TFAC Helpfile Language for Ethanol.docx Bonnie Nelson NOTES

 12/5/2017 Leads’, 1/18/2018 updated profiles, 2/6/2018, 1/7-15/2019

CITATIONS: See Flexibility Plus! Document for updated citations.[..\Flexibility\_AOS and Bypass Language\FLEXIBILITY Plus! for ethanol facilities.docx](../Flexibility_AOS%20and%20Bypass%20Language/FLEXIBILITY%20Plus%21%20for%20ethanol%20facilities.docx)

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| **CITATIONS**See Flexibility Plus! Document for updated citations. |
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| **TOTAL FACILITY REQUIREMENTS**Profiles: Air-Permitting-Ind. Permit- * General Total Facility Requirements – Pt. 70 or State
* Modeling – PSD or Title V – Choose appropriate Tier
* Construction Conditions – Dismantlement/Non-NSR
 | Typically use 3 profiles at TFAC. |
| **REQUIREMENTS TO BE LISTED FIRST, before profile language** |  |
| Avoid PSDAvoid Part 70 | The Permittee is authorized to construct the following equipment: EQUI XX as defined by the emissions unit information in Appendix [ ] of this permit [meeting the following design requirements. (Provide a list of design requirements] within 18 months after permit issuance of Permit No. XXXXXXXX-XXX. The emission unit must meet all applicable permit requirements.*A construction authorization should be written to expire; the Permittee does not have a right to “reserve” air quality indefinitely. This is especially important for nonexpiring permits. The default is 18 months, but no longer than five years.**The permit should include notifications/testing requirements triggered by either permit issuance or the start of construction. Include a submittal requirement for a notification for start of construction so we know if they met the deadline.* *If the permit application relies on netting and the netting include notification of equipment installation, notification of initial startup, and notification of dismantlement. Place the notifications of equipment installation, startup, and shutdown or dismantlement at the specific Subject Item. If the authorization is for a single SI, then include this requirement there; if it is for a defined Group SI, this requirement should be listed there; if it is for a set of SI's, then list this requirement at the TFAC. LEADS 10/4/17* | It is important for the permit to include a condition that tells the Permittee what they are allowed to construct and when they must construct. The equipment design/size requirements can be documented in an appendix or listed in a permit requirement. Default is 18 months. Include notification of installation, startup, dismantlement.For non-major sources. This may be at TFAC or at individual EQUI, STRU, COMG or TREA –  Reflects profiles 1/18/18,  |
| [40 CFR 52.21(r)(2)] | The Permittee is authorized to construct the following equipment: EQUI XX. The authorization to start construction of this equipment expires 18 months after Stage 1 permit issuance of Air Emissions Permit No. XX, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The permit shall meet all applicable permit requirements. [40 CFR 52.21(r)(2)] | For PSD major sources |
| *The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began.* The notification shall be submitted electronically on Form CS-02. *[Minn. R. 7007.0800, subp. 16(L)]* | This applies to units that are authorized to construct with the permit and not added using flexibility provisions. Authorization will expire if they don’t construct. The units added using flexible language use the Annual Report. Put in body of permit. |
| *The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]* | Include in all permits where other requirements are triggered off of startup. Put in body of permit. |
| *The Permittee shall submit a notification of equipment removal/dismantlement: Due 15 calendar days after Equipment Removal and/or Dismantlement Date. Submit the name and number of the Subject Item and the date of removal/dismantlement. The notification shall be submitted electronically on Form CS-02.[Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]* | Include in all permits where other requirements are triggered off of removal of an SI. Put in body of permit. |
| Avoid PSDAvoid Part 70Avoid NESHAPs | The Permittee shall limit Process Throughput: <= to 50.123654 million gallons per year 12-month rolling sum of undenatured ethanol loadout out to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.ORThe Permittee shall limit Production: less than or equal to 50.123654 million gallons per year 12-month rolling sum of undenatured ethanol to 200-proof day tank to be calculated..*Facility may want to choose different way to measure daily ethanol – could be product load-out, or product production. Verify location of flow meter or records used to track.* | Use enough significant digits. Most facilities are moving to in-line loadout, so use separate limit for undenatured ethanol and denaturant |
| Avoid PSDAvoid Part 70Avoid NESHAPsNear top of requirement list | The Permittee shall limit Process Throughput <= 2.50 million gallons per year 12-month rolling sum of denaturant loadout to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.*Verify location of flow meter to be used for denaturant use.* |  |
| *Avoid PSD**Avoid Part 70**Avoid NESHAPs**Near top of requirement list* | *OPTION. The Permittee shall limit Process Throughput: less than or equal to 50.123654 million gallons per year 12-month rolling sum of denatured ethanol loadout out to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. “Denatured ethanol” is defined as a mixture of ethanol with containing no more than <5%> denaturant (gasoline) by volume.* | *May use for facility that does not do in-line loadout. Calculations will detail maximum % denaturant. Will still need separate limit for denaturant use. Need to track for calculation assumptions for leaks and loadout.* |
| Avoid PSDAvoid Part 70Title V modeling/PSD Modeling | The Permittee shall limit Process Throughput: less than or equal to 543,219 tons per year 12-month rolling sum of grain received to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.  |  |
| Avoid PSDAvoid Part 70Title V modeling/PSD Modeling | The Permittee shall limit Process Throughput: less than or equal to 423,123 tons per year 12-month rolling sum of dry distiller’s grains with solubles (DDGS), or modified distiller’s grains with solubles (MDGS) handled in the DDGS loadout equipment, to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. MDGS is subject to the same requirements as DDGS. The Permittee is not allowed to adjust the weight of DDGS and MDGS handled in the DDGS loadout equipment or in the loadout receipts to account for moisture content unless the permit contains specific provisions for monitoring, recordkeeping, and reporting the moisture content of the MDGS and DDGS. | *Emissions from handling of dried distillers solids that are dried, sent through the cooler, piled and go out the loadout are calculated by relying upon the “FEED” factor. This factor likely UNDERESTIMATES emissions from this*Reference 38. Feed shipping emission factor based on data for loading of bulk feed (not pellets).38. *Emission Factors For Grain Receiving And Feed Loading Operations At Feed Mills,* forNational Cattleman’s Beef Association, Texas A&M University, College Station, Texas,September 17, 1996. |
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| Avoid PSDAvoid Part 70Avoid NESHAPs | The Permittee shall limit Process Throughput: less than or equal to 6.000 million gallons per year 12-month rolling sum of denaturant loadout to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. |  |
| Avoid PSDAvoid Part 706.7 | Grain received by the facility shall only be used for production of ethanol and co-products by the Permittee at the Corn Plus facility (ID No. 04300041). Grain as defined by 40 CFR Section 60.301, includes corn, wheat, sorghum, rice, oats barley or soybeans. All grain must be received at permitted receiving areas.C&E - Is coproducts defined in Rule? Or is it based on the dictionary definition? | *Unless calculations include grain shipping.* |
|  | Outdoor handling and storage of dry whole grain and DDGS is prohibited.Grain received must be unloaded only in the grain-receiving building and stored in grain silos or equivalent. Corn and/or other grains may not be unloaded and stockpiled or stored outdoors on the ground or any other surface or in any other area of the facility except the designated storage silos.This limitation does not apply to wet cake. [Minn. R. 7007.0800, subp. 2, Title V Model] | *Use this for* ***facilities that******do not have a modeling trigger for volume and area sources.*** *This is to preclude the installation of TSF using insig mod/AA or minor mod that result in non-compliance with the BAR.* |
| Avoid PSDAvoid Part 70Avoid NESHAPs | Denaturant (gasoline) received by the facility shall only be used as a denaturant of ethanol by the Permittee at the Al-Corn facility (ID 03900028).  | *Unless calculations include fuel-dispensing activities.* |
| Avoid PSDAvoid Part 70 | Alternative Feedstock: The Permittee may utilize liquid molasses and off-specification liquid sugar derived from sugarcane and sugar beets <off-specification liquid sugar-based beverages> as alternative fermentation feedstock to the fermentation process. The Permittee may blend up to a maximum of 30 percent by weight of alternative liquid feedstock to fermentation. Daily records of the alternative liquid feedstock usage rate for each liquid alternative feedstock must be maintained at the facility. Alternative feedstock records shall identify the type of liquid feedstock, date of usage, the quantity in gallons per day, and the percentage of the liquid feedstock on a percent by weight basis compared to the total mass of all fermentation feedstock. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]***Federal Register*** */Vol. 69, No. 176 /Monday, September 13, 2004**Sugar means any grade or type of saccharine product derived, directly or indirectly, from sugarcane, sugar beets, sugarcane molasses or sugar beet molasses and consisting of, or**containing, sucrose or invert sugar, including raw sugar, refined crystalline sugar, edible molasses, edible cane syrup, liquid sugar, and in-process sugar.* | The main consideration is to determine impact on worst-case conditions for performance testing. Is it added prior to the flow meter for “mash feed rate”? The Permittee needs to understand if the additional flow would add load to the scrubber, reduce load, or have no impact.The Permittee must identify the type of material to be added so this assessment can be made. Any product with a VOC/HAP content should be assessed to ensure it contains less VOC or HAP than existing feedstock, or add additional performance testing at the higher load.*60.301 (a) Grain means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.**UNDER CONSTRUCTION…**IA?**Flow meter to define worst-case operating conditions? With or w/o sugar? What about off-spec alchohols? Why a % limit – is this so process runs smoothly? Where is it inserted into the process? What records do we really need and do they need daily records, monthly calcluations? Daily calculations seems excessive.* |
| **PROFILE SITE-SPECIFIC REQUIREMENT** |
|  | Permit Appendices: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in Appendices A (Insignificant Activities and General Applicable Requirements), C (Odor Action Plan), D (Fugitive Dust Control Plan), E (Best Management Practices for Emergency Engines), F (Performance Testing Recordkeeping and Test Methods), G (Subject Item Data for Flexible Permitting), H (Plan for Precluding Access), I (NESHAP CCCCCC Requirements), J (NESHAP ZZZZ Requirements), K (40 CFR pt. 63, subp. A General Provisions), L (Emission Unit Definitions and Process Flow Diagram)Modeling parameters in Appendix B (Modeling Inputs) are included for reference only as described elsewhere in this permit. | *Options typically included in an ethanol permit. Question why not if not present.**NESHAPs and NSPS may be in permit body or as appendix.**Very few Odor Plans, Diesel Idling Plans, other**Consider adding list of EU definitions and PFD to permit or TSD. List of EU will be used to clarify what activities are contained within definition of an EU.* |
| **INSERT after modeling profile requirement – EVOLVING** |
| **Ambient Air Boundary Control Strategy Implementation Plan (Plan) for COMPLETE MODELING** |
| Title V modeling/PSD Modeling | ~~The Permittee shall install and maintain fencing around the facility to preclude access to the facility. In areas where fencing is not permissible by setbacks, right-of-ways, safety concerns, or clearances, the Permittee shall install, maintain, and monitor cameras, and/or conduct patrols to sufficiently restrict public access to the property as described in the Plan to Preclude Access in Appendix XX of this permit. Surveillance and patrol activities must be conducted at least once per 24-hour period when the facility is in operation. In addition, the Permittee must install and maintain signs every 1,000 feet in unfenced areas. The signs must state "No Trespassing," or similar words, in 2-inch high letters, and have the signature or name and telephone number of the landowner, lessee, or manager.~~  | 1/7/19If facility models, and does not have fencing around entire facility. (i.e. railroad right-of-way, roads,….) |
| Title V modeling/PSD Modeling | The Permittee shall restrict public access to the ambient air boundary as described in the Ambient Air Boundary Control Strategy Implementation Plan (Plan) in Appendix XX of this permit. In areas where fencing is not installed, the Permittee shall install, maintain, and monitor cameras, and/or conduct patrols to sufficiently restrict public access to the boundary as described in the Plan. Surveillance and patrol activities must be conducted at least once per 24-hour period when the facility is in operation. In addition, the Permittee must install and maintain signs every 1,000 feet in unfenced areas. The signs must state "No Trespassing," or similar words, in 2-inch high letters, and have the signature or name and telephone number of the landowner, lessee, or manager.  | 1/7/2019 – Guidance on this issue is currently evolving and has not settled. This language is currently the most representative of the of the ethanol sector, requiring fencing is overly burdensome at this time. |
| Title V modeling/PSD Modeling | Comply with Ambient Air Boundary Control Strategy Implementation Plan (Plan): The Permittee shall follow the actions and recordkeeping specified in the Plan (Appendix XX). A copy of the Plan and surveillance/patrol records must be maintained on site and available for inspection. The Permittee must update the Plan to reflect changes in surveillance, signage or patrols that occur within the effective fenceline and receptor grid relied upon in the most recent air dispersion modeling analysis. A copy of the updated Plan must be maintained on-site. Any changes to the Plan must continue to meet the minimum requirements for surveillance, patrols and signage identified in this permit. | The group should decide if  |
| Minn. R. 7007.0800, subp. 5 | Recordkeeping for Ambient Air Boundary Control Strategy Implementation Plan (Plan): The Permittee must record once each 24-hour period surveillance and/or patrol actions. The Permittee shall document each instance the effective fenceline was breeched by a member of the general public.~~Failure to conduct required surveillance and/or patrols is considered a deviation and must be reported~~.  |  |
| Minn. R. 7007.0800, subp. 6 | Reporting for Ambient Air Boundary Control Strategy Implementation Plan (Plan): The Permittee shall report any breech as a deviation in the semiannual deviations report required by this permit. The deviation report shall identify any additional steps that were taken to control access to that portion of the effective fenceline. |  |
| **Ambient Air Boundary Control Strategy Implementation Plan (Plan) for MODELING in the future (example - not “reviewed” yet)** |
| Title V modeling/PSD Modeling | The Permittee shall submit an Ambient Air Boundary Control Strategy Implementation Plan (Plan): due 30 days after computer dispersion modeling protocol approval. The Plan must identify the ambient air boundary at which access of the general public can be controlled and compliance with the National Ambient Air Quality Standards (NAAQS) can be demonstrated. The Plan must be complete and approved before approval of the final Computer Dispersion Modeling Report. At a minimum, the Permittee shall restrict public access to the ambient air boundary consistent with the approved modeling protocol. In areas where fencing is not installed, the Permittee shall install, maintain, and monitor cameras, and/or conduct patrols to sufficiently restrict public access to the boundary as described in an approved Plan that must be maintained at the facility. Surveillance and/or patrol activities must be conducted at least once per 24-hour period when the facility is in operation. In addition, the Permittee must install and maintain signs every 1,000 feet in unfenced areas. The signs must state "No Trespassing," or similar words, in 2-inch high letters, and have the signature or name and telephone number of the landowner, lessee, or manager. The Plan must provide for records once each 24-hour period for surveillance and/or patrol actions and include site maps. | 1/7/19Plan will be approved at the time of the modeling protocol. Permittee will maintain on site. At the next permit action that is public noticed, it should be put in as a permit appendix, and the language above inserted into the permit. |
| Title V modeling/PSD Modeling | **Comply with Ambient Air Boundary Control Strategy** Plan (Plan): After submittal, the Permittee shall follow the actions and recordkeeping specified in the Plan. A copy of the Plan and surveillance/patrol records must be maintained on site and available for inspection. The Permittee must update the Plan to reflect changes in surveillance, signage or patrols that occur within the effective fenceline and receptor grid relied upon in the most recent air dispersion modeling analysis. A copy of the updated Plan must be maintained on-site. Any changes to the Plan must continue to meet the minimum requirements for surveillance, patrols and signage identified in this permit. | 1/7/19 |
| Title V modeling/PSD Modeling  | Equivalent or Better Dispersion (EBD) Modeling Triggers: Appendix F provides applicable requirements to determine when changes at the facility may trigger an EBD analysis or re-modeling. Based upon the results of the Computer Dispersion Modeling conducted for PM10 and PM2.5, the Permittee will follow the requirements in either Table 1, 2 or 3 of Appendix F. | 1/7/19This still needs further work to link language with existing EBD language. The goal is gap-filling, how to trigger correct EBD response if modeling is conducted in the future. |
| Minn. R. 7007.0800, subp. 5  | Recordkeeping for Ambient Air Boundary Control Strategy Implementation Plan (Plan): The Permittee must record once each 24-hour period surveillance and/or patrol actions. ~~Failure to conduct required surveillance and/or patrols is considered a deviation and must be reported~~. | 1/7/19 |
| Minn. R. 7007.0800, subp. 6 | Reporting for Ambient Air Boundary Control Strategy Implementation Plan (Plan): The Permittee shall report any breech as a deviation in the semiannual deviations report required by this permit. The deviation report shall identify any additional steps that were taken to control access to that portion of the effective fenceline. | 1/7/19 |
| **PROFILE SITE-SPECIFIC REQUIREMENT** |
| Minn. R. 7007.0100, Minn. R. 7007.0800, subp. 2, Minn. R. 7009.0020, Minn. R. 7011.0150, Minn. Stat. 116.07, subd. 4aCAAA of 1990BACTModel | Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and recordkeeping specified in the fugitive dust control plan in Appendix XX of this permit. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner. 10/11/2017 | *May be more restrictive site-specific conditions. All ethanol facilities should have a Fugitive Emission Control Plan.**Many Consent Decrees required FECP.**It requires a public notice to change an appendix in a permit.* |
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| **Deactivated 9/28/2015** |
| Preview Desc: |   | **Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and recordkeeping specified in the control plan. The plan may be amended by the Permittee with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive control plan, …**  |

 | *See Jennas’s comments on Al-Corn* *Propose updates to template language to address consistency issues.* |
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| **INSERT THESE Standards of Performance after Fugitive Emissions PROFILE requirement**  |
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| Minn. R. 7011.1005, subp. 1(A) | The Permittee shall clean up commodities spilled on the driveway and other facility property as required to minimize fugitive emissions to a level consistent with RACT (reasonably available control technology). [Minn. R. 7011.1005, subp. 1(A)] | *Bulk Agricultural Rule* |
| [Minn. R. 7011.1010] | The Permittee may not operate or maintain the facility such that it creates a public nuisance. If the commissioner determines that operation or maintenance of a commodity facility creates a public nuisance, the commissioner may require the Permittee to take measures necessary to eliminate the nuisance. [Minn. R. 7011.1010] | *Bulk Agricultural Rule* |
| **INSERT THESE RECORDKEEPING requirements after general PROFILE RECORDKEEPING requirements, before MODELING language** |
| Avoid PSDAvoid Part 70Avoid NESHAPsMinn. R. 7007.0800, subps. 4-5 | Daily Ethanol <Production><Process Throughput> Recordkeeping. ~~Once~~ For each day of operation, the Permittee shall ~~calculate,~~ record and maintain records of the ethanol <loadout><production> in gallons. This shall be based on flowmeters from X to X.Facility Wide – 4Throughput Limit – 5* Ethanol/Denaturant/Grain/DDGS - 6

Consider adding profiles to the TFAC for the daily and monthly throughput limits? | *Explain how it is to be tracked and verify existence and location of flow meters.*1/15/2018 – If only tracked once if day, may not record the entire day – better to state “for” each day. There is no need to calculate throughput on a daily basis, only to record it, so that the facility can do the monthly calculation. Removed phrase “for the previous day”, not Tempo profile language, and caused problems with daily recordkeeping for days of non-operation. |
| Avoid PSDAvoid Part 70Avoid NESHAPsMinn. R. 7007.0800, subps. 4-5 | Daily Denaturant Process Throughput Recordkeeping. For each day of operation, the Permittee shall ~~calculate~~ record and maintain records of the denaturant loadout in gallons ~~for the previous calendar day~~. This shall be based on flowmeters from X to X. | *Explain how it is to be tracked and verify existence and location of flow meters.*1/15/2018 – see above |
| Avoid PSDAvoid Part 70Title V modeling/PSD ModelingMinn. R. 7007.0800, subps. 4-5 | Daily Grain Throughput Recordkeeping: For each day of operation, the Permittee shall record and maintain records of the tons of grain received by the facility. This shall be based on grain receipts. | 1/15/2018 – changes made consistent with those above |
| Avoid PSDAvoid Part 70Title V modeling/PSD ModelingMinn. R. 7007.0800, subps. 4-5 | Daily DDGS and MDGS Throughput Recordkeeping: For each day of operation, the Permittee shall record and maintain records of the tons of DDGS and MDGS loadout by the facility. This shall be based on loadout receipts. | 1/15/2018 changes made consistent with those above |
| Minn. R. 7007.0800, subps. 5 | Monthly Ethanol Production/Process Throughput Recordkeeping: By the 15th day of each month, the Permittee must calculate and record the following:1) The monthly gallons of undenatured ethanol loadout/produced during the previous month based on summing the daily denatured ethanol loadout/production records for that month, and2) The 12-month rolling sum undenatured ethanol loadout/produced for the previous 12-month period by summing the monthly denatured ethanol loadout/production data for the previous 12 months. |  |
| Minn. R. 7007.0800, subps. 5[S:\Nelson\_Bonnie.BN\Performance Testing\Alt test Opacity and VE intermittent.docx](file:///S%3A%5CNelson_Bonnie.BN%5CPerformance%20Testing%5CAlt%20test%20Opacity%20and%20VE%20intermittent.docx) | Monthly Denaturant Process Throughput Recordkeeping: By the 15th of each month, the Permittee must calculate and record the following:1) The monthly gallons of denaturant loadout during the previous month based on summing the daily denatured ethanol denaturant loadout records that month, and2) The 12-month rolling sum undenatured ethanol loadout/produced for the previous 12-month period by summing the monthly denatured ethanol loadout/production data for the previous 12 months. |  |
| Minn. R. 7007.0800, subps. 5 | Monthly Grain Throughput Recordkeeping: By the 15th of the month, the Permittee shall calculate and record the following: 1) The monthly tons of grain received during the previous month based on summing the daily grain receipts for that month, and2) The 12-month rolling sum grain received for the previous 12-month period by summing the monthly grain receipt data for the previous 12 months. |  |
| Minn. R. 7007.0800, subps. 5 | Monthly DDGS and MDGS Loadout Recordkeeping: By the 15th of the month, the Permittee shall calculate and record the following: 1) The monthly tons of DDGS and MDGS loadout during the previous month based on summing the daily DDGS and MDGS loadout records for that month, and2) The 12-month rolling sum DDGS and MDGS loadout for the previous 12-month period by summing the monthly DDGS and MDGS loadout data for the previous 12 months. | *Permittee could track DDGS produced in tons/day.* |
| **TFAC FLEXIBILITY recordkeeping LANGUAGE**  | **See Flexibility Plus! In flexibility folder on my s-drive**[**..\Flexibility\_AOS and Bypass Language\FLEXIBILITY Plus! for ethanol facilities.docx**](../Flexibility_AOS%20and%20Bypass%20Language/FLEXIBILITY%20Plus%21%20for%20ethanol%20facilities.docx) |  |
| **Remainder of PROFILE LANGUAGE, MODELING language at end of PROFILE Language** |
| ADDED 2/6/2018Removed 1/7/2019 | Equivalent or Better Dispersion (EBD) Modeling Triggers (Modeling Not Required) for PM2.5: Changes that ~~are modeled as point sources or elevated volume sources (not area or non-elevated volume sources~~), do not require a permit amendment or require an administrative permit amendment do not trigger the EBD Modeling Submittal requirement. The Permittee shall keep updated records on site of all modeled PM2.5 parameters and emission rates listed in Appendix D. The Permittee shall submit any changes to modeled PM2.5 parameters and emission rates with the next required modeling submittal.  | The additional language is that was to restrict the Permittee from adding area sources and non-elevated volume sources (like uncaptured grain and DDGS handling operations – specifically temporary storage facilities) is added by adding additional requirements at the TFAC level. These type of sources tend to be highly culpable in air dispersion modeling, but have very low PTE and are often added as **insignificant modifications**. This contributes to non-compliance issues.Use standard profile language without any changes. |
| ADDED 2/6/2018Removed 1/7/2019 | EBD Modeling Triggers (Modeling Required) for PM2.5: Changes that require, or would require1~~. For changes that are modeled as point sources or elevated volume sources: a minor, moderate, or major permit amendment due to an increase in PM2.5 emissions, or~~ ~~2. For changes that are modeled as area or volume sources: any increase in PM2.5 emissions,~~ and affect any modeled PM2.5 parameter or emission rate listed in Appendix D, or an addition to the information documented in Appendix D, trigger the EBD Remodeling Submittal requirement. The Permittee shall include previously made changes to modeled PM2.5 parameters and emission rates listed in Appendix D that did not previously trigger the EBD Modeling Submittal requirement with this modeling submittal.  |
| **AOS SET UP and SUMMARY if not feasible to place at individual STRU and EQUI. Discuss and coordinate with other members of ethanol team and your peer reviewer before proceeding.** |
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COMMENT RESPONSES **October 4, 2017 AQ Leads Meeting Agenda**

**TFAC Template Requirement to Operate Air pollution Control Equipment (Marshall Cole)**

The following comment was received from a permittee regarding our TFAC template requirement to operate air pollution control equipment. The comment response can be used by staff if they receive a similar comment.

The TFAC requirement: Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated. [Minn. R. 7007.0800, subp. 16(J), Minn. R. 7007.0800, subp. 2]

The permittee’s comment: The permit language is a careless revision of the rule at Minn. R. 7007.0800 subp. 16(j) and needs to be corrected, especially to include the phrase "to achieve compliance with the conditions of the permit."  Here, and in any‐and‐all permit sections citing this rule, either quote the rule directly or re‐write the permit to say: "*Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated as needed to achieve compliance with the conditions of the permit."*

Air permit staff response to comment: This requirement is standard air permit requirement language used for numerous years, and has been in the permit since the initial title V operating permit. It is not a revision of Minn. R. 7007.0800, subp. 16(J), but is an augmented version of the rule (which is the reason the citation includes Minn. R. 7007.0800, subp. 2). The augmentation is necessary due to situations where control equipment is installed after permit issuance and the control equipment is not (yet) listed in the permit. If the requirement mimicked Minn. R. 7007.0800, subp. 16(J), operation of any control equipment not included in the permit wouldn’t be required. This situation impedes compliance and enforcement staff response to a Permittee’s failure to operate control equipment.