IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER

IN THE MATTER OF: **GRAIN PROCESSING CORPORATION** **Muscatine County, Iowa**	AMENDMENT TO ADMINISTRATIVE CONSENT ORDER NO. 2014-AQ-A1

TO: Grain Processing Corporation
1600 Oregon Street
Muscatine, Iowa 52761

Chuck Becker
Belin McCormick
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309

Administrative Consent Order No. 2014-AQ-A1 was entered into between the Department of Natural Resources (Department) and Grain Processing Corporation on February 4, 2014. Based on discussions between the parties it has been determined that an amendment to the administrative consent order is necessary. Administrative Order No. 2014-AQ-A1 is amended as follows:

1. Paragraph 6, Section V. ORDER is rescinded and replaced with:

6. In addition to all applicable requirements, GPC shall comply with following requirements:

Performance Testing: Beginning on or before May 31, 2018, GPC shall complete a minimum of one performance test to demonstrate compliance with the PM2.5 emission limits contained in Attachment A, or as modified and included in the construction permits, for the emission points listed in Attachment C to this administrative consent order. The need to conduct the actual testing and the methodology used to demonstrate compliance shall be consistent with the requirements in 567 IAC 25.1(9) and the notification and reporting requirements in 567 IAC 25.1(7) and shall be exercised in the same manner as applied to other industrial sites in Iowa. If allowed by EPA, DNR may use alternative testing protocol as appropriate. During performance testing, all units shall be operated at maximum rated capacity, unless otherwise restricted in a permit.

In the event any performance testing conducted by GPC shows an exceedence, GPC shall take prompt and reasonable action to address the exceedence and

communicate to the DNR how the exceedences will be corrected and when additional testing shall take place.

Work Practices: GPC shall follow the monitoring, recordkeeping and reporting requirements contained in Attachment D to this administrative consent order beginning on the date this administrative consent order is signed unless otherwise specified in Attachment D. These requirements are in place to ensure continuous compliance of the equipment with the emission limits contained in Attachment A to this administrative consent order. It is understood that the terms of Attachment D relating to "Operation Requirement" reflects the results of initial performance testing and that this requirement many be modified after the initial test. These requirements may be adjusted after performance testing is completed to more accurately represent the observed operating ranges of the equipment during the successful demonstration of compliance. GPC shall maintain on-site written records demonstrating compliance with the operation and maintenance requirements specified in Attachment D. If a requirement(s) specified in Attachment D cannot be completed due to unforeseen circumstances, then the conditions which prevented the completion of the requirement(s) shall be documented, including the time period during which the conditions preventing completion of the requirements existed and the actions taken to remedy the situation. The written records shall be maintained on-site for at least two years and shall be made available to representatives of the DNR and EPA upon request;

2. In all other respects, Administrative Order No. 2014-AQ-A1 remains in full force and effect.

Chuck Gipp

CHUCK GIPP, DIRECTOR
Iowa Department of Natural Resources

Dated this 16th day of January, 2017.

GRAIN PROCESSING CORPORATION

Dated this 9 day of January, 2017.

cc: Kelli Book

IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER

IN THE MATTER OF: **GRAIN PROCESSING CORPORATION** **Muscatine County, Iowa**	ADMINISTRATIVE CONSENT ORDER NO. 2014-AQ-A1

TO: Grain Processing Corporation
1600 Oregon Street
Muscatine, Iowa 52761

Chuck Becker
Belin McCormick
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309

I. SUMMARY

This administrative consent order is entered into between Grain Processing Corporation (GPC) and the Iowa Department of Natural Resources (DNR) for the purpose of addressing monitored exceedences of the 2006 24-hour National Ambient Air Quality Standards (NAAQS) for fine particulate matter with a diameter of 2.5 microns or smaller (PM 2.5) in Muscatine, Iowa. This administrative consent order shall create an enforceable control strategy for GPC to meet its portion of the requirements of the United States Environmental Protection Agency's (EPA) State Implementation Plan (SIP) call for Muscatine County, Iowa and establishes time schedules for completion of such control strategy as being as expeditious as practicable. The parties have agreed to the provisions below.

Questions regarding this administrative consent order should be directed to:

Kelli Book, Attorney
DNR – Legal Services
7900 Hickman Road, Suite 1
Windsor Heights, Iowa 50324
(515) 725-9572

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II. JURISDICTION

The administrative consent order is issued pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1) which authorize the director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated or permits pursuant thereto, and to prevent, abate, and control air pollution.

III. STATEMENT OF FACTS

1. GPC owns a corn processing facility located in Muscatine, Iowa. GPC produces a variety of corn derivative products. Products include maltodextrins; corn syrup solids and starches for food, pharmaceutical and personal care markets; ethyl alcohol for beverage, industrial use, and fuel; starches for paper, corrugated box, textile, and wallboard industries; corn oil; and animal nutrition ingredients.

2. On September 21, 2006, EPA lowered the 2006 24-hour NAAQS for PM 2.5 from 65 to 35 micrograms per cubic meter ($\mu g/m^3$) of air. DNR adopted the 2006 24-hour PM 2.5 NAAQS in 2007 and the adoption became effective on September 26, 2007. DNR's monitoring data at the Garfield Elementary School in Muscatine for the 2007-2009 and 2008-2010 periods resulted in 2006 24-hour PM 2.5 design values of 38 and 37 $\mu g/m^3$, respectively. These values exceeded the 24-hour health standard.

3. On June 28, 2011, EPA signed a finding that Iowa's SIP was not adequate to maintain the 2006 24-hour PM 2.5 NAAQS in Muscatine. On July 14, 2011 the findings were published in the Federal Register and became effective on August 15, 2011. EPA required the State of Iowa to revise its SIP to correct the deficiency. The SIP revision must include the following: an emissions inventory for all sources that could be contributing to the monitored exceedences, a modeling demonstration that shows what reductions will be necessary to attain and maintain the standards in the area, adoption of federally enforceable measures to achieve the reductions determined to be necessary to maintain the standards in the area, and an enforceable commitment to implement contingency plans to further reduce emissions if the health standards are not met as planned.

4. Air dispersion modeling of GPC was conducted and the modeling predicted that GPC was a contributor to the monitored 2006 24-hour PM 2.5 levels exceedences. GPC is not the sole contributor of PM 2.5 emissions in Muscatine and other contributors are also being asked to address their PM 2.5 emissions.

5. DNR, GPC and the other contributors have been working together to quantify PM 2.5 emissions, identify sources that may need controls upgraded or added, and develop a timeline for implementing the necessary changes. GPC has submitted a control strategy that requires a large number of new permits, permit modifications and variances. GPC has submitted some, but not all, construction

permit applications to the DNR for evaluation. The DNR and GPC are entering into this administrative consent order to create an enforceable control strategy and timeline for implementation of the $PM_{2.5}$ SIP call pursuant to the understanding that EPA will and does approve Iowa's $PM_{2.5}$ SIP response and as amended at the request of GPC and approved by DNR ($PM_{2.5}$ SIP). However it does not allow GPC to begin construction without the proper air quality construction permits or variances. GPC is required to obtain all necessary air quality construction permits or variances and to operate the equipment in accordance with the construction permits or variances, Attachment A, and Attachment B even if it requires GPC to alter construction or operation of the equipment, with the understanding that DNR will not unreasonably withhold or delay issuance of the necessary permits, provided that all requested permit application information is submitted and deemed complete.

6. GPC is currently engaged in a significant number of changes and modifications of the facility that will favorably affect the air emissions from the facility. Additionally, the provisions of this administrative consent order may be impacted in the event the pending judicial action by the Attorney General is resolved by agreement or judge, or by the 1 hour sulfur dioxide nonattainment designation in Muscatine County. The parties recognize that these events may result in a need to amend the existing terms of this administrative consent order. Amendments to this administrative consent order and the attachments constitute a revision to the SIP and must be submitted to the EPA for approval.

7. The control strategy currently being implemented by GPC at the facility, in cooperation with DNR, is anticipated to have substantial beneficial effects related to particulate matter emissions, as well as other air emissions.

IV. CONCLUSIONS OF LAW

1. Section 110(k)(5) of the Clean Air Act provides that "[w]henever the Administrator finds that the applicable implementation plan for any area is substantially inadequate to attain or maintain the relevant national ambient air quality standard...the Administrator shall require the State to revise the plan as necessary to correct such inadequacies." On June 28, 2011, EPA signed a finding that Iowa's SIP was not adequate to maintain the 2006 24-hour PM 2.5 NAAQS in Muscatine and required the state to submit a plan to correct the SIP.

2. 567 Iowa Administrative Code (IAC) 28.1 states that the ambient air quality standards for the State of Iowa shall be the NAAQS located at 40 Code of Federal Regulations (CFR) Part 50, as amended through February 9, 2010. 40 CFR 50 states that the 24-hour PM 2.5 NAAQS is 35 $\mu g/m^3$ of air. The monitoring data at the Garfield Elementary School in Muscatine for the 2007-2009 and 2008-2010 periods indicated that the 24-hour PM 2.5 design values were at 38 and 37 $\mu g/m^3$,

respectively. Air dispersion modeling of GPC was conducted and the modeling predicted that GPC was a contributor to the PM 2.5 levels measured.

3. Iowa Code sections 455B.134(9) and 455B.138(1) authorize the director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II, and the rules promulgated or permits pursuant thereto, and to prevent, abate, and control air pollution. This administrative consent order will create an enforceable control strategy to address the PM 2.5 concentrations in Muscatine.

4. 567 IAC 22.1(1) and 567 IAC 22.1(3) require the owner or operator of a stationary source to obtain a permit to install or alter equipment or control equipment unless otherwise exempt. Any modifications occurring as a result of this administrative consent order and subject to the provisions of 567 IAC chapter 22 shall require a construction permit or variance.

V. ORDER

THEREFORE, the DNR and GPC agree to the following:

1. GPC shall implement the control strategy contained in Attachment A and Attachment B to this administrative consent order. Attachment A and Attachment B detail actions that GPC must take with each source included in the control strategy; the emission limits for each source; point source characteristics; and the deadlines for completing each source modification and achieving the specified source emission limit. GPC may install and operate additional emission control projects and may improve the emission controls listed in the attachments as is necessary to further reduce ambient PM 2.5 concentrations in Muscatine, Iowa with prior approval of the DNR;

2. GPC shall meet the emission limits and construction modification dates specified by the deadlines stated in Attachment A. GPC cannot begin construction without the issuance of air quality construction permits or variances. GPC is required to obtain all necessary air quality construction permits or variances and to operate the equipment in accordance with the construction permits or variances. DNR will not unreasonably withhold or delay the issuance of the necessary permits, provided that all requested permit application information is submitted and deemed complete;

3. GPC shall comply with the point source characteristics contained in Attachment B to this administrative consent order unless otherwise specified in Attachment A;

4. Construction permits or variances required by the administrative consent order and the attachments to the administrative consent order may be modified with the written approval of DNR and GPC. The administrative consent

order shall be updated at least annually to incorporate any changes agreed upon by the parties. Any request for modifications to the construction permits, variances, or attachments must be submitted prior to the deadline of the required action. Any modifications to the construction permits, variances, or attachments may result in the requirement to complete a modeled attainment demonstration using approved dispersion modeling techniques, if requested by the DNR;

5. GPC shall submit complete air quality construction permit application requests for construction permit modifications for existing construction permits, and variance requests to DNR within 90 days from the date the Director signs this administrative consent order, with the exception of the construction permit applications for EP1, EP143, EP158, and EP199. The complete air quality construction permits for the four emission points must be submitted within 90 days from the date a final resolution of *State of Iowa v. Grain Processing Corporation*, Law No. CVCV 02020979 pending in the Iowa District Court for Muscatine County. Until the air quality construction permits for EP1, EP143, EP158 and EP199 have been incorporated into the SIP and federally approved, GPC shall comply with the terms of this administrative consent order and all attachments, unless otherwise voided by the terms of this administrative consent order. If a determination is made that PSD has been triggered, complete PSD application(s) shall be submitted in a timely manner agreed upon by DNR and GPC. Construction permits issued under this administrative consent order shall incorporate the control strategy provided in Attachment A and Attachment B. GPC cannot begin construction until the appropriate permits have been issued;

6. In addition to all applicable requirements, GPC shall comply with following requirements:

> Performance Testing: Beginning on or before May 31, 2017 (180 days after completion of the control strategy) GPC shall complete a minimum of one performance test to demonstrate compliance with the PM2.5 emission limits contained in Attachment A, or as modified and included in the construction permits, for the emission points listed in Attachment C to this administrative consent order. The need to conduct the actual testing and the methodology used to demonstrate compliance shall be consistent with the requirements in 567 IAC 25.1(9) and the notification and reporting requirements in 567 IAC 25.1(7) and shall be exercised in the same manner as applied to other industrial sites in Iowa. If allowed by EPA, DNR may use alternative testing protocol as appropriate. During performance testing, all units shall be operated at maximum rated capacity, unless otherwise restricted in a permit.
>
> In the event any performance testing conducted by GPC shows an exceedence, GPC shall take prompt and reasonable action to address the exceedence and communicate to the DNR how the exceedences will be corrected and when additional testing shall take place.

Work Practices: GPC shall follow the monitoring, recordkeeping and reporting requirements contained in Attachment D to this administrative consent order beginning on the date this administrative consent order is signed unless otherwise specified in Attachment D. These requirements are in place to ensure continuous compliance of the equipment with the emission limits contained in Attachment A to this administrative consent order. It is understood that the terms of Attachment D relating to "Operation Requirement" reflects the results of initial performance testing and that this requirement many be modified after the initial test. These requirements may be adjusted after performance testing is completed to more accurately represent the observed operating ranges of the equipment during the successful demonstration of compliance. GPC shall maintain on-site written records demonstrating compliance with the operation and maintenance requirements specified in Attachment D. If a requirement(s) specified in Attachment D cannot be completed due to unforeseen circumstances, then the conditions which prevented the completion of the requirement(s) shall be documented, including the time period during which the conditions preventing completion of the requirements existed and the actions taken to remedy the situation. The written records shall be maintained on-site for at least two years and shall be made available to representatives of the DNR and EPA upon request;

7. GPC shall submit to the DNR Air Quality Bureau written semi-annual reports detailing progress toward the completion of the requirements of this administrative consent order. The semi-annual reports shall be due no later than 30 days following the end of each semi-annual period (the semi-annual periods are defined as January 1 – June 30 and July 1 – December 31). The first report shall be due 30 days from the date the Director signs this administrative consent order. The semi-annual reporting may be terminated following submittal of a final report and written request to the DNR, and a written response from the DNR stating that all such described requirements of this administrative consent order have been satisfactorily completed; and

8. GPC shall certify compliance with the provisions of this administrative consent order as part of GPC's compliance certification obligations pursuant to its Title V Operating permit for this facility.

VI. FAILURE TO ACCEPT PROPOSED $PM_{2.5}$ SIP

Due to the fact that the purpose of this administrative consent order is to provide for federal enforceability of the control strategy imposed on GPC, thereby allowing approval of the $PM_{2.5}$ SIP call by EPA, the purpose of this administrative consent order is not satisfied if DNR does not propose and EPA does not approve the terms of the $PM_{2.5}$ SIP call. Therefore, if, for any reason DNR does not approve and submit to EPA the terms of the $PM_{2.5}$ SIP call within 60 days of the execution of this administrative consent order, either GPC or DNR may withdraw from the terms and

conditions of this administrative consent order and, upon such written withdrawal the terms and conditions of this administrative consent order shall be null and void in their entirety and for all purposes.

In addition, if, for any reason, EPA does not accept and approve all terms and provisions of the $PM_{2.5}$ SIP call within 22 months of the execution of this administrative consent order, either GPC or DNR may withdraw from the terms and conditions of this administrative consent order and, upon such written withdrawal, the terms and conditions of this administrative consent order shall be null and void in their entirety and for all purposes.

VII. RESERVATION OF RIGHTS

This administrative consent order is entered into for the purposes of addressing monitored exceedences of the 2006 24-hour PM 2.5 NAAQS in Muscatine, Iowa and for creating an enforceable control strategy for GPC to address its PM 2.5 emissions. DNR reserves the right to bring an enforcement action to assess monetary penalties for any potential violations that may arise from the facts stated in this administrative consent order or to pursue referral to the Attorney General, to obtain injunctive relief and penalties or fines, pursuant to Iowa Code section 455B.146 or 455B.146A. Additionally, DNR reserves the right to bring an enforcement action or to pursue referral to the Attorney General, to obtain injunctive relief and penalties or fines, pursuant to Iowa Code section 455B.146 or 455B.146A, for alleged violations not addressed in this administrative consent order which may have occurred at or in relation to the GPC facility in Muscatine, Iowa to the extent but only to the extent, such claims are not inconsistent with or barred by any other court rulings, consent decrees, or settlement agreements. Nothing in this administrative consent order restricts or limits the administrative or judicial enforcement remedies available to the DNR or the State of Iowa for potential violations that may arise from the facts stated in this administrative consent order or any other violations which may have occurred at the GPC facility in Muscatine, Iowa. Nothing in this administrative consent order restricts or limits GPC's right to submit materials for consideration by the DNR, to contend that requirements are not applicable, to present discussion or arguments that the permit requirements are not applicable, to present discussions or arguments as part of the permit or deliberative process or requirements, or to appeal, in accordance with Iowa law, permit provisions.

VII. WAIVER OF APPEAL RIGHTS

This administrative consent order is entered into knowingly by and with the consent of GPC. For that reason, GPC waives the right to appeal this administrative consent order pursuant to the provisions of Iowa Code section 455B.138.

VIII. NONCOMPLIANCE

Failure to comply with this administrative consent order may result in the imposition of further administrative penalties or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code section 455B.146.

IX. TERMINATION OF THIS ADMINISTRATIVE CONSENT ORDER

This administrative consent order shall terminate upon a showing by GPC, acceptable to DNR and responded to in writing by the DNR, that it has complied with the obligations contained herein or as may otherwise be agreed upon by the parties. A termination of this administrative consent order will only be considered after all construction permits, with equivalent or more stringent requirements than those listed in the Attachments to this administrative consent order, have been issued, construction is completed, and all construction permits have been incorporated into the Iowa SIP and federally approved.

Chuck Gipp

Chuck Gipp, Director
Iowa Department of Natural Resources

Dated this 4th day of February, 2014.

GRAIN PROCESSING CORPORATION

Dated this 27 day of January, 2014.

#70-01-004; Sarah Piziali, DNR Air Quality; Jim McGraw, DNR Air Quality; Kelli Book; EPA

ATTACHMENT A - GPC Control Strategy and Timeline

LINE	SOURCE NAME	CURRENT PERMIT NUMBER	CURRENT CONTROL EQUIPMENT	EMISSION POINT ID	ADD CONTROL	MODIFY SOURCE CHARACTERISTICS	ESTABLISH OPERATIONAL RESTRICTION	CONSTRUCTION/OPERATIONAL MODIFICATION COMPLETION DATE (no later than date listed below)	REQUIRED $PM_{2.5}$ EMISSION LIMIT (pounds/hour)	EMISSION LIMIT EFFECTIVE DATE (beginning on or before date listed below*)
1	GEP Stack (Blrs 1-4 and 6-7)	NONE	MULTICLONES / ESP ON BOILER 7 ONLY	EP1.0	add dry FGD, baghouse and carbon injection **OR**		limit boilers to gaseous fuels only	January 31, 2016	36.400	January 31, 2016
2	PH, Ash Silo	77-A-357-S1	BAGHOUSE	EP2.0				NA	0.017	July 14, 2013
3	WM, #1 Wet Germ Cyclone	NONE	CYCLONE	EP14.0				NA	0.028	July 14, 2013
4	WM, #1 & #2 Germ Dryers	79-A-194-S1	CYCLONE	EP15.0				NA	0.239	July 14, 2013
5	Starch, #1 P&S Dryer	NONE	NONE	EP24.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
6	Starch, #2 P&S Dryer	NONE	NONE	EP24.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
7	Starch, #3 P&S Dryer	NONE	NONE	EP24.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
8	Starch, #4 P&S Dryer	NONE	NONE	EP24.4			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
9	Starch, #1 P&S Dryer	NONE	NONE	EP25.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
10	Starch, #2 P&S Dryer	NONE	NONE	EP25.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
11	Starch, #3 P&S Dryer	NONE	NONE	EP25.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
12	Starch, #4 P&S Dryer	NONE	NONE	EP25.4			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
13	Starch, #1 P&S Dryer	NONE	AERODYNE	EP26.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
14	Starch, #2 P&S Dryer	NONE	AERODYNE	EP26.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
15	Starch, #3 P&S Dryer	NONE	AERODYNE	EP26.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
16	Starch, #4 P&S Dryer	NONE	AERODYNE	EP26.4			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
17	DH1, #1 Product Aerodyne	71-A-003	AERODYNE	EP28.1			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
18	DH1, #2 Product Aerodyne	71-A-003	AERODYNE	EP28.2			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
19	DH1, #3 Product Aerodyne	71-A-003	AERODYNE	EP28.3			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
20	DH1, #1 Rotary Dryer	NONE	EXP CHAMBER	EP32.1			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
21	DH1, #2 Rotary Dryer	NONE	EXP CHAMBER	EP32.2			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
22	DH1, #3 Rotary Dryer	NONE	EXP CHAMBER	EP32.3			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
23	DH1, #4 Rotary Dryer	NONE	EXP CHAMBER	EP32.4			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
24	DH1, #5 Rotary Dryer	NONE	EXP CHAMBER	EP32.5			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
25	DH1, #6 Rotary Dryer	NONE	EXP CHAMBER	EP32.6			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
26	DH2, Gluten Day Bin	71-A-067-S3	BAGHOUSE	EP38.0			Impose $PM_{2.5}$ emission limit	NA	0.027	July 14, 2013
27	DH2, Rotary Dryer	74-A-130-S3	SCRUBBERS	EP40.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
28	DH2, Dry End Pickup	NONE	CYCLONE	EP41.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
29	DH2, #1 Mill Aerodyne	NONE	HE CYCLONE	EP42.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner

ATTACHMENT A - GPC Control Strategy and Timeline

LINE	SOURCE NAME	CURRENT PERMIT NUMBER	CURRENT CONTROL EQUIPMENT	EMISSION POINT ID	ADD CONTROL	MODIFY SOURCE CHARACTERISTICS	ESTABLISH OPERATIONAL RESTRICTION	CONSTRUCTION/OPERATIONAL MODIFICATION COMPLETION DATE (no later than date listed below)	REQUIRED $PM_{2.5}$ EMISSION LIMIT (pounds/hour)	EMISSION LIMIT EFFECTIVE DATE (beginning on or before date listed below*)
30	GP1, #1 & #2 Scrubber Units	75-A-087	SCRUBBERS	EP43.1	improve control of current scrubber by changing to higher collection efficiency packing and improving operation	increase stack height from 96 feet to 140 feet.		August 1, 2016	1.140	August 1, 2016
31	GP1, #3 Unit Scrubber	75-A-089	SCRUBBER	EP46.0			permanently cease operation of emission unit(s)/ emission point	April 30, 2015	0.000	April 30, 2015
32	Starch, #7 P&S Dryer	72-A-155	HE CYCLONE	EP59.1			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
33	Starch, #7 P&S Dryer	72-A-155	HE CYCLONE	EP59.2			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
34	Starch, #7 P&S Dryer	72-A-155	HE CYCLONE	EP59.3			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
35	Starch, WHSE, Quonset Bulk Loading	02-A-952	BAGHOUSE	EP60.0				NA	0.068	July 14, 2013
36	Maltrin, #1 Spray Dryer	72-A-199-S1	SCRUBBER	EP66.0		increase stack height from 124 feet to 144 feet		September 1, 2016	0.872	July 14, 2013
37	Maltrin, Product Filter	NONE	BAGHOUSE	EP67.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
38	Maltrin, Dust System Bag Filter	NONE	BAGHOUSE	EP68.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
39	DH3, Primary Dryer (NW)	73-A-137	CYCLONE	EP79.0			permanently cease operation of emission unit(s)/ emission point	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
40	DH3, Primary Dryer (SW)	73-A-138	CYCLONE	EP80.0			permanently cease operation of emission unit(s)/ emission point	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
41	DH3, Primary Dryer (SE)	73-A-139	CYCLONE	EP81.0			permanently cease operation of emission unit(s)/ emission point	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
42	DH3, Primary Dryer (NE)	73-A-140	CYCLONE	EP82.0			permanently cease operation of emission unit(s)/ emission point	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	April 30, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
43	DH2, Mill Aerodyne	73-A-135	AERODYNE	EP85.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
44	Starch, #9 P&S Dryer, #1 Wet Stack	74-A-009	NONE	EP91.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
45	Starch, #9 P&S Dryer, #2 Wet Stack	74-A-009	NONE	EP91.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
46	Starch, #9 P&S Dryer	74-A-009	AERODYNE	EP91.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
47	Starch, #10 P&S Dryer, #1 Wet Stack	74-A-010	NONE	EP92.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
48	Starch, #10 P&S Dryer, #2 Wet Stack	74-A-010	NONE	EP92.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
49	Starch, #10 P&S Dryer	74-A-010	AERODYNE	EP92.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
50	Starch WHSE, So. Bulk Loading	75-A-246-S1	BAGHOUSE	EP95.0				NA	0.068	July 14, 2013
51	WM, #2 Wet Germ Cyclone	74-A-014	CYCLONE	EP96.0				NA	0.013	July 14, 2013
52	WM, #3 Germ Cyclone	74-A-015-S1	CYCLONE	EP97.0				NA	0.134	July 14, 2013
53	Expeller, Dry Germ Cyclone	74-A-016-S2	BAGHOUSE	EP98.0	replace cylone with baghouse	increase stack height from 75 feet to 98.67 feet and slight changes to other stack parameters (diameter, flowrate)		Already Complete	0.034	July 14, 2013
54	Starch, #8 P&S Dryer, #1 Wet Stack	74-A-008	HE CYCLONE	EP101.1			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
55	Starch, #8 P&S Dryer, #2 Wet Stack	74-A-008	HE CYCLONE	EP101.2			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
56	Starch, #8 P&S Dryer	74-A-008	HE CYCLONE	EP101.3			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
57	PH, Blr #8	73-A-191	LNB	EP103.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
58	PH, Blr #9	74-A-159	LNB	EP104.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
59	DH4, #1 Rotary Dryer	75-A-210	EXP CHAMBER	EP108.1			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
60	DH4, #2 Rotary Dryer	75-A-211	EXP CHAMBER	EP108.2			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
61	DH4, #3 Rotary Dryer	75-A-212	EXP CHAMBER	EP108.3			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
62	DH4, #1 Mill Aerodyne	75-A-343-S1	AERODYNE	EP110.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016

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63	DH4, #2 Mill Aerodyne	75-A-344	AERODYNE	EP111.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
64	DH4, #3 Mill Aerodyne	75-A-345	AERODYNE	EP112.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
65	DH4, # 1 Mill Product	75-A-346-S1	BAGHOUSE	EP113.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
66	DH4, #2 Product Aerodyne	75-A-347	AERODYNE	EP114.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
67	DH4, #3 Product Aerodyne	75-A-348	AERODYNE	EP115.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
68	DH WHSE, #1 Feed Cooler	75-A-353-S1	BAGHOUSE	EP119.0	replace cylone with baghouse	increase stack height from 50 feet to 80 feet. Change stack from vertical obstructed to wertical unobstructed and slight changes to other stack parameters (diameter,flowrate)		Baghouse Already Complete/Stack Modification December 31, 2013	0.100	July 14, 2013
69	Starch, #11 P&S Dryer, #1 Wet Stack	76-A-209	NONE	EP121.1			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
70	Starch, #11 P&S Dryer, #2 Wet Stack	76-A-210	NONE	EP121.2			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
71	Starch, #11 P&S Dryer	76-A-211	HE CYCLONE	EP121.3			permanently cease operation of emission unit(s)/ emission point	December 31, 2016	0.000	December 31, 2016
72	Starch, WHSE, Pearl Starch	76-A-262-S1	BAGHOUSE	EP122.0				NA	0.064	July 14, 2013
73	DH4, #4 Rotary Dryer	79-A-196	EXP CHAMBER	EP125.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner	0.000	March 31, 2015 or no later than 6 months after the start-up of any of the new emission unit associated with Dryer House 5, whichever is sooner
74	WM, #4 Germ Dryer	79-A-195-S1	CYCLONE	EP126.0				NA	0.120	July 14, 2013
75	DH4, #5 Rotary Dryer	09-A-707-S1	EXP CHAMBER	EP 127.0	Add wet scrubber to expansion chamber	increase stack height from 98 feet to 110 feet. Relocate stack to UTM 662038.24, 4584857.17 (NAD 27, Z15) and slight changes to other stack parameters (temp, flowrate, diameter)		November 1, 2016	0.180	November 1, 2016
76	DH4, #4 Mill Aerodyne	80-A-113-S1	AERODYNE	EP128.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
77	DH4, #4 Product Aerodyne	80-A-114-S1	BAGHOUSE	EP129.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
78	Starch WHSE, Bagger Dust Control	02-A-760-S1	BAGHOUSE	EP 130.0				NA	0.030	July 14, 2013
79	Maltrin, #3 Spray Dryer (E)	80-A-149-S4	VENTURI SCRUBBER	EP132.1	improve control of current venturi scrubber by adding packed bed sections and insulating the stack	increase stack height from 126 feet to 150 feet		September 1, 2016	0.900	September 1, 2016
80	Maltrin, #3 Spray Dryer (W)	80-A-150-S4	VENTURI SCRUBBER	EP132.2	improve control of current venturi scrubber by adding packed bed sections and insulating the stack	increase stack height from 126 feet to 150 feet		September 1, 2016	0.900	September 1, 2016
81	CoPo, Disc Dryer Product Handling	NONE	BAGHOUSE	EP 133.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
82	CoPo, Disc Dryer Product Transfer	83-A-082	BAGHOUSE	EP134.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
83	Maltrin #4, Spray Dryer (E)	85-A-031-S1	PB SCRUBBER	EP135.0		increase stack height from 94 feet to 164 feet		September 1, 2016	0.800	July 14, 2013
84	Maltrin #4, Spray Dryer (W)	85-A-032-S1	PB SCRUBBER	EP136.0		increase stack height from 94 feet to 164 feet		September 1, 2016	1.000	July 14, 2013
85	DH4, #6 Rotary Dryer	85-A-033	EXP CHAMBER	EP137.0	Add wet scrubber to expansion chamber	increase stack height from 98 feet to 110 feet. Relocate stack to UTM 662039.93, 4584853.45 (NAD 27, Z15) and slight changes to other stack parameters (temp, flowrate, diameter)		November 1, 2016	0.210	November 1, 2016
86	DH4, #5 Milling Aerodyne	85-A-034	HE CYCLONE	EP138.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
87	DH4, #6 Milling Aerodyne	85-A-035-S1	HE CYCLONE	EP 139.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
88	DH4, #5 Product Aerodyne	85-A-036	HE CYCLONE	EP140.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
89	DH4, #6 Product Aerodyne	85-A-037	AERODYNE	EP141.0			permanently cease operation of emission unit(s)/ emission point	March 31, 2016	0.000	March 31, 2016
90	PH, Boiler #10	85-A-038	LOW EXCESS AIR	EP142.0		increase stack height from 70 feet to 110 feet		December 31, 2013	0.700	July 14, 2013
91	Starch, #1 Flash Dryer	85-A-039	SCRUBBER	EP143.0		increase stack height from 137 feet to 177 feet	Add burner and restrict fuel to natural gas only	December 31, 2016	2.640	July 14, 2013
92	Starch WHSE, Food Grade Bagger	90-A-307	BAGHOUSE	EP144.0	Install new baghouse	increase stack height from 33 feet to 140 feet		Already Complete	0.210	November 1, 2013
93	Starch WHSE, Food Grade Bagger	85-A-041	BAGHOUSE	EP145.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
94	WM, #1-4 Corn Cleaner	85-A-043-S1	BAGHOUSE	EP147.0		increase stack height from 16 feet to 80 feet		No later than 180 days after receiving approval from the Army Corp of Engineers	0.200	July 14, 2013
95	Starch WHSE, #1 Bin Vent	85-A-081-S1	BAGHOUSE	EP149.0				NA	0.020	July 14, 2013
96	Starch WHSE,#2 Bin Vent	85-A-082-S1	BAGHOUSE	EP150.0				NA	0.020	July 14, 2013
97	Starch WHSE, #3 Bin Vent	85-A-083-S1	BAGHOUSE	EP151.0				NA	0.020	July 14, 2013
98	Starch WHSE, #4 Bin Vent	85-A-084-S1	BAGHOUSE	EP152.0				NA	0.020	July 14, 2013
99	PH, Boiler #11	85-A-135	LOW EXCESS AIR	EP153.0		increase stack height from 70 feet to 110 feet		December 31, 2013	0.700	July 14, 2013
100	Maltrin, #1 Agglomerator	89-A-084	BAGHOUSE	EP154.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
101	Starch WHSE, Super Sacker	89-A-085	BAGHOUSE	EP155.0				NA	0.068	July 14, 2013

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102	Maltrin, #2 Agglomerator	89-A-146	BAGHOUSE	EP156.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
103	Maltrin, bagger	89-A-162-S1	BAGHOUSE	EP157.0				NA	0.057	July 14, 2013
104	Starch, #2 Flash Dryer	90-A-258	SCRUBBER	EP158.0		increase stack height from 139 feet to 179 feet	Add burner and restrict fuel to natural gas only	December 31, 2016	3.550	July 14, 2013
105	Starch WHSE, #5 Starch Silo (N)	90-A-259	BAGHOUSE	EP159.0				NA	0.030	July 14, 2013
106	Starch WHSE, #6 Starch Silo (E)	90-A-260	BAGHOUSE	EP160.0				NA	0.030	July 14, 2013
107	Starch WHSE, #7 Starch Silo (S)	90-A-261	BAGHOUSE	EP161.0				NA	0.030	July 14, 2013
108	Starch WHSE, #8 Starch Silo (W)	90-A-262	BAGHOUSE	EP162.0				NA	0.030	July 14, 2013
109	Starch WHSE, Track 3A Loadout	90-A-263	BAGHOUSE	EP163.0				NA	0.083	July 14, 2013
110	DH4, #7 Rotary Dryer	90-A-264	EXP CHAMBER	EP164.0	Add wet scrubber to expansion chamber	increase stack height from 98 feet to 110 feet. Relocate stack to UTM 662041.71, 4584849.89 (NAD 27, Z15) and slight changes to other stack parameters (temp, flowrate, diameter)		November 1, 2016	0.210	November 1, 2016
111	DH WHSE, #2 Feed Cooler	90-A-111	BAGHOUSE	EP167.0		increase stack height from 19 feet to 80 feet		December 31, 2013	0.110	July 14, 2013
112	Maltrin, #5 Spray Dryer (A Stack)	90-A-309-S1	SCRUBBER	EP168.0		increase stack height from 152 feet to 162 feet		September 1, 2016	0.873	July 14, 2013
113	Maltrin, #5 Spray Dryer (B Stack)	90-A-310-S1	SCRUBBER	EP169.0		increase stack height from 152 feet to 162 feet		September 1, 2016	0.753	July 14, 2013
114	Starch WHSE, #9 Starch Silo (NE)	90-A-359	BAGHOUSE	EP171.0				NA	0.030	July 14, 2013
115	Starch WHSE, #10 Starch Silo (NW)	90-A-360	BAGHOUSE	EP172.0				NA	0.030	July 14, 2013
116	GP2, #4 Gluten Flash Dryer	91-A-067-S2	SCRUBBER	EP173.0				NA	1.010	July 14, 2013
117	GP2, #4 Gluten Pre-Mill	91-A-068-S1	BAGHOUSE	EP174.0				NA	0.150	July 14, 2013
118	Maltrin, Product Silo Receiver (N)	91-A-069	BAGHOUSE	EP175.0				NA	0.035	July 14, 2013
119	Maltrin, Nuisance Duct Collector (W)	91-A-070	BAGHOUSE	EP176.0				NA	0.034	July 14, 2013
120	PH, Boiler #12	93-A-110	LOW NOX BURNERS	EP177.0				NA	1.500	July 14, 2013
121	WM, #5 Germ Dryer	91-A-176	CYCLONE	EP178.0				NA	0.230	July 14, 2013
122	GP2, #1 Feed Truck Loadout (West)	92-A-383-S1	BAGHOUSE	EP179.0		increase stack height from 38 feet to 75 feet and make stack vertical unobstructed instead of vertical obstructed		Already Complete	0.150	July 14, 2013
123	GP2, #2 Feed Truck Loadout (East)	92-A-385	BAGHOUSE	EP180.0		increase stack height from 38 feet to 75 feet and make stack vertical unobstructed instead of vertical obstructed		Already Complete	0.150	July 14, 2013
124	Elevator, South Corn Rail Receiving	76-A-264	BAGHOUSE	EP181.1				NA	0.170	July 14, 2013
125	Elevator, South Corn Truck Receiving	76-A-268	BAGHOUSE	EP181.2				NA	0.125	July 14, 2013
126	Maltrin, #1 Bulk Filter Aid Storage Bin (W)	93-A-032	BAGHOUSE	EP182.0			restrict operation to 1 out of 4 bins may be filled at a time	July 14, 2013	0.010	July 14, 2013
127	Maltrin, #2 Bulk Filter Aid Storage Bin (N)	93-A-033	BAGHOUSE	EP183.0			restrict operation to 1 out of 4 bins may be filled at a time	July 14, 2013	0.010	July 14, 2013
128	Maltrin, #3 Bulk Filter Aid Storage Bin (N)	93-A-034	BAGHOUSE	EP184.0			restrict operation to 1 out of 4 bins may be filled at a time	July 14, 2013	0.010	July 14, 2013
129	Maltrin, #1 Bulk Carbon Storage Bin (W)	93-A-035	BAGHOUSE	EP185.0			restrict operation to 1 out of 4 bins may be filled at a time	July 14, 2013	0.010	July 14, 2013
130	Maltrin, #6 Spray Dryer (Stack A)	94-A-055	SCRUBBER	EP186.0		increase stack height from 137 feet to 147 feet		September 1, 2016	0.663	July 14, 2013
131	Maltrin, #6 Spray Dryer (Stack B)	94-A-061	SCRUBBER	EP187.0		increase stack height from 137 feet to 147 feet		September 1, 2016	0.663	July 14, 2013
132	G-Starch, G-Starch Process	96-A-1028-S1	BAGHOUSE	EP188.0				NA	0.774	July 14, 2013
133	PH, Lime Silo	02-A-759	BIN VENT FILTER	EP189.0				NA	0.012	July 14, 2013
134	GP2, Gluten Loadout Transfer	02-A-781-S1	BAGHOUSE	EP190.1				NA	0.021	July 14, 2013
135	GP2, Gluten Truck Loadout	02-A-782-S1	BAGHOUSE	EP190.2				NA	0.002	July 14, 2013
136	PH, Bulk Salt Tank Vent	02-A-787	BIN VENT FILTER	EP191.0			limit operation to no more than 1 hour per day	July 14, 2013	0.200	July 14, 2013
137	CoPo, Corn Bran Dryer	06-A-215	BAGHOUSE	EP192.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
138	WM, #3 Germ Transfer & Receiving	02-A-783-S1	CYCLONE	EP194.0				NA	0.020	July 14, 2013
139	DH4, Spent Germ Receiving	09-A-482-S1	BAGHOUSE	EP195.0		increase stack height from 30 feet to 66.5 feet		Already Complete	0.028	July 14, 2013
140	DH1, DH2 and DH4 Product Receiver Cyclone	10-A-563	BAGHOUSE	EP196.0	add baghouse to bypass stack			Already Complete	0.140	July 14, 2013
141	Maltrin Hoffman Dust Collection	10-A-285	BAGHOUSE	EP197.0		vent source directly to atmosphere instead of inside production building		Already Complete	0.011	July 14, 2013
142	Germ Receiving Bin	NONE	NONE	EP198.0				NA	0.009	July 14, 2013
143	DH4 & DH5, New Milling Equipment & Product Conv	NONE	BAGHOUSE	EP199.0			replace existing DH4 milling aerodynes with new milling equipment with baghouse controLs	March 1, 2016	0.650	March 1, 2016
144	Starch WHSE, Ind. Modified Starch	03-A-079	BAGHOUSE	EP471.0				NA	0.065	July 14, 2013
145	Elevator, Grain Unloading "A" & "B"	02-A-687-S2	BAGHOUSE	EP490.0				NA	0.220	July 14, 2013
146	GP1, Pneunatic Transport System	03-A-471	BAGHOUSE	EP531.0				NA	0.122	July 14, 2013
147	GP1, Hulls' Milling System	03-A-1369	BAGHOUSE	EP536.0				NA	0.013	July 14, 2013
148	Starch WHSE, Modified Starch Pneumatic	03-A-1370	BAGHOUSE	EP537.0				NA	0.030	July 14, 2013
149	Maltrin, #1 Spray Dryer System Cooler	03-A-1371	BAGHOUSE	EP538.0				NA	0.100	July 14, 2013
150	WWT, #1 Biogas Flare Stack	04-A-548	FLARE	EP542.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
151	WWT, #2 Biogas Flare Stack	04-A-549	FLARE	EP543.0			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
152	Mash Fermenters 1-29	05-A-926-S3	SCRUBBERS	EP544.0				NA	0.185	July 14, 2013
153	Expeller, #1 Spent Germ Pickup	06-A-1261	BAGHOUSES	EP545.0				NA	0.365	July 14, 2013
154	DH4, #3 Alpha Laval (formerly #4 Sharples)	11-A-338	NONE	EP546.0		vent source directly to atmosphere instead of inside production building	replace existing sharples with new alpha laval centrifuge	Already Complete	0.001	July 14, 2013
155	WWTP Anaerobic Digesters #1 - #3	11-A-661	BIOGAS DESULFURIZATION SYSTEM / FLARE	EP548.0			add source to replace EP542.0 and EP543.0	Already Complete	0.260	July 14, 2013
156	Tank 4C and 5C	NONE	FLARE	EP550.0				NA	0.220	July 14, 2013
157	East Tank and C-400 Thru Tanks	NONE	NONE	EP551.0				NA	0.011	July 14, 2013
158	DH5, Swiss Combi Dryer	11-A-339	TO / SO2 SCRUBBER	EP600.0			replace existing DH1, DH2 and portions of DH4 and replace with new DH5	March 31, 2015	2.700	March 31, 2015
159	DH5, Spent Germ Pneumatic Transport	11-A-340	BAGHOUSE	EP601.0			replace existing DH1, DH2 and portions of DH4 and replace with new DH5	March 31, 2015	0.030	March 31, 2015
160	DH5, Cage Mill Feed Baghouse	11-A-342	BAGHOUSE	EP603.0			replace existing DH1, DH2 and portions of DH4 and replace with new DH5	March 31, 2015	0.160	March 31, 2015

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161	DH5, Building Scrubber	NONE	SCRUBBER	EP605.0			replace existing DH1, DH2 and portions of DH4 and replace with new DH5	March 31, 2015	0.010	March 31, 2015
162	Grnd & Whole Grains Unloading (KENT)	NONE	CYCLONE	E1			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
163	Pellet Cooler (KENT)	NONE	CYCLONE	E2A			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
164	Pellet Cooler (KENT)	NONE	CYCLONE	E2B			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
165	Pellet Cooler (KENT)	NONE	CYCLONE	E2C			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
166	Pellet Screen (KENT)	NONE	CYCLONE	E3			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
167	Pellet Cooler (KENT)	03-A-1414-S3	BAGHOUSE	E4				NA	0.086	July 14, 2013
168	Ingredient Mixer (KENT)	NONE	CYCLONE	E5			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
169	SBM Bin (KENT)	NONE	NONE	E7a			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
170	SBM Bin (KENT)	NONE	NONE	E7b			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
171	SBM Bin (KENT)	NONE	NONE	E7c			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
172	SBM Bin (KENT)	NONE	NONE	E7d			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
173	SBM Bin (KENT)	NONE	NONE	E7e			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
174	SBM Bin (KENT)	NONE	NONE	E7f			limit operation to no more than 1 hour per day	NA	0.020	July 14, 2013
175	Pellet Conveyor (KENT)	NONE	CYCLONE	E8			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
176	Loadout Bins (KENT)	NONE	NONE	E9a			limit operation to no more than 2.5 hours per day	NA	0.077	July 14, 2013
177	Loadout Bins (KENT)	NONE	NONE	E9b			limit operation to no more than 2.5 hours per day	NA	0.077	July 14, 2013
178	Loadout Bins (KENT)	NONE	NONE	E9c			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
179	Loadout Bins (KENT)	NONE	NONE	E9d			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
180	Pellet Cooler (KENT)	03-A-1415-S4	BAGHOUSE	E10				NA	0.034	July 14, 2013
181	Maltrin Storage Bins 1-4 & Kice Product Reciever	NONE	BAGHOUSE/BIN VENT FILTERS	MALT14				NA	0.040	July 14, 2013
182	Maltrin Storage Bins 5-8	NONE	BAGHOUSE/BIN VENT FILTERS	MALT58				NA	0.005	July 14, 2013
183	Sulfur Burner	NONE	ABSORBTION TOWER	SULFURBURN			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
184	Coal Barge Unloading	NONE	NONE	COALBARG			operate only in the months March through November and a minimum daily average coal moisture content of 8.7%	NA	0.060	July 14, 2013
185	Coal Pile	NONE	NONE	COAL PILE			no more than 266,263 tons per 12-month rolling period and a minimum daily average coal moisture content of 8.7%	NA	NA	July 14, 2013
186	Feed Barge Unloading	NONE	TELESCOPING SPOUT	FEEDBARG			operate only in the months March through November	NA	0.020	July 14, 2013
187	Feed Railcar Loading	NONE	SPOUT WITH SOCK	RAILCR1				NA	0.004	July 14, 2013
188	Feed Railcar Loading	NONE	SPOUT WITH SOCK	RAILCR2				NA	0.004	July 14, 2013
189	Wet Feed Loading	NONE	NONE	WETFEED			loadout no more than 37,000 tons of wet feed per 12-month rolling period	NA	0.003	July 14, 2013
190	Corn Storage Pad	NONE	NONE	CORNSTOR			permanently cease operation of emission unit(s)/ emission point	Already Complete	0.000	Already Complete
191	Kent Feeds Flat Corn Storage Pad	NONE	NONE	FLATSTOR			store no more than 26,000 tons of material per 12-month rolling period	NA	0.002	July 14, 2013
192	Haul Roads	NONE	NONE	ND	use PM10 efficient sweeper (a minimum of every other day)		silt loading of no more than 0.4 g/m2	NA	NA	July 14, 2013
193	River Levee	NONE	NONE	NONE			restrict access to levee by posting signs warning of restricted access on the north and south fence lines that intersect the levee. A third sign will be posted in the area of highest modeled concentrations prohibiting loitering and fishing. In-person surveillance of the levy will be conducted by GPC security staff periodically throughout the 24-hour day with documentation as to surveillance time and location.	Already Complete	NA	NA
	* If emission unit is operational before emission limit effective date, the date the unit becomes operational is the effective date of the PM2.5 emission limit									

ATTACHMENT B - Point Source Characteristics

LINE	SOURCE NAME	EMISSION POINT ID	STACK HEIGHT (feet)	STACK DIAMETER (inches)	STACK ORIENTATION		
1	PH, GEP Stack (Blrs 1-4 and 6-7)	EP001.0	219	180	Vertical, Unobstructed		
2	PH, Ash Silo	EP002.0	164	150	Vertical, Unobstructed		
3	Elevator, Grain Unloading "A"	EP009.0	179	23 x 26	Vertical, Unobstructed	merged stack with EP490.0	
4	WM, #1 Wet Germ Cyclone	EP014.0	56	8 x 13	Vertical, Unobstructed		
5	WM, #1 & #2 Germ Dryers	EP015.0	94	18.5 x 21.5	Vertical, Unobstructed		
6	DH2, Gluten Day Bin	EP038.0	43	12	Vertical, Unobstructed		
7	GP1, #1 & #2 Scrubber Units	EP043.1	140	42	Vertical, Unobstructed		
8	Starch, WHSE, Quonset Bulk Loading	EP060.0	48	12	Horizontal		
9	Maltrin, #1 Spray Dryer	EP066.0	144	36	Vertical, Unobstructed		
10	Starch WHSE, So. Bulk Loading	EP095.0	64	18	Vertical, Unobstructed		
11	WM, #2 Wet Germ Cyclone	EP096.0	53	10.8	Vertical, Unobstructed		
12	WM, #3 Germ Cyclone	EP097.0	84	18	Vertical, Unobstructed		
13	Expeller, Dry Germ Cyclone	EP098.0	98.7	14	Vertical, Unobstructed		
14	DH WHSE, #1 Feed Cooler	EP119.0	80	24	Vertical, Unobstructed		
15	Starch WHSE, Pearl Starch Storage Bin	EP122.0	110	12 x 16	Horizontal		
16	WM, #4 Germ Dryer	EP126.0	75	18	Vertical, Unobstructed		
17	DH4, #5 Rotary Dryer	EP127.0	110	36	Vertical, Unobstructed		
18	Starch WHSE, Bagger Dust Control	EP130.0	90	18	Horizontal		
19	Maltrin, #3 Spray Dryer	EP132.1	150	42	Vertical, Unobstructed		
20	Maltrin, #3 Spray Dryer	EP132.2	150	42	Vertical, Unobstructed		
21	Maltrin, #4 Spray Dryer	EP135.0	164	42	Vertical, Unobstructed		
22	Maltrin, #4 Spray Dryer	EP136.0	164	42	Vertical, Unobstructed		
23	DH4, #6 Rotary Dryer	EP137.0	110	36	Vertical, Unobstructed		
24	PH, Boiler #10	EP142.0	110	60	Vertical, Unobstructed		
25	Starch, #1 Flash Dryer	EP143.0	177	96	Vertical, Unobstructed		
26	Starch WHSE, Food Grade Bagger	EP144.0	140	36	Vertical, Unobstructed		
27	Elevator, Grain Unloading "B"	EP146.0	179	24 x 30	Vertical, Unobstructed	merged stack with EP490.0	
28	WM, #1-4 Corn Cleaner	EP147.0	80	30	Vertical, Unobstructed		
29	Starch WHSE, Food Grade Silo, #1 Bin Vent	EP149.0	117	10	Horizontal		
30	Starch WHSE, Food Grade Silo, #2 Bin Vent	EP150.0	117	10	Horizontal		
31	Starch WHSE, Food Grade Silo, #3 Bin Vent	EP151.0	117	10	Horizontal		
32	Starch WHSE, Food Grade Silo, #4 Bin Vent	EP152.0	117	10	Horizontal		
33	PH, Boiler #11	EP153.0	110	60	Vertical, Unobstructed		
34	Starch WHSE, Super Sacker	EP155.0	112	24	Vertical, Unobstructed		
35	Maltrin, Bagger	EP157.0	83	12	Horizontal		
36	Starch, #2 Flash Dryer	EP158.0	179	96	Vertical, Unobstructed		
37	Starch WHSE, #5 Starch Silo (N)	EP159.0	94	12	Horizontal		
38	Starch WHSE, #6 Starch Silo (E)	EP160.0	94	12	Horizontal		
39	Starch WHSE, #7 Starch Silo (S)	EP161.0	94	12	Horizontal		
40	Starch WHSE, #8 Starch Silo (W)	EP162.0	94	12	Horizontal		
41	Starch WHSE, Track 3A Loadout	EP163.0	92	12 x 15	Horizontal		
42	DH4, #7 Rotary Dryer	EP164.0	110	36	Vertical, Unobstructed		
43	DH WHSE, #2 Feed Cooler	EP167.0	80	27	Vertical, Unobstructed		
44	Maltrin, #5 Spray Dryer	EP168.0	162	48	Vertical, Unobstructed		
45	Maltrin, #5 Spray Dryer	EP169.0	162	48	Vertical, Unobstructed		
46	Starch WHSE, #9 Starch Silo (NE)	EP171.0	94	12	Horizontal		
47	Starch WHSE, #10 Starch Silo (NW)	EP172.0	94	12	Horizontal		
48	GP2, #4 Gluten Flash Dryer	EP173.0	148	80	Vertical, Unobstructed		
49	GP2, #4 Gluten Pre-Mill Cooling System	EP174.0	82	18	Vertical, Unobstructed		
50	Maltrin, Product Silo Receiver (N)	EP175.0	162	12	Vertical, Obstructed		
51	Maltrin, Nuisance Duct Collector (W)	EP176.0	99	18	Vertical, Unobstructed		
52	PH, Boiler #12	EP177.0	117	72	Vertical, Unobstructed		
53	WM, #5 Germ Dryer	EP178.0	65	24	Vertical, Unobstructed		
54	GP2, #1 Feed Truck Loadout (West)	EP179.0	75	30	Vertical, Unobstructed		
55	GP2, #2 Feed Truck Loadout (East)	EP180.0	75	30	Vertical, Unobstructed		
56	Elevator, South Corn Rail Receiving	EP181.1	11	34 x 46	Vertical, Obstructed		
57	Elevator, South Corn Truck Receiving	EP181.2	32	28 x 38	Vertical, Obstructed		
58	Maltrin, #1 Bulk Filter Aid Storage Bin (W)	EP182.0	90	18	Vertical, Obstructed		
59	Maltrin, #2 Bulk Filter Aid Storage Bin (N)	EP183.0	90	18	Vertical, Obstructed		
60	Maltrin, #3 Bulk Filter Aid Storage Bin (N)	EP184.0	90	18	Vertical, Obstructed		
61	Maltrin, #1 Bulk Carbon Storage Bin (W)	EP185.0	90	18	Vertical, Obstructed		
62	Maltrin, #6 Spray Dryer	EP186.0	147	72	Vertical, Unobstructed		
63	Maltrin, #6 Spray Dryer	EP187.0	147	72	Vertical, Unobstructed		
64	G-Starch, G-Starch Process	EP188.0	140	54	Vertical, Unobstructed		
65	PH, Lime Silo	EP189.0	29	7.5 x 12	Vertical, Obstructed		
66	GP2, Gluten Loadout Transfer	EP190.1	77	10	Downward		
67	GP2, Gluten Truck Loadout	EP190.2	75	6	Horizontal		
68	PH, Bulk Salt Tank Vent	EP191.0	38	24	Vertical, Obstructed		
69	WM, #3 Germ Transfer & Receiving	EP194.0	68	24	Vertical, Unobstructed		
70	DH4, Spent Germ Receiving	EP195.0	66.5	12	Vertical, Unobstructed		
71	DH1, DH2 and DH4 Product Receiver Cyclone	EP196.0	82.67	22	Vertical, Unobstructed		
72	Maltrin Hoffman Dust Collection	EP197.0	40	4	Horizontal		
73	Germ Receiving Bin	EP198.0	49.5	10.6 x 10.6	Vertical, Unobstructed		
74	DH4, New Milling Unit	EP199.0	160	48	Vertical, Unobstructed		
75	Starch WHSE, Ind. Modified Starch	EP471.0	111	16	Vertical, Obstructed		
76	Elevator, Grain Unloading "A" & "B"	EP490.0	179	42	Vertical, Unobstructed		
77	GP1, Pneumatic Transport System	EP531.0	60	24	Vertical, Unobstructed		
78	GP1, Hulls' Milling System	EP536.0	90	18	Vertical, Unobstructed		

ATTACHMENT B - Point Source Characteristics

LINE	SOURCE NAME	EMISSION POINT ID	STACK HEIGHT (feet)	STACK DIAMETER (inches)	STACK ORIENTATION		
79	Starch WHSE, Modified Starch Pneumatic	EP537.0	36	4	Downward		
80	Maltrin, #1 Spray Dryer System Cooler	EP538.0	97	26	Vertical, Unobstructed		
81	Mash Fermenters 1-29	EP544.0	50	30	Vertical, Unobstructed		
82	Expeller, #1 Spent Germ Pickup	EP545.0	95	36	Vertical, Unobstructed		
83	DH4, #3 Alpha Laval (formerly #4 Sharples)	EP546.0	25	6	Vertical, Unobstructed		
84	WWTP Anaerobic Digesters #1 - #3	EP548.0	35	24	Vertical, Unobstructed		
85	Tank 4C and 5C	EP550.0	30	8	Vertical, Unobstructed		
86	East Tank & C-400 Thrus Tank	EP551.0	69	6	Vertical, Unobstructed		
87	DH5 Swiss Combi Dryer	EP600.0	155	76	Vertical, Unobstructed		
88	DH5 Spent Germ Pneumatic Transport	EP601.0	123	8	Vertical, Unobstructed		
89	Cage Mill Feed Baghouse	EP603.0	123	24	Vertical, Unobstructed		
90	DH5 Bldg Scrubber	EP605.0	123	30	Vertical, Unobstructed		
91	Pellet Cooler (KENT)	E10	60	18	Vertical, Unobstructed		
92	Pellet Cooler (KENT)	E4	46	18	Vertical, Unobstructed		
93	SBM Bin (KENT)	E7A	42	18	Vertical, Obstructed		
94	SBM Bin (KENT)	E7B	42	18	Vertical, Obstructed		
95	SBM Bin (KENT)	E7C	42	18	Vertical, Obstructed		
96	SBM Bin (KENT)	E7D	50	18	Vertical, Obstructed		
97	SBM Bin (KENT)	E7E	50	18	Vertical, Obstructed		
98	SBM Bin (KENT)	E7F	50	18	Vertical, Obstructed		
99	Loadout Bins (KENT)	E9A	40	18	Vertical, Obstructed		
100	Loadout Bins (KENT)	E9B	40	18	Vertical, Obstructed		

Attachment C - Performance Test List

LINE	SOURCE NAME	CURRENT PERMIT NUMBER	CURRENT CONTROL EQUIPMENT	EMISSION POINT ID
1	GEP Stack (Blrs 1-4 and 6-7)	NONE	MULTICLONES / ESP ON BOILER 7 ONLY	EP1.0
2	PH, Ash Silo	77-A-357-S1	BAGHOUSE	EP2.0
3	WM, #1 Wet Germ Cyclone	NONE	CYCLONE	EP14.0
4	WM, #1 & #2 Germ Dryers	79-A-194-S1	CYCLONE	EP15.0
5	DH2, Gluten Day Bin	71-A-067-S3	BAGHOUSE	EP38.0
6	GP1, #1 & #2 Scrubber Units	75-A-087	SCRUBBERS	EP43.1
7	Starch, WHSE, Quonset Bulk Loading	02-A-952	BAGHOUSE	EP60.0
8	Maltrin, #1 Spray Dryer	72-A-199-S1	SCRUBBER	EP66.0
9	Starch WHSE, So. Bulk Loading	75-A-246-S1	BAGHOUSE	EP95.0
10	WM, #2 Wet Germ Cyclone	74-A-014	CYCLONE	EP96.0
11	WM, #3 Germ Cyclone	74-A-015-S1	CYCLONE	EP97.0
12	Expeller, Dry Germ Cyclone	74-A-016-S2	BAGHOUSE	EP98.0
13	DH WHSE, #1 Feed Cooler	75-A-353-S1	BAGHOUSE	EP119.0
14	Starch, WHSE, Pearl Starch	76-A-262-S1	BAGHOUSE	EP122.0
15	WM, #4 Germ Dryer	79-A-195-S1	CYCLONE	EP126.0
16	DH4, #5 ROTARY DRYER	09-A-707-S1	EXP CHAMBER	EP 127.0
17	Starch WHSE, Bagger Dust Control	02-A-760-S1	BAGHOUSE	EP 130.0
18	Maltrin, #3 Spray Dryer (E)	80-A-149-S4	VENTURI SCRUBBER	EP132.1
19	Maltrin, #3 Spray Dryer (W)	80-A-150-S4	VENTURI SCRUBBER	EP132.2
20	Maltrin #4, Spray Dryer (E)	85-A-031-S1	PB SCRUBBER	EP135.0
21	Maltrin #4, Spray Dryer (W)	85-A-032-S1	PB SCRUBBER	EP136.0
22	DH4, #6 Rotary Dryer	85-A-033	EXP CHAMBER	EP137.0
23	PH, Boiler #10	85-A-038	LOW EXCESS AIR	EP142.0
24	Starch, #1 Flash Dryer	85-A-039	SCRUBBER	EP143.0
25	Starch WHSE, Food Grade Bagger	90-A-307	BAGHOUSE	EP144.0
26	WM, #1-4 Corn Cleaner	85-A-043-S1	BAGHOUSE	EP147.0
27	Starch WHSE, #1 Bin Vent	85-A-081-S1	BAGHOUSE	EP149.0
28	Starch WHSE,#2 Bin Vent	85-A-082-S1	BAGHOUSE	EP150.0
29	Starch WHSE, #3 Bin Vent	85-A-083-S1	BAGHOUSE	EP151.0
30	Starch WHSE, #4 Bin Vent	85-A-084-S1	BAGHOUSE	EP152.0
31	PH, Boiler #11	85-A-135	LOW EXCESS AIR	EP153.0
32	Starch WHSE, Super Sacker	89-A-085	BAGHOUSE	EP155.0
33	Maltrin, bagger	89-A-162-S1	BAGHOUSE	EP157.0
34	Starch, #2 Flash Dryer	90-A-258	SCRUBBER	EP158.0
35	Starch WHSE, #5 Starch Silo (N)	90-A-259	BAGHOUSE	EP159.0
36	Starch WHSE, #6 Starch Silo (E)	90-A-260	BAGHOUSE	EP160.0
37	Starch WHSE, #7 Starch Silo (S)	90-A-261	BAGHOUSE	EP161.0
38	Starch WHSE, #8 Starch Silo (W)	90-A-262	BAGHOUSE	EP162.0
39	Starch WHSE, Track 3A Loadout	90-A-263	BAGHOUSE	EP163.0
40	DH4, #7 Rotary Dryer	90-A-264	EXP CHAMBER	EP164.0
41	DH WHSE, #2 Feed Cooler	90-A-111	BAGHOUSE	EP167.0
42	Maltrin, #5 Spray Dryer (A Stack)	90-A-309-S1	SCRUBBER	EP168.0
43	Maltrin, #5 Spray Dryer (B Stack)	90-A-310-S1	SCRUBBER	EP169.0
44	Starch WHSE, #9 Starch Silo (NE)	90-A-359	BAGHOUSE	EP171.0
45	Starch WHSE, #10 Starch Silo (NW)	90-A-360	BAGHOUSE	EP172.0
46	GP2, #4 Gluten Flash Dryer	91-A-067-S2	SCRUBBER	EP173.0
47	GP2, #4 Gluten Pre-Mill	91-A-068-S1	BAGHOUSE	EP174.0
48	Maltrin, Product Silo Receiver (N)	91-A-069	BAGHOUSE	EP175.0
49	Maltrin, Nuisance Duct Collector (W)	91-A-070	BAGHOUSE	EP176.0
50	PH, Boiler #12	93-A-110	LOW NOX BURNERS	EP177.0
51	WM, #5 Germ Dryer	91-A-176	CYCLONE	EP178.0
52	GP2, #1 Feed Truck Loadout (West)	92-A-383-S1	BAGHOUSE	EP179.0
53	GP2, #2 Feed Truck Loadout (East)	92-A-385	BAGHOUSE	EP180.0
54	Elevator, South Corn Rail Receiving	76-A-264	BAGHOUSE	EP181.1
55	Elevator, South Corn Truck Receiving	76-A-268	BAGHOUSE	EP181.2
56	Maltrin, #1 Bulk Filter Aid Storage Bin (W)	93-A-032	BAGHOUSE	EP182.0
57	Maltrin, #2 Bulk Filter Aid Storage Bin (N)	93-A-033	BAGHOUSE	EP183.0
58	Maltrin, #3 Bulk Filter Aid Storage Bin (N)	93-A-034	BAGHOUSE	EP184.0
59	Maltrin, #1 Bulk Carbon Storage Bin (W)	93-A-035	BAGHOUSE	EP185.0
60	Maltrin, #6 Spray Dryer (Stack A)	94-A-055	SCRUBBER	EP186.0

Attachment C - Performance Test List

LINE	SOURCE NAME	CURRENT PERMIT NUMBER	CURRENT CONTROL EQUIPMENT	EMISSION POINT ID
61	Maltrin, #6 Spray Dryer (Stack B)	94-A-061	SCRUBBER	EP187.0
62	G-Starch, G-Starch Process	96-A-1028-S1	BAGHOUSE	EP188.0
63	PH, Lime Silo	02-A-759	BIN VENT FILTER	EP189.0
64	GP2, Gluten Loadout Transfer	02-A-781-S1	BAGHOUSE	EP190.1
65	GP2, Gluten Truck Loadout	02-A-782-S1	BAGHOUSE	EP190.2
66	PH, Bulk Salt Tank Vent	02-A-787	BIN VENT FILTER	EP191.0
67	WM, #3 Germ Transfer & Receiving	02-A-783-S1	CYCLONE	EP194.0
68	DH4, Spent Germ Receiving	09-A-482-S1	BAGHOUSE	EP195.0
69	DH1, DH2 and DH4 Product Receiver Cyclone	10-A-563	BAGHOUSE	EP196.0
70	Maltrin Hoffman Dust Collection	10-A-285	BAGHOUSE	EP197.0
71	Germ Receiving Bin	NONE	NONE	EP198.0
72	DH4, New Milling Unit	NONE	BAGHOUSE	EP199.0
73	Starch WHSE, Ind. Modified Starch	03-A-079	BAGHOUSE	EP471.0
74	Elevator, Grain Unloading "A" & "B"	02-A-687-S2	BAGHOUSE	EP490.0
75	GP1, Pneunatic Transport System	03-A-471	BAGHOUSE	EP531.0
76	GP1, Hulls' Milling System	03-A-1369	BAGHOUSE	EP536.0
77	Starch WHSE, Modified Starch Pneumatic	03-A-1370	BAGHOUSE	EP537.0
78	Maltrin, #1 Spray Dryer System Cooler	03-A-1371	BAGHOUSE	EP538.0
79	Mash Fermenters 1-29	05-A-926-S3	SCRUBBERS	EP544.0
80	Expeller, #1 Spent Germ Pickup	06-A-1261	BAGHOUSES	EP545.0
81	DH4, #3 Alpha Laval (formerly #4 Sharples)	11-A-338	NONE	EP546.0
82	WWTP Anaerobic Digesters #1 - #3	11-A-661	BIOGAS DESULFURIZATION FLARE	EP548.0
83	Tank 4C and 5C	NONE	FLARE	EP550.0
84	East Tank and C-400 Thru Tanks	NONE	NONE	EP551.0
85	DH5, Swiss Combi Dryer	11-A-339	TO / SO2 SCRUBBER	EP600.0
86	DH5, Spent Germ Pneumatic Transport	11-A-340	BAGHOUSE	EP601.0
87	DH5, Cage Mill Feed Baghouse	11-A-342	BAGHOUSE	EP603.0
88	DH5, Building Scrubber	NONE	SCRUBBER	EP605.0
89	Pellet Cooler (KENT)	03-A-1414-S3	BAGHOUSE	E4
90	SBM Bin (KENT)	NONE	NONE	E7a
91	SBM Bin (KENT)	NONE	NONE	E7b
92	SBM Bin (KENT)	NONE	NONE	E7c
93	SBM Bin (KENT)	NONE	NONE	E7d
94	SBM Bin (KENT)	NONE	NONE	E7e
95	SBM Bin (KENT)	NONE	NONE	E7f
96	Loadout Bins (KENT)	NONE	NONE	E9a
97	Loadout Bins (KENT)	NONE	NONE	E9b
98	Pellet Cooler (KENT)	03-A-1415-S4	BAGHOUSE	E10
99	Maltrin Storage Bins 1-4	NONE	BAGHOUSE/BIN VENT FILTERS	MALT14
100	Maltrin Storage Bins 5-8	NONE	BAGHOUSE/BIN VENT FILTERS	MALT58
101	Coal Barge Unloading	NONE	NONE	COALBARG
102	Coal Pile	NONE	NONE	COAL PILE
103	Feed Barge Unloading	NONE	TELESCOPING SPOUT	FEEDBARG
104	Feed Railcar Loading	NONE	SPOUT WITH SOCK	RAILCR1
105	Feed Railcar Loading	NONE	SPOUT WITH SOCK	RAILCR2
106	Wet Feed Loading	NONE	NONE	WETFEED
107	Kent Feeds Flat Corn Storage Pad	NONE	NONE	FLATSTOR
108	Haul Roads	NONE	NONE	ND

Summary of Work Practices for Attachment D

EP	Name	Control Device	Operation Requirement	Currently Implemented ?	Duration	O&M Plan?	Description	Currently Implemented ?
1.0	GEP Stack, Boiler #7 ESP	ESP	#7 Primary 20-40 KV	Yes	1x shift	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	GEP Stack, Boiler #7 ESP	ESP	#7 Secondary 100-400 mA	Yes	1x shift	CAM		
	GEP Stack, Boiler #6 ESP	CL	#6 DP 1" - 5"	Yes	Continious	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	GEP Stack, Boiler #6 ESP	CL	#6 & #7 Airlocks for rotation	Yes	1x shift	CAM		
	GEP Stack, Boiler #6 ESP	CL	#1 - #4 Discharge Hoppers	Yes	1x shift	CAM		Yes
	GEP Stack, Multi Clones	MC	Walk through	Yes	1x shift	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	GEP Stack		Continuous Opacity Monitor	Yes	continuous	Yes	Daily Inspections/Quarterly Maintenance and RATA	Yes
2.0	PH Ash Silo	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
14.0	WM #1 Wet Germ Cyclone	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
15.0	WM, #1 & #2 Germ Dryers	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
38.0	DH2, Gluten Day Bin	BH	No Visible Emissions	No / 2014	1x dayshift	No		
43.1	GP1 #1 Gluten Flash Dryer	SC	Scrubber Flow, minimum 100 gpm	Yes	1x day shift	CAM		Yes
		SC	Pressure drop, minimum 1 " of H2O	Yes	1x day shift	CAM		Yes
60.0	Quonset (Track 3&4 N Starch) Bulk Loadout	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
66.0	#1 Maltrin SD	SC	Scrubber Flow, minimum 175 gpm	Yes	continuous	CAM		Yes
	#1 Maltrin SD	SC	Pressure drop, minimum 0.25 " of H2O	Yes	continuous	CAM		Yes
95.0	Starch Track 3 south Starch Bulk Loading	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
96.0	WM, #2 Wet Germ Cyclone	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
97.0	WM, #3 Germ Cyclone	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
98.0	Expeller, Dry Germ Baghouse	BH	Differential Pressure 1" - 6"	Yes	1x dayshift	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
119.0	DHWH #1 Product Cooler	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
122.0	Pearl Starch Storage	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
126.0	WM, #4 Germ Dryer	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
127.0	DH4, #5 Rotary Dryer	EC	Equipment Walk through	Yes	1x/day	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
			Stub Feed not to Exceed 28.9 RPM (I hour average)	Yes	continuous			
		SC	Scrubber Flow and pressure drop	No / 2016	continuous	No		No / 2016
130.0	Starch Industrial Bagger	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic inspection and Maintenance of Bag Filters	Yes
130.0	Starch Industrial Bagger	BH	Pressure Differential 1" - 6" H2O	Yes	1x dayshift	CAM		Yes

132.1	#3 Maltrin Spray Dryer East	SC	Scrubber Flow, minimum 60 gpm	Yes	continuous	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
132.2	#3 Maltrin Spray Dryer West	SC	Scrubber Flow, minimum 60 gpm	Yes	continuous	CAM		Yes
135.0	#4 Maltrin Spray Dryer East	SC	Scrubber Flow, minimum 400 gpm	Yes	continuous	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	#4 Maltrin Spray Dryer East	SC	Pressure drop, minimum 0.3 " of H2O	Yes	continuous	CAM		Yes
136.0	#4 Maltrin Spray Dryer West	SC	Scrubber Flow, minimum 400 gpm	Yes	continuous	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	#4 Maltrin Spray Dryer West	SC	Pressure drop, minimum 0.3 " of H2O	Yes	continuous	CAM		
137.0	DH4, #6 Rotary Dryer	EC/SC	Equipment Walk through	Yes	1x/day	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
		SC	Scrubber Flow and pressure drop	No / 2016	continuous			No / 2016
142.0	PH, Boiler #10	none		No				No
143.0	Starch, #1 Flash Dryer	SC	Scrubber recycle pressure 40 -50 psig	Yes	1x/day	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
144.0	Starch WHSE, Food Grade Bagger	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic inspection and Maintenance of Bag Filters	Yes
147.0	Corn Cleaners 1,2,3,4 + Corn Day Bin	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic inspection and Maintenance of Bag Filters	Yes
149.0	Starch Food Grade Silo #1	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
150.0	Starch Food Grade Silo #2	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
151.0	Starch Food Grade Silo #3	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
152.0	Starch Food Grade Silo #4	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
153.0	PH, Boiler #11	none		No		No		No
155.0	Starch WHSE, Super Sacker	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
157.0	Maltrin Bagger (Supersacker)	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
158.0	Starch, #2 Flash Dryer	SC	Scrubber Flow, minimum 600 gpm	Yes	1x dayshift	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
159.0	Starch WHSE, #5 Starch Silo (N)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
160.0	Starch WHSE, #6 Starch Silo (E)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
161.0	Starch WHSE, #7 Starch Silo (S)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
162.0	Starch WHSE, #8 Starch Silo (W)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
163.0	Starch WHSE, Track 3A Loadout	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
164.0	DH4, #7 Rotary Dryer	EC	Equipment Walk through	Yes	1x/day	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
		SC	Scrubber Flow and pressure drop	No / 2016	continuous	No		No / 2016
167.0	DH WHSE, #2 Feed Cooler	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
168.0	#5 Maltrin Spray Dryer A Stack	SC	Scrubber Flow, minimum 600 gpm	Yes	continuous	CAM		Yes
	#5 Maltrin Spray Dryer A Stack	SC	Pressure drop, minimum 1.8 " of H2O	Yes	continuous	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	#5 Maltrin Spray Dryer A Stack	SC	Operated less than 6,667 hr/rolling 12 months	Yes	Daily	CAM		Yes
169.0	#5 Maltrin Spray Dryer B Stack	SC	Scrubber Flow, minimum 600 gpm	Yes	continuous	CAM		Yes
	#5 Maltrin Spray Dryer B Stack	SC	Pressure drop, minimum 1.8 " of H2O	Yes	continuous	CAM		Yes
	#5 Maltrin Spray Dryer B Stack	SC	Operated less than 6,667 hr/rolling 12 months	Yes	monthly	CAM		Yes
171.0	Starch WHSE, #9 Starch Silo (NE)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
172.0	Starch WHSE, #10 Starch Silo (NW)	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
173.0	GP2 #4 Gluten Flash Dryer	SC	Scrubber Flow, Operation	Yes	Continuous	Yes	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes

173.0	GP2 #4 Gluten Flash Dryer	SC	Scrubber Flow, minimum 400 gpm	Yes	Continious	CAM		Yes
		SC	Pressure drop, minimum 2.8 " of H2O	Yes	Continious	CAM		Yes
		SC	pH, minimum 5.2	Yes	Continious	CAM		Yes
174.0	#4 Gluten Pre-Mill Cooling System	BH	No Visible Emissions	Yes	1x dayshift	CAM		Yes
175.0	Maltrin, Product Silo Receiver (N)	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
176.0	Maltrin, Nuisance Duct Collector (W)	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
177.0	PH, Boiler #12	LONOX	Continuous NO2 Monitor	Yes	Continuous	Yes	Daily Inspections/Quarterly Maintenance and RATA	Yes
178.0	WM, #5 Germ Dryer	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		
179.0	GP2, #1 Feed Truck Loadout (West)	BH	No Visible Emissions	No /2014	1x dayshift	Yes	Equipment Walk through/ DP Gauges	Yes
180.0	GP2, #2 Feed Truck Loadout (East)	BH	No Visible Emissions	No/2014	1x dayshift	Yes	Equipment Walk through/ DP Gauges	Yes
181.1	Elevator, South Corn Rail Receiving	BH	Equipment Walk through	Yes	1x dayshift	Yes	Daily Walk Through; Monthly Baghouse Inspection	Yes
181.2	Elevator, South Corn Truck Receiving	BH	Equipment Walk through	Yes	1x dayshift	Yes	Daily Walk Through; Monthly Baghouse Inspection	Yes
182.0	Maltrin, #1 Bulk Filter Aid Storage Bin (W)	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
183.0	Maltrin, #2 Bulk Filter Aid Storage Bin (N)	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
184.0	Maltrin, #3 Bulk Filter Aid Storage Bin (N)	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
185.0	Maltrin, #1 Bulk Carbon Storage Bin (W)	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
186.0	#6 Maltrin Spray Dryer A Stack	SC	Scrubber Flow, minimum 900 gpm	Yes	continuous	CAM	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	Yes
	#6 Maltrin Spray Dryer A Stack	SC	Pressure drop, minimum 1.4 " of H2O	Yes	continuous	CAM		Yes
187.0	#6 Maltrin Spray Dryer B Stack	SC	Scrubber Flow, minimum 900 gpm	Yes	continuous	CAM		Yes
	#6 Maltrin Spray Dryer B Stack	SC	Pressure drop, minimum 1.4 " of H2O	Yes	continuous	CAM		Yes
188.0	G-Starch, G-Starch Process	BH	No Visible Emissions	Yes	1x dayshift	Yes	Daily Inspection; Routine Baghouse Maintenance	Yes
	G-Starch, G-Starch Process	BH	Operated less than 5,843 hr/rolling 12 months	Yes	daily			
189.0	PH, Lime Silo	BVF	No Visible Emissions during fill	No / 2014	1x at fill	Yes	Daily Inspection; Routine Baghouse Maintenance	Yes
190.1	GP2, Gluten Loadout Transfer	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Equipment Walk through/ DP Gauges	Yes
190.2	GP2, Gluten Truck Loadout	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Equipment Walk through/ DP Gauges	Yes
191.0	PH, Bulk Salt Tank Vent	BVF	No Visible Emissions during fill	No / 2014	1x at fill	Yes	Daily Inspection; routine Baghouse Maintenance	Yes
194.0	WM, #3 Germ Transfer & Receiving	CY	Inspect Discharge Hoppers	Yes	1x dayshift	No		No
195.0	DH4, Spent Germ Receiving	BH	Differential Pressure 6"<>0.3"	Yes	Continuous	Yes	Daily Inspection; routine Baghouse Maintenance	Yes
196.0	DH1, DH2 and DH4 Product Receiver Cyclone	BH	Differential Pressure 10"<>0.3"	Yes	Continuous	Yes	Differential Pressure 10"<>0.3"; Routine and Long term Maintenance per Manufacturer's Recommendation	Yes
197.0	Maltrin Hoffman Dust Collection	BH	Walk Through	Yes	1x day	Yes	Differential Pressure 8"<>1"; Routine and Long term Maintenance per Manufacturer's Recommendation	Yes
			Differential Pressure 1" - 8"	Yes	Continuous			
198.0	Germ Receiving Bin	none	No Visible Emissions	No / 2014	1x dayshift	No	Maintain Integrity	No
199.0	DH4, New Milling Unit	BH	No Visible Emissions	No / 2014	1x dayshift	No	Daily Inspections/Annual Maintenance/ Preventative Maintenance will be automatically initiated using GPC's MARCAM maintenance system.	No / 2016
471.0	Starch WHSE, Ind. Modified Starch	BH	Equipment Walk through/DP	Yes	1x dayshift	Yes		
490.0	Elevator Corn Unloading A, B, C	BH	No Visible Emissions	Yes	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
531.0	GP1 Transport System	BH	No Visible Emissions	Yes	1x dayshift	CAM		
536.0	GP1 Hulls Milling System	BH	No Visible Emissions	Yes	1x dayshift	CAM		
538.0	Maltrin #1 Spray Dryer System Cooler	BH	No Visible Emissions	Yes	1x dayshift	CAM		
544.0	Mash Fermenters 1-29	SC	Operation according to mfg specification	Yes	Continuous	Yes	Maintain Scrubbers to manufacturers specification; maintain records	Yes
545.0	Expeller, #1 Spent Germ Pickup	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Daily Inspection; Routine Baghouse Maintenance	Yes
546.0	DH4, #3 Alpha Laval (formerly #4 Sharples)	BH	No Visible Emissions	No / 2014	1x dayshift	No		
548.0	WWTP Anaerobic Digesters #1 - #3	FLARE	No Visible Emissions When in Operation	No / 2014	1x dayshift	Yes	Daily Inspection, Annual Preventative Maintenance	Yes
550.0	Tank 4C and 5C	FLARE	No Visible Emissions When in Operation	No / 2014	1x dayshift	No		

551.0	East Tank and C-400 Thru Tanks	none	none	No		No		
600.0	DHS, Swiss Combi Dryer	SC	Scrubber flowrate, pH	No / 2015	Continuous	No	Manufacturers operation and maintenance schedule	No / 2015
	DHS, Swiss Combi Dryer	TO	Temperature	No / 2015	Continuous	No	Manufacturers operation and maintenance schedule	No / 2015
601.0	DHS, Spent Germ Pneumatic Transport	BH	Differential Pressure Drop Measurement	No / 2015	Continuous	No	Manufacturers operation and maintenance schedule	No / 2015
603.0	DHS, Cage Mill Feed Baghouse	BH	Differential Pressure Drop Measurement	No / 2015	Continuous	No	Manufacturers operation and maintenance schedule	No / 2015
605.0	DHS, Building Scrubber	SC	Scrubber flow rate, pH	No / 2015	Continuous	No	Manufacturers operation and maintenance schedule	No / 2015
E4	Pellet Cooler (KENT)	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
E7a	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E7b	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E7c	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E7d	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E7e	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E7f	SBM Bin (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E9a	Loadout Bins (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E9b	Loadout Bins (KENT)	BVF	No Visible Emissions During Fill	No	During fills	No	Maintain Integrity	Yes
E10	Pellet Cooler (KENT)	BH	No Visible Emissions	No / 2014	1x dayshift	Yes	Periodic Inspection and Maintenance of Bag Filter	Yes
MALT14	Maltrin Storage Bins 1-4	BH/BVF	No Visible Emissions Outside of Building	No	1x dayshift	No		
MALT58	Maltrin Storage Bins 5-8	BVF	No Visible Emissions Outside of Building	No	1x dayshift	No		
COALBRG	Coal Barge Unloading	none	Only occurs March to October	No	record operating time	No		
COAL PILE	Coal Pile	none	No fugitive emissions beyond property line	No	1x dayshift	No		
FEEDBARG	Feed Barge Unloading	none	Maintain spout extension and keep non-use openings shut	No / 2014	1x at fill	No		
RAILCR1	Feed Railcar Loading	none	Maintain spout extension and keep non-use openings shut	No / 2014	1x at fill	No		
RAILCR2	Feed Railcar Loading	none	Maintain spout extension and keep non-use openings shut	No / 2014	1x at fill	No		
WETFEED	Wet Feed Loading	none	No Visible Emissions	No / 2014	1x dayshift	No		
FLATSTOR	Kent Feeds Flat Corn Storage Pad	none	No Visible Emissions Outside of Building	No / 2014	1x dayshift	No		
ROADS	Haul Roads	none	Sweep main roads daily, except during and immediately following precipitation events	Yes	1x dayshift	Yes	Daily cleaning of main raods	Yes

Administrative Consent Order
2014-AQ-A1

EPA Rulemakings

CFR: 40 C.F.R. 52.820(d)
FRM: 79 FR 71025 (12/1/14) and 80 FR 18133 (4/3/15)
PRM: 79 FR 46742 (8/11/14) and 80 FR 18179 (4/3/15)
State Submission: 2/18/14 and 11/3/14
State Final: 2/14/14
APDB File: IA-167 EPA-R07-OAR-2014-0550, and IA 167a EPA-R07-OAR-2015-0159.
Description: This action approves Iowa's State Implementation Plan to address the 2011 SIP Call for the 2006 24-hour PM2.5 NAAQS for the Muscatine County, Iowa area. The state's plan addresses the requirements of the SIP Call and includes into the SIP permits for Muscatine Power and Water and Union Tank Car. It also includes an Administrative Consent Order for Grain Processing Corporation. IA 167 published December 1, 2014 approved new permits (29)-(109), codified in 52.820(d), IA 167a updates and revises the previously approved permits for administrative errors and approves the updated versions of the permits that were not available when IA-167 was published.

CFR: 40 C.F.R. 52.820(d)
FRM: 83 FR 30348 (6/28/18)
PRM: 83 FR 15526 (4/11/18)
State Submission: January 30, 2017
State Final: January 16, 2017
APDB File: IA-167b; EPA-R07-OAR-2017-0143
Description: Direct final action to approve a revision to the SIP for the purpose of incorporating an amendment to the Administrative Consent Order (ACO) for Grain Processing Corporation (GPC), Muscatine, Iowa. The revision amends the ACO to change the date for completion of performance testing to allow the state more time to complete processing air construction permit applications submitted by GPC and specify testing requirements as appropriate in the final permits.

Difference between the State and EPA-Approved Regulation:

(29)Grain Processing Corporation, Administrative Consent Order NO.2014-AQ-A1, the last sentence of Paragraph 5, Section III and Section VI are not approved by EPA as part of the SIP.