TECHNICAL SUPPORT DOCUMENT
For
DRAFT/PROPOSED AIR EMISSION PERMIT NO. 06900025-004

This technical support document (TSD) is intended for all parties interested in the draft/proposed 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 preliminary determination to issue the draft/proposed permit.

1. General Information

1.1 Applicant and Stationary Source Location:

Table 1. Applicant and Source Address

Applicant/Address	Stationary Source/Address (SIC Code: 2079)
PICO Northstar Hallock LLC 15 Broadway Suite 500 Fargo, ND 58102	Northstar Agri Industries - Hallock 2100 US Highway 75 Kennedy, MN 56733 Kittson County
Contact: **Jim Dudley** Phone: **701-478-5848**	Consultant: Kathryn Anderson Phone: 651-294-4593

1.2 Facility Description

Background: The facility was issued a permit on July 15, 2008 to construct and operate a 1,000 ton per day extraction plant and refinery. The original plant design included a biodiesel facility. The Permittee did not install the biodiesel portion of the facility so it was removed from the permit. The first phase of the facility commenced operation in May of 2012.

Facility Expansion: The existing facility was permitted as a synthetic minor source under federal New Source Review (NSR) Prevention of Significant Deterioration (PSD) regulations. In order to remove the existing synthetic minor limits and expand the capacity, the facility will be re-permitted as a major source with respect to Prevention of Significant Deterioration (PSD) review in accordance with 40 CFR pt. 52.21(r)(4) which regulates relaxation of limits under NSR. Potential emissions from expanding the oilseed extraction facility are above the PSD major modification thresholds for VOC, PM, PM_{10}, $PM_{2.5}$ and NO_x. CO and lead emissions are below the major modification thresholds. The facility is requesting a limit of 70,000 tons per year limit for greenhouse gases in order to be below the PSD

major modification thresholds. The facility has accepted limits on fuel sulfur content of 0.0015 ppm in fuel oil. At this fuel sulfur content, uncontrolled PTE emissions of SO2 do not exceed the major modification thresholds for NSR.

Facility Description after Expansion

The total facility operating permit authorizes PICO Northstar Hallock LLC to construct and operate a canola oil processing facility, Northstar Agri Industries – Hallock (Northstar), consisting of a 2,000 ton/day oilseed extraction plant and refinery, located in Kittson County southwest of the city of Hallock, Minnesota.

Emissions from Northstar include PM, PM10, PM2.5, NOx, SO2, CO, VOC, methanol, n-hexane and other hazardous air pollutants (HAPs), and greenhouse (GHG) gas emissions. Emissions from the facility will be controlled by applying baghouses and cyclones to control particulate emissions. Mineral oil scrubbing and good solvent recovery practices will be applied to control VOC and HAP emissions.

Receiving. The facility will receive raw canola seeds via semi-trailer truck and railcar. The canola will be off-loaded onto conveyors that will have aspiration and a bar separator with magnet to remove ferrous and large foreign objects before going into on-site seed storage bins. The facility will have a total oilseed storage capacity of 2.08 million bushels. Emissions in the receiving section consist of PM/PM10/PM2.5 emissions from product unloading, storage and transferring and will be controlled by fabric filter baghouses.

Preparation. In the preparation section, the canola is cleaned, conditioned and rolled flat into “flakes”. The flakes are then conveyed to the flake cooker and heated to approximately 200°F. Cooked flakes are then pressed to release 20 percent by weight crude canola oil. The remaining “cake” is cooled in the cake cooler and transferred to the extraction section. The emissions in the preparation section consist of PM/PM10/PM2.5 and will be controlled by fabric filter baghouses or have high efficiency process cyclones used to recover the economically valuable canola and cake from the process. The cyclones in the process are considered to be process equipment.

Solvent Extraction. Inside the extraction building, the cake is washed in an extractor with commercial grade hexane, which strips the oil from the flakes. Two process streams leave the extractor: commercial hexane-laden cake and miscella, which is a mixture of commercial hexane, oil, and water. The miscella is separated into its components – oil, commercial hexane, and water – using distillation processes. The separated oil is termed crude oil, which will be further refined and sold. Emissions from the solvent extraction section include VOC and PM/PM10/PM2.5 emissions from the extraction vent system, desolventizer-toaster/dryer-cooler (DTDC) vent, and fugitive sources (equipment leaks). PM/PM10/PM2.5 emissions will be exhausted from high efficiency process cyclones used to recover the meal commodity. A solvent recovery system will recapture the majority of the VOC (hexane) emissions

for reuse in the process. After startup and shakedown of the facility, the plant will recover better than 99.9 percent of the commercial hexane and re-use it in the extractor. The separated water will be pretreated prior to going to the municipal wastewater treatment facility.

Meal System. The meal is "desolventized" by subjecting the commercial hexane-laden meal to heat. The meal is cooled, ground or pelletized, and conveyed to storage bins. The desolventized meal is sold as an animal feed. The commercial hexane that is driven off of the meal is piped to the solvent recovery system for re-use. A small portion of the hexane solvent is "fixed" to the meal during the desolventizing process and cannot be recovered. The meal will be shipped from the site primarily in bulk quantities via trucks and railcars. The emissions in the meal section consist of PM/PM10/PM2.5 emissions from the grinding, pelletizing, and loadout of the meal and will be exhausted from high efficiency process cyclones and a process fabric filter or controlled by a baghouse. The process cyclones and process fabric filters will be used to recover the meal. Northstar is proposing to install a can-pass system as part of this permit action. The can-pass process is used to add lignin to the meal in order to increase protein uptake for livestock. There will be three emission units installed as part of the can-pass process. One will be controlled by a fabric filter and the other two will each be controlled by a cyclone.

Extraction Process Liquid Storage Tanks**.** The two hexane tanks are part of the closed loop extraction system with the mineral oil scrubber as the final solvent recovery point.

Food Grade Refinery. The refining process removes compounds from the crude oil to produce "salad oil". By-products include fatty acids and distillates. Emissions from this section include PM/PM10/PM2.5 emissions from bleaching and filtering. There are bulk material storage silos for the refining materials, and a pneumatic conveying system. Three silos will be used, one for each refining material (filter aid, silica, and bleaching earth). The refinery section has two 4 MMBtu/hr boilers to supply high-pressure steam to the deodorizer process. Emissions from the high boilers consist of PM, PM10, PM2.5, NOx, SO2, CO, VOC, CO2e and HAP emissions.

Ancillary Facilities**.** Ancillary facilities at the site will include a steam plant, cooling tower, offices, a wastewater pretreatment system, maintenance facilities, warehouses, and HVAC units. Generated wastewater will enter a wastewater treatment system before being discharged to surface water as allowed by an NPDES/SDS permit.

Steam Generating Boilers. The facility has two 53.071 MMBtu/hr boilers to provide steam for the plant. The boilers are permitted to burn natural gas primarily, with propane and fuel oil #2 as backup fuels. An additional 90.9 MMBtu/hr boiler will be installed as part of this permit action. Emissions from the boilers consist of PM, PM10, PM2.5, NOx, SO2, CO, VOC, CO2e and HAP emissions.

Refinery Boilers. The facility will be permitted to install two 4 MMBtu/hr refinery boilers to provide high pressure steam for the deodorizing process. The refinery boiler is permitted to burn natural gas primarily, with propane as backup fuel. Emissions from the refinery boilers consist of PM, PM10, PM2.5, NOx, SO2, CO, VOC, CO2e and HAPs.

The facility boilers will be subject to NESHAP Subpart DDDDD because they are located in a major source of HAPs. This includes the existing Boilers 1 and 2 (EU 001 and 002) and existing refinery boiler (EU 004) as well as the proposed Boiler 3 (EU 033) and proposed refinery boiler (EU 034). All affected emission units are considered "new" affected sources under the standard. Boilers 1 through 3 will be allowed to combust fuel oil #2 only during periods of natural gas curtailment. For this reason, the boilers are classified in the "gas 1 subcategory" as defined in the rule. Boilers 1 through 3 primarily burn natural gas with propane and fuel oil #2 back-up. The refinery boilers burn natural gas with propane back-up. EU004 and EU034 do not have continuous oxygen trim systems.

Removal of Case-By-Case MACT

EU001, EU002 and EU004 were previously subject to a case-by-case Maximum Achievable Control Technology (MACT) due to the vacature (7/30/07) of 40 CFR pt. 63, subp. DDDDD. The January 31, 2013, **Federal Register** contains a notice of final rulemaking and a notice of final action on reconsideration of 40 CFR 63, Subpart DDDDD.

40 CFR Section 63.56 contains requirements for case-by-case determination of equivalent emission limitations after promulgation of a subsequent MACT standard. Section 63.56(b) requires the permitting authority to incorporate requirements of the standard in the title V permit upon its next renewal, and provides guidance on establishing a compliance date. However, Section 63.56(c) allows the case-by-case MACT to remain in the permit if it is substantially as effective as the promulgated MACT.

This permit action will be incorporating the requirements of the standard finalized on January 31, 2013, and removing the case-by-case MACT limits. The Permittee will be complying with the standards effective immediately upon permit issuance.

Compliance Assurance Monitoring (CAM)

CAM applies on a pollutant-specific basis to emissions units that:

1. Are subject to an emission limit or standard, and
2. Use add-on pollution control to achieve compliance with the applicable limit or standard, and
3. Have pre-controlled potential emissions greater than or equal to the Part 70 major source threshold for that pollutant.

Several emission units are either equipped with a cyclone or a fabric filter in order to recover product. The recovered product is then transferred back into the process. Therefore, the cyclones or dust collectors are considered process equipment and are not subject to CAM. These units include: EU 003, EU 009 – 016; EU 028 – 029; EU 032 EU035 – EU043

The following emission units were evaluated for CAM:

EU 007 (+EU044) – Canola Seed Receiving + Uncaptured Receiving Emissions
EU 017, EU 025 – 027, EU 0045 – 048.

The pre-control potential PM, PM_{10}, and $PM_{2.5}$ emissions for the emission units listed above are below 100 tons per year. Therefore, CAM does not apply to these units.

3. Technical Information

3.1 Prevention of Significant Deterioration (PSD)

PSD requirements apply to the entire facility due to relaxation of limits previously accepted to avoid PSD (according to 40 CFR Section 52.21(r)(4)). These requirements include the determination of Best Available Control Technology (BACT) for individual units, air quality modeling to demonstrate compliance with National Ambient Air Quality Standards (NAAQS), Minnesota Ambient Air Quality Standards (MAAQS) and Class I and Class II PSD Increments, and demonstrations of protection of Class I Air Quality Related Values (AQRVs), including visibility.

3.1.1 Best Available Control Technology (BACT) Analysis:

BACT was determined using EPA's top-down approach. Following the top-down approach progressively less stringent control technologies are analyzed until a level of control considered BACT is reached on the basis of environmental, energy, and economic impacts. A top-down analysis for BACT for PM, PM_{10}, $PM_{2.5}$, NO_X, CO, and VOC was conducted for the entire facility.

The Table below summarizes the results of the BACT Analysis. The complete BACT Analysis is included as Attachment 8 to the TSD.

Table 7 - BACT Summary

EU ID	Source Description	CE ID	SV ID	BACT Pollutants	BACT	Rejected Controls
EU 001 EU 002 EU 033	Boiler 1 Boiler 2 Boiler 3	NA NA NA	SV 007 SV 007 SV 007	$PM/PM_{10}/PM_{2.5}$, NO_x, VOC	Good Combustion Practices[1], Natural Gas, Gas 1 subcategory[2], lb/MMBtu emission limits	All controls for $PM/PM_{10}/PM_{2.5}$, NO_X, VOC rejected due either to technical or economic infeasibility
EU 004 EU 034	Refinery Boiler 1 Refinery Boiler 2	NA NA	SV 006 SV 006	$PM/PM_{10}/PM_{2.5}$, NO_x, VOC	Good Combustion Practices[1], Natural Gas, lb/MMBtu emission limits	All controls for $PM/PM_{10}/PM_{2.5}$, NO_X, VOC rejected due either to technical or economic infeasibility
EU 005 EU 031	Fire Pump Engine 1 Fire Pump Engine 2	NA NA	SV 013 SV 039	$PM/PM_{10}/PM_{2.5}$, NO_x, VOC	Good Combustion Practices[3], preventative maintenance, engine design	All controls for $PM/PM_{10}/PM_{2.5}$, NO_X, VOC rejected due either to technical or economic infeasibility
GP 001 (EU 003,	Extraction Process	NA	SV 012	VOC	Good solvent recovery practices[4], 0.25 gal/ton	All controls for VOC rejected due either to

EU013, EU014, EU018, FS 001, TK001, TK002)					solvent loss emission limit; Leak Detection And Repair (LDAR) program. See Attachment 13.	technical or economic infeasibility
EU 007	Seed Receiving	CE 001	SV 005	$PM/PM_{10}/PM_{2.5}$	Fabric Filter	None rejected, top control selected
EU 008	Seed Cleaning and Aspirator	CE 002	SV 001	$PM/PM_{10}/PM_{2.5}$	Fabric Filter	None rejected, top control selected
EU 009 EU 010 SV 012	Conditioner Cyclone Flaker Cyclone Cake Cooker Cyclone	NA NA NA	SV 002 SV002 SV002	$PM/PM_{10}/PM_{2.5}$	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 011 EU 032	Cooker Cyclone 1 Cooker Cyclone 2	NA NA	SV 040 SV 040	$PM/PM_{10}/PM_{2.5}$	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 013 EU 014 EU 003	DTDC Dryer Deck #1 DTDC Cooler Deck DTDC Dryer Deck #2	NA NA NA	SV 004 SV 004 SV 004	$PM/PM_{10}/PM_{2.5}$ See GP001 for VOC BACT	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 015	Meal Grinder	NA	SV 003	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	None rejected, top control selected
EU 016	Pellet Cooler	NA	SV 003	$PM/PM_{10}/PM_{2.5}$	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 017	Meal Storage and Loadout	CE 003	SV 008	$PM/PM_{10}/PM_{2.5}$	Fabric Filter	None rejected, top control selected
EU 024	Mold Inhibitor	NA	NA	VOC	Best management practices including operating process with maximum efficiency	No control options available for this process
EU 025	Seed Bin	CE	SV 031	$PM/PM_{10}/PM_{2.5}$	Fabric Filter	None rejected, top

EU 026 EU 027	1010, 1012 Seed Bin 1203, 1204, 1205 Seed Bin 1201, 1202	005 CE 006 CE 007	SV 032 SV 033			control selected
EU 028	Can Pass	NA	SV 036	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	None rejected, top control selected
EU 029	Meal Cooler	NA	SV 037	$PM/PM_{10}/PM_{2.5}$	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 006 EU 030	Cooling Tower East Cooling Tower	NA NA	SV 009 SV 038	$PM/PM_{10}/PM_{2.5}$	Drift loss limit of 0.001%	All controls for $PM/PM_{10}/PM_{2.5}$ rejected due either to technical or economic infeasibility
EU 035 EU 036	Can Pass Cyclone #1 Can Pass Cyclone #2	NA NA	SV 036 SV 036	$PM/PM_{10}/PM_{2.5}$	Process Cyclone	Fabric filter and wet scrubber were rejected due to economic infeasibility
EU 037	Refining Material Storage Silos	NA	SV 014 - 016	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	Additional control technology rejected due to economic infeasibility
EU 038	Refining Material Process Filter Receivers	NA	SV 017 - 019	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	Additional control technology rejected due to economic infeasibility
EU 039	Canola Seed Reclaim	NA	SV 029	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	Additional control technology rejected due to economic infeasibility
EU 040	Meal to Storage Transfer	NA	SV 020	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	Additional control technology rejected due to economic infeasibility
EU 041	Process Seed Reclaim	NA	SV 030	$PM/PM_{10}/PM_{2.5}$	Process Fabric Filter	Additional control technology rejected

the boiler stacks and fire pump stacks. Air pollution control equipment efficiencies and proposed air permit limits are included in the air emission estimates that were used in the modeling.

Haul roads were not required to be included in the modeling analysis used to demonstrate compliance with the NAAQS or MAAQS as the results were below the required inclusion levels from the MPCA. According the May 16, 2011 MPCA memo titled, "Air Quality Policy on Paved Roads and Fugitive Particulate Matter" the inclusion of paved road fugitive PM emissions are not required if the predicted ambient impacts (including background) are less than 95% of the NAAQS or MAAQS. The facility still must maintain an appropriate and enforceable fugitive dust control plan or be subject to comparable permit conditions.

The AERMOD air dispersion model was used to estimate Class II ambient air concentrations. The USEPA recommends AERMOD as a "Preferred Model" for Class II air quality analyses. Building downwash was predicted for the facility stacks using the BPIP-PRIME downwash model. Both AERMOD and BPIP-PRIME were developed by USEPA.

As shown in Table 8 below, the Class II air quality analysis demonstrated that PM_{10}, $PM_{2.5}$ and NO_x emissions would meet the NAAQS and MAAQS. The results of the analysis for this permit action are that the facility falls into Category 2 [Table 9] for paved roads. Paved roads are not required to be modeled, but there are paved road fugitive dust permit conditions in the permit.

Table 8. Maximum Predicted Ambient Air Concentrations
Modeling Analysis submitted 3/26/13

Pollutant	Averaging Period	Modeled Impact ($\mu g/m^3$)	Background Concentration ($\mu g/m^3$)	Predicted Ambient Air Concentration ($\mu g/m^3$)	MAAQS ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)	Percent of Standard (%)
PM_{10}	24-Hour	13.37	38.91	52.28	150[a]	150[a]	34.9
	Annual	1.96	12.11	14.07	50[b]	-	28.1
$PM_{2.5}$	24-Hour	4.81	26.30	31.11	65[c]	35[c]	47.9/**88.9**
	Annual	1.06	6.12	7.18	15[d]	12[d]	47.9/59.8
NO_x	1-Hour	58.24	48.92	107.16	-	188[e]	57.0
	Annual	1.72	9.83	11.55	100[b]	100[b]	11.6

[a] Not to be exceeded more than five times during a five-year period.
[b] Never to be exceeded.
[c] Not to be exceeded more than the three-year average of the 98th percentile of 24-hour concentrations.
[d] Not to be exceeded more than a three-year annual average.
[e] Not to be exceeded more than the three-year average of the 98th percentile of 1-hour concentrations.

Level*	Requirement (basis)	Additional Monitoring	Discussion
	of canola oilseed processed Process throughput ≤ 2000 tons/day Compliance ratio ≤ 1.00 for the previous operating month Leak Detection and Repair (LDAR) Plan (BACT)	Records of all Start-up, Shutdown and Malfunction (SSM) Plan versions for a period of 5 years. Recordkeeping of actual solvent: the 12-operating month rolling sum of the actual solvent loss in gallons (as described in 40 CFR Section 63.2853(c)) Recordkeeping of fraction of HAP: the weighted average volume fraction of HAP in extraction solvent received for the previous 12 operating months (as described in 40 CFR Section 63.2854(b)(3))	leaks. The hexane monitoring system provides an indication of liquid hexane leaks and hexane vapor leaks in and around the Solvent Extraction Plant. Monitors sample continuously. The monitors are hard wired to a human machine interface (HMI) and an alarm panel in the main process control room which is staffed 24 hours/day, 7 days/week. The monitors measure percentage of lower explosive limit (LEL). They alarm at 25% of the LEL and shutdown the Solvent Extraction Plant at 50% of the LEL. There are ten monitors. Four monitors are located just outside of the Extraction Plant building at ground level. Five monitors are located at floor level inside the Extraction Plant building permanently placed in a pattern to detect leaks anywhere in the building. One monitor is located in the final vent line exiting the Extraction Plant after vapors have been through the Mineral Oil Absorption system Hexane vapors are three (3) times heavier than air. Northstar's extraction building was designed to have an elevated floor system with open grating. Fans pull the hexane vapors to the bottom of the building where they are monitored by nine of the monitors described above. Northstar also maintains a Management of Change (MOC) Program. The MOC program is designed to manage modifications and ensure the safe startup and commissioning of changes in compliance with the Process Safety

Level*	Requirement (basis)	Additional Monitoring	Discussion
	PM ≤ 0.0020 g/dscf PM <10 micron ≤ 0 .0020 g/dscf PM<2.5micron ≤ 0 .0020 g/dscf Opacity ≤ 20% For EU016: PM ≤ 0 .0260 g/dscf PM <10 micron ≤ 0 .0130 g/dscf PM<2.5micron ≤ 0 .00460 g/dscf Opacity ≤ 20%	compliance with limits.	required for PM, PM10 and PM2.5 SV 003 is designed with 2 ports that allow the facility to test the control equipment individually even though they exhaust through the same stack.
SV004	PM ≤0.0026 g/dscf PM <10 micron ≤ 0 .0130 g/dscf PM<2.5micron ≤ .00680 g/dscf Opacity ≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Cyclones are inherent process equipment. Testing will be required for PM, PM10 and PM2.5
SV005	PM ≤ 0.0020 g/dscf PM <10 micron ≤ 0 .0020 g/dscf PM<2.5micron ≤ 0 .0020 g/dscf Opacity ≤ 5%	Stack testing and a testing frequency plan to show compliance with limits.	Required control efficiencies in excess of control equipment rule, so testing will be required for PM, PM10 and PM2.5.
SV008	PM≤ 0.0020 g/dscf PM <10 micron ≤ 0.0020 g/dscf PM<2.5micron	Stack testing and a testing frequency plan to show compliance with limits.	Required control efficiencies in excess of control equipment rule, so testing will be required for PM, PM10 and PM2.5.

Level*	Requirement (basis)	Additional Monitoring	Discussion
	≤ 0 .0020 g/dscf Opacity ≤ 20%		
SV020	PM ≤ 0.0020 g/dscf PM <10 micron ≤ 0 .0020 g/dscf PM<2.5micron ≤ 0 .0020 g/dscf Opacity ≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Fabric filter is inherent process equipment. Testing will be required for PM, PM10 and PM2.5.
SV029	PM ≤ .0020 g/dscf PM <10 micron ≤ 0 .0020 g/dscf PM<2.5micron ≤ 0 .0020 g/dscf Opacity ≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Fabric filter is inherent process equipment. Testing will be required for PM, PM10 and PM2.5.
SV030	PM ≤ 0.0020 g/dscf PM <10 micron ≤ 0.0020 g/dscf PM<2.5micron ≤ 0.0020 g/dscf Opacity ≤20%	Stack testing and a testing frequency plan to show compliance with limits.	Fabric filter is inherent process equipment. Testing will be required for PM, PM10 and PM2.5.
SV034	PM≤ .0020 g/dscf PM <10 micron ≤ 0.0020 g/dscf PM<2.5micron ≤ .0020 g/dscf Opacity ≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Fabric filter is inherent process equipment. Testing will be required for PM, PM10 and PM2.5.
SV035	PM ≤ .0020 g/dscf	Stack testing and a testing frequency plan to show	Fabric filter is inherent process equipment. Testing will be required for

Level*	Requirement (basis)	Additional Monitoring	Discussion
	PM <10 micron ≤ .0020 g/dscf PM<2.5micron ≤ .0020 g/dscf Opacity ≤ 20%	compliance with limits.	PM, PM10 and PM2.5.
SV036	For EU035&EU036: PM ≤ .0260 g/dscf PM <10 micron ≤ .0130 g/dscf PM<2.5micron ≤ .00460 g/dscf For EU028 PM ≤ .0020 g/dscf PM <10 micron ≤ .0020 g/dscf PM<2.5micron ≤ .0020 g/dscf Both: Opacity ≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Fabric filter and cyclones are inherent process equipment. Testing will be required for PM, PM10 and PM2.5.
SV037	PM ≤ .0260 g/dscf PM <10 micron ≤ .0130 g/dscf PM<2.5micron ≤ .00460 g/dscf Opacity≤ 20%	Stack testing and a testing frequency plan to show compliance with limits.	Cyclones are inherent process equipment. Testing will be required for PM, PM10 and PM2.5
SV040	PM ≤ .0260 g/dscf PM <10 micron <or= .0130 g/dscf	Stack testing and a testing frequency plan to show compliance with limits.	Cyclones are inherent process equipment. Testing will be required for PM, PM10 and PM2.5

ATTACHMENT 1

Facility Description, PTE Summary and CD-01 Forms

Contained within the FACILITY DESCRIPTION tab in Delta Database