

AIR EMISSION PERMIT NO. 16900013-004
Administrative Amendment

IS ISSUED TO

Malteurop North America Inc

MALTEUROP NORTH AMERICA INC - WINONA
500 3rd Street West
Winona, Winona County, MN 55987

The emission units, control equipment and emission stacks at the stationary source authorized in this permit amendment are as described in the Permit Applications Table.

This permit amendment supersedes Air Emission Permit No. 16900013-003 and authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the State Implementation Plan under 40 CFR § 52.1220 and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: Federal; Pt 70/Limits to Avoid NSR

Operating Permit Issue Date: February 12, 2008

Administrative Amendment Issue Date: February 3, 2009

Expiration Date: February 12, 2013 – Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit - Reissuance	4/25/05; revision on 9/4/07	003
Administrative Amendment	11/24/08	004

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194. Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

This facility receives barley by truck and rail. The barley is then weighed and sent to storage. Prior to the malting process, the barley is transferred from storage to a cleaner, width grader, separator, debearder, and an aspirator. Barley is then sent to one of the two malt houses.

In the malt house the barley is soaked in water in a steep tank, and then sent to a germination box to sprout. After the barley has sprouted it is dried in a malt kiln. Sulfur is burned in the kiln to produce sulfur dioxide, which acts as a fungicide, bactericide, and preservative. After drying is complete the malt is sent to storage via a bucket elevator.

Malted barley is then sent to a scale and shipped by truck or rail. Malt by-product (sprouts and screenings dust) is loaded and shipped out by truck. Barley byproduct is loaded out in the barley receiving area and shipped out by rail or truck. Both byproduct loadouts are equipped with extendible DCL loadout spouts to reduce byproduct freefall and fugitive dust emissions.

Fabric filters are used to control particulate matter and particulate matter less than 10 um in size from barley and malt handling processes. All other sources are uncontrolled. All fuel combustion sources are restricted to natural gas and propane. Small vacuum systems are used in malthouses and elevators for building cleanup and are insignificant activities under Minn. R. 7007.1300, subp. 4(B).

There are also four natural gas fired boilers used for heating on site. All are insignificant activities under Minn. R. 7007.1300, subp. 4.

The facility is a non-major source under New Source Review, due to federally enforceable operating conditions contained in the permit.

AMENDMENT DESCRIPTION (Administrative Amendment -004)

This amendment will change the facility name to Malteurop North America Inc. – Winona, previously ADM Malting – Winona. Ownership is also changing to Malteurop North America Inc., previously Archer Daniels Midland (owner) and ADM Malting Division (operator). A repeated word, “control” was deleted from opacity limits for GP007, 008 and 010.

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-1**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:**Total Facility**

What to do	Why to do it
Permit Appendices: This permit contains 2 appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in the appendices.	Minn. R. 7007.0800, subp. 2
SOURCE-SPECIFIC REQUIREMENTS	hdr
Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and recordkeeping specified in the fugitive emission control plan, located at Appendix C to the permit. 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 emission control plan, then the Permittee may be required to amend the fugitive emission control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150; Minn. R. 7009.0020
OPERATIONAL REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080.
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p> <p>The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	<p>Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2</p>
<p>Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.</p>	<p>Minn. R. 7017.2025, subp. 3</p>
MONITORING REQUIREMENTS	hdr
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
RECORDKEEPING	hdr
<p>Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>
<p>Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.</p>	<p>Minn. R. 7007.0800, subp. 5(B)</p>
<p>If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.</p>	<p>Minn. R. 7007.1200, subp. 4</p>
REPORTING/SUBMITTALS	hdr
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. The Permittee shall submit this on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 001 Sulfur Pans**Associated Items:** EU 041 MH-2 Sulfur Pans (SV 005)

EU 043 MH-3 Sulfur Pans (SV 006)

What to do	Why to do it
Material Usage: less than or equal to 120 tons/year using 12-month Rolling Sum . This is a total combined Sulfur usage limit for all units listed in GP001.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Sulfur Usage Recordkeeping: Each operating day, the Permittee shall record the total quantity of sulfur consumed by the units listed in GP001. By the 15th day of each month, the Permittee shall calculate and record the following: 1. the total tons of sulfur burned in the GP001 units during the previous calendar month; 2. the total tons of sulfur burned in GP001 units during the previous 12-month period (12-month rolling sum).	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 003 Indirect Heating Equipment post-1977**Associated Items:** EU 062 MH-2 Kiln Heater 1

EU 063 MH-2 Kiln Heater 2

EU 064 MH-2 Kiln Heater 3

EU 065 MH-2 Kiln Heater 4

EU 066 MH-3 Kiln Heater 1

EU 067 MH-3 Kiln Heater 2

EU 068 MH-3 Kiln Heater 3

EU 069 MH-3 Kiln Heater #4

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . This limit applies individually to each unit listed in GP003. PTE based on worst case fuel allowed is 0.007 lbs/million Btu heat input for each unit.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuels allowed: natural gas and propane only, by design	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 005 Fabric Filter Requirements**Associated Items:** CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

What to do	Why to do it
The Permittee shall operate and maintain each fabric filter at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain each fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Operate and maintain each fabric filter in GP005 so that each fabric filter achieves a collection efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent collection efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
Operate and maintain each fabric filter in GP005 so that each fabric filter achieves a collection efficiency for Total Particulate Matter: greater than or equal to 99 percent collection efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to 1 inches of water column and less than or equal to 8 inches of water column for each fabric filter, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 14
Visible Emissions: The Permittee shall check each fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across each fabric filter, once each day of operation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified in this permit	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 007 Handling/Receiving Operations Subject to Minn. R. 7011.1005**Associated Items:** CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 002 West Barley Jump Leg

EU 003 West Barley Bsmnt Conveyor

EU 004 East Barley Bsmnt Conveyor

EU 005 Receiving Leg

EU 009 West Transfer Leg

EU 016 Malt Storage, Gallery Belt

EU 018 Malt Storage, Basement Belt

EU 019 Malt Byproduct (Sprouts and Screenings) Dust Tank

EU 020 Sprout Transfer

EU 048 East Barley Gallery Conveyor

EU 049 East Transfer Leg

EU 053 Kiln Malt Leg

EU 054 Malt Transfer Leg

EU 055 Shipping Leg

EU 057 Rail Unloading

EU 058 MH-1 Leg

SV 002 Barley Elevator West Baghouse (CE002)

SV 003 Barley Elevator East Baghouse (CE003)

SV 007 Malt Storage East Baghouse (CE004)

SV 008 Malt Storage West Baghouse (CE005)

What to do	Why to do it
EMISSION LIMITS	hdr
Opacity: less than or equal to 10 percent opacity (process emissions from SV002, SV003, SV007, and SV008). SV002 and SV003 are also subject to a more restrictive limit under NSPS Subpart DD (see GP008). The units controlled by CE002 and CE003 (listed below) are exhausted to SV002 and SV003, respectively. Therefore, the stack opacity limit of Subpart DD (GP008) supersedes the GP007 stack opacity limit for SV002 and SV003.	Minn. R. 7011.1005, subp. 3(D)
Opacity: less than or equal to 5 percent opacity (fugitive emissions - those emissions not captured and routed to control equipment). This limit applies individually to each emission unit listed in GP007.	Minn. R. 7011.1005, subp. 3(A)
CONTROL REQUIREMENTS (see GP005 for specific operation and maintenance requirements)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

All emission units listed in GP007 must be controlled by control equipment listed in GP005. Units controlled by CE002 (SV002): EU002, EU003, EU005, EU009, EU049, EU057 Units controlled by CE003 (SV003): EU004, EU020, EU048 Units controlled by CE004 (SV007): EU053, EU054 Units controlled by CE005 (SV008): EU018, EU019, EU055, EU058	Minn. R. 7011.1005, subp. 3; Minn. R. 7011.1015; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 80 percent control efficiency	Minn. R. 7011.1005, subp. 3(E)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 008 Grain Handling Operations Subject to 40 CFR part 60 subp. DD**Associated Items:** CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 001 West Barley Gallery

EU 012 Unload Scale

EU 013 Debearders

EU 014 Aspirator

EU 050 Transfer Scale

EU 071 Barley width graders

EU 072 Barley length graders

SV 002 Barley Elevator West Baghouse (CE002)

SV 003 Barley Elevator East Baghouse (CE003)

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.01 grains/dry standard cubic foot from SV002 and SV003, individually.	40 CFR Section 60.302(b)(1); Minn. R. 7011.1005, subp. 2
Opacity: less than or equal to 0 percent opacity (process emissions from SV002 and SV003).	40 CFR Section 60.302(b)(2); Minn. R. 7011.1005, subp. 2
Opacity: less than or equal to 0 percent opacity (fugitive emissions - those emissions not captured and routed to control equipment). This limit applies individually to each emission unit listed in GP008.	40 CFR Section 60.302(c)(2); Minn. R. 7011.1005, subp. 2
CONTROL REQUIREMENTS (see GP005 for specific operation and maintenance requirements)	hdr
All emission units listed in GP008 must be controlled by control equipment listed in GP005. Units controlled by CE002 (SV002): EU001 Units controlled by CE003 (SV003): EU012, EU013, EU014, EU050, EU071, EU072	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 009 Malt Houses**Associated Items:** EU 040 MH-2 Kiln Grain Beds

EU 041 MH-2 Sulfur Pans (SV 005)

EU 042 MH-3 Kiln Grain Beds

EU 043 MH-3 Sulfur Pans (SV 006)

SV 005 Malt House 2 (EU 040 & 041)

SV 006 Malt House 3 (EU 042 & 043)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to meet the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies separately to each stack/vent in GP 009.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity for each stack/vent in GP009.	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-11**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 010 Loadout operations subject to Minn. R. 7011.1005

Associated Items: CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 008 DCL Barley Byproduct Loadout Spout

EU 060 Malt Loadout Rail/Truck

EU 061 Sprouts/Screenings Dust Tank DCL Truck Loadout Spout

SV 002 Barley Elevator West Baghouse (CE002)

SV 008 Malt Storage West Baghouse (CE005)

What to do	Why to do it
EMISSION LIMITS	hdr
Opacity: less than or equal to 10 percent opacity (process emissions from SV002 and SV008). SV002 is also subject to a more restrictive limit under NSPS Subpart DD (see GP008). The unit controlled by CE002 is exhausted to SV002. Therefore, the stack opacity limit of Subpart DD (GP008) supersedes the GP010 stack opacity limit for SV002.	Minn. R. 7011.1005, subp. 3(D)
Opacity: less than or equal to 10 percent opacity (fugitive emissions - those emissions not captured and routed to control equipment). This limit applies individually to each emission unit listed in GP010.	Minn. R. 7011.1005, subp. 3(B)
CONTROL REQUIREMENTS (see GP005 for specific operation and maintenance requirements)	hdr
All emission units listed in GP010 must be controlled by control equipment listed in GP005. Units controlled by CE002 (SV002): EU008 Units controlled by CE005 (SV008): EU060, EU061	Minn. R. 7011.1005, subp. 3; Minn. R. 7011.1015; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 80 percent control efficiency	Minn. R. 7011.1005, subp. 3(E)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

Subject Item: GP 011 Operations subject to IPER**Associated Items:** CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 007 Barley Shaker Cleaner

EU 017 Kiln Malt Cleaners

EU 056 Shipping Cleaners

SV 002 Barley Elevator West Baghouse (CE002)

SV 007 Malt Storage East Baghouse (CE004)

SV 008 Malt Storage West Baghouse (CE005)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to meet the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies individually at SV002, SV007, and SV008. SV002 is also subject to a more restrictive limit under NSPS Subpart DD (see GP008). The units controlled by CE002 (listed below) are exhausted to SV002. Therefore, the Total Particulate Matter limit of Subpart DD (GP008) supersedes the GP011 stack emission limit for SV002.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This limit applies individually to SV002, SV007, and SV008. SV002 is also subject to a more restrictive limit under NSPS Subpart DD (see GP008). The units controlled by CE002 (listed below) are exhausted to SV002. Therefore, the stack opacity limit of Subpart DD (GP008) supersedes the GP011 stack emission limit for SV002. SV007 and SV008 are also subject to a more restrictive limit under Minn. R. 7011.1005 (see GP007). The units controlled by CE004 and CE005 (listed below) are exhausted to SV007 and SV008, respectively. Therefore, the stack opacity limit of GP007 supersedes the GP011 stack emission limit for SV007 and SV008.	Minn. R. 7011.0715, subp. 1(B)
CONTROL REQUIREMENTS (see GP005 for specific operation and maintenance requirements)	hdr
All emission units listed in GP011 must be controlled by control equipment listed in GP005. Units controlled by CE002 (SV002): EU007 Units controlled by CE004 (SV007): EU017 Units controlled by CE005 (SV008): EU056	Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14

TABLE B: SUBMITTALS**B-1** 02/03/09

Facility Name: Malteurop North America Inc - Winona
Permit Number: 16900013 - 004

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Malteurop North America Inc - Winona
Permit Number: 16900013 - 004

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS**B-3** 02/03/09

Facility Name: Malteurop North America Inc - Winona

Permit Number: 16900013 - 004

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 02/12/2008 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 02/12/2008 (for the previous calendar year). The Permittee shall submit this on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

Facility Name: Malteurop North America Inc. - Winona
Permit Number: 16900013-004

The table below lists the insignificant activities that are currently at the facility and their associated general applicable requirements.

[illegible]

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
4	<p>Individual emissions units at a stationary source, each of which has:</p> <p>A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide;</p> <p>B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and</p> <p>C. For hazardous air pollutants, emissions units with:</p> <p>(1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or</p> <p>(2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart.</p> <ul style="list-style-type: none"> ▪ <i>EU070 Germ air boiler – potential lb/hr below thresholds</i> ▪ <i>EU032 MH-2 space heat boiler – potential lb/hr below thresholds</i> ▪ <i>EU033 MH-3 space heat boiler – potential lb/hr below thresholds</i> ▪ <i>EU059 Maintenance space heat boiler – potential lb/hr below thresholds</i> 	Minn. R. 7011.0510/0515

Conditionally Insignificant Activities

	Rule Description of the Activity	Applicable Requirement
Minn. R. 7008.4100	<p>Total VOC Usage at the stationary source less than 200 gallons or 2000 pounds in each calendar year. See Minn. R. 7008.4100 for recordkeeping and calculation requirements for this activity.</p> <ul style="list-style-type: none"> ▪ <i>Maintenance department parts cleaning tank, uses less than 200 gallons solvent per year</i> 	Minn. R. 7011.0710/0715

APPENDIX C: Fugitive Emissions Control Plan

Facility Name: Malteurop North America Inc. - Winona

Permit Number: 16900013-004

FUGITIVE EMISSIONS CONTROL PLAN

1. Inspections of facility grounds will be performed weekly by the elevator foreman and necessary cleaning assigned.
2. Spillage from truck loading operations or control equipment malfunction will be cleaned up no later than four hours after they occur unless safety or weather conditions prevent starting within this time frame. In these cases cleanup will start as soon as possible after conditions allow it.
3. Employees will be instructed that vacuuming is the preferred method of cleaning and that use of compressed air is to be considered a last resort method of cleaning. When compressed air is used care shall be taken to prevent fugitive dust emissions.
4. Employees will be instructed that loadout operations will be done in a manner to reduce free fall height of product.
5. All bag filters will be operated as designed to control fugitive emissions during receiving, loadout and handling.
6. All bag filters will be operated as designed to control fugitive emission sources including but not limited to:
 - a) Truck and rail car loadout
 - b) Truck and rail receiving
 - c) Spillage from control and process equipment
 - d) Open doors and windows in headhouse and gallery areas
7. Roof areas will be inspected by the responsible foreman on a weekly basis and cleaning will be assigned as necessary.
8. Weekly inspection reports will indicate the following items at a minimum:
 - a) Date inspection was completed
 - b) Areas inspected
 - c) What condition was found
 - d) Whether an employee was assigned to clean area
 - e) Whether such cleaning was completed
 - f) Whether any maintenance or repair of control equipment (dust collectors) was necessary
9. Weekly inspection reports shall be retained for 5 years.

BARLEY ELEVATOR

DATE: _____

DUST COLLECTOR:		WEST (CE 003)		EAST (CE 002)
	OK	COMMENTS	OK	COMMENTS
FANS RUNNING				
REVERSE AIR BLOWER ON				
ROTARY VALVE TURNING				
PNEUMATIC TAKEAWAY ON				
EXTERIOR PIPING (LEAKS?)				
DISCHARGE (VISIBLE EMISSIONS?)				
PRESSURE READINGS				

ROOF AREAS: _____

INSPECTION COMMENTS _____

BARLEY SCALE AREA: _____

ASSIGNMENTS _____

BARLEY UNLOAD AREA: _____

COMPLETION _____

GROUND: A) FROM MALT LOADOUT WEST TO FENCELINE

B) PARKING & STORAGE AREA

C) ROADWAY NORTH OF MH #2 & 3

D) ROADWAY EAST OF KILN

ADDITIONAL COMMENTS:

FOREMAN: _____

PLANT MANAGER: _____

MALT ELEVATOR

DATE: _____

DUST COLLECTOR:		EAST (CE 004)		WEST (CE 005)
	OK	COMMENTS	OK	COMMENTS
FANS RUNNING				
REVERSE AIR BLOWER ON				
ROTARY VALVE TURNING				
PNEUMATIC TAKEAWAY ON				
EXTERIOR PIPING (LEAKS?)				
DISCHARGE (VISIBLE EMISSIONS?)				
PRESSURE READINGS				

ROOF AREAS: _____

INSPECTION COMMENTS _____

BARLEY SCALE AREA: _____

ASSIGNMENTS _____

BARLEY UNLOAD AREA: _____

COMPLETION _____

GROUND: A) FROM MALT LOADOUT WEST TO FENCELINE

B) PARKING & STORAGE AREA

C) ROADWAY NORTH OF MH #2 & 3

D) ROADWAY EAST OF KILN

ADDITIONAL COMMENTS:

FOREMAN: _____

PLANT MANAGER: _____

MALTHOUSE

DATE: _____

ROOF AREAS:

INSPECTION

COMMENTS _____

A) MH #2&3 _____
ASSIGNMENTS _____

B) MH #2&3 _____
COMPLETION _____

ADDITIONAL COMMENTS:

FOREMAN: _____

PLANT MANAGER: _____

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 16900013-004

This technical support document is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

1. General Information

1.1 Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2083)
Malteurop North America Inc. PO Box 712 Milwaukee, WI 53201	Malteurop North America Inc. - Winona 500 3rd St W Winona, Winona County, MN 55987
Contact: David L. Brunette Phone: 414-649-0284	

1.2 Description of the Facility

This facility receives barley by truck and rail. The barley is then weighed and sent to storage. Prior to the malting process, the barley is transferred from storage to a cleaner, width grader, separator, debearder, and an aspirator. Barley is then sent to one of the two malt houses.

In the malt house the barley is soaked in water in a steep tank, and then sent to a germination box to sprout. After the barley has sprouted it is dried in a malt kiln. Sulfur is burned in the kiln to produce sulfur dioxide which acts as a fungicide, bactericide, and preservative. This is the primary source of emissions at the facility – oxidation of sulfur to sulfur dioxide (SO₂). After drying is complete the malt is sent to storage via a bucket elevator.

Malted barley is then sent to a scale and shipped by truck or rail. Malt by-product (sprouts and screenings dust) is loaded and shipped out by truck. Barley byproduct is loaded out in the barley receiving area and shipped out by rail or truck. Both byproduct loadouts are equipped with extendible DCL loadout spouts to reduce by-product freefall and fugitive dust emissions.

Fabric filters are used to control particulate matter and PM₁₀ from barley and malt handling processes. All other sources are uncontrolled. All fuel combustion sources are restricted to natural gas and propane. Small vacuum systems are used in malthouses and elevators for building cleanup and are insignificant activities under Minn. R. 7007.1300, subp. 4(B).

There are also four natural gas fired boilers used for heating on site. All are insignificant activities under Minn. R. 7007.1300, subp. 4.

The facility is a synthetic minor source under New Source Review, due to federally enforceable conditions in the permit.

1.3 Description of the Activities Allowed by this Permit Action

An administrative amendment application was received November 24, 2008, in accordance with Minn. R. 7007.1400, subps. 1(B) and (E) that requested a change in ownership and facility name. The new name of the facility is Malteurop North America Inc. - Winona (formerly ADM Malting - Winona) located at 500 3rd St. W. Winona, MN 55987. Ownership of the facility is also changing to Malteurop North America Inc. (formerly Archer Daniels Midland corporate owner, ADM Malting Division corporate operator). ADM Malting, a wholly owned division of Archer Daniels Midland was sold to Malteurop North America Inc. on August 1, 2008. All permit responsibility, coverage and liability were also transferred to Malteurop on this date. A repeated word, "control" in opacity limits for GP007, GP008 and GP010 was deleted. Updates were made to the permit to reflect current MPCA policy.

2. Conclusion

Based on the information provided by Malteurop North America Inc. - Winona, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 16900013-004 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Tarik Hanafy (permit writer/engineer)
 Jennifer Lovett (enforcement)
 Sarah Sevcik (peer reviewer)

AQ File No. 2162B; DQ 2334

Attachments: 1. Facility Description and CD-01 Forms