 | 0.51 | 2.21 | 5.16 | 22.62 | 41.31 | 180.94 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | | |
| Acetaldehyde | 1.67E-01 | 7.31E-01 | - | - | 1.67E-01 | 7.31E-01 | 1.34E+00 | 5.85E+00 |
| Acrolein | 2.27E-02 | 9.92E-02 | - | - | 2.27E-02 | 9.92E-02 | 1.81E-01 | 7.94E-01 |
| Benzene | - | - | 1.93E-04 | 8.45E-04 | 1.93E-04 | 8.45E-04 | 1.54E-03 | 6.76E-03 |
| Dichlorobenzene | - | - | 1.10E-04 | 4.83E-04 | 1.10E-04 | 4.83E-04 | 8.82E-04 | 3.86E-03 |
| Formaldehyde | 7.27E-02 | 3.18E-01 | - | - | 7.27E-02 | 3.18E-01 | 5.81E-01 | 2.55E+00 |
| Hexane | - | - | 1.65E-01 | 7.25E-01 | 1.65E-01 | 7.25E-01 | 1.32E+00 | 5.80E+00 |
| Lead Compounds | - | - | 4.60E-05 | 2.01E-04 | 4.60E-05 | 2.01E-04 | 3.68E-04 | 1.61E-03 |
| Methanol | 2.90E-02 | 1.27E-01 | - | - | 2.90E-02 | 1.27E-01 | 2.32E-01 | 1.02E+00 |
| Naphthalene | - | - | 5.61E-05 | 2.46E-04 | 5.61E-05 | 2.46E-04 | 4.48E-04 | 1.96E-03 |
| Polycyclic Organic Matter (POM) | - | - | 8.11E-06 | 3.55E-05 | 8.11E-06 | 3.55E-05 | 6.48E-05 | 2.84E-04 |
| Toluene | - | - | 3.12E-04 | 1.37E-03 | 3.12E-04 | 1.37E-03 | 2.50E-03 | 1.09E-02 |
| Arsenic Compounds (ASC) | - | - | 1.84E-05 | 8.05E-05 | 1.84E-05 | 8.05E-05 | 1.47E-04 | 6.44E-04 |
| Beryllium Compounds (BEC) | - | - | 1.10E-06 | 4.83E-06 | 1.10E-06 | 4.83E-06 | 8.82E-06 | 3.86E-05 |
| Cadmium Compounds (CDC) | - | - | 1.01E-04 | 4.43E-04 | 1.01E-04 | 4.43E-04 | 8.09E-04 | 3.54E-03 |
| Chromium Compounds (CRC) | - | - | 1.29E-04 | 5.64E-04 | 1.29E-04 | 5.64E-04 | 1.03E-03 | 4.51E-03 |
| Cobalt Compounds (COC) | - | - | 7.72E-06 | 3.38E-05 | 7.72E-06 | 3.38E-05 | 6.18E-05 | 2.70E-04 |
| Manganese Compounds (MNC) | - | - | 3.49E-05 | 1.53E-04 | 3.49E-05 | 1.53E-04 | 2.79E-04 | 1.22E-03 |
| Mercury Compounds (HGC) | - | - | 2.39E-05 | 1.05E-04 | 2.39E-05 | 1.05E-04 | 1.91E-04 | 8.37E-04 |
| Nickel Compounds (NIC) | - | - | 1.93E-04 | 8.45E-04 | 1.93E-04 | 8.45E-04 | 1.54E-03 | 6.76E-03 |
| Selenium Compounds (SEC) | - | - | 2.21E-06 | 9.66E-06 | 2.21E-06 | 9.66E-06 | 1.76E-05 | 7.73E-05 |
| Total HAPs | 0.29 | 1.28 | 0.17 | 0.73 | 0.46 | 2.01 | 3.66 | 16.04 |

⁽¹⁾(A) x 8

⁽²⁾Provided by source in application materials

⁽³⁾(A) (dscf/hour) x (C) / 7,000 (grains/lb)

⁽⁴⁾(D) x 8,760 (hours/yr) / 2,000 (lbs/ton)

⁽⁵⁾(D) x 8

⁽⁶⁾(E) x 8

⁽⁷⁾((H) / 1,000,000) x (I) x (A) (dscf/hour) / 385.5 (dscf/lb-mol)

⁽⁸⁾(J) x 8,760 (hours/yr) / 2,000 (lbs/ton)

⁽⁹⁾(J) x 8

⁽¹⁰⁾(K) x 8

⁽¹¹⁾Emission Factors from AP-42 Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4 (7/98) unless otherwise specified

⁽¹²⁾(O) (MMscf/hr) x (P)

⁽¹³⁾(Q) x 8,760 (hours/yr) / 2,000 (lbs/ton)

⁽¹⁴⁾(Q) x 8

⁽¹⁵⁾(R) x 8

⁽¹⁶⁾Emission Factors in units of lb/MMBtu, provided by the source based on vendor information; (Q) = (N) x (P)

⁽¹⁷⁾Control Efficiency provided by source; Controlled by the Natural Gas Combustors

⁽¹⁸⁾(U) x (1-(W))

⁽¹⁹⁾(V) x (1-(W))

⁽²⁰⁾(X) x 8

⁽²¹⁾(Y) x 8

Fact Sheet Attachment: DDGS Drying and Cooling Operations

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Number: DM07A through DM07H and DM08A through DM08C

DDGS Cooling Emissions (DM08A, DM08B, and DM08C)

(A) Flow Rate Exiting One (1) DDGS Cooling Baghouse (provided by source): 45,000 dscf/minute
2,700,000 dscf/hour

| Pollutant | (B) Controlled Emission Factor and BACT Limit ⁽¹⁾ | Controlled PM/PM ₁₀ Emissions from One (1) DDGS Cooling Baghouse | | Controlled PM/PM ₁₀ Emissions from All (3) DDGS Cooling Baghouses | |
|--|---|---|----------------------------------|--|----------------------------------|
| | grains/dscf | (C) ⁽²⁾ (lb/hour) | (D) ⁽³⁾ (ton/year) | (E) ⁽⁴⁾ (lb/hour) | (F) ⁽⁵⁾ (ton/year) |
| Particulate Matter (PM) | 0.004 | 1.54 | 6.76 | 4.63 | 20.27 |
| Particulate Matter (PM ₁₀) | 0.004 | 1.54 | 6.76 | 4.63 | 20.27 |

| Pollutant | (G) Uncontrolled Emissions ⁽⁶⁾ | (H) Molecular Weight | Uncontrolled Emissions from One (1) DDGS Cooling Baghouse | | Uncontrolled Emissions from All (3) DDGS Cooling Baghouses | |
|---|--|-------------------------|---|----------------------------------|--|-----------------------------------|
| | (ppmv,d) | (lb/lb-mol) | (I) ⁽⁷⁾ (lb/hour) | (J) ⁽⁸⁾ (ton/year) | (K) ⁽⁹⁾ (lb/hour) | (L) ⁽¹⁰⁾ (ton/year) |
| Sulfur Dioxide (SO ₂) ⁽¹¹⁾ | 10.00 | 64.06 | 4.49 | 19.65 | 13.46 | 58.96 |
| Volatile Organic Compounds (VOC) ⁽¹¹⁾ | 40.00 | 46.00 | 12.89 | 56.45 | 38.66 | 169.34 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 2.10 | 44.05 | 0.65 | 2.84 | 1.94 | 8.51 |
| Acrolein | 2.90 | 56.06 | 1.14 | 4.99 | 3.42 | 14.96 |
| Formaldehyde | 3.10 | 30.03 | 0.65 | 2.86 | 1.96 | 8.57 |
| Methanol | 1.70 | 32.04 | 0.38 | 1.67 | 1.14 | 5.01 |
| Total HAPs | - | - | 2.82 | 12.35 | 8.46 | 37.06 |

⁽¹⁾Emission Factor based on established BACT Limit

⁽²⁾(A) (dscf/minute) x (B) x 60 (mins/hr) / 7,000 (grains/lb)

⁽³⁾(C) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

⁽⁴⁾(C) x 3

⁽⁵⁾(D) x 3

⁽⁶⁾Emissions provided by source in application materials, based on worst-case scenarios and design estimate

⁽⁷⁾((G) / 1,000,000) x (G) x (A) (dscf/hour) / 385.5 (dscf/lb-mol)

⁽⁸⁾(I) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

⁽⁹⁾(I) x 3

⁽¹⁰⁾(J) x 3

⁽¹¹⁾The Uncontrolled Emissions in ppmv,d has been established as the BACT Limitation as it is not cost effective to install a control device for control of this pollutant

Fact Sheet Attachment: DDGS Drying and Cooling Operations

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Number: DM07A through DM07H and DM08A through DM08C

Total Emissions from Drying and Cooling DDGS

| Pollutant | DDGS Drying Emissions | DDGS Cooling Emissions | Total DDGS Drying and Cooling Emissions |
|---|-----------------------|------------------------|---|
| | (tons/year) | (tons/year) | (tons/year) |
| Particulate Matter (PM) | 97.94 | 20.27 | 118.21 |
| Particulate Matter (PM ₁₀) | 97.94 | 20.27 | 118.21 |
| Sulfur Dioxide (SO ₂) | 12.89 | 58.96 | 71.84 |
| Nitrogen Oxides (NO _x) | 131.33 | - | 131.33 |
| Carbon Monoxide (CO) | 361.16 | - | 361.16 |
| Volatile Organic Compounds (VOC) | 180.94 | 169.34 | 350.28 |
| Individual Hazardous Air Pollutants (HAP) | | | |
| Acetaldehyde | 5.85 | 8.51 | 14.36 |
| Acrolein | 0.79 | 14.96 | 15.76 |
| Benzene | 6.76E-03 | - | 6.76E-03 |
| Dichlorobenzene | 3.86E-03 | - | 3.86E-03 |
| Formaldehyde | 2.55 | 8.57 | 11.11 |
| Hexane | 5.80 | - | 5.80 |
| Lead Compounds | 1.61E-03 | - | 1.61E-03 |
| Methanol | 1.02 | 5.01 | 6.03 |
| Naphthalene | 1.96E-03 | - | 1.96E-03 |
| Polycyclic Organic Matter (POM) | 2.84E-04 | - | 2.84E-04 |
| Toluene | 1.09E-02 | - | 1.09E-02 |
| Arsenic Compounds (ASC) | 6.44E-04 | - | 6.44E-04 |
| Beryllium Compounds (BEC) | 3.86E-05 | - | 3.86E-05 |
| Cadmium Compounds (CDC) | 3.54E-03 | - | 3.54E-03 |
| Chromium Compounds (CRC) | 4.51E-03 | - | 4.51E-03 |
| Cobalt Compounds (COC) | 2.70E-04 | - | 2.70E-04 |
| Manganese Compounds (MNC) | 1.22E-03 | - | 1.22E-03 |
| Mercury Compounds (HGC) | 8.37E-04 | - | 8.37E-04 |
| Nickel Compounds (NIC) | 6.76E-03 | - | 6.76E-03 |
| Selenium Compounds (SEC) | 7.73E-05 | - | 7.73E-05 |
| Total HAPs | 16.04 | 37.06 | 53.10 |

Fact Sheet Attachment: Degermination Byproduct Conveying, Storage, and Loadout

Archer Daniels Midland Company - Dry Mill
Facility ID #39285
Emission Point ID Numbers: DM10, DM11, and DM12

Conversion Factors

1 lb-mol = 385.5 dscf @ 68 F, 1 atm

Emissions exiting DM10: Byproduct (Feed/Germ) Conveying Baghouse

(A) Conveyor Aspiration Rate for One (1) Conveyor (provided by source): 1,000 dscf/minute
 60,000 dscf/hour

(B) Conveyor Aspiration Rate for Ten (10) Conveyors⁽¹⁾: 10,000 dscf/minute
 600,000 dscf/hour

| Pollutant | (C) Controlled Emission Factor and BACT Limit ⁽²⁾ | Controlled PM/PM ₁₀ Emissions | |
|--|---|--|----------------------------------|
| | grains/dscf | (D) ⁽³⁾ (lb/hour) | (E) ⁽⁴⁾ (ton/year) |
| Particulate Matter (PM) | 0.004 | 0.34 | 1.50 |
| Particulate Matter (PM ₁₀) | 0.004 | 0.34 | 1.50 |

| Pollutant | (F) Uncontrolled Emissions ⁽²⁾ | (G) Molecular Weight | Uncontrolled Emissions | | Permitted BACT Limits for DM10 | |
|---|---|----------------------------|---------------------------------|----------------------------------|-----------------------------------|------------|
| | (ppmv,d) | (lb/lb-mol) | (H) ⁽⁵⁾ (lb/hour) | (I) ⁽⁶⁾ (ton/year) | (lb/hour) | (ton/year) |
| Volatile Organic Compounds (VOC) | 20.00 | 46.00 | 1.43 | 6.27 | 1.43 | 6.26 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 3.00 | 44.05 | 0.21 | 0.90 | No Control | |
| Acrolein | 2.30 | 56.06 | 0.20 | 0.88 | | |
| Formaldehyde | 4.00 | 30.03 | 0.19 | 0.82 | | |
| Methanol | 3.50 | 32.04 | 0.17 | 0.76 | | |
| Total HAPs | - | - | 0.77 | 3.36 | | |

Fact Sheet Attachment: Degermination Byproduct Conveying, Storage, and Loadout

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM10, DM11, and DM12

Emissions exiting DM11: Byproduct (Feed/Germ) Storage Baghouse

(A) Bin Vent Aspiration Rate for One (1) Bin Vent (provided by source):
 1,000 dscf/minute
 60,000 dscf/hour

(B) Bin Vent Aspiration Rate for Eight (8) Bin Vents^[1]:
 8,000 dscf/minute
 480,000 dscf/hour

| Pollutant | (C) Controlled Emission Factor and BACT Limit ^[2] | Controlled PM/PM ₁₀ Emissions | |
|--|---|--|----------------------------------|
| | grains/dscf | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) |
| Particulate Matter (PM) | 0.004 | 0.27 | 1.20 |
| Particulate Matter (PM ₁₀) | 0.004 | 0.27 | 1.20 |

| Pollutant | (F) Uncontrolled Emissions ^[2] | (G) Molecular Weight | Uncontrolled Emissions | | Permitted BACT Limits for DM11 | |
|---|---|----------------------------|---------------------------------|----------------------------------|-----------------------------------|------------|
| | (ppmv,d) | (lb/lb-mol) | (H) ^[5] (lb/hour) | (I) ^[6] (ton/year) | (lb/hour) | (ton/year) |
| Volatile Organic Compounds (VOC) | 20.00 | 46.00 | 1.15 | 5.02 | 1.15 | 5.04 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 3.00 | 44.05 | 0.16 | 0.72 | No Control | |
| Acrolein | 2.30 | 56.06 | 0.16 | 0.70 | | |
| Formaldehyde | 4.00 | 30.03 | 0.15 | 0.66 | | |
| Methanol | 3.50 | 32.04 | 0.14 | 0.61 | | |
| Total HAPs | - | - | 0.61 | 2.69 | | |

Fact Sheet Attachment: Degermination Byproduct Conveying, Storage, and Loadout

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM10, DM11, and DM12

Emissions exiting DM12: Byproduct (Feed/Germ) Loadout Baghouse

(A) Byproduct (Feed/Germ) Loadout Baghouse Aspiration Rate (provided by source):
 10,000 dscf/minute
 600,000 dscf/hour

| Pollutant | (C) Controlled Emission Factor and BACT Limit ^[2] | Controlled PM/PM ₁₀ Emissions | |
|--|---|--|----------------------------------|
| | grains/dscf | (D) ^[3] (lb/hour) | (E) ^[4] (ton/year) |
| Particulate Matter (PM) | 0.004 | 0.34 | 1.50 |
| Particulate Matter (PM ₁₀) | 0.004 | 0.34 | 1.50 |

| Pollutant | (F) Uncontrolled Emissions ^[2] | (G) Molecular Weight | Uncontrolled Emissions | | Permitted BACT Limits for DM12 | |
|---|---|----------------------------|---------------------------------|----------------------------------|-----------------------------------|------------|
| | (ppmv,d) | (lb/lb-mol) | (H) ^[5] (lb/hour) | (I) ^[6] (ton/year) | (lb/hour) | (ton/year) |
| Volatile Organic Compounds (VOC) | 20.00 | 46.00 | 1.43 | 6.27 | 1.43 | 6.26 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | |
| Acetaldehyde | 3.00 | 44.05 | 0.21 | 0.90 | No Control | |
| Acrolein | 2.30 | 56.06 | 0.20 | 0.88 | | |
| Formaldehyde | 4.00 | 30.03 | 0.19 | 0.82 | | |
| Methanol | 3.50 | 32.04 | 0.17 | 0.76 | | |
| Total HAPs | - | - | 0.77 | 3.36 | | |

^[1](A) x 10 (DM10) or (A) x 8 (DM11)

^[2]Provided by source in application materials and based on design specifications

^[3](B) (dscf/minute) x (C) x 60 (mins/hr) / 7,000 (grains/lb)

^[4](E) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

^[5](F) / 1,000,000) x (G) x (B) (dscf/hour) / 385.5 (dscf/lb-mol)

^[6](H) x 8,760 (hrs/yr) / 2,000 (lbs/ton)

Fact Sheet Attachment: Degermination Byproduct Conveying, Storage, and Loadout

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM10, DM11, and DM12

PM/PM₁₀ Fugitive Emissions from Byproduct (Feed/Germ) Loadout

| Emission Point ID# | Emission Point Description | (A) | (B) | (C) | Emission Factors ^[2] | | PM Emissions | | PM ₁₀ Emissions | |
|--------------------|-----------------------------------|----------------------------------|----------------------------------|-----|----------------------------------|-----------|-------------------------|--------------------------------|---------------------------------|--------------------------------|
| | | Hourly Throughput (tons/hour) | Annual Throughput (tons/year) | | Percent Fugitives ^[1] | (D) PM | (E) PM ₁₀ | (F) ^[3] (lbs/hr) | (G) ^[4] (tons/yr) | (H) ^[5] (lbs/hr) |
| DM35/DM35A | Truck Byproduct Loadout Fugitives | 800 | 1,111,111 | 5% | 0.0033 | 0.0008 | 0.13 | 0.09 | 0.03 | 0.02 |
| DM36/DM36A | Rail Byproduct Loadout Fugitives | 200 | 1,111,111 | 5% | 0.0033 | 0.0008 | 0.03 | 0.09 | 0.01 | 0.02 |

^[1]5% fugitives are assumed since loading operations will occur in an enclosure and will utilize choke flow and/or coupled chutes

^[2]Emission Factors are from AP-42 Section 9.9.1 (5/2003)

^[3](A) x (C) x (D)

^[4](B) x (C) x (D) / 2,000 (lbs/ton)

^[5](A) x (C) x (E)

^[6](B) x (C) x (E) / 2,000 (lbs/ton)

NOTE: All VOC emissions from Byproduct (Feed/Germ) Conveying, Storage, and Loadout are accounted for in the calculations above

Total Emissions from Byproduct (Feed/Germ) Conveying, Storage, and Loadout

| Pollutant | Controlled/Permitted Emissions | |
|---|--------------------------------|------------|
| | (lb/hour) | (ton/year) |
| Particulate Matter (PM) | 1.09 | 4.30 |
| Particulate Matter (PM ₁₀) | 0.99 | 4.23 |
| Volatile Organic Compounds (VOC) | 4.01 | 17.56 |
| Individual Hazardous Air Pollutants (HAP) | | |
| Acetaldehyde | 0.58 | 2.52 |
| Acrolein | 0.56 | 2.46 |
| Formaldehyde | 0.52 | 2.29 |
| Methanol | 0.49 | 2.14 |
| Total HAPs | 2.15 | 9.42 |

Fact Sheet Attachment: Emergency Fire Pumps

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM50A, DM50B, DM50C, and DM50D

Four (4) 460 HP Emergency Fire Pumps

Internal Combustion of Distillate Fuel in Engines (< 600 hp)

Total Horsepower 1,840 HP
 Total Heat Input Capacity 12.88 MMBtu/hr
 Potential Diesel Fuel Throughput 0.094 kgal/hr 823.44 kgal/year

Sulfur Fuel Limit 0.05 weight % sulfur

Limited Operating Hours 500 hr/year

| Pollutant | (A) Emission Factor ^[1] (lb/MMBtu) | (B) = (A)x kgal/hr Emission Rate (lbs/hr) | | (C) = (B)xOperating Hours Emission Rate (lbs/year) | | (D) = (C)/2000 Potential to Emit (tons/year) | |
|---|---|---|---------|--|----------|--|----------|
| | | Potential | Limited | Potential | Limited | Potential | Limited |
| Particulate Matter (PM) ^[2] | 8.82E-04 | 1.62 | 1.62 | 14213.76 | 811.29 | 7.11 | 0.41 |
| Particulate Matter (PM ₁₀) ^[2] | 8.82E-04 | 1.62 | 1.62 | 14213.76 | 811.29 | 7.11 | 0.41 |
| Sulfur Dioxide (SO ₂) | 0.29 | 3.74 | 3.74 | 32720.35 | 1867.60 | 16.36 | 0.93 |
| Nitrogen Oxides (NO _x) ^[2] | 1.72E-02 | 31.64 | 31.64 | 277168.25 | 15820.11 | 138.58 | 7.91 |
| Carbon Monoxide (CO) ^[2] | 5.73E-03 | 10.55 | 10.55 | 92389.42 | 5273.37 | 46.19 | 2.64 |
| Volatile Organic Compounds (VOC) ^[2] | 1.72E-02 | 31.64 | 31.64 | 277168.25 | 15820.11 | 138.58 | 7.91 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| 1,3 - Butadiene | 3.91E-05 | 0.0005 | 0.0005 | 4.41E+00 | 0.25 | 2.21E-03 | 1.26E-04 |
| Acetaldehyde | 7.67E-04 | 0.0099 | 0.0099 | 8.65E+01 | 4.94 | 4.33E-02 | 2.47E-03 |
| Acrolein | 9.25E-04 | 0.0119 | 0.0119 | 1.04E+02 | 5.96 | 5.22E-02 | 2.98E-03 |
| Benzene | 9.33E-04 | 0.0120 | 0.0120 | 1.05E+02 | 6.01 | 5.26E-02 | 3.00E-03 |
| Formaldehyde | 1.18E-03 | 0.0152 | 0.0152 | 1.33E+02 | 7.60 | 6.66E-02 | 3.80E-03 |
| Naphthalene | 8.48E-05 | 0.0011 | 0.0011 | 9.57E+00 | 0.55 | 4.79E-03 | 2.73E-04 |
| Polycyclic Organic Matter (POM) | 8.32E-05 | 0.0011 | 0.0011 | 9.39E+00 | 0.54 | 4.70E-03 | 2.68E-04 |
| Toluene | 4.09E-04 | 0.0053 | 0.0053 | 4.62E+01 | 2.63 | 2.31E-02 | 1.32E-03 |
| Xylene | 2.85E-04 | 0.0037 | 0.0037 | 3.22E+01 | 1.84 | 1.61E-02 | 9.18E-04 |
| Total HAPs | - | 0.0606 | 0.0606 | 530.9800 | 30.31 | 0.2655 | 1.52E-02 |

^[1]Emission Factors are from AP-42 Tables 3.3-1 and 3.3-2 (10/96)

^[2]Emission Factors in lb/hp-hr and based on emission limitation in NSPS, Subpart IIII for Stationary Fire Pumps, ≥300hp & <600hp, Model Year 2008 and earlier
 Conversion Factor: Heat Capacity of Diesel Fuel is 137,000 Btu/gal (AP-42 Appendix A)

Note: Sulfur Dioxide Emission Factor = 1.01 x Sulfur Content (%)

Note: kgal = 1000 gallons

Note: Potential Operating Hours is 8760

Note: The units are each limited to their operating hours by permit, therefore the PTE of the units are the Limited values

Fact Sheet Attachment: Emergency Generators

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM51, DM52, and DM53

Two (2) 804 HP, One (1) 134 HP, and One (1) 201 HP Emergency Generators

Internal Combustion of Distillate Fuel in Engines (> 600 hp)

| | | | | | |
|--|--------|-----------------|---------|-----------|--|
| Total Horsepower | 1,943 | HP | | | |
| Total Heat Input Capacity | 13.60 | MMBtu/hr | | | |
| Potential Diesel Fuel Throughput | 0.0993 | kgal/hr | 869.868 | kgal/year | |
| Sulfur Fuel Limit | 0.05 | weight % sulfur | | | |
| Limited Operating Hours for Each Generator | 500 | hr/year | | | |

| Pollutant | (A) Emission Factor ^[1] (lb/MMBtu) | (B) = (A)x MMBtu/hr Emission Rate (lbs/hr) | | (C) = (B)xOperating Hours Emission Rate (lbs/year) | | (D) = (C)/2000 Potential to Emit (tons/year) | |
|---|--|--|---------|--|-----------|--|----------|
| | | Potential | Limited | Potential | Limited | Potential | Limited |
| Particulate Matter (PM) | 0.0697 | 0.95 | 0.95 | 8,304.39 | 473.99 | 4.15 | 0.24 |
| Particulate Matter (PM ₁₀) | 0.0573 | 0.78 | 0.78 | 6,826.99 | 389.67 | 3.41 | 0.19 |
| Sulfur Dioxide (SO ₂) | 0.0505 | 0.69 | 0.69 | 6,016.81 | 343.43 | 3.01 | 0.17 |
| Nitrogen Oxides (NO _x) | 3.2 | 43.52 | 43.52 | 381,263.23 | 21,761.60 | 190.63 | 10.88 |
| Carbon Monoxide (CO) | 0.85 | 11.56 | 11.56 | 101,273.05 | 5,780.43 | 50.64 | 2.89 |
| Volatile Organic Compounds (VOC) | 0.0819 | 1.11 | 1.11 | 9,757.96 | 556.96 | 4.88 | 0.28 |
| Individual Hazardous Air Pollutants (HAP) | | | | | | | |
| Acetaldehyde | 2.52E-05 | 0.0003 | 0.0003 | 3.00E+00 | 1.71E-01 | 1.50E-03 | 1.00E-04 |
| Acrolein | 7.88E-06 | 0.0001 | 0.0001 | 9.40E-01 | 5.36E-02 | 5.00E-04 | 0.00E+00 |
| Benzene | 7.76E-04 | 0.0106 | 0.0106 | 9.25E+01 | 5.28E+00 | 4.62E-02 | 2.60E-03 |
| Formaldehyde | 7.89E-05 | 0.0011 | 0.0011 | 9.40E+00 | 5.37E-01 | 4.70E-03 | 3.00E-04 |
| Naphthalene | 1.30E-04 | 0.0018 | 0.0018 | 1.55E+01 | 8.84E-01 | 7.70E-03 | 4.00E-04 |
| Toluene | 2.81E-04 | 0.0038 | 0.0038 | 3.35E+01 | 1.91E+00 | 1.67E-02 | 1.00E-03 |
| Xylene | 1.93E-04 | 0.0026 | 0.0026 | 2.30E+01 | 1.31E+00 | 1.15E-02 | 7.00E-04 |
| Polycyclic Organic Matter (POM) | 8.15E-05 | 0.0011 | 0.0011 | 9.71E+00 | 5.55E-01 | 4.90E-03 | 3.00E-04 |
| Total HAPs | 1.57E-03 | 0.02 | 0.02 | 187.48 | 10.70 | 0.09 | 0.01 |

^[1]Emission Factors are from AP-42 Tables 3.4-1, 3.4-2, and 3.4-4 (10/96)

Conversion Factor: Heat Capacity of Diesel Fuel is 137,000 Btu/gal (AP-42 Appendix A)

Note: Sulfur Dioxide Emission Factor = 1.01 x Sulfur Content (%)

Note: kgal = 1,000 gallons

Note: Potential Operating Hours is 8,760

Note: The units are each limited to their operating hours by permit, therefore the PTE of the units are the Limited values

Fact Sheet Attachment: Equipment Leaks

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Number: DM91

| Type of Component | (A) Component Count ^[1] | VOC Emission Factors ^[2] | | (D) % of components serviced with leak rates ≥ 10,000 ppmv ^[3] | (E) ^[4] Weighted Average Emission Factor (kg/hr/source) | VOC Potential Emissions | |
|--------------------------------------|---------------------------------------|---|---|--|---|--------------------------------|---------------------------------|
| | | (B) LDAR leak rates ≥ 10,000 ppmv (kg/hr/source) | (C) LDAR leak rates < 10,000 ppmv (kg/hr/source) | | | (F) (lbs/hr) ^[5] | (G) (tons/yr) ^[6] |
| Valves - Gas Service | 400 | 0.078200 | 0.000131 | 1.83% | 0.001558 | 1.377 | 6.032 |
| Valves - Light Liquid | 1,600 | 0.089200 | 0.000165 | 0.78% | 0.000860 | 3.041 | 13.319 |
| Valves - Heavy Liquid | 600 | 0.000230 | 0.000230 | 0.01% | 0.000230 | 0.305 | 1.336 |
| Pump & Agitator Seals - Light Liquid | 100 | 0.243000 | 0.001870 | 1.73% | 0.006045 | 1.336 | 5.851 |
| Pump & Agitator Seals - Heavy Liquid | 20 | 0.216000 | 0.002100 | 0.09% | 0.002297 | 0.102 | 0.445 |
| Compressor Seals | 0 | 1.608000 | 0.089400 | 0.00% | 0.089400 | 0.000 | 0.000 |
| Pressure Relief Valves | 10 | 1.691000 | 0.044700 | 1.25% | 0.065213 | 1.441 | 6.312 |
| Connectors & Flanges | 1,800 | 0.113000 | 0.000081 | 0.48% | 0.000623 | 2.478 | 10.855 |
| Open-ended Lines | 50 | 0.011950 | 0.001500 | 0.00% | 0.001500 | 0.166 | 0.726 |
| Sampling Connections | 20 | 0.015000 | | 0.00% | 0.015000 | 0.663 | 2.904 |

^[1]Component count based on design estimate. The valves, seals, and pumps are based on the existing Cedar Rapids component count. The open-ended lines are based on the Wahalla component count.

^[2]Emission factors are from Protocol for Equipment Leak Emission Estimates, Tables 2-1 and 2-5, Nov. 1995.

^[3]ADM LDAR Data

^[4](B) x (D) + (C) x (1-(D))

^[5](A) x (E) x 2.21 (lbs/kg)

^[6](F) x 8,760 (hours/yr) / 2,000 (lbs/ton)

| | | |
|----------------------------|-------|----------|
| Total VOC Emissions | 10.91 | lb/hr |
| | 47.78 | ton/year |

| Pollutants | (A) HAP Speciation of VOC (wt %) | Emission Rate | |
|--------------|--|-------------------------|--------------------------|
| | | (lbs/hr) ^[1] | (tons/yr) ^[2] |
| Acetaldehyde | 1.29% | 0.1405 | 0.6154 |
| Benzene | 0.29% | 0.0321 | 0.1405 |
| n-Hexane | 1.21% | 0.1323 | 0.5794 |
| Methanol | 0.18% | 0.0201 | 0.0880 |
| Toluene | 0.18% | 0.0194 | 0.0848 |
| Total HAPS | | 0.3443 | 1.5080 |

^[1]Total VOC Emissions (lb/hr) x (A)

^[2]Total VOC Emissions (ton/year) x (A)

Fact Sheet Attachment: Cooling Tower Emissions

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM13 - DM20, DM20A, DM20B, and DM20C

Potential to Emit Calculations for Emissions from the One (1) Eleven (11) celled Cooling Tower

| | | |
|---------------------|------------|---------------------------------|
| Circulation rate: | 9,900,000 | gal/hr |
| | 86,724,000 | Mgal/yr (based on 8,760 hrs/yr) |
| Drift loss percent: | 0.0005 | % |
| Water density: | 8.34 | lbs/gal |
| TDS concentration: | 3,000 | ppm single sample event |
| | 3,000 | ppm average annual rate |

Emission Factor Calculation for PM and PM₁₀

Emission factor equation from AP-42, Section 13.4-2 (01/1995)

$$PM/PM_{10} \text{ emission factor} = \left(\frac{ppmTDS}{1,000,000 \text{ lbswater}} \right) \left(\frac{8.34 \text{ lbs}}{\text{gal}} \text{ water} \right) \left(\frac{1,000 \text{ gal}}{1 \text{ Mgal}} \right) \left(\frac{0.0005}{100} \text{ driftloss} \right)$$

0.000125 lbs/Mgal single sample event (highest hourly rate)

0.000125 lbs/Mgal average annual rate

Hourly Emissions = (lbs/Mgal single sample event)(hourly throughput gal/hr)(1 Mgal/1,000 gal)

Annual Emissions = (lbs/Mgal average annual rate)(annual throughput Mgal/yr)/(2,000 lbs/ton)

| Cooling Tower Emission Summary | | |
|---------------------------------|------------------------|---------------------------|
| Pollutant | Hourly PTE (lbs/hr) | Annual PTE (tons/year) |
| PM | 1.24 | 5.42 |
| PM ₁₀ ^[1] | 0.62 | 2.71 |

^[1]PM₁₀ is 50% percent of the PM amount, percentage provided by facility

Fact Sheet Attachment: Haul Road Emissions

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Emission Point ID Numbers: DM90

Paved roads {AP-42 Chapter 13.2.1 (11/06)}

$$\text{Equation (2): } E = k \times \left(\frac{sL}{2}\right)^{0.65} \times \left(\frac{W}{3}\right)^{1.5} \times \left(1 - \frac{P}{4 \times 365}\right) \times \left(\frac{S}{30}\right)^d$$

(modified)

| | k | d |
|------------------|-------|-----|
| PM | 0.082 | 0.3 |
| PM ₁₀ | 0.016 | 0.5 |

Unpaved roads {AP-42 Chapter 13.2.2 (11/06)}

$$\text{Equation (1a): } E = k \times \left(\frac{sC}{12}\right)^a \times \left(\frac{W}{3}\right)^b \times \left(\frac{365-P}{365}\right) \times \left(\frac{S}{30}\right)^d \times (1-CE)$$

(modified)

| | k | a | b | d |
|------------------|-----|-----|------|-----|
| PM | 4.9 | 0.7 | 0.45 | 0.3 |
| PM ₁₀ | 1.5 | 0.9 | 0.45 | 0.5 |

Haul Road / Traffic Parameters

| Activity / Road Description | Road Type / Silt Value | Roundtrip Distance (feet) | | Truck Weight (tons) | | | Ave. Speed (mph) | Maximum Throughput (units/yr) ^[2] | Ave. Truck Capacity (units/truck) | | Annual VMT | |
|-----------------------------|------------------------|---------------------------|-------|---------------------|------|---------------------|------------------|--|-----------------------------------|-------|------------|---------|
| | | empty | full | empty | full | Ave. ^[1] | | | | | | |
| Grain Delivery | p | 3.00 | 1,700 | 3,500 | 15 | 40 | 31.8 | 15 | 4,148,148 | 25 | ton | 163,412 |
| Denaturant | p | 3.00 | 3,000 | 3,000 | 15 | 40 | 27.5 | 15 | 21,052,632 | 8,000 | gallon | 2,990 |
| WDGS | p | 3.00 | 2,640 | 2,640 | 15 | 40 | 27.5 | 15 | 1,888,889 | 25 | ton | 75,556 |
| DDGS | p | 3.00 | 2,640 | 2,640 | 15 | 40 | 27.5 | 15 | 1,259,259 | 25 | ton | 50,370 |
| Byproduct | p | 3.00 | 2,640 | 2,640 | 15 | 40 | 27.5 | 15 | 1,111,111 | 25 | ton | 44,444 |

^[1] Weighted average = {(distance*weight empty)+(distance*weight full)}/(Roundtrip distance)

Total VMT: 336,773

^[2] Includes permit-limited throughput

Fact Sheet Attachment

| | Emission Factors (lb/VMT) | | Potential Emissions (tons/yr) | |
|--|---------------------------|------------------|-------------------------------|------------------|
| | PM | PM ₁₀ | PM | PM ₁₀ |
| Grain Delivery | 2.81 | 0.48 | 229.67 | 39.01 |
| Denaturant | 2.26 | 0.38 | 3.38 | 0.57 |
| WDGS | 2.26 | 0.38 | 85.29 | 14.49 |
| DDGS | 2.26 | 0.38 | 56.86 | 9.66 |
| Byproduct | 2.26 | 0.38 | 50.17 | 8.52 |
| Total Annual Emissions^[3]: | | | 368.50 | 62.59 |

Corrected Total Annual Emissions^[4]: **40.49** **6.88**

^[3] Includes Grain Delivery, Denaturant, Byproduct, and WDGS

^[4] Total Annual Emissions divided by 9.1

Description of Constants/Variables

E: haul road emissions (lb/VMT)

k, a, b, c, d: dimensionless constants from AP-42 Tables 13.2.1-1 & 13.2.2-2

sL: silt loading (g/m²) of paved road surface

sC: silt content (%) of unpaved road surface

W: average vehicle weight (tons)

P: days/yr with at least 0.01" of precipitation

P = 90

S: mean vehicle speed on road (mph)

default = 30, minimum = 15

CE: unpaved road, dust control efficiency

CE = 0% default = 0%

VMT: vehicle miles traveled

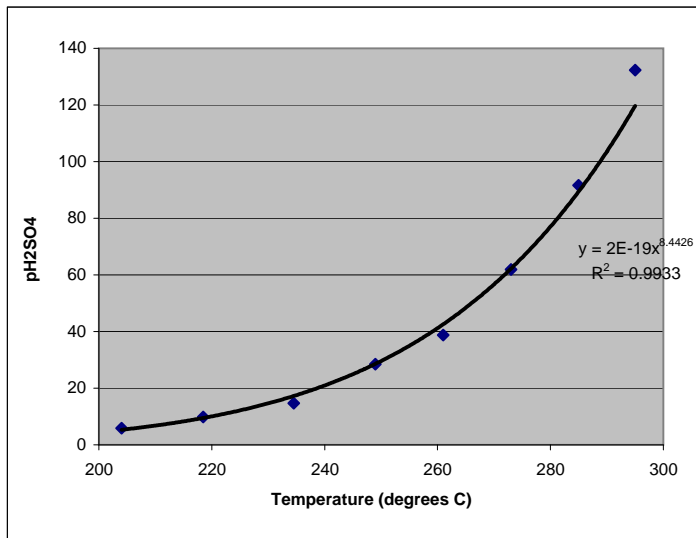
Fact Sheet Attachment: H₂SO₄ Tank Emissions

Archer Daniels Midland Company - Dry Mill
 Facility ID #39285

| | |
|--|--|
| Tank Diameter | 15 ft |
| Level Rate Change | 20% gal/gal |
| Level Change Range (set point +/-) | 2 ft |
| Minimum Level Cycle Time | 15,107 min |
| Working Volume | 40,000 gal |
| Tank Throughput | 4 gpm |
| Tank Temperature | 75 °F |
| Tank Temperature | 24 °C |
| Tank Pressure | 14.7 psia |
| Water Vapor Pressure @ Tank Temp. | 0.4 psia |
| Moisture Content of Vapor | 3% vol. % |
| Tank Displacement Rate | 0.05 acfm (wet) |
| Tank Displacement Rate | 0.05 scfm (wet) |
| Tank Displacement Rate | 0.04 scfm (dry) |
| Process Vent Molar Flow | 0.01 lb-mol/hr |
| R (gas law constant) | 1.9872 cal/gmol-°K |
| Saturation Factor | 100% vol. % |
| H ₂ SO ₄ Concentration | 1.1E-04 ppmv (dry) <-- Extrapolation of Perry's data; see figure for equation. |
| H ₂ SO ₄ Emissions | 3.4E-10 tpy |

| T (°C) | pH ₂ SO ₄ |
|--------|---------------------------------|
| 204 | 5.9 |
| 218.5 | 9.8 |
| 234.5 | 14.7 |
| 249 | 28.5 |
| 261 | 38.8 |
| 273 | 61.9 |
| 285 | 91.6 |
| 295 | 132.3 |

Data from Perry's 5th Edition; Table 3-14.



Fact Sheet Attachment: Facility Wide PSD Pollutant Emissions

Archer Daniels Midland Company - Dry Mill

Facility ID #39285

Facility Wide Emissions (tons/year)

| Process or Unit | Pollutants | | | | | | | | |
|--|-------------------------|--|----------------------------------|------------------------------------|----------------------|----------------------------------|---|-----------------|-----------------|
| | Particulate Matter (PM) | Particulate Matter (PM ₁₀) | Sulfur Oxides (SO _x) | Nitrogen Oxides (NO _x) | Carbon Monoxide (CO) | Volatile Organic Compounds (VOC) | Sulfuric Acid (H ₂ SO ₄) | Fluoride (F) | Lead (Pb) |
| Grain Receiving and Processing (DM01, DM04, DM04A) | 24.33 | 23.38 | - | - | - | - | - | - | - |
| Degermination Drying and Cooling (DM39) | 44.85 | 44.85 | 52.21 | - | - | 27.07 | - | - | - |
| Byproduct Conveying, Storage, and Loadout (DM10, DM11, DM12) | 4.30 | 4.23 | - | - | - | 17.56 | - | - | - |
| Fermentation RTO (DM05) | 7.76 | 7.76 | 12.75 | 7.88 | 7.88 | 36.78 | - | - | 3.85E-05 |
| DDGS Drying and Cooling | 118.21 | 118.21 | 71.84 | 131.33 | 361.16 | 350.28 | - | - | 1.61E-03 |
| Fire Pumps (DM50) | 0.41 | 0.41 | 0.93 | 7.91 | 2.64 | 7.91 | - | - | - |
| Generators (DM51, DM52, DM53) | 0.2370 | 0.1948 | 0.1717 | 10.88 | 2.89 | 0.28 | - | - | - |
| Haul Roads | 40.49 | 6.88 | - | - | - | - | - | - | - |
| Tanks | - | - | - | - | - | 7.86 | - | - | - |
| Liquid Loadout (DM09) | 0.36 | 0.36 | 0.03 | 7.26 | 16.95 | 4.13 | - | - | - |
| Cooling Tower (DM13-DM20) | 5.42 | 2.71 | - | - | - | - | - | - | - |
| 30% DS Loadout | - | - | - | - | - | 0.0012 | - | - | - |
| H ₂ SO ₄ Tank | - | - | - | - | - | - | 3.41E-10 | - | - |
| Equipment Leaks (DM91) | - | - | - | - | - | 47.78 | - | - | - |
| Dry Mill Potential Emissions (tons/year) | 246.37 | 208.98 | 137.94 | 165.26 | 391.52 | 499.65 | 3.41E-10 | 0.00E+00 | 1.65E-03 |
| Dry Mill Emissions (CP07-0061) | 246.37 | 208.98 | 137.94 | 165.26 | 391.52 | 499.65 | 0.00 | 0.00 | 0.00 |
| Dry Mill Emissions (CP06-0005) | 179.26 | 147.61 | 874.38 | 345.11 | 416.33 | 477.18 | 32.81 | 3.94 | 0.66 |
| Change in Dry Mill Potential Emissions | 67.11 | 61.37 | -736.44 | -179.85 | -24.81 | 22.47 | -32.81 | -3.94 | -0.66 |

Fact Sheet Attachment: Facility Wide HAP Pollutant Emissions

Archer Daniels Midland Company - Dry Mill
Facility ID #39285

Facility Wide HAP Emissions (tons/year)

| | Degermination Drying and Cooling (DM39) | Byproduct Conveying, Storage, and Loadout (DM10, DM11, DM12) | Fermentation RTO (DM05) | DDGS Drying and Cooling | Fire Pumps (DM50) | Generators (DM51, DM52, DM53) | Tanks | Liquid Loadout (DM09) | Equipment Leaks (DM91) | Total Individual HAPs |
|--|---|--|-------------------------------|----------------------------|----------------------|-------------------------------------|-----------------|--------------------------|---------------------------|--------------------------|
| Individual Hazardous Air Pollutants (HAP) | | | | | | | | | | |
| Acetaldehyde | 8.06 | 2.52 | 3.49 | 14.36 | 2.47E-03 | 1.00E-04 | 6.01E-02 | 4.31E-02 | 6.15E-01 | 29.16 |
| Acrolein | 7.98 | 2.46 | 1.17 | 15.76 | 2.98E-03 | 0.00E+00 | - | - | - | 27.37 |
| Arsenic compounds | - | - | 1.54E-05 | 6.44E-04 | - | - | - | 9.49E-06 | - | 6.69E-04 |
| Benzene | - | - | 1.62E-04 | 6.76E-03 | 3.00E-03 | 2.60E-03 | 4.28E-03 | 2.37E-03 | 1.40E-01 | 0.16 |
| Beryllium compounds | - | - | 9.25E-07 | 3.86E-05 | - | - | - | 5.70E-07 | - | 4.01E-05 |
| 1,3 - Butadiene | - | - | - | - | 1.26E-04 | - | - | - | - | 1.26E-04 |
| Cadmium compounds | - | - | 8.48E-05 | 3.54E-03 | - | - | - | 5.22E-05 | - | 3.68E-03 |
| Carbon disulfide | - | - | - | - | - | - | 2.95E-05 | 1.57E-05 | - | 4.52E-05 |
| Chromium compounds | - | - | 1.08E-04 | 4.51E-03 | - | - | - | 6.65E-05 | - | 4.68E-03 |
| Cobalt compounds | - | - | 6.48E-06 | 2.70E-04 | - | - | - | 3.99E-06 | - | 2.81E-04 |
| Cumene | - | - | - | - | - | - | 1.48E-04 | 7.83E-05 | - | 2.26E-04 |
| Dichlorobenzene | - | - | 9.25E-05 | 3.86E-03 | - | - | - | 5.70E-05 | - | 4.01E-03 |
| Ethyl benzene | - | - | - | - | - | - | 7.39E-05 | 3.92E-05 | - | 1.13E-04 |
| Formaldehyde | 8.09 | 2.29 | 8.12E-01 | 1.11E+01 | 3.80E-03 | 3.00E-04 | - | 3.56E-03 | - | 22.32 |
| Hexane | - | - | 1.39E-01 | 5.80E+00 | - | - | 1.79E-02 | 9.49E-02 | 5.79E-01 | 6.63 |
| Lead Compounds | - | - | 3.85E-05 | 1.61E-03 | - | - | - | 2.37E-05 | - | 1.67E-03 |
| Manganese compounds | - | - | 2.93E-05 | 1.22E-03 | - | - | - | 1.80E-05 | - | 1.27E-03 |
| Mercury compounds | - | - | 2.00E-05 | 8.37E-04 | - | - | - | 1.23E-05 | - | 8.70E-04 |
| Methanol | 8.14 | 2.14 | 9.75E-01 | 6.03E+00 | - | - | 2.32E-01 | 6.02E-03 | 8.80E-02 | 17.61 |
| Naphthalene | - | - | 4.70E-05 | 1.96E-03 | 2.73E-04 | 4.00E-04 | - | 2.90E-05 | - | 2.71E-03 |
| Nickel compounds | - | - | 1.62E-04 | 6.76E-03 | - | - | - | 9.97E-05 | - | 0.01 |
| Polycyclic Organic Matter (POM) | - | - | 6.80E-06 | 2.84E-04 | 2.68E-04 | 3.00E-04 | - | 4.19E-06 | - | 8.63E-04 |
| Selenium compounds | - | - | 1.85E-06 | 7.73E-05 | - | - | - | 1.14E-06 | - | 8.03E-05 |
| Toluene | - | - | 2.62E-04 | 1.09E-02 | 1.32E-03 | 1.00E-03 | 2.66E-03 | 1.57E-03 | 8.48E-02 | 0.10 |
| Xylenes | - | - | - | - | 9.18E-04 | 7.00E-04 | 9.00E-02 | 3.92E-04 | - | 0.09 |
| TOTAL HAP | 32.28 | 9.42 | 6.59 | 53.10 | 0.02 | 0.01 | 0.41 | 0.15 | 1.51 | 103.47 |