

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): DDGS Cooler (100 tons/hour)

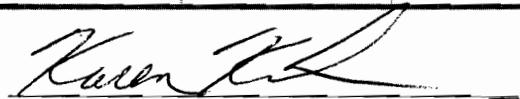
Control Equipment: Baghouse

Emission Point: S70

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-764	07-093	Original Permit	June 8, 2007	Yes
07-A-764-S1	10-065	Increase Facility Capacity	July 30, 2010	Yes



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|MMDDYYYY|10065|07A764S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
 - 1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 - 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 - 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 - 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 - 5. Transfer of equipment ownership, within 30 days of the occurrence;
 - 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.

- B. The owner shall furnish the DNR with the following reports:
 - 1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 - 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 - 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

- C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

- D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127

- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.56	NA	0.1 gr/dscf	23.4(7)
PM ₁₀	0.56	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	2.12	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
Acetaldehyde	0.21	NA	NA	Synthetic Minor
(Single HAP)	0.13	NA	NA	Synthetic Minor
(Total HAP)	0.34	NA	NA	Synthetic Minor

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	48 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	48 in. dia.
Exhaust Temperature (°F)	85 °F
Exhaust Flowrate (scfm)	12,600 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes ¹	No	Stack Testing	NA
PM ₁₀	Yes ¹	No	Stack Testing	NA
Opacity	Yes ¹	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	Yes ¹	No	Stack Testing	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
Total HAP	Yes	Yes	Stack Testing	Semi-annual ²
Acetaldehyde	Yes	Yes	Stack Testing	Semi-annual ²
Single HAP	Yes	Yes	Stack Testing	Semi-annual ²

¹ Testing completed on September 29-30, 2009 shall be sufficient to satisfy this requirement.

² Provided testing demonstrates compliance with the applicable emission rate, the facility may request a reduction in the frequency of testing from semi-annual after six (6) tests have been completed after the date of the issuance of permits under project number 10-065. Acrolein, acetaldehyde, formaldehyde and methanol shall be tested for specifically. In addition to acrolein, acetaldehyde, formaldehyde and methanol, all HAP compounds for which a test is specifically run need to be accounted for in emissions totals. Tests shall be completed a minimum of 90 days apart.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	7 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A ^{1,2}
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Total HAP	1 hour	According to IDNR Approved Method ^{1,2}
Acrolein	1 hour	According to IDNR Approved Method ^{1,2}
Acetaldehyde	1 hour	According to IDNR Approved Method ^{1,2}
Formaldehyde	1 hour	According to IDNR Approved Method ^{1,2}
Methanol	1 hour	According to IDNR Approved Method ^{1,2}

¹ Testing of VOC and HAP for this unit shall be completed simultaneously with the stack testing for the emissions venting from the thermal oxidizer(s) and waste heat recovery boiler(s) stack (S10, permit number 07-A-760-S1).

² VOC compliance testing will be determined using the worst case of either Method 25A or the sum of the Method 320 results. Alternative test methods may be used in place of either of these methods if use of the method is approved by the Department prior to testing. Method 25A shall include the Midwest Scaling Protocol adjustment.

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for this source type at this time.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- B. Plant-wide, DDGS Production shall not exceed 406,250 tons per rolling twelve (12) month rolling period.
- C. The owner or operator shall always send a portion of the DDGS cooling drum exhaust stream to the thermal oxidizers and waste heat recovery system. The maximum amount of air out S70 stack shall not exceed 25,000 acfm.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall keep records of control equipment inspections and repairs.
- B. Plant-wide, for the first twelve (12) months of operation, determine the amount of DDGS for each month of operation. After the first twelve (12) months of operation, determine the cumulative amount of DDGS on a rolling-12-month basis for each month of operation.
- C. The facility shall install a unit that measures and records the air flow rate being exhausted from the S70 stack.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

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Contact:

Michael Hollenberg
Plant Manager

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1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): DDGS Dryers (see Condition 11)
Ethanol Distillation

Control Equipment: Low NOx Burners/Thermal Oxidizers

Emission Point: S10

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-760	07-093	Original Permit	June 8, 2007	Yes
07-A-760-S1	10-065	Increase Facility Capacity	July 30, 2010	Yes

Under the Direction of the Director of
the Department of Natural Resources
CPFP|3702004|07302010|10065|07A760S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

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¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

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This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

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However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
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4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

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Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
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Telephone: (515) 242-6001
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- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	5.88	NA	0.1 gr/dscf	Synthetic Minor, 23.3(2)"a"
PM ₁₀	5.88	NA	NA	Synthetic Minor, NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	17.66	NA	500 ppmv	Synthetic Minor, NAAQS
Nitrogen Oxides (NO _x)	21.2	NA	0.1 lb/mmBTU ⁴	Synthetic Minor, NAAQS
Volatile Organic Compounds	6.03	NA	NA	Synthetic Minor
Carbon Monoxide (CO)	19.94	NA	NA	Synthetic Minor, NAAQS
Lead (Pb)	NA	NA	NA	NA
Acetaldehyde	0.10	NA	NA	Requested Limit
(Single HAP)	0.57	NA	NA	Requested Limit
(Total HAP)	1.12	NA	NA	Requested Limit

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of "No visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁴ Limit is a 30-day rolling average expressed as NO₂. This limit applies at all times the unit is operating

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	125 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	121 in. dia.
Exhaust Temperature (°F)	280 °F
Exhaust Flowrate (scfm)	158,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The following equipment is associated with this emission point:

- A. Equipment that must be vented through Thermal Oxidizer #1/Heat Recovery Steam Generator #1
 - a. Dryer A (45 mmBTU/hr)
 - b. Dryer B (45 mmBTU/hr)
- B. Equipment that must be vented through Thermal Oxidizer #2/Heat Recovery Steam Generator #2
 - a. Dryer C (45mmBTU/hr)
 - b. Dryer D (45mmBTU/hr)
- C. Equipment that must be vented to either System #1 or System #2 or somehow split between the two:
 - a. Mixer #1 (13,500 gallons)
 - b. Mixer #2 (13,500 gallons)
 - c. Yeast Tank #1 (20,000 gallons)
 - d. Yeast Tank #2 (20,000 gallons)
 - e. Cook Tube #1 (5,000 gallons)
 - f. Cook Tube #2 (5,000 gallons)
 - g. Flash Tank (4,500 gallons)
 - h. Slurry Tank #1 (25,000 gallons)
 - i. Slurry Tank #2 (25,000 gallons)
 - j. Beer Column (1600 gallons per minute)
 - k. Side Stripper (215 gallons per minute)
 - l. Rectifier Column (450 gallons per minute)
 - m. 190 Proof Condenser ()
 - n. Molecular Sieve ()
 - o. 200 Proof Condenser ()
 - p. Centrate Tank (1690 gallons)
 - q. Evaporator (18,000 sq. ft.)
 - r. Cook Water Tank (374,000 gallons)
 - s. Centrifuge #1 (300 gallons per minute)
 - t. Centrifuge #2 (300 gallons per minute)
 - u. Centrifuge #3 (300 gallons per minute)
 - v. Centrifuge #4 (300 gallons per minute)
 - w. Centrifuge #5 (300 gallons per minute)
 - x. Centrifuge #6 (300 gallons per minute)
- D. The following equipment may be vented to either System #1 or System #2 or split between them or vented to the biomethanor flare:
 - a. Methanator #1 (30,000 gallons)
 - b. Methanator #2 (30,000 gallons)
 - c. Methanator #3 (30,000 gallons)
 - d. Methanator #4 (30,000 gallons)

Note: The heat input of the thermal oxidizers is 122 mmBTU/hr each.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes ¹	No	Stack Testing	NA
PM ₁₀	Yes ¹	No	Stack Testing	NA
Opacity	Yes ¹	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	Yes	Yes	Stack Testing	Annual ²
VOC	Yes	Yes	Stack Testing	Semi-Annual ³
CO	Yes	No	Stack Testing	NA
Pb	No	No	NA	NA
Acetaldehyde	Yes	Yes	Stack Testing	Semi-Annual ³
Single HAP	Yes	Yes	Stack Testing	Semi-Annual ³
Total HAP	Yes	Yes	Stack Testing	Semi-Annual ³

¹ Testing completed on September 30, 2009 shall be sufficient to satisfy this requirement.

² Testing completed as part of the annual RATA for the NO_x CEMS required under 40 CFR 60 Subpart Db is acceptable to satisfy this requirement.

³ Semi-Annual tests shall be conducted once every six month following the issuance of the permits for project number 10-065. These tests shall be conducted with a minimum of 90 days between tests.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	7 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A ¹
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Acetaldehyde	1 hour	According to IDNR Approved Method
Single HAP	1 hour	According to IDNR Approved Method
Total HAP	1 hour	According to IDNR Approved Method

¹ VOC compliance testing will be determined using the worst case of either Method 25A or the sum of the Method 320 results. Alternative test methods may be used in place of either of these methods if use of the method is approved by the Department prior to testing. Method 25A shall include the Midwest Scaling Protocol adjustments.

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the

Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This equipment is subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60 Subpart Db; 567 IAC 23.1(2)“ccc”).

This facility is of the source type regulated under the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources (40 CFR 63 Subpart VVVVVV). At the time of the issuance of this permit, the Department has not adopted this standard. Until such time as the Department adopts this standard, the USEPA shall be considered the Administrator for this standard.

This equipment is of the source type to be regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial-Commercial-Institutional Boilers and Process Heaters. The initial standard promulgated by the USEPA has been vacated. At the time of the issuance of this permit, USEPA has proposed new standards for both major and area sources of HAP. With the issuance of this permit project, this facility is an area source for HAPs. Once this standard has been promulgated, these units may become subject to one of these standards.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The owner or operator shall follow the applicable standards of Subpart Db, 40 CFR 60.40b through 60.49b.
 - B. Each of the thermal oxidizers shall maintain a temperature (3 hour average) during operation of within – 50 degrees Fahrenheit of the average temperature of the oxidizer recorded during the most recent performance test which demonstrated compliance with the emission limits, and shall be operated at all times the dryers or distillation equipment is being used.
 - C. Each dryer/thermal oxidizer system shall combust only natural gas and/or process off-gases.
 - D. The control equipment shall be inspected and maintained according to manufacturer's recommendations.
 - E. Plant-wide, DDGS production shall not exceed 406,250 tons per rolling twelve (12) month rolling period.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall keep hourly records of the operating temperatures of each thermal oxidizer, and record all three-hour periods (during actual operations) during which the average temperature of either thermal oxidizer is 50 degrees Fahrenheit below the average temperature of the oxidizer during its most recent performance test which demonstrated compliance with the emission limits.
- B. The owner or operator shall keep records as required in 40 CFR 60.486, and reports as required in 40 CFR 60.487.
- C. The owner or operator shall keep records of control equipment inspections and repairs.
- D. The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day, and calculate the annual capacity factor on a 12 month rolling average basis with a new annual

capacity factor calculated at the end of each calendar month, as required in 40 CFR 60.49b(d). The annual capacity factor is defined as the ratio between the actual heat input to a steam generating unit during a calendar year, and the potential heat input had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. This shall be completed for each TO and HRSG system.

- E. Record on an hourly basis the air flow rate from the emission point.
 - F. The owner or operator shall maintain records of the following information for each steam generating unit operating day, as required in 40 CFR 60.49b(g). This information shall also be submitted in a report, as required in 40 CFR 60.49b(i)
 - 1. Calendar date
 - 2. Average hourly nitrogen oxides emission (as NO₂) rates measured or predicted.
 - 3. 30-day average nitrogen oxides emission rates calculated at the end of each steam generating unit operating day from the measured hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
 - 4. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the emission standard, with the reason for such excess emissions as well as a description of corrective actions taken.
 - 5. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
 - 6. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
 - 7. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.
 - 8. Identification of the times when the pollutant concentrations exceeded the full span of the continuous monitoring system.
 - 9. Description of any modifications to the continuous monitoring system that could affect the ability of the CMS to comply with Performance Specification 2 or 3.
 - 10. Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR Appendix F, Procedure 1.
 - G. Plant-wide, for the first twelve (12) months of operation, determine the amount of DDGS for each month of operation. After the first twelve (12) months of operation, determine the cumulative amount of DDGS on a rolling-12-month basis for each month of operation.
-

16. Continuous Emission Monitoring

Compliance with the nitrogen oxide emission limits of this permit shall be continuously demonstrated by the owner/operator through the use of a CEMS. Therefore, the facility shall install, calibrate, maintain, and operate a CEMS for measuring nitrogen oxides emissions discharged to the atmosphere and record the output of the system in lb/hr. This output shall be calculated as a 3-hour rolling average. To determine lb/hr emission rate, owner/operator is required to install a flow rate sensor per the requirements of 40 CFR Part 60 Appendix B: Performance Specification 2 (PS2) and Performance Specification 6 (PS6) requirements. The specifications of 40 CFR Appendix F (Quality Assurance/Quality Control) shall apply. The monitor span shall be between 0 and 100 ppmv. Appendix F requirements shall be supplemented with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit.

The CEMS required by this permit shall be operated and data recorded during all periods of operation of the TO and HRSG system except for CEM breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. If data is not collected from the CEMS, data shall be obtained through alternative methods to meet the minimum data requirement as outlined in 40 CFR 60.48b(f).

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources

Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): DDGS Loadout
Rail Loadout capacity – 420 tons per hour
Truck Loadout capacity – 420 tons per hour

Control Equipment: Baghouse

Emission Point: S90

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-765	07-093	Original Permit	June 8, 2007	Yes
07-A-765-S1	10-065	Increase Facility Capacity	July 30, 2010	Yes



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A765S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.47	NA	0.1 gr/dscf	23.4(7)
PM ₁₀	0.47	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	0.28	NA	NA	Synthetic Minor
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
Acetaldehyde	0.04	NA	NA	Synthetic Minor
(Single HAP)	0.14	NA	NA	Synthetic Minor
(Total HAP)	0.22	NA	NA	Synthetic Minor

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	40 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	24 in. dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	11,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes ¹	No	Stack Testing	NA
PM ₁₀	Yes ¹	No	Stack Testing	NA
Opacity	Yes ¹	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	Yes	Yes	Stack Testing	Semi-Annual ²
CO	No	No	NA	NA
Pb	No	No	NA	NA
Acetaldehyde	Yes	Yes	Stack Testing	Semi-Annual ³
Single HAP	Yes	Yes	Stack Testing	Semi-Annual ³
Total HAP	Yes	Yes	Stack Testing	Semi-Annual ³

¹ Testing completed on September 29, 2009 shall be sufficient to satisfy this requirement.

² Tests shall be conducted once every six months following the issuance of the permits for project number 10-065. These tests shall be conducted with a minimum of 90 days between tests.

³ Provided testing demonstrates compliance with the applicable emission rate, the facility may request a reduction in the frequency of testing from semi-annual after six (6) tests have been completed after the date of the issuance of permits under project number 10-065. Acrolein, acetaldehyde, formaldehyde and methanol shall be tested for specifically. In addition to acrolein, acetaldehyde, formaldehyde and methanol, all HAP compounds for which a test is specifically run need to be accounted for in emissions totals. Tests shall be completed a minimum of 90 days apart.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A ¹
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Acetaldehyde	1 hour	According to IDNR Approved Method
Acrolein	1 hour	According to IDNR Approved Method
Formaldehyde	1 hour	According to IDNR Approved Method
Methanol	1 hour	According to IDNR Approved Method
Total HAP	1 hour	According to IDNR Approved Method

¹ VOC compliance testing will be determined using the worst case of either Method 25A or the sum of the Method 320 results. Alternative test methods may be used in place of either of these methods if use of the method is approved by the Department prior to testing. Method 25A shall include the Midwest Scaling Protocol adjustments.

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s)

will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for this source type at this time.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The average hourly DDGS loadout rate shall not exceed 190 tons per hour on a daily basis.
 - B. The amount of DDGS loaded out shall not exceed a maximum of 406,250 tons over a twelve (12) month period, rolled monthly.
 - C. The owner or operator shall inspect and maintain the baghouse according to the manufacturer's recommendation.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each working day, record the amount of DDGS loaded out during that working day.
- B. At the end of each working day, record the number of hours that DDGS was loaded out during that working day.
- C. No later than 7 days after the end of the month, calculate the average hourly DDGS loadout rate for each working day during the previous month by dividing the amount of DDGS loaded out during a day by the number of hours DDGS was loaded out during that day.
- D. At the end of each month, record the amount of DDGS loaded out (to rail and to trucks) over the previous month.
- E. At the end of each month, record the amount of DDGS loaded out (to rail and to trucks) over the previous twelve (12) months.

- F. The owner or operator shall maintain a log of all maintenance and inspection activities. This log shall include, but may not be limited to, the date and time of each inspection of the baghouse occurs, any items identified during the inspection that need to be addressed, the date and time each maintenance activity is started, and a description of the corrective actions taken during the maintenance of the baghouse.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Denaturant (Unleaded Gasoline) Storage Tank (200,000 gallons)

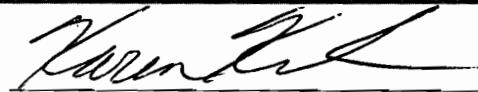
Control Equipment: Internal Floating Roof

Emission Point: T64

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-775	07-093	Original Permit	June 8, 2007	No
07-A-775-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A775S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"F", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
 - 1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 - 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 - 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 - 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 - 5. Transfer of equipment ownership, within 30 days of the occurrence;
 - 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.

- B. The owner shall furnish the DNR with the following reports:
 - 1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 - 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 - 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

- C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

- D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127

- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	NA	NA
PM ₁₀	NA	NA	NA	NA
Opacity	NA	NA	NA	NA
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Main Vent

Parameter	Value
Stack Height, (ft, from the ground)	33 Feet
Discharge Style	Vertical Obstructed
Stack Opening, (inches, dia.)	10 in. dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	See Note

Additional Vents

This tank has 4 additional vents around the perimeter of the tank, each having the following characteristics:

Parameter	Value
Stack Height, (ft, from the ground)	31 Feet
Discharge Style	Horizontal
Stack Opening, (inches, dia.)	7" X 34"
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	See Note

Note: The airflow from this emission point is the result of standing and breathing losses of the fluid stored in the tank.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the

equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This unit is subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR 60 Subpart Kb; 567 IAC 23.1(2)“ddd”).

There are no National Emission Standard for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. This tank shall be used to store only denaturant (unleaded gasoline).
- B. The facility-wide use of denaturant (unleaded gasoline) shall not exceed a maximum of 6,250,000 gallons per twelve (12) month period, rolled monthly.
- C. The owner or operator shall follow the applicable standards of Subpart Kb, 40 CFR 60.112b(a)(1) and inspect as required in 40 CFR 60.113b(a).

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each month, record the amount of denaturant (unleaded gasoline) used at this facility over the previous month.
 - B. At the end of each month, record the amount of denaturant (unleaded gasoline) used at this facility over the previous twelve (12) months.
 - C. The owner or operator shall follow the applicable recordkeeping and reporting standards of Subpart Kb, 40 CFR 60.115b through 60.116b.
 - D. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the lifetime of the source.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Denatured Ethanol Storage Tank (1,500,000 gallons)

Control Equipment: Internal Floating Roof

Emission Point: T61

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-772	07-093	Original Permit	June 8, 2007	No
07-A-772-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A772S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	NA	NA
PM ₁₀	NA	NA	NA	NA
Opacity	NA	NA	NA	NA
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Main Vent

Parameter	Value
Stack Height, (ft, from the ground)	80 Feet
Discharge Style	Vertical Obstructed
Stack Opening, (inches, dia.)	10 in. dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	See Note

Additional Vents

This tank has 8 additional vents around the perimeter of the tank, each having the following characteristics:

Parameter	Value
Stack Height, (ft, from the ground)	78 Feet
Discharge Style	Horizontal
Stack Opening, (inches, dia.)	7" X 34"
Exhaust Temperature (°F)	Ambient

Exhaust Flowrate (scfm)	See Note
-------------------------	----------

Note: The airflow from this emission point is the result of standing and breathing losses of the fluid stored in the tank.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This unit is subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR 60 Subpart Kb; 567 IAC 23.1(2)“ddd”).

There are no National Emission Standard for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. This tank shall be used to store only denatured ethanol.
 - B. The production of denatured ethanol in this facility shall not exceed a maximum of 125,000,000 gallons per twelve (12) month period, rolled monthly.
 - C. The owner or operator shall follow the applicable standards of Subpart Kb, 40 CFR 60.112b(a)(1) and inspect as required in 40 CFR 60.113b(a).
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each month, record the amount of denatured ethanol produced at this facility over the previous month.
 - B. At the end of each month, record the amount of denatured ethanol produced at this facility over the previous twelve (12) months.
 - C. The owner or operator shall follow the applicable recordkeeping and reporting standards of Subpart Kb, 40 CFR 60.115b through 60.116b.
 - D. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the lifetime of the source.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

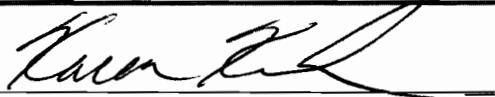
Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Denatured Ethanol Storage Tank (1,500,000 gallons)
Control Equipment: Internal Floating Roof
Emission Point: T62
Equipment Location: 1149 U Avenue
Grand Junction, IA
Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-773	07-093	Original Permit	June 8, 2007	No
07-A-773-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A773S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

- F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	NA	NA
PM ₁₀	NA	NA	NA	NA
Opacity	NA	NA	NA	NA
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Main Vent

Parameter	Value
Stack Height, (ft, from the ground)	80 Feet
Discharge Style	Vertical Obstructed
Stack Opening, (inches, dia.)	10 in .dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	See Note

Additional Vents

This tank has 8 additional vents around the perimeter of the tank, each having the following characteristics:

Parameter	Value
Stack Height, (ft, from the ground)	78 Feet
Discharge Style	Horizontal
Stack Opening, (inches, dia.)	7" X 34"
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	See Note

Note: The airflow from this emission point is the result of standing and breathing losses of the fluid stored in the tank.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the

equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This unit is subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR 60 Subpart Kb; 567 IAC 23.1(2)“ddd”).

There are no National Emission Standard for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. This tank shall be used to store only denatured ethanol.
- B. The production of denatured ethanol in this facility shall not exceed a maximum of 125,000,000 gallons per twelve (12) month period, rolled monthly.
- C. The owner or operator shall follow the applicable standards of Subpart Kb, 40 CFR 60.112b(a)(1) and inspect as required in 40 CFR 60.113b(a).

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each month, record the amount of denatured ethanol produced at this facility over the previous month.
 - B. At the end of each month, record the amount of denatured ethanol produced at this facility over the previous twelve (12) months.
 - C. The owner or operator shall follow the applicable recordkeeping and reporting standards of Subpart Kb, 40 CFR 60.115b through 60.116b.
 - D. The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the lifetime of the source.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Emergency Fire Pump (300 bhp)

Control Equipment: None

Emission Point: S100

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-769	07-093	Original Permit	June 8, 2007	No
07-A-769-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A769S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.78	NA	NA	NA
PM ₁₀	0.78	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	0.62	NA	NA	NA
Nitrogen Oxides (NO _x)	2.88	NA	NA	NA
Volatile Organic Compounds	0.19	NA	NA	NA
Carbon Monoxide (CO)	0.21	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	8 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	3 in. dia.
Exhaust Temperature (°F)	660 °F
Exhaust Flowrate (scfm)	800 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This unit is subject to the New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engine (40 CFR 60 Subpart IIII; 567 IAC 23.1(2)“yyy”).

This unit is subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (40 CFR 63 Subpart ZZZZ). At the time of the issuance of this permit, this facility was considered an area source under the NESHAP program. Additionally, this unit was constructed after the June 12, 2006 applicability date. Therefore, this unit shall be considered a new source at an area source for this standard at this time. The Department has adopted part of this standard. However, at the time of the issuance of this permit, the Department has not adopted the portion of this standard which applies to units at area sources. Therefore, until such time as the Department adopts the portion of this standard which applies to new units at area sources, the USEPA shall be considered the Administrator of this standard.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. As required by 40 CFR §60.4207, the fuel used in this unit shall meet the requirements of 40 CFR §80.510(a) until October 1, 2010. After October 1, 2010 the fuel used in this unit shall meet the requirements of 40 CFR §80.510(b) unless the owner/operator has petitioned the Administrator to use remaining non-compliant fuel as allowed under 40 CFR 60.4207(c).
 - B. As required by 40 CFR §60.4209, this unit must be equipped with a non-resettable hour meter.
 - C. This unit shall not operate more than a maximum of 300 hours per twelve (12) month rolling period, rolled monthly.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. For each shipment of fuel received for use in this unit, the owner/operator shall maintain a copy of the vendor’s certification or other documentation showing the sulfur content of the fuel received.
 - B. At the end of each month, record the number of hours the unit operated over the previous month.
 - C. At the end of each month, record the number of hours the unit operated over the previous twelve (12) months.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Equipment Leaks
Control Equipment: Leak Detection and Repair (LDAR)
Emission Point: F60
Equipment Location: 1149 U Avenue
Grand Junction, IA
Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-770	07-093	Original Permit	June 8, 2007	Yes
07-A-770-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A770S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"F", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	NA	NA
PM ₁₀	NA	NA	NA	NA
Opacity	NA	NA	NA	NA
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	See Note
Discharge Style	See Note
Stack Opening, (inches, dia.)	See Note
Exhaust Temperature (°F)	See Note
Exhaust Flowrate (scfm)	See Note

Note: Emissions from this unit are the fugitive emissions from various equipment leaks within the facility. This equipment includes, but is not limited to, pumps, valves and connectors.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

The equipment is subject to the requirements of the New Source Performance Standard (NSPS) for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (40 CFR 60 Subpart VVa; 567 IAC 23.1(2)“nn”).

This equipment is of the source type regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Area Sources in Chemical Manufacturing (40 CFR 63 Subpart VVVVVV). At the time of the issuance of this permit, the Department has not adopted this standard. Until the Department adopts this standard, the administrator of this standard is the USEPA.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The owner or operator shall follow the applicable standards of NSPS Subpart VVa, 40 CFR 60.480a through 40 CFR 60.489a.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall follow the applicable recordkeeping and reporting standards of Subpart VVa, 40 CFR 60.486a and 60.487a.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources

Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Ethanol Loadout
Truck Loading rate (600 gallons per minute)
Rail Loading rate (1200 gallons per minute)

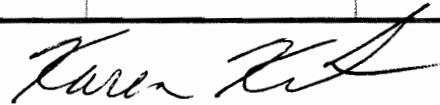
Control Equipment: Vapor Recovery System/Flare (12.4 mmBTU/hr)

Emission Point: EP22/F50

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-767	07-093	Original Permit	June 8, 2007	No
07-A-767-S1	07-606	Remove Truck Restriction Limits	December 20, 2007	No
07-A-767-S2	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A767S2

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.026	NA	0.1 gr/dscf	23.3(2)"a"
PM ₁₀	0.026	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	0.01	NA	NA	NA
Nitrogen Oxides (NO _x)	0.84	NA	NA	NA
Volatile Organic Compounds	1.20	NA	NA	NA
Carbon Monoxide (CO)	4.59	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	0.02	NA	NA	NA
(Total HAP)	0.26	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	30 feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	60 in. (outer diameter); 27 in. (inner diameter)
Exhaust Temperature (°F)	1800 °F
Exhaust Flowrate (scfm)	120 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	25 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	42 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standard (NSPS) for this source type at this time.

This equipment is of the source type regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (40 CFR 63, Subpart BBBBBB). However, to be subject to this standard, the equipment must process gasoline. At this time, the denatured ethanol handled by this equipment does not meet the definition of gasoline. Therefore, this equipment is not subject to this standard at this time. However, should the material handled by this equipment change, this equipment may become subject to this standard.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The flare associated with this operation shall meet the requirements of 40 CFR 60.18.
 - B. The flare and VOC collection system associated with this operation shall be operated at all times that product is being loaded out.
 - C. VOC off-gases shall only be vented to this flare for a maximum of 3129 hours per twelve (12) month period, rolled monthly.
 - D. The pilot for the flare may be operated at all times.
 - E. The owner or operator shall inspect and maintain the control equipment according to manufacturer's specifications.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each day, record the number of hours VOC off-gases were vented to the flare during that day.
 - B. At the end of each month, record the total number of hours VOC off-gases were vented to the flare over the previous month.
 - C. At the end of each month record the total number of hours VOC off-gases were vented to the flare over the previous twelve (12) months.
 - D. The owner or operator shall keep record of control equipment inspections and maintenance.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources

Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Fermentation/Beerwell (see Condition 11)

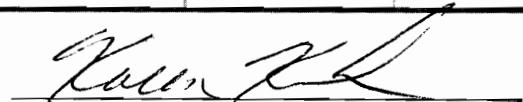
Control Equipment: CO2 Scrubber

Emission Point: S40

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-763	07-093	Original Permit	June 8, 2007	Yes
07-A-763-S1	10-065	Increase Facility Capacity	July 30, 2010	Yes



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A763S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	0.21	NA	0.1 gr/dscf	Synthetic Minor, 23.3(2)"a"
PM ₁₀	0.21	NA	NA	Synthetic Minor, NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	10.91	NA	NA	Synthetic Minor
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
Acetaldehyde	1.80	NA	NA	Requested Limit
Single HAP ⁴	0.28	NA	NA	Requested Limit
Total HAP	2.31	NA	NA	Requested Limit

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁴ Standard applies to all single HAPs except Acetaldehyde which has a specific limit listed above.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	75 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	27 in. dia.
Exhaust Temperature (°F)	75 °F
Exhaust Flowrate (scfm)	11,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The following equipment is associated with this emission point:

Fermenter #1 (807,000 gallons)	Fermenter #5 (807,000 gallons)
Fermenter #2 (807,000 gallons)	Fermenter #6 (807,000 gallons)
Fermenter #3 (807,000 gallons)	Fermenter #7 (807,000 gallons)
Fermenter #4 (807,000 gallons)	Beerwell (1,080,000 gallons)

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes	No	Stack Testing	NA
PM ₁₀	Yes	No	Stack Testing	NA
Opacity	Yes	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	Yes	Yes ¹	Stack Testing	Semi-Annual ²
CO	No	No	NA	NA
Pb	No	No	NA	NA
Acetaldehyde	Yes	Yes ¹	Stack Testing	Semi-Annual ²
Single HAP	Yes	Yes ¹	Stack Testing	Semi-Annual ²
Total HAP	Yes	Yes ¹	Stack Testing	Semi-Annual ²

¹ The facility may request a reduction or elimination of the subsequent testing requirement after 8 quarterly tests have been completed following the issuance of the permits for project number 10-065.

² Tests shall be conducted once every six months following the issuance of the permits for project number 10-065. These tests shall be conducted with a minimum of 90 days between tests.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	10 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	16 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A ¹
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Acetaldehyde	1 hour	According to IDNR Approved Method
Single HAP	1 hour	According to IDNR Approved Method
Total HAP	1 hour	According to IDNR Approved Method

¹ VOC compliance testing will be determined using the worst case of either Method 25A or the sum of the Method 320 results. Alternative test methods may be used in place of either of these methods if use of the method is approved by the Department prior to testing. Method 25A shall include the Midwest Scaling Protocol adjustments.

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s)

will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for these source types at this time.

This equipment is of the source type regulated by the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Manufacturing Industry (40 CFR 63 Subpart FFFF; 567 IAC 23.1(4)"cf"). To be subject to this standard, the equipment must be located at a major source of HAPs. At the time of the issuance of this permit, this facility is not a major source of HAP. Therefore, this facility is not subject to this standard at this time. Should this facility become a major source of HAP, this equipment may become subject to this standard.

This equipment is of the source type regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Area Sources in Chemical Manufacturing (40 CFR 63 Subpart VVVVVV). At the time of the issuance of this permit, the Department has not adopted this standard. Until the Department adopts this standard, the administrator of this standard is the USEPA.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- B. The liquid feed rate to the scrubber shall be maintained within a 10% above or below the average liquid feed rate observed during the most recent accepted compliance test which demonstrated compliance with all applicable emission limitations.
- C. The pressure drop across to the scrubber shall be maintained above 90% of the average pressure drop across the scrubber observed during the most recent accepted compliance test which demonstrated compliance with all applicable emission limitations.
- D. The pH of the scrubber liquid shall be maintained within a pH of 1 above or below the average scrubber liquid pH observed during the most recent accepted compliance test which demonstrated compliance with all applicable emission limitations.
- E. Any additive added to the scrubber liquid during the compliance testing to enhance the removal efficiency of the scrubber shall be added at the same rate that it was added for the most recent accepted compliance test which demonstrated compliance with all applicable emission limitations.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall keep records of control equipment inspections and repairs.
- B. Maintain a copy of the most recent compliance test report which showed compliance with all applicable emission limitations. This report shall include, but not be limited to, the emission rates observed during the testing, the average liquid feed rate to the scrubber during the testing, the average pressure drop across the scrubber during the testing, the average pH of the scrubber liquid during the testing, and the additive feed rate during the testing if additives are used. All excess emission reporting shall be conducted in accordance with conditions 6 and 8.
- C. Install and continually operate a strip chart recorder or other device to continually record the scrubber liquid feed rate. All excess emission reporting shall be conducted in accordance with conditions 6 and 8.
- D. Install and continually operate a strip chart recorder or other device to continually record the pressure drop across the scrubber. All excess emission reporting shall be conducted in accordance with conditions 6 and 8.
- E. Install and continually operate a strip chart recorder or other device to continually record the pH of the scrubber liquid. All excess emission reporting shall be conducted in accordance with conditions 6 and 8.
- F. If an additive to the scrubber liquid is used and it is continually added to the scrubber liquid, install and continually operate a strip chart recorder or other device to continually record the additive feed rate. If an additive to the scrubber liquid is used and it is mixed with the scrubber liquid in a batch operation, record the time each batch is mixed as well as the amount of additive added to the scrubber liquid.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Grain Handling (See condition 11)

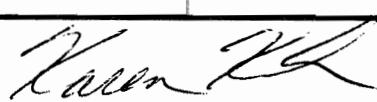
Control Equipment: Baghouse

Emission Point: S20

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-761	07-093	Original Permit	June 8, 2007	Yes
07-A-761-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A761S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"P", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
 - 1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 - 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 - 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 - 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 - 5. Transfer of equipment ownership, within 30 days of the occurrence;
 - 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.

- B. The owner shall furnish the DNR with the following reports:
 - 1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 - 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 - 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

- C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

- D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127

- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

- F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.67	NA	0.1 gr/dscf	23.4(7)
PM ₁₀	1.67	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	160 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	44 in. dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	16,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The following equipment is associated with this emission point:

Truck Receiving Pit #1 (20,000 bushels/hr)	Grain Storage Bin #2 (500,000 bushels)
Truck Receiving Pit #2 (20,000 bushels/hr)	Corn Day Bin (Dirty Corn) (27,000 bushels)
Rail Receiving Pit (20,000 bushels/hr)	Corn Day Bin (Clean Corn) (9,000 bushels)
Unloading Elevator Leg #1 (20,000 bushels/hr)	Bin Emptying Conveyor #1 (6,000 bushels/hr)
Unloading Elevator Leg #2 (20,000 bushels/hr)	Bin Emptying Conveyor #2 (6,000 bushels/hr)
Bin Fill Conveyor #1 (20,000 bushels/hr)	Day Bin Loading Elevator Leg #1 (20,000 bushels/hr)
Bin Fill Conveyor #2 (20,000 bushels/hr)	Day Bin Loading Elevator Leg #2 (20,000 bushels/hr)
Grain Storage Bin #1 (500,000 bushels)	

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes ¹	No	Stack Testing	NA
PM ₁₀	Yes ¹	No	Stack Testing	NA
Opacity	Yes ¹	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

¹ Testing completed October 27, 2009 is sufficient to satisfy this requirement at this time.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	4 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

This equipment is of the source type regulated by the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60 Subpart DD; 567 IAC 23.1(2)“ooo”). This facility is a dry corn mill and has a storage capacity of 1,000,000 bushels. However, the final product is a fuel not a product for human consumption. Therefore, this facility is not grain storage elevator as defined in this standard. This facility does not have the storage capacity to be a grain terminal elevator as defined in this standard. Therefore, at this time, this facility is not subject to this standard.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The amount of corn received by this facility shall not exceed 44,642,857 bushels of corn per twelve (12) month rolling period, rolled monthly.
- B. The owner or operator shall inspect and maintain the baghouse according to the manufacturer’s recommendation.

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. At the end of each month, record the amount of grain received (in bushels) over the previous month.
- B. At the end of each month, record the amount of grain received (in bushels) over the previous twelve (12) months.
- C. The owner or operator shall maintain a log of all maintenance and inspection activities. This log shall include, but may not be limited to, the date and time of each inspection of the baghouse occurs, any items identified during the inspection that need to be addressed, the date and time each maintenance activity is started, and a description of the corrective actions taken during the maintenance of the baghouse.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

Iowa Department of Natural Resources Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Grain Milling (4 Hammermills; 1500 bushels per hour each)
Hammermill Feed System (See Condition 11 for description)

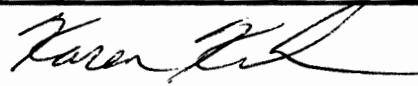
Control Equipment: Baghouse

Emission Point: S30

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-762	07-093	Original Permit	June 8, 2007	Yes
07-A-762-S1	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources
CPFP|3702004|07302010|10065|07A762S1

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
 - (2) This permit becomes void.
-

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 5. Transfer of equipment ownership, within 30 days of the occurrence;
 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.
- B. The owner shall furnish the DNR with the following reports:
1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.
- C. The owner shall send correspondence regarding this permit to the following address:
- Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094
- D. The owner shall send correspondence concerning stack testing to:
- Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127
- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

- F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	1.20	NA	0.1 gr/dscf	23.4(7)
PM ₁₀	1.20	NA	NA	NAAQS
Opacity	NA	NA	40% ³	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.

² Standard is a 12-month rolling total.

³ An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	160 Feet
Discharge Style	Vertical Unobstructed
Stack Opening, (inches, dia.)	40 in. dia.
Exhaust Temperature (°F)	Ambient
Exhaust Flowrate (scfm)	28,000 scfm

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

The Hammermill Feed System is a gravity feed system which takes clean corn from the day bin to a hopper then to one of the four hammermills. The capacity of this system is 4800 bushels per hour.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	Yes ¹	No	Stack Testing	NA
PM ₁₀	Yes ¹	No	Stack Testing	NA
Opacity	Yes ¹	No	Stack Testing	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

¹ Testing completed on September 28, 2009 is sufficient to satisfy this requirement at this time.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	3.5 hours	Iowa Compliance Sampling Manual Method 5
PM ₁₀	6 hours	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for this source type at this time.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The owner or operator shall inspect and maintain the baghouse according to the manufacturer's recommendation.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall maintain a log of all maintenance and inspection activities. This log shall include, but may not be limited to, the date and time of each inspection of the baghouse occurs, any items identified during the inspection that need to be addressed, the date and time each maintenance activity is started, and a description of the corrective actions taken during the maintenance of the baghouse.
-

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS

**STATE OF IOWA
DEPARTMENT OF NATURAL RESOURCES
HENRY A. WALLACE BUILDING
DES MOINES, IOWA 50319**

CONSTRUCTION PERMIT

Louis Dreyfus Commodities Grand Junction, LLC
1149 U Avenue
Grand Junction, Iowa 50107

PERMIT NO.: 09-183-S

FILE: Sewage

Attn: Bruce Chapin

RE: Louis Dreyfus nr. Grand Junction

PROJECT NO: S09-138

In accordance with the provisions of Section 455B.173.3 and 455B.174.4, Code of Iowa, and Rule 567--64.2(455B) of the Iowa Administrative Code, the Director of the Department of Natural Resources does hereby issue a permit for the installation of:

A solids settling lagoon for the backwash water from a water filtration operation at an ethanol plant. The lagoon is designed for an average hydraulic loading rate of 64,600 gallons per day.

This permit is issued subject to the following conditions:

1. A construction permit shall be obtained prior to making any additions or alterations to the lagoon, making any process changes that would materially effect the lagoon or increasing wastewater loading to the lagoon in excess of the design loading stated above. Application for a construction permit shall be submitted 120 days before construction is scheduled to start.
2. Wastewater shall be removed from the lagoon as required to maintain a minimum of two feet of freeboard at all times. Freeboard shall be defined as the difference in elevation between the liquid level and the top of the lagoon embankments, measured at the lowest point of the embankments.
3. No plant sanitary or process wastewater shall be discharged into the solids settling lagoon.

The construction of the project shall be initiated within one year of issuance of this permit or this permit is no longer valid. Within thirty days after completion of construction, the permit holder shall submit a certification by a licensed professional engineer that the project was completed in accordance with the approved project documents.

Pursuant to Section 455B.174.4, Code of Iowa, you have the right to appeal any condition of this permit by filing with the Director of the Department of Natural Resources a notice of

appeal and request for administrative hearing within thirty days of receipt of this permit. The issuance of this permit in no way relieves the permittee of the responsibility for complying with any other local, state, and federal laws, ordinances, regulations or other requirements applicable to this facility. Please contact Robert Palla at 515/281-8868 with any questions or comments.

For the Department of Natural Resources: RICHARD A. LEOPOLD, DIRECTOR

By: Robert Palla
ENVIRONMENTAL SERVICES DIVISION

Date: February 6, 2009

cc: Thomas Madden, Yaggy Colby Associates, 215 North Adams, Mason City, IA. 50401
DNR Field Office 4

Plan Distribution: 1 Engineer; 1 Field Office; 1 DNR File

Iowa Department of Natural Resources

Air Quality Construction Permit

Permit Holder

Firm: Louis Dreyfus Commodities Grand Junction, LLC

Contact:

Michael Hollenberg
Plant Manager

(515) 738-2822

1149 U Avenue
Grand Junction, IA 50107

Responsible Party:

Bruce Chapin
Vice President

4800 Main Street; Suite 107
Kansas City, MO 64112

Permitted Equipment

Emission Unit(s): Internal Plant Roads Truck Traffic

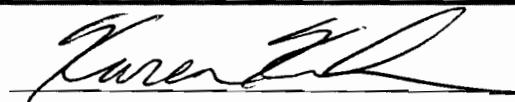
Control Equipment: Sweeping/Flushing as necessary

Emission Point: F110

Equipment Location: 1149 U Avenue
Grand Junction, IA

Plant Number: 37-02-004

Permit No.	Proj. No.	Description	Date	Testing
07-A-771	07-093	Original Permit	June 8, 2007	Yes
07-A-771-S1	07-606	Modify Road Length/Remove traffic Limits	December 20, 2007	Yes
07-A-771-S2	10-065	Increase Facility Capacity	July 30, 2010	No



Under the Direction of the Director of
the Department of Natural Resources

CPFP|3702004|07302010|10065|07A771S2

PERMIT CONDITIONS

The permit holder, owner and operator of the facility shall assure that the installation, operation, and maintenance of this equipment is in compliance with all of the conditions of this permit and all other applicable requirements. This permit and its provisions are subject to the appeal rights set forth in Iowa Administrative Code (IAC), rule 561—7.5.

1. Departmental Review

This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant shall cause this permit to be void. In addition, the applicant may be subject to criminal penalties according to Iowa Code Section 455B.146A.

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 34; and 40 CFR Parts 51, 52, 60, 61, and 63 and has the potential to comply.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The DNR assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

2. Transferability

As limited by 567 IAC 22.3(3)"f", this permit is not transferable from one location to another or from one piece of equipment to another, unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the DNR shall be notified in writing at least fourteen (14) days prior to transferring to the new location unless the equipment will be located in an area which is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) or is a maintenance area for the NAAQS in which case notification shall be given thirty (30) days prior to the relocation of equipment¹ (See Permit Condition 8.A.6). The owner will be notified at least ten (10) days prior to the scheduled relocation if the relocation will cause a violation of the (NAAQS). In such case, a supplements permit shall be required prior to the initiation of construction of additional control equipment or equipments modifications needed to meet the standards.

The permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for compliance with the provisions of this permit. No person shall construct, install, reconstruct or alter this emissions unit, control equipment or emission point without the required revisions to this permit.

¹ A list of nonattainment areas and maintenance areas for the NAAQS can be obtained from the Department.

3. Construction

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted, and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

This permit shall become void if any one of the following conditions occur:

- (1) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or modification of the proposed project, as it affects the emission point(s) permitted herein, is not completed within a time period specified elsewhere in this permit.

3. Construction (Continued)

3.a. Original Permits

The owner or operator shall obtain a new permit if any changes are made to the final plans and specifications submitted for the proposed project.

3.b. Modified or Supplemental Permits

This permit supersedes any and all previous permits issued for the emission point(s) or emission unit(s) permitted herein.

However, the permittee may continue to act under the provisions of the previous permit for the emission point(s) or emission unit(s) until one of the following conditions occurs:

- (1) The proposed project authorized by this permit is completed as it affects the emission point(s) permitted herein; or
- (2) The permit becomes void.

The owner or operator shall obtain a new permit if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

4. Credible Evidence

As stated in 567 IAC 21.5 and also in 40 CFR Part 60.11(g), where applicable, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions specified in this permit or any provisions of 567 IAC Chapters 20 through 34.

5. Owner Responsibility

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

The owner or operator of any emission unit or control equipment shall maintain and operate the equipment and control equipment at all times in a manner consistent with good practice for minimizing emissions, as required by paragraph 567 IAC 24.2(1) "*Maintenance and Repair*".

6. Excess Emissions

Excess emissions during a period of startup, shutdown, or cleaning of control equipment are not a violation of the emission standard if it is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions except when another regulation applicable to the unit or process provides otherwise. Cleaning of control equipment, which does not require the shutdown of process equipment, shall be limited to one six-minute period per one-hour period. An incident of excess emissions other than the above is a violation and may be subject to criminal penalties according to Iowa Code 455B.146A. If excess emissions are occurring, either the control equipment causing the excess shall be repaired in an expeditious manner, or the process generating the emissions shall be shutdown within a reasonable period of time, as specified in 567 IAC 24.1.

An incident of excess emissions shall be orally reported to the appropriate DNR field office within eight (8) hours of, or at the start of, the first working day following the onset of the incident (See section 8.B.1). A written report of an incident of excess emissions shall be submitted as a follow-up to all required oral reports within seven (7) days of the onset of the upset condition.

7. Disposal of Contaminants

The disposal of materials collected by the control equipment shall meet all applicable rules.

8. Notification, Reporting, and Recordkeeping

- A. The owner shall furnish the DNR the following written notifications:
 - 1. The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration;
 - 2. The actual date of startup, postmarked within fifteen (15) days following the start of operation;
 - 3. The date of each compliance test required by Permit Condition 12, at least thirty (30) days before the anticipated compliance test date;
 - 4. The date of each pretest meeting, at least fifteen (15) days before the proposed meeting date. The owner shall request a proposed test plan protocol questionnaire at least sixty (60) days prior to each compliance test date. The completed questionnaire shall be received by the DNR at least fifteen (15) days before the pretest meeting date;
 - 5. Transfer of equipment ownership, within 30 days of the occurrence;
 - 6. Portable equipment relocation:
 - i. at least thirty (30) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS;
 - ii. at least fourteen (14) days before equipment relocation.

- B. The owner shall furnish the DNR with the following reports:
 - 1. Oral excess emissions reports, in accordance with 567 IAC 24.1;
 - 2. A written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met;
 - 3. Operation of this emission unit(s) or control equipment outside of those limits specified in Permit Conditions 10 and 14 and according to the schedule set forth in 567 IAC 24.1.

- C. The owner shall send correspondence regarding this permit to the following address:

Construction Permit Supervisor
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 281-8189
Fax: (515) 242-5094

- D. The owner shall send correspondence concerning stack testing to:

Stack Testing Coordinator
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324
Telephone: (515) 242-6001
Fax: (515) 242-5127

- E. The owner shall send reports and notifications to:

Compliance Unit Supervisor Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 281-8448 Fax: (515) 242-5127	Iowa Department of Natural Resources Field Office #4 1401 Sunnyside Lane Atlantic, IA 50022 Phone: (712) 243-1934 Fax: (712) 243-6251
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8. Notification, Reporting, and Recordkeeping (Continued)

F. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording.

9. Permit Violations

Knowingly committing a violation of this permit may carry a criminal penalty of up to \$10,000 per day fine and 2 years in jail according to Iowa Code Section 455B.146A.

10. Emission Limits

Pollutant	lb/hr ¹	tons/yr ²	Additional Limits	Reference (567 IAC)
Particulate Matter (PM)	NA	NA	NA	23.3(2)"a"
PM ₁₀	NA	NA	NA	NAAQS
Opacity	NA	NA	NA	23.3(2)"d"
Sulfur Dioxide (SO ₂)	NA	NA	NA	NA
Nitrogen Oxides (NO _x)	NA	NA	NA	NA
Volatile Organic Compounds	NA	NA	NA	NA
Carbon Monoxide (CO)	NA	NA	NA	NA
Lead (Pb)	NA	NA	NA	NA
(Single HAP)	NA	NA	NA	NA
(Total HAP)	NA	NA	NA	NA

¹ Standard is expressed as the average of three (3) runs.
² Standard is a 12-month rolling total.

11. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height, (ft, from the ground)	See Note
Discharge Style	See Note
Stack Opening, (inches, dia.)	See Note
Exhaust Temperature (°F)	See Note
Exhaust Flowrate (scfm)	See Note

Note: Emissions from this unit are fugitive emissions generated by vehicle traffic on paved roadways inside the facility.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

12. Compliance Demonstration(s) and Performance Testing

Pollutant	Initial	Subsequent	Methodology	Frequency
PM (federal)	No	No	NA	NA
PM (state)	No	No	NA	NA
PM ₁₀	No	No	NA	NA
Opacity	No	No	NA	NA
SO ₂	No	No	NA	NA
NO _x	No	No	NA	NA
VOC	No	No	NA	NA
CO	No	No	NA	NA
Pb	No	No	NA	NA
HAP	No	No	NA	NA

¹ Specifics on the testing requirement are outlined in conditions 14 and 15 below.

If an initial compliance demonstration specified above is testing, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.

If subsequent testing is specified above, the owner shall verify compliance with the emission limitations contained in Permit Condition 10 according to the frequency noted above.

If testing is required, the owner shall use the test method and run time listed in the table below unless another testing methodology is approved by the Department prior to testing.

Pollutant	Test Run Time	Test Method
PM (federal)	1 hour	40 CFR 60, Appendix A, Method 5
PM (state)	1 hour	Iowa Compliance Sampling Manual Method 5
PM ₁₀	1 hour	40 CFR 51, Appendix M, 201A with 202
Opacity	1 hour	40 CFR 60, Appendix A, Method 9
SO ₂	1 hour	40 CFR 60, Appendix A, Method 6C
NO _x	1 hour	40 CFR 60, Appendix A, Method 7E
VOC	1 hour	40 CFR 60, Appendix A, Method 25A
CO	1 hour	40 CFR 60, Appendix A, Method 10
Pb	1 hour	40 CFR 60, Appendix A, Method 12
Other		

The unit(s) being sampled should be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

A pretest meeting shall be held at a mutually agreeable site no less than fifteen (15) days prior to the date of each test. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. The owner shall be responsible for the installation and maintenance of test ports. The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

13. NSPS and NESHAP Applicability

There are no New Source Performance Standards (NSPS) for this source type at this time.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) for this source type at this time.

14. Operating Limits

Operating limits for this emission unit shall be:

- A. The speed limit shall be posted on the haul road.
 - B. Any spills of grain or DDGS on the road shall be cleaned up immediately.
 - C. Truck traffic emissions on the paved road shall be controlled by water flushing (except as noted in 14(D)(4)) and sweeping once per day. The water spray rate shall be a minimum of 0.23 gallons per square yard.
 1. If water flushing followed by sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35°F (1.70 C) only sweeping is required. Water flushing and/or sweeping is not required for days of inclement weather.
 2. Water flushing and sweeping need not occur when a rain gauge located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hr time period or the paved road(s) will not be used on a given day.
 3. Water flushing need not occur provided that the haul road emissions do not exceed 67.8 tons PM for the last twelve months. This shall be calculated using the formula in Section 15(C) of this permit. In the event that emissions exceed 67.8 tons for the last twelve months the plant shall be required to commence daily water flushing with daily sweeping until PM emissions fall below 67.8 tons for the last twelve months.
 - D. Silt load performance testing shall be completed monthly with the initial testing being performed within 10 days of the start of production. Testing shall be completed prior to water flushing and/or sweeping for that day. Provided the results demonstrate compliance with the PM & PM10 ton per year emission limits in Section 10, reduced frequency of testing may be requested after 12 performance tests have been completed (see 15(A) of permit).
 - E. The owner/operator shall record the number of trucks that load/unload material on a monthly basis. Based on the number of trucks the total Vehicle Miles Traveled (VMT) shall be calculated for that month.
-

15. Operating Condition Monitoring

All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. Performance testing on the haul road surface silt loading shall be completed on a monthly basis. For each performance test, silt loading sampling shall be done for at least 3 different locations. Performance testing shall be completed prior to water flushing and/or sweeping.
- B. The plant shall maintain a log for the haul roads that show the following:
 1. The silt content of the road for that month based on testing;
 2. The date of performance testing;
 3. The vehicle miles traveled (VMT) for that month;
 4. Each day record whether or not water flushing and sweeping was accomplished. For days w/o water flushing and/or sweeping record the circumstances (i.e. weather condition, equipment

5. The amount of water applied and the areas treated;
 6. The operator's initials.
- C. The owner or operator shall calculate and record the monthly haul road emissions according to the following formulas, which uses the equations from AP-42 Section 13.2.1, the empirical constants, and assumes a mean vehicle weight of 27 tons.

$$EPM = \frac{[(2.055 * (sL/2)^{0.65}) - 0.00046] * VMT}{2000}$$

Where E = tons PM per month
sL = road surface silt loading (g/m²) for each performance test
VMT = Vehicle miles traveled

$$EPM_{10} = \frac{[(0.401 * (sL/2)^{0.65}) - 0.00046] * VMT}{2000}$$

Where E = tons PM₁₀ per month
sL = road surface silt loading (g/m²) for each performance test
VMT = Vehicle miles traveled

- D. The owner or operator shall update monthly the twelve-month rolling total of PM and PM₁₀ emissions by adding up the calculated monthly emissions for the previous twelve months. The plant shall notify DNR immediately if the twelve-month rolling total exceeds 96.89 tons PM or 18.88 tons of PM₁₀.

16. Continuous Emission Monitoring

Continuous emission monitoring is not required by this permit at this time.

17. Description of Terms and Acronyms

acfm	Actual cubic feet per minute
Applicant	The owner, company official or authorized agent
CFR	Code of Federal Regulations
Department	Iowa Department of Natural Resources
DNR	Iowa Department of Natural Resources
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant(s)
IAC	Iowa Administrative Code
MMBtu	One million British thermal units
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Owner	The owner or authorized representative
Permit	This document including permit conditions and all submitted application materials
PM ₁₀	Particulate Matter equal to or less than 10 microns in aerodynamic diameter
scfm	Standard cubic feet per minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound

END OF PERMIT CONDITIONS



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

July 30, 2010

Certified Mail

Bruce Chapin
Louis Dreyfus Commodities Corp.
4800 Main Street
Suite 107
Kansas City MO 64112

Re: DNR Project No: 10-065; Plant No: 37-02-004
See attached list for permit numbers

Dear Mr. Chapin:

Enclosed with this you will find the modified construction permits for your facility located in Grand Junction IA. The attached table outlines the important information concerning these permits.

It should be noted that the storage tanks are subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR 60 Subpart Kb; 567 IAC 23.1(2)"ddd"), the heat recovery steam generators are subject to the NSPS for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60 Subpart Db; 567 IAC 23.1(2)"ccc") and the equipment leaks are subject to the NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (40 CFR 60 Subpart VVa; 567 IAC 23.1(2)"nn"). Additionally it should be noted that the grain storage and handling equipment is of the source type regulated by the NSPS for Grain Elevators. However, to be subject to this regulation, the facility would have to have a grain storage capacity of greater than 2.5 million bushels. At this time, the storage capacity of the facility appears to be below this threshold. Therefore, this facility is not subject to this standard at this time.

You should be aware that there are also two National Emission Standards for Hazardous Air Pollutants (NESHAP) that your facility may be subject to as well. The first would be the NESHAP for Industrial-Commercial-Institutional Boilers and Process Heaters. This standard has been proposed by the USEPA but has not been finalized. Additionally, your facility is of the source type regulated by the NESHAP for Chemical Manufacturing Area Sources (40 CFR 63 Subpart VVVVV). At this time the Department has not adopted this standard. Therefore, the USEPA shall be considered the administrator of this standard until such time as the Department completes the adoption of this standard.

7900 Hickman Road, Suite 1 / Windsor Heights, Iowa 50324
515-242-5100 FAX 515-242-5094 <http://www.iowacleanair.com/>

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Source	Control Equipment	Testing Required	DNR Permit No:
DDGS Dryers/Distillation	Thermal Oxidizers	Yes (See Permit)	07-A-760-S1
Grain Handling	Baghouse	No	07-A-761-S1
Grain Milling	Baghouse	No	07-A-762-S1
Fermentation/Beerwell	CO2 Scrubber	Yes (VOC, HAPS)	07-A-763-S1
DDGS Cooler	Baghouse	Yes (HAPS)	07-A-764-S1
DDGS Loadout	Baghouse	Yes (VOC, HAPS)	07-A-765-S1
Biomethanators	Flare	No	07-A-766-S2
Ethanol Loadout	Flare	No	07-A-767-S2
Cooling Tower	Drift Eliminator/Demister	No	07-A-768-S1
Emergency Fire Pump	None	No	07-A-769-S1
Equipment Leaks	LDAR Program	No	07-A-770-S1
Plant Roads	Sweeping/Flushing	No	07-A-771-S1
Denatured Ethanol Tank	Internal Floating Roof	No	07-A-772-S1
Denatured Ethanol Tank	Internal Floating Roof	No	07-A-773-S1
200 Proof Ethanol Tank	Internal Floating Roof	No	07-A-774-S1
Denaturant Tank	Internal Floating Roof	No	07-A-775-S1
190 Proof Ethanol Tank	Internal Floating Roof	No	07-A-776-S1
Additive Tank	None	No	07-A-921-S1

With the limits included in these permits, your facility is considered a minor source for the Title V Operating permit program. If you have any questions concerning these permits, please contact Corey Detter at (515) 281-4842. If you have any general construction permitting questions, please contact our construction permitting hotline at 1-877-AIR-IOWA (1-877-247-4692).

Sincerely,



Karen Kuhn, P.E.
Environmental Engineer Senior
Air Quality Bureau

C: File No: 37-02-004
Field Office: 4

with enclosures
with enclosures