DRAFT AIR POLLUTION CONTROL OPERATION PERMIT

EI FACILITY NO. 241031340 PERMIT NOS. 241031340-P02

TYPE: Major, Part 70 Source

THIS OPERATION PERMIT IS FOR THE GENERATION OF EMISSION REDUCTION CREDITS BY LIMITING THE EMISSIONS FROM A SOURCE AND A REVISION OF THE FACILITY OPERATION PERMIT

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Lesaffre Yeast Corporation

Street Address: 2702 West Greves Street
Milwaukee, WI

Responsible Official & Title: Geoff O'Connor, CFO and Treasurer

is required to operate the facility as described in the plans and specifications dated February 10, 2005 in conformity with the conditions herein.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Milwaukee, Wisconsin this _____ day of _____, 2005 .

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By _____.
Daniel Schramm, Air Management Supervisor
Milwaukee Service Center

Preamble

An Asterisk "*" throughout this document denotes legal authority, limitations and conditions which are not federally enforceable.

Concurrent Permit Actions Performed as Part of the Review and Issuance of Permit 241031340-P02

Construction Permits Issued In Conjunction with Permit 241031340-P02 under s. 285.61(8), Wis. Stats.

None

Revised Construction Permits Issued in Conjunction with Permit 241031340-P02 under s. NR 406.11, Wis. Adm. Code:

None

Operation (CONOP) Permits Issued in Conjunction with Permit 241031340-P02 under s. 285.62(7)(b), Wis. Stats.:

05-DJH-177-OP

Revised Operation Permits Issued in Conjunction with Permit 241031340-P02 under ss. NR 407.11, 407.12, 407.13 and/or 407.14, Wis. Adm. Code:

None

The following permits, orders, etc. are adopted, under ss. 285.65(3), Wis. Stats., NR 406.11(1)(c) and (d), NR 407.09(2)(d) and NR 407.15(3) and (4), Wis. Adm. Code, by Permit 241031340-P02 which then becomes the primary enforceable document:

241031340-J01, 93-DJH-304R, 94-DJH-247R & 00-JB-016, 05-DJH-177-OP

Stack and Process Index

Stack S00, Emission Units T01, T02, T04 & T05
Stack S41, Emission Unit T03

Identifies the five tanks used to store aqueous ammonia. The emissions from Tanks T01, T02, T04 & T05 are exhausted from a single shared exhaust stack (Stack S00), while Tank T03 is equipped with its own dedicated exhaust stack (Stack S41). The emissions from the tanks are emitted uncontrolled. The tanks were installed in 1977, 1986 & 1997. The installations of the tanks were not permitted since the theoretical emissions of ammonia from the different tank installations individually are less than the threshold level requiring a construction permit.

Stack S03, Emission Unit P02, Control Unit C01

Identifies the packaging operation associated with the older drying oven. The particulate emissions generated from the packaging operation are controlled using a cyclone and baghouse connected in series (Control Unit C01). The emissions from the baghouse are emitted from a fixed exhaust stack (Stack

S03). The packaging unit was originally installed in 1942 and modified in 1981. The ovens were not permitted, since the original installations predate the construction permit program and the modification made may not have been large enough to require a construction permit.

Stack S06, Emission Unit P05, Control Unit C05

Identifies the drying oven used to dry consumer packaged yeast. Stack S06 represents a composite of three exhaust stacks. The emissions from exhaust Stacks S06A & S06C are emitted uncontrolled. The emissions from Stack S06B (South Stack) are controlled using a cyclone, wet scrubbing unit or something equivalent (Control Unit C05). The ovens are heated using process steam. The oven was installed in 1976. The oven's installation was not permitted, since it was installed before there was a construction permit program.

Stack S10, Boiler Units B20, B21 & B22
Stack S42, Boiler Unit 23

Identifies the fuel combustion units used to produce convenience heat, process steam and hot water. Boiler Units B20, B22 & B23 are essentially identical units (23.3 mmBtu/hr, each). The three boilers were all installed within the same year (1942). The boilers primarily burn natural gas, but are also capable of burning distillate fuel oil as a backup fuel. The emissions from these boilers are emitted uncontrolled from a shared exhaust stack (Stack S10). Boiler Unit S23 is a hot water heating unit (25 mmBtu/hr). The unit was installed in 1999, and burns only natural gas. The emissions from the hot water unit are emitted uncontrolled from a dedicated exhaust stack (Stack S42). None of the boiler/unit installations were permitted. The older boiler units were installed before there was a construction permit program and the hot water heating unit is exempt from needing to obtain a construction permit (Gas-fired combustion unit with a maximum heat input of less than or equal to 25 mmBtu/hr).

Stack S11, Emission Units P07 & P09, Control Unit C06
Stack S12, Emission Unit P11, Control Unit C07

Identifies the three drying units used to produce nutritional yeast. The drying units are equipped with a custom designed control device to reduce the units' particulate emissions. The emissions from two of the drying units (Units P07 & P09) are combined, share a common particulate control device (Control Unit C06) and exhausted from a common exhaust stack (Stack S11). The two drying units (Units P09 & P11) were originally installed in the late 70's. The units were later modified in to increase their output capacities at the same time the third drying unit (Unit P11) was installed (July of 2000). Unit P11 is equipped with its own a dedicated particulate control device (Control Unit C07) and exhaust stack (Stack S12). The installation of the original drying units (Units P07 & P09) was not permitted because the installation was made before there was a construction permit program. The installation of the third unit (Unit P11) and the modification of the two existing units (Units P07 & P09) were not permitted since the combined increase in emissions was not large enough to require a construction permit.

Stack S20, Emission Unit P24
Stack S21, Emission Unit P27
Stack S22, Emission Unit P18
Stack S23, Emission Unit P19
Stack S24, Emission Unit P20
Stack S25, Emission Unit P21

Stack S26, Emission Unit P22
Stack S27, Emission Unit P25
Stack S28, Emission Unit P26
Stack S29, Emission Unit P28
Stack S30, Emission Unit P29

Identifies the eleven fermenters used to produce or grow yeast. The fermentation process is a batch operation and each fermenter operates essentially independent of the other fermenters. The emissions generated by the fermentation process are not directly controlled. Air flow and material inputs are used control the rate of fermentation, and indirectly used to control the emissions from a fermenter. Each fermenter is equipped with its own dedicated exhaust stack. The fermenters were installed at various times (1 - 1964, 3 - 1965, 1- 1974, 2 - 1975, 2- 1978, 1- 1994, 1 –1995). The units installed or modified before 1980 were not permitted, since they were installed before there was a construction permit program. The units installed or modified after 1979 were permitted (Permits 93-DJH-304 and 94-DJH-247). The installations were permitted as minor modifications to a major emission source, as were the modifications made in 2000 (Permit 00-JB-016). In 2000, several equipment modifications were made to improve the production capabilities of Units P24 & P29.

This source is not subject to New Source Performance Standards (NSPS).

This source is subject to National Emission Standards for Hazardous Air Pollutants - Manufacturing of Nutritional Yeast (40 CFR Part 63, Subpart CCCC). For purposes of applying this MACT standard, the facility and its fermenters are considered an existing affected source. The compliance date for an existing affected source is May 21, 2004.

This source is subject to National Emission Standards for Hazardous Air Pollutants – Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD). For purposes of applying this MACT standard, the facility's boilers are considered an existing affected source. The compliance date for an existing affected source is not yet established. The standard was proposed on January 13, 2003. The facility may need to submit a Part 2 MACT application if the proposed standard is not signed by April 28, 2004.

Permit Shield - Unless precluded by the Administrator of the USEPA, compliance with all emission limitations in this operation permit is considered to be compliance with all emission limitations established under ss. 285.01 to 285.87, Wis. Stats., and emission limitations under the federal clean air act, that are applicable to the source if the permit includes the applicable limitation or if the Department determines that the emission limitations do not apply. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source:

s. NR 439.075(2), Wis. Adm. Code (Periodic Compliance Emission Testing) – The three steam boilers are connected to the same exhaust stack (Stack S10), and the stack's potential emission of sulfur dioxide exceeds 100 tpy. Normally this situation would require periodic emissions testing of the stack once every 24 months. However, under s. NR 439.075(4)(a)3., Wis. Adm. Code, units that burn only natural gas, propane or distillate fuel oil are exempt. The three steam boilers burn only natural gas and distillate fuel oil. (Boiler Units B20, B21, B22 & B23)

s. NR 440.207, Wis. Adm. Code (NSPS for Small Industrial-Commercial-Institutional Stem Generation Units) - At the facility three steam boilers were installed in 1942 and the hot water heating unit was installed in 1998. Since the steam boilers were installed before June 9, 1989, and the hot

water heater is not a steam generation unit, the facility fuel combustion units, or these emission units, are not subject to this NSPS by definition. (Boiler Units B20, B21, B22 & B23)

Part I -- The headings for the areas in the permit are defined below. The legal authority for these limitations or methods follows them in [brackets].

Pollutant -- This area will note which pollutant is being regulated by the permit.

Limitations -- This area will list all applicable emission limitations that apply to the source, including case-by-case limitations such as Latest Available Control Techniques (LACT), Best Available Control Technology (BACT), or Lowest Achievable Emission Rate (LAER). It will also list any voluntary restrictions on hours of operation, raw material use, or production rate requested by the permittee to limit potential to emit.

Compliance Demonstration -- The compliance demonstration methods outlined in this area may be used to demonstrate compliance with the associated emission limit or work practice standard listed under the corresponding *Limitations* column. The compliance demonstration area contains limits on parameters or other mechanisms that will be monitored periodically to ensure compliance with the limitations. The requirement to test as well as initial and periodic test schedules, if testing is required, will be stated here. Notwithstanding the compliance determination methods which the owner or operator of a sources is authorized to use under ch. NR 439, Wis. Adm. Code, the Department may use any relevant information or appropriate method to determine a source's compliance with applicable emission limitations.

Reference Test Methods, Recordkeeping, and Monitoring Requirements -- Specific USEPA Reference test methods or other approved test methods will be contained in this area and are the methods that must be used whenever testing is required. A reference test method will be listed even if no testing is immediately required. Also included in this area are any recordkeeping requirements and their frequency and reporting requirements. Accuracy of monitoring equipment shall meet, at a minimum, the requirements of s. NR 439.055(3) and (4), Wis. Adm. Code, as specified in Part II of this permit.

Condition Type -- This area will specify other conditions that are applicable to the entire facility that may not be tied to one specific pollutant.

Conditions -- Specific conditions usually applicable to the entire facility or compliance requirements.

Compliance Demonstration -- This area contains monitoring and testing requirements and methods to demonstrate compliance with the conditions.

PART II -- This section contains the general limitations that the permittee must abide by. These requirements are standard for most sources of air pollutants so they are included in this section with every permit.

A. Stack S00, Emission Units T01, T02, T04 & T05 (Ammonia Storage Tanks SH#1, SH#2, SH #3 & SH#4)
Stack S41, Emission Unit T03 (Ammonia Storage Tank CADY)

`Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Hazardous Air Pollutants (HAPs) Ammonia (CAS #7664-41-7)	No person may cause, allow or permit emissions into the ambient air of any hazardous substance in a quantity, concentration, or duration which is injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include but are not limited to hazardous air contaminants listed in Tables 1 to 5 of s. NR 445.04, Wis. Adm. Code. **[s. NR 445.03, Wis. Adm. Code] ***	(1) If an when the permittee elects to store any material other than aqueous ammonia in the storage tanks or significantly change the existing storage conditions, the permittee shall determine, either analytically or through the use of technical literature (e.g., AP-42), the tanks and facility's new or increased potential emissions of all hazardous air pollutants (HAPs). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** (2) The permittee shall determine, if under maximum operation conditions, the facility's new or increased potential emission of any HAP exceeds an applicable threshold or de minimus value published in Tables 1, 2, 4 & 5 of s. NR 445.04, Wis. Adm. Code. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** (3) If the facility's new or increased potential emission of any HAP exceeds an applicable threshold or de minimus value the permittee shall evaluate the impact of the pollutant's emission and determine if any action is needed to protect an ambient air quality standard. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]***	(1) Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the USEPA or the Department. **[ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]** (2) Recordkeeping and monitoring of emissions (e.g., aqueous ammonia) are not required for any emission unit or operation that does not have the potential to violate an emission limitation under normal operating conditions. **[ss. 285.65(3) and 285.63(4)(b), Wis. Stats.]***

B. Stack S06, Emission Unit P05 (newer Yeast Drying Oven, installed in 1976)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter (PM)	(1) No person may cause, allow or permit particulate matter to be emitted to the ambient air which substantially contribute to exceeding an air standard or creates air pollution. **[ss. NR 415.03 and NR 404.04, Wis. Adm. Code (General limitations)]** (2) No person may cause, allow or permit the emissions of particulate matter to the ambient air in excess of 0.20 pounds per 1000 pounds of exhaust gas. **[ss. NR 415.05(1)(m), (2) and (3)(a) & (b), Wis. Adm. Code (RACT)]** (3) No person may cause, allow or permit the operation of the drying oven without the use of a cyclone, wet scrubbing unit or equivalent method of control, to control the emissions from Stack S06B (South Stack). **[s. 285.65(3), Wis. Stats., and s. NR 404.04, Wis. Adm. Code]**	(1) The permittee shall maintain the heights of the exhaust stacks at or above the following stack heights: (a) 31.9 feet above grade for Stack S06C. (b) 33.4 feet above grade for Stack S06B. (c) 34.6 feet above grade for Stack S06A. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall maintain the cross-sectional openings of the exhaust stacks at or below the following area measurements: (a) 1.8 square feet for Stack S06C. (b) 5.0 square feet for Stacks S06A & S06B (individually). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (3) The permittee shall maintain the exhaust flows from the stacks free of any obstructions (e.g., rainhats) which impede flow. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any particulate matter emission testing of a nonfugitive particulate emission source is required for demonstrating compliance, the permittee shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 (including condensable backhalf) in 40 CFR part 60, Appendix A, or Method 202 in 40 CFR part 51, Appendix M**. [ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(1), Wis. Adm. Code]** (2) The permittee shall retain and have available, upon request, documentation (e.g., blueprints or technical drawings) showing or stating all the pertinent exhaust stack parameters (i.e., stack heights, stack cross sectional areas and flow obstructions) associated with the drying ovens. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall maintain an operation log or record of the drying oven (including the dates and times the unit operates). In addition, the log shall record any maintenance activities performed on cyclone or wet scrubbing unit attached to Stack S06B. If the drying oven is not used on a particular day, the permittee shall indicate on the log the drying oven was not used that day. During long periods of shutdown, the permittee may wait until the oven is again operational before recording the required information. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. And NR 439.04(1)(a) & (d), Wis. Adm. Code]** (4) Whenever the drying oven is operating, the permittee shall record daily the pressure drop across the cyclone or wet scrubbing unit once every 8 hours of operation or once per day, whichever yields the greater number of measurements. The log or record shall identify the date

B. Stack S06, Emission Unit P05 (newer Yeast Drying Oven, installed in 1976)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		(4) The permittee shall equip and maintain a cyclone, wet scrubbing unit or an equivalent control device, to control the emissions from Stack S06B (South Stack). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (5) The permittee shall be equipped the control device (i.e., cyclone or wet scrubbing unit) associated with Stack S06B (South Stack) with a monitoring device, which continuously measures the pressure drop across the unit, in units of inches of water. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	and time of each measurement. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., NR 439.04(1)(a) & (d) and NR 439.055(2)(b)1., Wis. Adm. Code]**
2. Visible Emissions (VE)	No owner or operator may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity with the following exception: Emission may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the	The permittee shall use the requirements in Section I.B.1.b., stack and equipment design parameters, to demonstrate compliance with the limitation in I.B.2.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any visible emissions testing is required for demonstrating compliance, the owner or operator of the source shall use Method 9 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04(13), Wis. Adm. Code, to determine compliance with a visible emission limitation. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(9)(a)1., Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.B.1.c.(2)-(4), stack and equipment design parameter documentation, operating

B. Stack S06, Emission Unit P05 (newer Yeast Drying Oven, installed in 1976)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises. **[s. NR 431.05, Wis. Adm. Code]**		log & pressure drop measurements, to monitor compliance with the limitation in I.B.2.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
3. Volatile Organic Compounds	No person may cause, allow or permit the permit emission of organic compound emissions into the ambient air which substantially contribute to exceeding an air standard or cause air pollution. **[s. NR 419.03(1), Wis. Adm. Code (General limitations)]**	The permittee shall use the requirements in Section I.B.1.b.(4), equipment design parameters, to demonstrate compliance with the limitation in I.B.3.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any organic compound emission concentration or emission rate testing is required for demonstrating compliance, the permittee shall use Method 18, 25, 25A or 25B in 40 CFR part 60, Appendix A. Method 1, 2, 3, and 4 in 40 CFR part 60, Appendix A, shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled streams. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. And NR 439.06(3)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.B.1.c.(3)-(4), equipment design parameter documentation, operating log and pressure drop measurements, to monitor compliance with the limitation in I.B.3.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
4. Hazardous Air Pollutants (HAPs) Acetaldehyde CAS #75-07-0	For the applicable requirements regarding the emissions of acetaldehyde (CAS #75-07-0) refer to Section G.1.of Part I of the Permit (Total Facility – General Hazardous Air Pollutants Requirements)		

C. Stack S03, Emission Unit P02 (Older Yeast Packaging Operation, installed in 1942, modified in 1981)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter (PM)	(1) No person may cause, allow or permit particulate matter to be emitted to the ambient air which substantially contribute to exceeding an air standard or creates air pollution. **[ss. NR 404.05 and 415.03, Wis. Adm. Code (General limitations)]** (2) No person may cause, allow or permit the emissions of particulate matter to the ambient air in excess of 0.20 pounds per 1000 pounds of exhaust gas. **[ss. NR 415.05(1)(m), (2) and (3)(b), Wis. Adm. Code (RACT)]** (3) No person may cause, allow or permit the operation of the packing operation without the use of a cyclone and baghouse, arranged in series, or an equivalent method of control, to control the emissions from Stack S03. **[s. 285.65(3), Wis. Stats., and s. NR 404.04, Wis. Adm. Code]**	(1) The permittee shall maintain the height of the exhaust stack at or above 12.8 feet above grade (Stack S03). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall maintain the cross-sectional opening of the exhaust stack at or below 0.8 square feet (Stack S03) **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (3) The permittee shall maintain the exhaust flow from the stack (Stack S03) free of any obstructions (e.g., rainhats) which impede flow. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (4) The permittee shall maintain and operate a cyclone and baghouse arranged in series, or an equivalent method of particulate control, whenever any yeast is being packaged. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (5) The cyclone and baghouse shall both be equipped with a monitoring device, which continuously measures the pressure drop across each unit, in units of inches of water. **[s. NR**	(1) Whenever any particulate matter emission testing of a nonfugitive particulate emission source is required for demonstrating compliance, the permittee shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 (including condensable backhalf) in 40 CFR part 60, Appendix A, or Method 202 in 40 CFR part 51, Appendix M**. [ss. NR 407.09(1)(c)1.a. & (4)(a)1. And NR 439.06(1), Wis. Adm. Code]** (2) The permittee shall retain and have available, upon request, documentation (e.g., blueprints or technical drawings) showing or stating all the pertinent exhaust stack parameters (i.e., stack heights, stack cross sectional areas and flow obstructions) associated with the packaging operation. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall maintain a log or record of the packaging operation (including the dates and times the unit operates). In addition, the log shall record any maintenance activities performed on the cyclone and baghouse. If the packaging operation is not used on a particular day, the permittee shall indicate on the log the packaging operation was not used that day. During long periods of shutdown, the permittee may wait until the unit is

C. Stack S03, Emission Unit P02 (Older Yeast Packaging Operation, installed in 1942, modified in 1981)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		407.09(4)(a)3.b., Wis. Adm. Code]	again operational before recording the required information. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 439.04(1)(a) & (d), Wis. Adm. Code]** (4) Whenever the packing operation is operating, the permittee shall record daily the pressure drops across both the cyclone and the baghouse once every 8 hours of operation or once per day, whichever yields the greater number of measurements. The log or record shall identify the date and time of each measurement. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., NR 439.04(1)(a) & (d) and NR 439.055(2)(b)1., Wis. Adm. Code]**
2. Visible Emissions (VE)	No owner or operator may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity with the following exception: Emission may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises.	The permittee shall use the requirements in Section I.C.1.b., stack parameters and the operation and monitoring of the cyclone and baghouse, to demonstrate compliance with the limitation in I.C.2.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any visible emissions testing is required for demonstrating compliance, the owner or operator of the source shall use Method 9 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04(13), Wis. Adm. Code, to determine compliance with a visible emission limitation. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(9)(a)1., Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.C.1.c.(2)-(4), stack parameter documentation, the unit's operation log and a record of

C. Stack S03, Emission Unit P02 (Older Yeast Packaging Operation, installed in 1942, modified in 1981)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	[s. NR 431.05(2), Wis. Adm. Code]		the pressure drop measurements across the cyclone and baghouse, to monitor compliance with the limitation in I.C.2.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**

D. Stack S10, Boiler Units B20, B21 & B22 (Three - Natural Gas & Distillate-fired Steam Boilers, installed in 1942)
Stack S42, Boiler Unit 23 (One- Natural Gas-fired Hot Water Heating Unit, installed in 1999)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter (PM)	(1) No person may cause, allow or permit particulate matter to be emitted to the ambient air which substantially contribute to exceeding an air standard or creates air pollution. **[ss. NR 404.04 and NR 415.03, Wis. Adm. Code (General limitations)]** (2) No person may cause, allow or permit the emissions of particulate into the ambient air from the boilers (Units B20, B21 & B22) in excess of an emission rate defined by the equation E = 0.3 – 0.0006 x I, where I is the heat input in millions of Btu per hour and E is the maximum allowable particulate matter emissions from any stack in pounds per million Btu heat input. **[ss. NR 415.06(1)(c) & (4), Wis. Adm. Code (RACT)]** (3) No person may cause, allow or permit the emissions of particulate into the ambient air from the hot water heating unit (Unit B23) in excess of 0.15 pounds of particulate matter per million Btu heat input. **[ss. NR**	(1) The permittee shall maintain the heights of the exhaust stacks at or above the following stack heights: (a) 153 feet above grade for Stack S10. (b) 49.0 feet above grade for Stack S42. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall maintain the cross-sectional openings of the exhaust stacks at or below the following area measurements: (a) 7.1 square feet for Stack S42. (b) 30.2 square feet for Stack S10. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (3) The permittee shall maintain the directions of the exhaust flows from the stacks (Stacks S10 & S42) upright (i.e., vertical) and Stack S10 free of any obstruction (e.g., rainhat) which impedes flow. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** **(4)** The permittee shall monitor monthly the fuels used by or	(1) Whenever any particulate matter emission testing of a nonfugitive particulate emission source is required for demonstrating compliance, the permittee shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 (including condensable backhalf) in 40 CFR part 60, Appendix A, or Method 202 in 40 CFR part 51, Appendix M**. [ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(1), Wis. Adm. Code]** (2) The permittee shall retain and have available, upon request, documentation (e.g., blueprints or technical drawings) showing or stating all the pertinent exhaust stack parameters (i.e., stack heights, stack cross sectional areas, flow directions and flow obstructions). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall keep a monthly record of the fuels used by or purchased for the boilers and hot water heating unit (Units B20, B21, B22 & B23). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. And NR 439.04(1)(d), Wis. Adm. Code]**

D. Stack S10, Boiler Units B20, B21 & B22 (Three - Natural Gas & Distillate-fired Steam Boilers, installed in 1942)
Stack S42, Boiler Unit 23 (One- Natural Gas-fired Hot Water Heating Unit, installed in 1999)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	415.06(2)(a) & (3)(a), Wis. Adm. Code (RACT)] **(4)** The permittee shall use only natural gas and distillate #2 fuel oil to fire the boilers (Units B20, B21& B22). **[ss. 285.65(3) & (7), Wis. Stats.]** (5) The permittee shall use only natural gas to fire the hot water heating unit (Unit B23). **[ss. 285.65(3) & (7), Wis. Stats.]**	purchased for the boilers and hot water heating unit (Units B20, B21, B22 & B23). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	
2. Visible Emissions (VE)	No owner or operator may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity with the following exception: Emission may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises. **[ss. NR 431.04(2) and NR 431.05(2), Wis. Adm. Code]**	The permittee shall use the requirements in Section I.D.1.b., stack parameters and the monitoring of the fuels used, to demonstrate compliance with the limitation in I.D.2.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any visible emissions testing is required for demonstrating compliance, the owner or operator of the source shall use Method 9 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04(13), Wis. Adm. Code, to determine compliance with a visible emission limitation. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(9)(a)1., Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.D.1.c.(2) & (3), stack parameter documentation and fuel use records, to monitor compliance with the limitation in I.D.2.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**

D. Stack S10, Boiler Units B20, B21 & B22 (Three - Natural Gas & Distillate-fired Steam Boilers, installed in 1942)
Stack S42, Boiler Unit 23 (One- Natural Gas-fired Hot Water Heating Unit, installed in 1999)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
3. Nitrogen Oxides (NOx)	No person may cause, allow or permit nitrogen oxides or nitrogen compounds to be emitted to the ambient air which substantially contribute to exceeding an air standard or cause air pollution. **[ss. NR 404.04 and NR 428.03, Wis. Adm. Code (General limitations)]**	The permittee shall use the requirements in Section I.D.1.b., stack parameters and the monitoring of the fuels used, to demonstrate compliance with the limitation in I.D.3.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any nitrogen compound emission testing is required for demonstrating compliance, the permittee shall use Method 7, 7A, 7B, 7C, 7D or 7E in 40 CFR part 60, Appendix A. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(6)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.D.1.c.(2) & (3), stack parameter documentation and fuel use records, to monitor compliance with the limitation in I.D.3.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
4. Carbon Monoxide (CO)	No person may cause, allow or permit the emissions of carbon monoxide to the ambient air which substantially contribute to exceeding an air standard or causes air pollution. **[ss. NR 404.04 and NR 426.03, Wis. Adm. Code (General limitations)]**	The permittee shall use the requirements in Section I.D.1.b., stack parameters and the monitoring of the fuels used, to demonstrate compliance with the limitation in I.D.4.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any carbon monoxide emission testing is required for demonstrating compliance, the permittee shall use Method 10, 10A or 10B in 40 CFR part 60, Appendix A. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. And NR 439.06(4)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.D.1.c.(2) & (3), stack parameter documentation and fuel use records, to monitor compliance with the limitation in I.D.4.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
5. Sulfur Dioxide (SO2)	No person may cause, allow or permit emission of sulfur or sulfur compounds into the ambient air which substantially contribute to exceeding	The permittee shall use the requirements in Section I.D.1.b., stack parameters and the monitoring of the fuels used, to demonstrate compliance	(1) Whenever any sulfur dioxide emission testing is required for demonstrating compliance, the permittee shall use Method 6, 6A, 6B, 6C or 8 in 40 CFR part 60, Appendix A, or Method

D. Stack S10, Boiler Units B20, B21 & B22 (Three - Natural Gas & Distillate-fired Steam Boilers, installed in 1942)
Stack S42, Boiler Unit 23 (One- Natural Gas-fired Hot Water Heating Unit, installed in 1999)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	an air standard or cause air pollution. **[ss. NR 404.04 and NR 417.03, Wis. Adm. Code (General limitations)]**	with the limitation in I.D.5.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	202 in 40 CFR part 60, Appendix A. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. And NR 439.06(2)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.D.1.c.(2) & (3), stack parameter documentation and fuel use records, to monitor compliance with the limitation in I.D.5.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
6. Volatile Organic Compounds (VOCs)	No person may cause, allow or permit organic compound emissions into the ambient air which substantially contribute to exceeding an air standard or cause air pollution. **[s. NR 419.03, Wis. Adm. Code (General limitations)]**	The permittee shall use the requirements in Section I.D.1.b.(4), the monitoring of the fuels used, to demonstrate compliance with the limitation in I.D.6.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any organic compound emission concentration or emission rate testing is required for demonstrating compliance, the permittee shall use Method 18, 25, 25A or 25B in 40 CFR part 60, Appendix A. Method 1, 2, 3, and 4 in 40 CFR part 60, Appendix A, shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled streams. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(3)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Section I.D.1.c.(3), fuel use records, to monitor compliance with the limitation in I.D.6.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**

D. Stack S10, Boiler Units B20, B21 & B22 (Three - Natural Gas & Distillate-fired Steam Boilers, installed in 1942)
Stack S42, Boiler Unit 23 (One- Natural Gas-fired Hot Water Heating Unit, installed in 1999)

7. Hazardous Air Pollutants (HAPs)	No person may cause, allow or permit emissions into the ambient air of any hazardous substance in a quantity, concentration, or duration which is injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include but are not limited to hazardous air contaminants listed in Tables 1 to 5 of s. NR 445.04, Wis. Adm. Code. **[s. NR 445.03, Wis. Adm. Code] ***	The permittee shall use the requirements in Section I.D.1.b.(4), monitoring of the fuels used, to demonstrate compliance with the limitation in I.D.7.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**[1]	(1) Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the USEPA or the Department. **[ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Section I.D.1.c.(3), fuel use records, to monitor compliance with the limitation in I.D.7.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**

[1] Under ch. NR 445, Wis. Adm. Code, the HAP emissions generated from the combustion of a group 1 virgin fossil fuel are exempt from the emission threshold levels established in ch. NR 445, Wis. Adm. Code. Natural gas and Distillate #2 fuel oil are both considered a group 1 virgin fossil fuel.

E. Stack S11, Emission Units P07 & P09, Control Unit C06 (Two - Nutritional yeast drying units, installed in 2000 and 1976 (modified in 2000))
Stack S12, Emission Unit P11, Control Unit C07 (Nutritional yeast drying unit, installed in 1976, modified in 2000)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter (PM)	(1) No person may cause, allow or permit particulate matter to be emitted to the ambient air which substantially contribute to exceeding an air standard or creates air pollution. **[ss. NR 404.04 and NR 415.03, Wis. Adm. Code (General limitations)]** (2) No person may cause, allow or permit the emissions of particulate matter to the ambient air in excess of 0.20 pounds per 1000 pounds of exhaust gas. **[ss. NR 415.05(1)(m), NR 415.05(2) and (3)(b), Wis. Adm. Code (RACT)]**	(1) The permittee shall maintain the heights of the exhaust stacks at or above 63.0 feet above grade (Stacks S11 & S12). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall maintain the cross-sectional openings of the exhaust stacks at or below the following area measurements: (a) 3.2 square feet for Stack S12. (b) 4.9 square feet for Stack S11. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (3) The permittee shall maintain the exhaust flows from the stacks (Stacks S11 & S12) free of any obstructions (e.g., rainhats) which impede flow. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (4) The permittee shall maintain records showing the maximum operating capacity and exhaust airflow rate of each dryer. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any particulate matter emission testing of a nonfugitive particulate emission source is required for demonstrating compliance, the permittee shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 (including condensable backhalf) in 40 CFR part 60, Appendix A, or Method 202 in 40 CFR part 51, Appendix M**. [ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(1), Wis. Adm. Code** (2) The permittee shall retain and have available, upon request, documentation (e.g., blueprints or technical drawings) showing or stating all the pertinent exhaust stack parameters (i.e., stack heights, stack cross sectional areas and flow obstructions). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall retain and have available, upon request, documentation (e.g., technical drawings and related calculations) showing the maximum operating capacity and stack exhaust rate of each dryer. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**

E. Stack S11, Emission Units P07 & P09, Control Unit C06 (Two - Nutritional yeast drying units, installed in 2000 and 1976 (modified in 2000))
Stack S12, Emission Unit P11, Control Unit C07 (Nutritional yeast drying unit, installed in 1976, modified in 2000)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
2. Visible Emissions (VE)	No owner or operator may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity with the following exception: Emission may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises. **[s. NR 431.05(2), Wis. Adm. Code]**	The permittee shall use the requirements in Section I.E.1.b., stack and equipment design parameters, to demonstrate compliance with the limitation in I.E.2.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any visible emissions testing is required for demonstrating compliance, the owner or operator of the source shall use Method 9 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04(13), Wis. Adm. Code, to determine compliance with a visible emission limitation. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(9)(a)1., Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.E.1.c.(2) & (3), stack and equipment design parameter documentation, to monitor compliance with the limitation in I.E.2.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
3. Volatile Organic Compounds	No person may cause, allow or permit the permit emission of organic compound emissions into the ambient air which substantially contribute to exceeding an air standard or cause air pollution. **[s. NR 419.03(1), Wis. Adm. Code (General limitations)]**	The permittee shall use the requirements in Section I.E.1.b.(4), equipment design parameters, to demonstrate compliance with the limitation in I.E.3.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any organic compound emission concentration or emission rate testing is required for demonstrating compliance, the permittee shall use Method 18, 25, 25A or 25B in 40 CFR part 60, Appendix A. Method 1, 2, 3, and 4 in 40 CFR part 60, Appendix A, shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled streams. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(3)(a), Wis. Adm. Code]**

E. Stack S11, Emission Units P07 & P09, Control Unit C06 (Two - Nutritional yeast drying units, installed in 2000 and 1976 (modified in 2000))
Stack S12, Emission Unit P11, Control Unit C07 (Nutritional yeast drying unit, installed in 1976, modified in 2000)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
			(2) The permittee shall use the recordkeeping and monitoring requirements in Section I.E.1.c.(3), equipment design parameter documentation, to monitor compliance with the limitation in I.E.3.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
4. Hazardous Air Pollutants (HAPs) Acetaldehyde CAS #75-07-0	For the applicable requirements regarding the emissions of acetaldehyde (CAS #75-07-0) refer to Section G.1.of Part I of the Permit (Total Facility - General Hazardous Air Pollutants Requirements)		

F. Stack S20, Emission Unit P24 (Fermenter #6, installed in 1994, modified in 2000, but not reconstructed)
Stack S21, Emission Unit P27 (Fermenter #9, installed in 1978)
Stack S22, Emission Unit P18 (Fermenter #1, Installed in 1965)
Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter (PM)	(1) No person may cause, allow or permit particulate matter to be emitted to the ambient air which substantially contribute to exceeding an air standard or creates air pollution. **[ss. NR 404.04 and 415.03, Wis. Adm. Code (General limitations)]** (2) No person may cause, allow or permit the emissions of particulate matter to the ambient air in excess of 0.20 pounds per 1000 pounds of exhaust gas. **[ss. NR 415.05(1)(o), (2) and (3)(b), Wis. Adm. Code (RACT)]** (3) No person may cause, allow or permit Fermenter #11 (S30/P29) to perform any types of fermentation other than "trade". **[s. NR**	(1) The permittee shall maintain the heights of the exhaust stacks at or above the following stack heights: (a) 74.3 feet above grade for Stacks S22 - S30. (b) 76.6 feet above grade for Stack S20. (c) 79.7 feet above grade for Stack S21 **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall maintain the cross-sectional openings of the exhaust stacks at or below 1.8 square feet. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (3) The permittee shall maintain the directions and flows from the exhaust stacks (Stacks S20-S30) upright (i.e., vertical) and free of any obstructions (e.g., rainhats) which impede flow. **[s.**	(1) Whenever any particulate matter emission testing of a nonfugitive particulate emission source is required for demonstrating compliance, the permittee shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 (including condensable backhalf) in 40 CFR part 60, Appendix A, or Method 202 in 40 CFR part 51, Appendix M**. [ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(1), Wis. Adm. Code** (2) The permittee shall retain and have available, upon request, documentation (e.g., blueprints or technical drawings) showing or stating all the pertinent exhaust stack parameters (i.e., stack heights, stack cross sectional areas, flow directions and flow obstructions). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall have available, upon request, records (e.g., production cards) showing the types of fermentation batches

F. Stack S20, Emission Unit P24 (Fermenter #6, installed in 1994, modified in 2000, but not reconstructed)
Stack S21, Emission Unit P27 (Fermenter #9, installed in 1978)
Stack S22, Emission Unit P18 (Fermenter #1, Installed in 1965)
Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	407.09(2)(d)2., Wis. Adm. Code, and ss. 285.65(3) & (7), Wis. Stats. (Permit 00-JB-016)] (4) No person may cause, allow or permit the total volume of airflow to Fermenters #1-#5 & #7-#10 (S22/P18, S23/P19, S24/P19, S24/P20, S25/P21, S26/P22, S27/P25, S28/P26, S21/P27 & S29/P28) to exceed 85,265 standard cubic feet per minute (volumetric air flow rate at 68 degrees F and 29.92 inches of mercury pressure). **[ss. 285.65(3) & (7), Wis. Stats.]** (5) No person may cause, allow or permit the volume of airflow to Fermenter #6 (S20/P24) to exceed 5,500 standard cubic feet per minute (volumetric air	**NR 407.09(4)(a)3.b., Wis. Adm. Code]** (4) The permittee shall monitor the types of fermentation batches produced by Fermenter #11 (S30/P29). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (5) The permittee shall either install and operate flow meters to continuously measure the individual volumes of airflow to Fermenters #1-#5 & #7-#10 (S22/P18, S23/P19, S24/P19, S24/P20, S25/P21, S26/P22, S27/P25, S28/P26, S21/P27 & S29/P28) and continuously determine and monitor the total volume of air flow to the fermenters or determine the maximum total volume of airflow supplied by blowers connected to the fermenters. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (6) The permittee shall either install and operate flow meters to continuously measure the volume of airflow to	produced in Fermenter #11 (e.g., "stock", "first generation" or "trade"). **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]** (4) The permittee shall record, at least once every 15 minutes of operation, the combined flow rate of air to Fermenters #1-#5 & #7-#10 (S22/P18, S23/P19, S24/P19, S24/P20, S25/P21, S26/P22, S27/P25, S28/P26, S21/P27 & S29/P28) or have available, upon request, documentation (e.g., manufacturing specifications) showing the total maximum volume of airflow supplied by the blowers connected to the fermenters. All air flow rate measurements shall be recorded in units of standard cubic feet per minute. **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]** (5) The permittee shall record, at least once every 15 minutes of operation, the flow rate of air to Fermenter #6 (S22/S24), or have available, upon request,

F. Stack S20, Emission Unit P24 (Fermenter #6, installed in 1994, modified in 2000, but not reconstructed)
Stack S21, Emission Unit P27 (Fermenter #9, installed in 1978)
Stack S22, Emission Unit P18 (Fermenter #1, Installed in 1965)
Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	flow rate at 68 degrees F and 29.92 inches of mercury pressure). **[s. NR 407.09(2)(d)2., Wis. Adm. Code, and ss. 285.65(3) & (7), Wis. Stats. (Permit 00-JB-016)]** (6) No person may cause, allow or permit the volume of airflow to Fermenter #11 (S30/P29) to exceed 13,500 standard cubic feet per minute (volumetric air flow rate at 68 degrees F and 29.92 inches of mercury pressure) **[s. NR 407.09(2)(d)2., Wis. Adm. Code, and ss. 285.65(3) & (7), Wis. Stats. (Permit 00-JB-016)]** (7) No person may cause, allow or permit Fermenter #11 (S30/S29) to operate for more than 608.3 hours per month,	Fermenter #6 or determine the maximum volume of airflow supplied by the blowers connected to Fermenter #6 (primary and backup) and certify the blowers are physically incapable of operating simultaneously. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (7) The permittee shall install and operate flow meters to continuously measure the volume of airflow to Fermenter #11. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (8) The permittee shall maintain all instruments used to monitor air flow rates and calibrate the instruments yearly or at a frequency based upon good engineering practice as established by the units' operational history, whichever is more frequent. **[ss. NR 407.09(4)(a)3.b. and NR 439.055(4), Wis. Adm. Code]** (9) The permittee shall monitor and	documentation (e.g., manufacturing specifications, blueprints and electircal specifications) showing the maximum volume of airflow suppled by the blowers connected to the fermenter and the blowers are physically incapable of operating simultaneously. All air flow rate measurements shall be recorded in units of standard cubic feet per minute. **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]** (6) The permittee shall record, at least once every 15 minutes of operation, the flow rate of air to Fermenter #11 (S30/P29). All air flow rate measurements shall be recorded in units of standard cubic feet per minute. **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]** (7) The permittee shall have available, upon rerquest, a maintenance log for the instruments used to measure the air flow rates to the fermenters. These records shall include the date and time of all maintenance activites including, but not

F. Stack S20, Emission Unit P24 (Fermenter #6, installed in 1994, modified in 2000, but not reconstructed)
Stack S21, Emission Unit P27 (Fermenter #9, installed in 1978)
Stack S22, Emission Unit P18 (Fermenter #1, Installed in 1965)
Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	averaged over the 12 most recent consecutive calendar months. Fermenter downtime and the time spent cleaning the vessel are not included as long as the fermenter is empty or contains only residual yeast and/or molasses. **[s. NR 407.09(2)(d)2., Wis. Adm. Code, and ss. 285.65(3) & (7), Wis. Stats. (Permit 00-JB-016)]**	determine monthly the monthly and monthly average hours of operation of Fermenter #11, excluding downtime and time spent cleaning the unit. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	limited to, all equipment calibrations. **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]** (8) The permittee shall record monthly the monthly and monthly average hours of operation of Fermenter #11, excluding downtime and time spent cleaning the unit. **[ss. NR 407.09(1)(c)1.b., (4)(a)1 & (4)(d)., Wis. Adm. Code]**
2. Visible Emissions (VE)	No owner or operator may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity with the following exception: Emission may exceed number 1 of the Ringlemann chart or 20%	The permittee shall use the requirements in Section I.F.1.b., stack parameters, operation requirements and equipment requirements, to demonstrate compliance with the limitation in I.F.2.a. **[s NR 407.09(4)(a)3.b., Wis. Adm. Code]**	(1) Whenever any visible emissions testing is required for demonstrating compliance, the owner or operator of the source shall use Method 9 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04(13), Wis. Adm. Code, to determine compliance with a visible emission limitation. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(9)(a)1., Wis.**

F. Stack S20, Emission Unit P24 (Fermenter #6, installed in 1994, modified in 2000, but not reconstructed)
Stack S21, Emission Unit P27 (Fermenter #9, installed in 1978)
Stack S22, Emission Unit P18 (Fermenter #1, Installed in 1965)
Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe condition arises. **[s. NR 431.04(2) and NR431.05(2), Wis. Adm. Code]**		**Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.F.1.c.(2)-(7), stack parameter documentation, operation records and equipment documentation, to monitor compliance with the limitation in I.F.2.a. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]**
3. Volatile Organic Compounds	(1) No person may cause, allow or permit the permit emission of organic compound emissions into the ambient air which substantially contribute to exceeding an air standard or cause air pollution. **[s. NR 419.03(1), Wis. Adm. Code**	(1) The permittee shall use the requirements in Section I.F.1.b.(4)-(9)., operating requirements and equipment requirements, to demonstrate compliance with the limitation in I.F.3.a.(1) and the synthetic minor aspect of limitations in Section I.F.1.a.. **[s NR**	(1) Whenever any organic compound emission concentration or emission rate testing is required for demonstrating compliance, the permittee shall use Method 18, 25, 25A or 25B in 40 CFR part 60, Appendix A. Method 1, 2, 3, and 4 in 40 CFR part 60, Appendix A, shall be used to determine the sampling location, volumetric flow rate,

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	(General limitations)] (2) No owner of operator of a yeast manufacturing facility may cause, allow or permit the average concentration of VOCs in the exhaust gas stream from a fermenter during a fermentation batch to exceed the following applicable emission levels: (a) 100 ppmv from a "trade" fermentation batch. (b) 150 ppmv from a "first generation" fermentation batch. (c) 200 ppmv from a " stock" fermentation batch. These levels are on a saturated water basis and reported as total VOC expressed as	**407.09(4)(a)3.b., Wis. Adm. Code]** (2) The permittee shall install, calibrate, maintain and operate a continuous emission monitor (CEM) system to measure the concentration of Volatile Organic Compounds (VOCs) emitted by each fermenter during any "stock", "first generation" or "trade" fermentation batch. **[ss. NR 407.09(4)(a)3.b., NR 424.05(5)(a) and NR 439.095(1)(e), Wis. Adm. Code]** (3) The permittee shall install, calibrate, maintain and operate CEM systems in accordance the performance specifications in 40 CFR part 60, Appendix B and the requirements in s. NR 439.09, Wis. Adm. Code. The type of monitoring equipment used and the manner and location of its installation are subject to prior	molecular weight, and moisture of all sampled streams. **[ss. NR 407.09(1)(c)1.a. & (4)(a)1. and NR 439.06(3)(a), Wis. Adm. Code]** (2) The permittee shall use the recordkeeping and monitoring requirements in Sections I.F.1.c.(3)-(7), operation requirements and equipment documentation, to monitor compliance with the limitation in I.F.3.a.(1) and the synthetic minor aspect of limitations Section I.F.1.a.. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1., Wis. Adm. Code]** (3) The permittee shall maintain a daily record or log of the following information: (a) Operation times for all monitoring equipment, by fermenter. (b) Details of all routine and non-routine maintenance performed on the monitoring equipment, including the

[2] These RACT emission limitations combined with the operation and equipment limitations described in Section I.F.1.(3)-(7) in this permit, limit the potential VOC emissions from Fermenters #6 & #11 to less than 25 tpy to allow the modification of Fermenters #6 & #11 to be permitted as a minor modification of a major source (Permit 00-JB-016).

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
	propane. The emission limitations above do not apply to any variety of yeast which represents less than 1% by weight of the facility's total annual yeast production. **[s. NR 424.05(2), Wis. Adm. Code (RACT)]**[2]	department approval. The owner or operator shall submit a quality control and quality assurance plan for approval by the department. The permittee shall follow the plan, as approved by the department. **[ss. NR 407.09(4)(a)3.b., NR424.05(5)(a) and NR 439.095(1)(e) & (6), Wis. Adm. Code]** (4) All testing shall be conducted at a point in the exhaust gas stream prior to the introduction of any dilution air. Dilution air shall be defined as any air introduced to the fermenter for any purpose other than to aid the fermentation process. **[ss. NR 407.09(4)(a)3.b. and NR 424.05(5)(c), Wis. Adm. Code]** (5) The VOC monitors shall complete one cycle of sampling, analyzing, and data recording every 15-minutes of operation. The values recorded shall be averaged hourly. Hourly averages	duration of any outages. (c) The type of fermentation or fermentation cycle produced by each fermenter ("stock", "first generation", "trade" or "none of the types listed"). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 424.05(6)(a), Wis. Adm. Code]** (4) The permittee shall maintain a record of the following information: (a) The pounds of liquid yeast produced annually by yeast variety. (b) The total pounds of liquid yeast produced annually. (c) The weight percent of each yeast variety produced annually. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 424.05(6)(b), Wis. Adm. Code]** (5) The permittee maintain and have available, upon request, a copy of the

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		shall be computed from 4 data points equally spaced over each 1 hour period, except during periods when calibration, quality assurance, or maintenance activities are being performed. During these periods, a valid hour shall consist of at least 2 data points separated by a minimum of 15 minutes **[ss. NR 407.09(4)(a)3.b. and NR 439.09(9)(b), Wis. Adm. Code]** (6) The permittee shall monitor the operating times of each fermenter, including the functional operation of all monitoring equipment associated with the fermenter. All equipment problems, shutdowns, breakdowns and malfunctions shall be noted. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]** (7) The permittee shall monitor the facility's annual liquid yeast production by variety and determine	facility's CEM quality control and quality assurance plan submitted to and approved by the department. The plan shall identify the type of monitoring equipment used and the location of each exhaust gas stream sampling port. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 439.04(1)(d), Wis. Adm. Code]** (6) The permittee shall maintain a record of all malfunctions which cause any applicable emission limitation to be exceeded, including logs to document the implementation of the plan required by s. NR 439.11, Wis. Adm. Code (Malfunction and Abatement Plan). **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 439.04(1) (b), Wis. Adm. Code]** (7) The permittee shall notify the Department of any shutdown, breakdown, or malfunction of any of the CEM system or monitoring device which is anticipated to continue in excess of one week. Notice shall be submitted to the department by

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		the weight percentage each variety of liquid yeast produced annually. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]**	the next business day following the onset of the shutdown, breakdown or malfunction. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 439.03(5), Wis. Adm. Code]** (8) The permittee shall submit quarterly excess emission reports to the department within 30 days following the end of each calendar quarter in accordance with ss. NR 439.09(10)(a)-(d), Wis. Adm. Code. In addition, yearly the permittee shall submit either a full excess emission report under s. NR 439.09(10)(a) or summary excess emission report using a form or format approved by the department. The full excess emission reports shall contain the following information: (a) The date and starting and ending times or duration of each period of excess emissions and the magnitude of the emissions. (b) The periods of excess emissions that occur during startups, shutdowns,

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
			process malfunctions, other known causes or for unknown causes. The report shall identify the cause of any malfunction and measures taken to reduce excess emissions. (c) The date and starting and ending time of any period during which the monitoring system was inoperative for any reason or causes, including monitoring malfunction or calibration, except for zero and span checks. The report shall identify the repairs or adjustments made to the system. (d) The date and starting and ending time of any period during which the process being monitored was inoperative. (e) When no period of excess emissions occurred during the quarter and the monitoring system had no period of downtime, an excess emissions report shall be filed stating such information. **[ss. NR 407.09(1)(c)1.b. & (4)(a)1. and NR 439.03(10)(a), Wis. Adm. Code]**

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4. Hazardous Air Pollutants (HAPs) Acetaldehyde CAS #75-07-0	For the applicable requirements regarding the emissions of acetaldehyde (CAS #75-07-0) refer to Section G.1.of Part I of the Permit (Total Facility - General Hazardous Air Pollutants Requirements) and Section G.2.of Part I of the Permit (Total Facility - National Emission Standards for Hazardous Air Pollutants – Manufacturing of Nutritional Yeast (40 CFR Part 63, Subpart CCCC - MACT)). The compliance date of this MACT standard for an existing affected source is May 21, 2004.		

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a. CONDITION TYPE	**b. SPECIFIC CONDITIONS**
1. General Hazardous Air Pollutants Requirements No person may cause, allow or permit emissions into the ambient air of any hazardous substance in a quantity, concentration, or duration which is injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include but are not limited to hazardous air contaminants listed in Tables 1 to 5 of s. NR 445.04, Wis. Adm. Code. **[s. NR 445.03, Wis. Adm. Code (General Limitations)] ***	(1) Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the USEPA or the Department. **[ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]** (2) If and when the permittee elects to significantly change the existing operation (e.g., raw material changes and increases in output), the permittee shall determine, either analytically or through the use of technical literature (e.g., AP-42), the operation and facility's potential emissions or increases in potential emissions of all hazardous air pollutants (HAPs). **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** (3) The permittee shall determine, if under maximum operation conditions, the facility's potential emissions or increases in potential emissions exceed any of the applicable thresholds or de minimus values published in Tables 1, 2, 4 & 5 of s. NR 445.04, Wis. Adm. Code. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** (4) If any of the facility's emissions exceed an applicable threshold or de minimus value, the permittee shall evaluate the impact of that pollutant's emission and determine if any action is needed to protect the ambient air quality standard. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*** (5) Recordkeeping and monitoring of acetaldehyde emissions are not required for any emission unit or operation that does not have the potential to violate the ambient air quality standard under normal operating conditions. **[ss. 285.65(3) and 285.63(4)(b), Wis. Stats.]***

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2. National Emission Standards for Hazardous Air Pollutants – Manufacturing of Nutritional Yeast (40 CFR Part 63, Subpart CCCC) (1) No later than May 31, 2005, the permittee must be in compliance with the emission limitations below, or in Table 1 of this subpart, at all times, except during periods of malfunction. For each fed-batch fermenter producing yeast in the last stage (last stage of fermentation (trade), or second-to-last stage of fermentation (first generation), or third-to-last stage of fermentation (stock)), the permittee must meet the following emission limitation: (a) At least 98 percent of all batches (sum of batches from last, second-to-last and third-to-last stages) in each 12-month calculation period described in Sec. 63.2171(b), the VOC concentration in the fermenter exhaust does not exceed the applicable maximum concentration (100 ppmv for last stage, 200 ppmv for second-to-last stage, or 300 ppmv for third-to-last stage), measured as propane, and averaged over the duration of a batch. (b) The emission limitation does not apply during the production of specialty yeast. **[s. 63.2150(a), 40 CFR Part 63, Subpart CCCC]** (2) No later than May 21, 2004, the permittee must always	(1) No later than May 31, 2005, the permittee must demonstrate "initial compliance" for the period ending on the last day of the month that is 12 calendar months (or 11 calendar months, if the compliance date for your source is the first day of the month) after the compliance date that is specified for your source in Sec. 63.2133. The compliance date for an existing affected source in Sec. 63.2133, is May 21, 2004. **[s. 63.2160(a), 40 CFR Part 63, Subpart CCCC]** (2) No later than May 21, 2004, the permittee shall implement and comply with the following monitoring installation, operation, and maintenance requirements: (a) Each Continuous Emissions Monitoring System (CEMS) must be installed, operated, and maintained according to the applicable Performance Specification (PS) of 40 CFR Part 60, Appendix B. (b) You must performance evaluation of each CEMS according to the requirements in Sec. 63.8, according to the applicable Performance Specification of 40 CFR part 60, appendix B, and according to paragraphs (b)1. through 4. of this section. 1. If your CEMS monitor generates a single combined response value for VOC (examples of such detection principles are flame ionization, photoionization, and non-dispersive infrared absorption), but it is not a flame ionization analyzer, you must use PS 8 to show that your CEMS is operating properly. i. Use EPA Test Method 25A of 40 CFR part 60, appendix A, to do the relative-accuracy test PS 8 requires. ii. Calibrate the reference method with propane. iii. Collect a 1-hour sample for each reference-method test.

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operate and maintain your affected source, including monitoring equipment, according to the provisions in Sec. 63.6(e)(1)(i). Between May 21, 2004, and May 31, 2005, the permittee must maintain a log detailing the operation and maintenance of the continuous monitoring (CEM) systems and the process and emissions control equipment. **[s. 63.2150(b), 40 CFR Part 63, Subpart CCCC]** (3) No later than May 21, 2004, the permittee must develop and implement a written malfunction plan. The plan shall be in accordance with Sec. 63.6(e)(3), except that the requirements for startup, shutdown, and maintenance plans, records and reports apply only to malfunctions. A period of malfunction shall be expressed in whole batches and not in portions of batches. **[s. 63.2150(b), 40 CFR Part 63, Subpart CCCC]**	2. If you continuously monitor VOC emissions using a flame ionization analyzer, then you must conduct the calibration drift test PS 8 requires, but you are not required to conduct the relative-accuracy test PS 8 requires. 3. If you continuously monitor VOC emissions using gas chromatography, you must use PS 9 of CFR part 60, appendix B, to show that your CEMS is operating properly. 4. You must complete the performance evaluation and submit the performance evaluation report before the compliance date that is specified for your source in Sec. 63.2133. (c) Calibrate the CEMS with propane. (d) Set the CEMS span at not greater than 5 times the relevant emission limit, with 1.5 to 2.5 times the relevant emission limit being the range considered by us to be generally optimum. (e) You must monitor VOC concentration in fermenter exhaust at any point prior to dilution of the exhaust stream. (f) Each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 30-minute period within each batch monitoring period. Except as specified in paragraph (g) of this section, you must have a minimum of two cycles of operation in a 1-hour period to have a valid hour of data. (g) The CEMS data must be reduced to arithmetic batch averages computed from two or more data points over each 1-hour period, except during periods when calibration, quality assurance, or maintenance activities pursuant to provisions of this part are being performed. During these periods, a valid hour of data shall consist of at least one data point representing a 30-minute period. (h) You must have valid CEMS data from at least 75 percent of the full hours over the

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	entire batch monitoring period. (i) For each CEMS, record the results of each inspection, calibration, and validation check. (j) You must check the zero (low-level) and high-level calibration drifts for each CEMS in accordance with the applicable PS of 40 CFR part 60, appendix B. The zero (low-level) and high-level calibration drifts shall be adjusted, at a minimum, whenever the zero (low-level) drift exceeds 2 times the limits of the applicable PS. The calibration drift checks must be performed at least once daily except that they may be performed less frequently under the conditions of paragraph (j)1. Through 3. of this section. 1. If a 24-hour calibration drift check for your CEMS is performed immediately prior to, or at the start of, a batch monitoring period of a duration exceeding 24 hours, you are not required to perform 24-hour- interval calibration drift checks during that batch monitoring period. 2. If the 24-hour calibration drift exceeds 2.5 percent of the span value (or more than 10 percent of the calibration gas value if your CEMS is a gas chromatography (GC)) in fewer than 5 percent of the checks over a 1-month period, and the 24-hour calibration drift never exceeds 7.5 percent of the span value, then the frequency of calibration drift checks may be reduced to at least weekly (once every 7 days). 3. If, during two consecutive weekly checks, the weekly calibration drift exceeds 5 percent of the span value (or more than 20 percent of the calibration gas value, if your CEMS is a GC), then a frequency of at least 24-hour interval calibration checks must be resumed until the 24- hour calibration checks meet the test of paragraph (j)2. Of this section. (k) If your CEMS is out of control, you must take corrective action according to paragraph (k)1. Through 3. of this section. 1. Your CEMS is out of control if the zero (low-level) or high- level calibration drift

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	exceeds 2 times the limits of the applicable PS. 2. When the CEMS is out of control, take the necessary corrective action and repeat all necessary tests that indicate that the system is out of control. You must take corrective action and conduct retesting until the performance requirements are below the applicable limits. 3. During the batch monitoring periods in which the CEMS is out of control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement established under this subpart. The beginning of the out-of-control period is the beginning of the first batch monitoring period that follows the most recent calibration drift check during which the system was within allowable performance limits. The end of the out-of-control period is the end of the last batch monitoring period before you have completed corrective action and successfully demonstrated that the system is within the allowable limits. If your successful demonstration that the system is within the allowable limits occurs during a batch monitoring period, then the out-of-control period ends at the end of that batch monitoring period. If the CEMS is out of control for any part of a particular batch monitoring period, it is out of control for the whole batch monitoring period. **[s. 63.2163, 40 CFR Part 63, Subpart CCCC]** (3) To demonstrate "initial compliance", the permittee shall demonstrate initial compliance with each emission limitation that applies in Table 3 of this subpart (Table 3 of 40 CFR, Part 63, Subpart CCCC) You have demonstrated "initial compliance" if: (a) You reduce the CEMS batch averages according to Sec. 63.2163(g). (b) The average VOC concentration in the fermenter exhaust for at least 98 percent of the batches (sum of batches from the last, second-to-last and third-to-last stages) during the initial compliance period described in Sec. 63.2160(a) does not exceed the applicable maximum concentration (100 ppmv for last stage (trade), 200 ppmv for second-to-last stage (first generation), or 300 ppmv for third-to-last stage (stock),

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Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

	measured as propane). Under Sec. 63.2160(a), the initial compliance period for an existing affected source is May 21, 2004 to May 31, 2005. **[s. 63.2165(a), 40 CFR Part 63, Subpart CCCC]** (4) To demonstrate "initial compliance", the permittee shall submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in Sec. 63.2180(e). **[s. 63.2165(b), 40 CFR Part 63, Subpart CCCC]** (5) No later than May 21, 2004, the permittee shall implement and use the following methods to monitor and collect data to demonstrate "continuous compliance": (a) Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must monitor continuously during each batch monitoring period. (b) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or quality control activities in data averages and calculations used to report emission or operating levels, or to fulfill a minimum data availability requirement. You must use all the data collected during all other periods in assessing the operation of the control system. **[s. 63.270, 40 CFR Part 63, Subpart CCCC]** (6) After May 31, 2005, the permittee shall implement and do the following to demonstrate "continuous compliance" with the emission limitations: (a) Demonstrate continuous compliance with the emission limitation in Table 1 to this subpart that applies to you according to methods specified in Table 4 to this subpart.

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Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

	The compliance demonstration methods in Table 4 for a fed-batch fermenter, where the VOC concentration in the fermenter exhaust, is monitored is as follows: 1. Collect the monitoring data according to Sec. 63.2163(f). 2. Reduce the data according to Sec. 63.2163(g). 3. For at least 98 percent of the batches (sum of batches from last, second-to-last, and third-to-last stages) for each 12-month period ending within a semiannual reporting period described in Sec. 63.2181(b)(3), the batch average VOC concentration in the fermenter exhaust does not exceed the applicable maximum concentration. (b) Calculate the percentage of within-concentration batches (defined in Sec. 63.2192) for each 12-month period according to paragraph (b)1. Through 4. of this section. 1. Determine the percentage of batches over a 12-month calculation period that were in compliance with the applicable maximum concentration. The total number of batches in the calculation period is the sum of the numbers of batches of each fermentation stage for which emission limits apply. To calculate the 12-month percentage, do not include batches in production during periods of malfunction. In counting the number of batches in the 12-month calculation period, include those batches for which the batch monitoring period ended on or after 12 a.m. on the first day of the period and exclude those batches for which the batch monitoring period did not end on or before 11:59 p.m. on the last day of the period. 2. Determine the 12-month percentage at the end of each calendar month. 3. The first 12-month calculation period begins on the compliance date that is specified for your source in Sec. 63.2133, and ends on the last day of the month that includes the date 365 days after your compliance date, unless the compliance date for your source is the first day of the month, in which case the first 12-month calculation period ends on the last day of the month that is 11 calendar months after the compliance date. (For example, if the compliance date for your source is October 15, 2003, the first 12-month calculation period would begin on October 15, 2003, and end on October 31, 2004. If the compliance date for your source is

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Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
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Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

	October 1, 2003, the first 12-month calculation period would begin on October 1, 2003, and end on September 30, 2004.). 4. The second 12-month calculation period and each subsequent 12- month calculation period begin on the first day of the month following the first full month of the previous 12-month averaging period and end on the last day of the month 11 calendar months later. (For example, if the compliance date for your source is October 15, 2003, the second calculation period would begin on December 1, 2003 and end on November 30, 2004.) (c) Report each instance (that is, each 12-month calculation period) in which you did not meet each emission requirement in Table 4 to this subpart that applies to you. (Failure of a single batch to meet a concentration limit does not in and of itself constitute a failure to meet the emission limitation.) Each instance in which you failed to meet each applicable emission limitation is reported as part of the requirements in Sec. 63.2181. (d) During periods of malfunction, operate in accordance with the malfunction plan. **[s. 63.2171, 40 CFR Part 63, Subpart CCCC]** (7) The permittee shall submit the following notifications: (a) You must submit all of the notifications in Secs. 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified. (b) You are not subject to the initial notification requirements of Sec. 63.9(b)(2). (c) If you are required to conduct a performance evaluation as specified in Sec. 63.2163(b), you must submit a notification of the date of the performance evaluation at least 60 days prior to the date the performance evaluation is scheduled to begin as required in Sec. 63.8(e)(2).

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Stack S23, Emission Unit P19 (Fermenter #2, installed in 1965)
Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
Stack S29, Emission Unit P28 (Fermenter #10, installed in 1978)
Stack S30, Emission Unit P29 (Fermenter #11, installed in 1995, modified in 2000, but not reconstructed)

	(d) If you are required to conduct a performance test or other initial compliance demonstration as specified in Table 2 or 3 in this subpart you must submit a Notification of Compliance Status according to Sec. 63.9(h)(2)(ii). For each initial compliance demonstration required in Table 3 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status no later than July 31 or January 31, whichever date follows the end of the first 12 calendar months after the compliance date that is specified for your source in Sec. 63.2133. If your initial compliance demonstration does not include a performance test, the first compliance report, described in Sec. 63.2181(b)(1), serves as the Notice of Compliance Status. **[s. 63.2180, 40 CFR Part 63, Subpart CCCC]** (8) The permittee shall submit the following reports at the times specified below: (a) You must submit each report in Table 5 to this subpart that applies to you. According to Table 5 the following report must be submitted: 1. Your "Compliance Report" semiannually according to the requirements in Sec. 63.2181(b). 2. Your "Immediate Malfunction Report" (if you had a malfunction during the reporting period that is consistent with your malfunction plan) by fax or telephone within 2 working days after starting actions inconsistent with the plan and by letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority (s. 63.10(d)(5)(ii)). (b) Unless the Administrator has approved a different schedule for submission of reports under Sec. 63.10(a), you must submit each report by the date in Table 5 to this subpart and according to paragraph (b)1. Through 5. of this section. 1. The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in Sec. 63.2133 and ending on either June 30 or December 31 (use whichever date is the first date following the end of

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Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
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	the first 12 calendar months after the compliance date that is specified for your source in Sec. 63.2133). The first compliance report must include the percentage of within-concentration batches, as described in Sec. 63.2171(b), for the first 12-month calculation period described in Sec. 63.2171(b)(3). It must also include a percentage for each subsequent 12-month calculation period, as described in Sec. 63.2171(b)(4), ending on a calendar month that falls within the first compliance period. (For example, if the compliance date for your source is October 15, 2003, the first compliance report would cover the period from October 15, 2003 to December 31, 2004. It would contain percentages for the 12-month periods ending October 31, 2004; November 30, 2004; and December 31, 2004.). 2. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first 12 calendar months after the compliance date that is specified for your affected source in Sec. 63.2133. 3. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent compliance report must include the percentage of within-concentration batches for each 12-month calculation period ending on a calendar month that falls within the reporting period. (For example, if the compliance date for your source is October 15, 2003, the second compliance report would cover the period from January 1, 2005 through June 30, 2005. It would contain percentages for the 12-month periods ending January 31, 2005; February 28, 2005; March 31, 2005; April 30, 2005; May 31, 2005; and June 30, 2005.). 4. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. 5. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(a)(iii)(A) or 40 CFR 71.6(a)(3)(a)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)1. through 4. of this section.

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	(c) The compliance report must contain the information listed in paragraph (c)1. through 5. of this section. 1. Company name and address. 2. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report. 3. Date of report and beginning and ending dates of the reporting period. 4. Percentage of batches that are within-concentration batches for each 12-month period ending on a calendar month that falls within the reporting period. 5. If you had a malfunction during the reporting period and you took actions consistent with your malfunction plan, the compliance report must include the information in Sec. 63.10(d)(5)(i) for each malfunction. **[s. 63.2181, 40 CFR Part 63, Subpart CCCC]** (9) The permittee shall retain the following records: (a) You must keep the records listed in paragraph (a)1. Through 4. of this section. These include: 1. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Notification of Compliance Status and compliance report that you submitted, according to the requirements in Sec. 63.10(b)(2)(xiv). 2. The records in Sec. 63.6(e)(3)(iii) through (v) related to malfunction; 3. Records of performance tests and performance evaluations as required in Sec. 63.10(b)(2)(viii); and 4. Records of results of brew-to-exhaust correlation tests specified in Sec. 63.2161. (b) For each CEMS, you must keep the records listed in paragraph (b)1. through 9. of this section. These include:

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Stack S24, Emission Unit P20 (Fermenter #3, installed in 1975)
Stack S25, Emission Unit P21 (Fermenter #4, installed in 1965)
Stack S26, Emission Unit P22 (Fermenter #5, installed in 1964)
Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
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	1. Records described in Sec. 63.10(b)(2)(vi); 2. All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 30-minute averages of CEMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report); 3. Records described in Sec. 63.10(b)(2)(viii) through (xi). The CEMS system must allow the amount of excess zero (low-level) and high- level calibration drift measured at the interval checks to be quantified and recorded; 4. All required CEMS measurements (including monitoring data recorded during unavoidable CEMS breakdowns and out-of-control periods); 5. Identification of each batch during which the CEMS was inoperative, except for zero (low-level) and high-level checks; 6. Identification of each batch during which the CEMS was out of control, as defined in Sec. 63.2163(k); 7. Previous (i.e., superseded) versions of the performance evaluation plan as required in Sec. 63.8(d)(3); 8. Request for alternatives to relative accuracy test for CEMS as required in Sec. 63.8(f)(6)(i); and 9. Records of each batch for which the batch-average VOC concentration exceeded the applicable maximum VOC concentration in Table 1 to this subpart and whether the batch was in production during a period of malfunction or during another period. (c) You must keep the records required in Table 4 to this subpart to show continuous compliance with each emission limitation that applies to you. (d) You must also keep the records listed in paragraph (d)1. Through 3. of this section for each batch in your affected source. 1. Unique batch identification number. 2. Fermentation stage for which you are using the fermenter. 3. Unique CEMS equipment identification number.

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Stack S27, Emission Unit P25 (Fermenter #7, installed in 1975)
Stack S28, Emission Unit P26 (Fermenter #8, installed in 1974)
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	[s. 63.2182, 40 CFR Part 63, Subpart CCCC] (10) The permittee shall retain the following records: (a) Your records must be in a form suitable and readily available for expeditious review, according to Sec. 63.10(b)(1). (b) As specified in Sec. 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to Sec. 63.10(b)(1). You can keep the records offsite for the remaining 3 years. **[s. 63.2183, 40 CFR Part 63, Subpart CCCC]** (11) The permittee shall comply with the general provisions listed in Table 6 to this subpart. Table 6 shows which parts of the General Provisions in Secs. 63.1 through 63.13 that apply. **[s. 63.2190, 40 CFR Part 63, Subpart CCCC]**
3. National Emission Standards for Hazardous Air Pollutants – MACT Hammer for Industrial Boilers Institutional/Commercial Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (1) The permittee shall submit a Part 2 MACT application to the Department by April 28, 2004, unless USEPA	(1) The Part 2 MACT application shall contain: (a) For a new affected source, the anticipated date of startup of operation; (b) Each emission point or group of emission points at the affected source which is part of a category or subcategory for which a Part 2 MACT application is required, and each of the hazardous air pollutants emitted at those emission points; (c) Any existing Federal, State, or local limitations or requirements applicable to the affected source;

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finalizes the Industrial Boilers, Institiutional/Commercial Boilers and Process Heaters MACT standard before this date. **[s. 285.65(13), Wis. Stats., and s 63.52(e)(1), 40 CFR Part 63]**	(d) For each piece of equipment or activity or source, an identification of control technology in place; (e) Any additional emission data or other information specifically requested by the Department. **[s. 285.65(13), Wis. Stats., and s. 63.53(b)(2), 40 CFR Part 63]** (2) The Part 2 MACT application may contain: (a) Recommended emission limitations for the affected source and support information consistent with 40 CFR 63.52(f). The owner or operator may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation; (b) A description of the control technologies that shall be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies shall be applied; (d) Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period. **[s. 285.65(13), Wis. Stats., and s. 63.53(b)(3), 40 CFR Part 63]**
4. General Reporting Requirements (1) The permittee shall periodically submit monitoring and compliance reports. **[s. NR 407.09(1)(c)3., Wis. Adm. Code]**	(1) Submit the results of monitoring or a summary of monitoring results required by this permit to the Department once every six (6) months.

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	(a) The time periods to be addressed by the submittals are January 1 to June 30 and July 1 to December 31. (b) The report shall be submitted to the within 30 days after the end of each reporting period. (c) All deviations from and violations of applicable requirements shall be clearly identified in the submittals. (d) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report. **[ss. NR 407.09(1)(c)3. & NR 439.03(1)(b), Wis. Adm. Code]** (2) Submit an annual certification of compliance with the requirements of this permit to the Wisconsin Department of Natural Resources, Air Management Program, Milwaukee Service Center, 2300 MLK Drive, P.O. Box 12436, Milwaukee, WI 53212, (262) 263-8500 and to Compliance Data – Wisconsin, Air and Radiation Division, U.S. EPA, 77 W. Jackson, Chicago, IL 60604, once every tweleve (12) months. (a) The time periods to be addressed by the reports is January 1 to December 31. (b) The reports shall be submitted to the department and U.S. EPA within 30 days after the end of each reporting period. (c) The information included in the reports shall comply with the requirements of Part II Section N of this permit. (d) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report. **[ss. NR 407.09(4)(a)3. & NR 439.03(1)(c), Wis. Adm. Code]**

G. EMISSION REDUCTION CREDIT REQUIREMENTS

1. The permittee shall not exceed 21,666 lb VOC per month from existing sources on a 12 month rolling average. Emissions shall be recorded on a daily basis and kept for five years. (sec 285.65(5), Wis. Stats.)

2. The Department certifies a VOC emission reduction of 116.2 TPY as a result of the shutdown. Quantification and use of this emission reduction is subject to applicable state and federal requirements and to subsequent rule development by the Department.