

Attention:

Quaker Manufacturing, LLC-Danville Plant  
Attn: Dustin Benway, HSE Manager  
1703 East Voorhees Street  
Danville, Illinois 61832

State of Illinois

# CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Quaker Manufacturing, LLC - Danville Plant  
1703 East Voorhees Street  
Danville, Illinois 61832

I.D. No.: 183020AET  
Permit No.: 96030114

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

## CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title V Permit]

Type of Application: Significant Modification (SM)  
Purpose of Application: Revise Existing CAAPP Permit

ID No.: 183020AET  
Permit No.: 96030114  
Statement of Basis No.: 96030114-1910

Date Application Received: April 1, 2019  
Date Issued: December 31, 2019  
Permit Effective Date<sup>1</sup>: January 1, 2020

Date Revision Received: September 16, 2020  
Date Revision Issued: TBD

Expiration Date: January 1, 2025  
Renewal Submittal Date: 9 Months Prior to January 1, 2025

Source Name: Quaker Manufacturing, LLC- Danville Plant  
Address: 1703 East Voorhees Street  
City: Danville  
County: Vermilion  
ZIP Code: 61832

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued December 31, 2019 is incorporated herein by reference. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Jacob Minor at 217/785-1705.

William D. Marr  
Manager, Permit Section  
Bureau of Air

WDM:WDM:JEM:tan

cc: IEPA, Permit Section  
IEPA, FOS, Region 3

---

<sup>1</sup> This permit renewal is being issued prior to the expiration date of the existing CAAPP permit currently in effect for the source. Terms and conditions of each CAAPP permit remain in effect for the full five-year term of the permit. For this reason, the renewed permit will become effective on the first day following the expiration date of the existing permit, as denoted above, unless this permitting action is appealed and subsequently stayed by the Pollution Control Board.

<u>Section</u>	<u>Table of Contents</u>	<u>Page</u>
<b>1</b>	<b>Source Information</b>	<b>3</b>
	1.1 Addresses	
	1.2 Contacts	
	1.3 Single Source	
<b>2</b>	<b>General Permit Requirements</b>	<b>4</b>
	2.1 Prohibitions	
	2.2 Emergency Provisions	
	2.3 General Provisions	
	2.4 Testing	
	2.5 Recordkeeping	
	2.6 Certification	
	2.7 Permit Shield	
	2.8 Title I Conditions	
	2.9 Reopening and Revising Permit	
	2.10 Emissions Trading Programs	
	2.11 Permit Renewal	
	2.12 Permanent Shutdown	
	2.13 Startup, Shutdown, and Malfunction	
<b>3</b>	<b>Source Requirements</b>	<b>12</b>
	3.1 Applicable Requirements	
	3.2 Applicable Plans and Programs	
	3.3 Title I Requirements	
	3.4 Synthetic Minor Limits	
	3.5 Reporting Requirements	
<b>4</b>	<b>Emission Unit Requirements</b>	<b>16</b>
	4.1 Pre-processing Plants	
	4.2 Cereal Lines	
	4.3 Pancake Lines	
	4.4 Boilers	
<b>5</b>	<b>Additional Title I Requirements</b>	<b>39</b>
<b>6</b>	<b>Insignificant Activities Requirements</b>	<b>40</b>
	6.1 Insignificant Activities Subject to Specific Regulations	
	6.2 Insignificant Activities in 35 IAC 201.210(a)	
	6.3 Insignificant Activities in 35 IAC 201.210(b)	
	6.4 Applicable Requirements	
	6.5 Compliance Method	
	6.6 Notification Requirements for Insignificant Activities	
<b>7</b>	<b>Other Requirements</b>	<b>44</b>
	7.1 Testing	
	7.2 PM Process Weight Rate Requirements	
	7.3 40 CFR 63 Subpart A Requirements (NESHAP)	
<b>8</b>	<b>State Only Requirements</b>	<b>48</b>
	8.1 Permitted Emissions for Fees	
<b>Attachment 1</b>	<b>List of Emission Units at This Source</b>	<b>49</b>
<b>Attachment 2</b>	<b>Acronyms and Abbreviations</b>	<b>50</b>
<b>Attachment 3</b>	<b>Contact and Reporting Addresses</b>	<b>52</b>
<b>Attachment 4</b>	<b>Example Certification by a Responsible Official</b>	<b>53</b>

## Section 1 - Source Information

## 1. Addresses

Source

Quaker Manufacturing LLC  
1703 East Voorhees Street  
Danville, Illinois 61832

Owner

The Quaker Oats Company  
555 N. Monroe Street  
Chicago, Illinois 60661

Operator

Quaker Manufacturing LLC- Danville Plant  
1703 East Voorhees Street  
Danville, Illinois 61832

Permittee

The Operator of the source as identified in this table.

## 2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Dave Kramp	Plant Manager
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Dustin Benway	217-554-2222	dustin.benway@pepsico.com
<i>Technical Contact</i>	Holly Argiris	317-816-7301	holly.argiris@erm.com
<i>Correspondence</i>	Dustin Benway	217-554-2222	dustin.benway@pepsico.com
<i>Billing</i>	Dustin Benway	217-554-2222	dustin.benway@pepsico.com

## 3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

### **3. General Provisions**

#### **a. Duty to Comply**

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

#### **b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

#### **c. Duty to Maintain Equipment**

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

#### **d. Disposal Operations**

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

#### **e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. Fee payment shall be made either electronically at <https://magic.collectorsolutions.com/magic-ui/Login/illinois-epa> or by check or money order payable to "Illinois Environmental Protection Agency" and sent to: Fiscal Services #2, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

#### **f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
  - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
  - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
  - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

<b>4. <u>Testing</u></b>
--------------------------

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7) (a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

## **5. Recordkeeping**

### **a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7) (b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

### **b. Retention of Records**

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7) (e) (ii) of the Act]
- ii. Pursuant to Section 39.5(7) (a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

### **c. Availability of Records**

- i. Pursuant to Section 39.5(7) (a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7) (a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD



shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

## **6. Certification**

### **a. Compliance Certification**

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

### **b. Certification by a Responsible Official**

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

## **7. Permit Shield**

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after November 12, 2014 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

## 8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
  - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
  - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

## 9. Reopening and Revising Permit

### a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7) (o) (iii) of the Act]

### b. Reopening and Revision

Pursuant to Section 39.5(15) (a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

### c. Inaccurate Application

Pursuant to Sections 39.5(5) (e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

### d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7) (o) (v) of the Act]

## 10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7) (o) (vii) of the Act]

## 11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5) (l) and (o) of the Act]

- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

## **12. Permanent Shutdown**

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

## **13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

#### c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**d. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

**2. Applicable Plans and Programs**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

**c. Episode Action Plan**

Should this source become subject to 35 IAC 244.142, the Permittee shall prepare, submit, and operate under an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures and submitted to the IEPA for its review. The Episode Action Plan shall contain the information specified in 35 IAC 244.144. The Permittee shall immediately implement the appropriate steps described in this Episode Action Plan should an air pollution alert or emergency be declared. Any future Episode Action Plan made by the Permittee during the

permit term is automatically incorporated by reference provided the Episode Action Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Episode Action Plan. In the event that the IEPA notifies the Permittee of a deficiency with any Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.

**d. Risk Management Plan (RMP)**

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7) (f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
  - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).
  - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

**b. Semiannual Reporting**

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

**c. Annual Emissions Reporting**

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.



## Section 4 - Emission Unit Requirements

### 4.1 Pre-Processing Plants

#### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Groats Processing Plant	PM(Opacity), PM	1974	N/A	Fabric Filters	Pressure Gauge
Flaking Plant	PM(Opacity), PM	1973	2019	Fabric Filters	Pressure Gauge

#### 2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act. In addition, each emission unit that is in Section 5 shall comply with the applicable requirements in Section 5.1.

##### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 112.123(b) or 35 IAC 112.124.

##### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on Pre-Processing Plants in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the Pre-Processing Plants, maintenance and repair and/or adjustment of the operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each Method 9 and Method 22 conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions or opacity measurements, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

##### b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

**Section 4 - Emission Unit Requirements**  
**4.1 - Pre-Processing Plants**

emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (see Section 7.2)

- B. Pursuant to Construction permit #19030008, the PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the Pre-Processing Plants shall not exceed the following limits: [T1]

Plant/Emission Unit	Limit	
	Lbs/Hour	Tons/Year
Flaking Plant		
Flaking System #1	2.61	11.43
Flaking Systems #2 and #3	5.22	22.86
By-Product	0.09	0.40
Groats Processing Plant		
Cutting	2.11	9.22
Truck Load Out Building	2.25	9.84
Groats Destoner	1.92	8.41
Storage Bins and Hoppers	0.13	0.56
By-Product	0.02	0.08

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to 39.5(7) (b) from the Act, the Permittee shall monitor the pressure drop across each fabric filter on a weekly basis when in operation.

Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation for the flaking systems and groats processing plants, in hrs/mo and hrs/yr.
  - II. Weight of materials being conveyed in the flaking systems and groats processing plants, in lbs/mo and tons/yr.
  - III. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.
  - IV. The emissions of PM for each of the flaking systems and groats processing plants, in lbs/mo and tons/yr, for the current month plus the preceding 11 months (running 12 month total), with supporting calculations.
  - V. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for PM from the emission units in the Flaking Plant and the Groats Processing Plant (lb/hr), with supporting calculations.
  - VI. The pressure drop across each fabric filter on a weekly basis when in operation.

c. i. Operational and Production Requirements

- A. Pursuant to Construction Permit #09110038, the amount of material processed by the groats processing plant shall not exceed 26,280 tons/month and 262,800 tons/year. [T1]

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

- B. Pursuant to Construction permit #19030008, the design capacity of each flaking system shall not exceed 7,500 lbs/hour. [T1]
- C. Pursuant to Construction Permit #19030008, the emissions of PM from the Pre-Processing Plants, total, shall not exceed 6.3 tons/month and 62.8 tons/year. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:

- I. Weight of materials being conveyed in the flaking systems and groats processing plants, in lbs/mo and lbs/yr.

d. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7) (a) of the Act, at all times, the Permittee shall, to the extent practicable, maintain and operate the pre-processing plants, including associated baghouses, in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall conduct inspections of the control measures (i.e., fabric filters) at least once per year for the purpose of verifying that these control measures control emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

- B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum the following:

- I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel.

**3. Non-Applicability Determinations**

- a. The Pre-Processing Plants are not subject to 35 IAC 215.301, because the Pre-processing Plants do not use "Organic Material" as defined by 35 IAC 211.4250.
- b. The Pre-Processing Plant Units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the Pre-Processing Plant Units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), and 4.1.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

## 4.2 Cereal Lines

### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
<b>RTE 1</b>					
RTE 1 Oven	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1995	N/A	None	None
Cooling Conveyors (RTE 1 Base Dust Collector)	PM(Opacity), PM	1995	N/A	Fabric Filter	Pressure Gauge
Conveyor Storeveyor Screener Remill Surge Bin Cyclone (RTE 1 Finish Product/ Remill Dust Collector)	PM(Opacity), PM	1995	2017	Fabric Filter	Pressure Gauge
RTE 1 Hammermill (Remill Dust Collector)	PM(Opacity), PM	1995	N/A	Fabric Filter	Pressure Gauge (
Bin Screener Tote Line (Crisp Rice Toting Dust Collector)	PM(Opacity), PM	2000	N/A	Fabric Filter	Pressure Gauge
RTE 1 Extruder Cutter (RTE 1 Extruder Cutter Cyclone)	PM(Opacity), PM	2003	N/A	Cyclone	None
Sifter (Sifter Dust Collector)	PM(Opacity), PM	1992	N/A	Fabric Filter	Pressure Gauge
Wet Blender Syrup Mix Kettle (RTE 1 Wet Collector)	PM(Opacity), PM	1998	N/A	Wet Collector	Pressure Gauge and Flow Meter (after installation)
<b>RTE 2</b>					
Conveyors Base Product Bin Base Product Screener Sample Box (RTE 2 Base Dust Collector)	PM(Opacity), PM	1989	N/A	Fabric Filter	Pressure Gauge
Oven (RTE Oven Exhaust #1)	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1989	N/A	None	None
Oven (RTE Oven Exhaust #2)	PM(Opacity), PM	1989	N/A	None	None
Furnace Extruder (RTE 2 Hot Cyclone Receiver)	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1989	N/A	Cyclone	None
Incline Belt Conveyor Oven #2 Outlet Vibrators(4) Oven #3 Outlet RTE 11 Packaging Scale Vibrators (2) (RTE 2 Finish Product Dust Collector)	PM(Opacity), PM	1989	N/A	Fabric Filter	Pressure Gauge
Dry Mix Receiver Bin	PM(Opacity), PM	1989	N/A	Fabric Filter	Pressure Gauge
Sift Surge Hopper	PM(Opacity), PM	1989	N/A	Fabric Filter	Pressure Gauge

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

**Section 4 - Emission Unit Requirements**  
**4.2 - Cereal Lines**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Pre-remill Surge Bin	PM(Opacity), PM	2010	N/A	Fabric Filter	Pressure Gauge)
Hammermill Dust Collector	PM(Opacity), PM	2010	N/A	Fabric Filter	Pressure Gauge
Cinnamon Mixer	PM(Opacity), PM	1991	N/A	Fabric Filter	Pressure Gauge
<b>RTE 3</b>					
RTE 2, 3 Storeeveryors and Conveyors Packaging Line 11 and 12 Surge Bin and Conveyor Hand Dump Bucket Elevator Drop Pre-mix Mixer (RTE 3 Finish Product Dust Collector)	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Conveyors Base Product Bin Base Product Screener Sample Box Crisp Rice System and Tote Dump (RTE 3 Base Dust Collector)	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Furnace Extruder (RTE 3 Hot Cyclone Receiver)	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1983	N/A	Cyclone	None
Oven (RTE 3 Oven Exhaust)	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1983	N/A	None	None
Cooling Conveyor (RTE 3 Cooling Conveyor Dust Collector)	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge)
RTE Extruder Rice Cutter Cyclone	PM(Opacity), PM	2009	N/A	Cyclone	None
Sifter Surge Hopper	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Drymix Receiver	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Hammermill	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Remill Surge Bin	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Sugar Surge Hopper	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
Sugar Dump	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge
#2, #3, #6 Wet Blenders (RTE 2,3,6 Wet Scrubber) #2 and #6 Enrobers	PM(Opacity), PM	1999	N/A	Wet Collector	Pressure Gauge and Flow Meter (after installation)
RTE 3 Enrober RTE 3 Syrup Mix Kettle (Wet Collector)	PM(Opacity), PM	2000	N/A	Wet Collector	Pressure Gauge and Flow Meter (after installation)
RTE 3 White Sugar Bin (White Sugar Bin Dust Collector)	PM(Opacity), PM	1983	N/A	Fabric Filter	Pressure Gauge (
<b>RTE 6</b>					

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

**Section 4 - Emission Unit Requirements**  
**4.2 - Cereal Lines**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Cooling Conveyor Base Product Bin Base Product Screener Sample Box (RTE 6 Base Dust Collector)	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Furnace Extruder (RTE 6 Hot Cyclone Receiver)	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1998	N/A	Cyclone	None
Storeveyors Line 16 Tote Line Surge Bins(3) Screens (3) Pkg Line 16 Scales and Baggers (RTE 6 Finish Dust Collector)	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
RTE 6 Oven	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1998	N/A	None	None
Hammermill Dust Collector	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Hammermill Remill Surge Bin	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Drymix Receiver	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Sugar Receiver	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Sifter	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
Remill Reclaim Dust Collector	PM(Opacity), PM	2000	N/A	Fabric Filter	Pressure Gauge
#2 and#6 Enrobers (RTE 2 and6 Wet Scrubber)	PM(Opacity), PM, VOM	2002	N/A	Wet Collector	Pressure Gauge and Flow Meter (after installation)
<b>QNG 1, 2, 3</b>					
QNG Oven 1	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1972	2006	None	None
QNG Cooler	PM(Opacity), PM	1972	2006	None	None
#1, 2, 3 Enrobers #1, 2, 3 Oven Feeders Oven #1 Conveyors Oven #2 Conveyor Puffed Rice Tote Dumpster QNG Bucket Elevator (QNG 1,2,3 Dust Collector)	PM(Opacity), PM	1973	N/A	Fabric Filter	Pressure Gauge
QNG 2 Oven	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO <sub>2</sub>	1972	2010	None	None
QNG 2 Cooler	PM(Opacity), PM	1972	2006	None	None
QNG 3 Oven	PM(Opacity), PM, VOM, NO <sub>x</sub> , CO, SO	1973	2011	None	None
QNG 3 Cooler	PM(Opacity), PM	1973	2011	None	None
QNG 1 Bag Dump	PM(Opacity), PM	1999	N/A	Fabric Filter	Pressure Gauge

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
QNG 1 Lump Break	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
QNG 2 Bag Dump	PM(Opacity), PM	1999	N/A	Fabric Filter	Pressure Gauge
QNG 2 Vibratory Screener	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
QNG 2 Cooler #2	PM(Opacity), PM	2014	N/A	Cyclone	None
QNG 3 Pre-Mix Hand Dump	PM(Opacity), PM	1999	N/A	Fabric Filter	Pressure Gauge
QNG 3 Vibratory Screener and Lump Break	PM(Opacity), PM	1998	N/A	Fabric Filter	Pressure Gauge
QNG Crisp Rice Vacuum System	PM(Opacity), PM	2005	N/A	Fabric Filter	Pressure Gauge
Dense Phase Vacuum System #1	PM(Opacity), PM	2003	N/A	Fabric Filter	Pressure Gauge
Dense Phase Vacuum System #2	PM(Opacity), PM	2003	N/A	Fabric Filter	Pressure Gauge
QNG 1 Mix Kettles	PM(Opacity), PM	1997	N/A	Wet Collector	Pressure Gauge and Flow Meter (after installation)
Granola Supersak Fill Station	PM(Opacity), PM	2013	N/A	Fabric Filter	None
QNG Tote Lines	PM(Opacity), PM	2008	N/A	Fabric Filter	Pressure Gauge

## **2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act. In addition, each emission unit that is in Section 5 shall comply with the applicable requirements in Section 5.1.

### **a. i. Opacity Requirements**

- A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 112.123(b) or 35 IAC 112.124.

### **ii. Compliance Method (Opacity Requirements)**

#### **Monitoring**

- A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the cereal lines in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the cereal lines, maintenance and repair and/or adjustment of the operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

#### **Recordkeeping**

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each Method 9 and Method 22 conducted. These records shall

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD



include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions or opacity measurements, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (see Section 7.2)
- B. Pursuant to Construction Permit #19030008, the emissions of PM/PM10/PM2.5 from the affected QNG and RTE lines shall not exceed the following limits:  
[T1]

Line	Limit	
	Lbs/Hour	Tons/Year
QNG Line 1	2.16	9.46
QNG Line 2	1.91	8.38
QNG Line 3	1.23	5.37
RTE Line 1	2.87	12.58
RTE Line 2	2.46	10.78
RTE Line 3	7.66	33.54
RTE Line 6	2.5	11.5

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7) (a) and (d) of the Act, the Permittee shall run the equipment as provided by the manufacturer to maintain proper efficiency of each cyclone, fabric filter and wet collector.
- B. Pursuant to 39.5(7) (b) of the Act, the Permittee shall monitor the pressure drop across each fabric filter on a weekly basis when in operation.
- C. Pursuant to 39.5(7) (b) of the Act, the Permittee shall monitor the water pressure and water flow rate to each wet collector on a daily basis when in operation.

Note: The water flow meters shall be installed no later than 90 days after permit issuance.

Recordkeeping

- D. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation of the cereal lines, in hrs/mo and hrs/yr.
- II. Weight of materials being conveyed used in the cereal lines, in tons/mo and tons/yr.
- III. A file containing the method used by the Permittee to determine emissions of PM from the cereal lines, with supporting documentation.

- IV. The emissions of PM from the cereal lines, in tons/mo and tons/yr, for the current month plus the preceding 11 months (running 12 month total), with supporting calculations.
- V. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for PM from the emission units in Section 4.2.1 (lb/hr), with supporting calculations.
- VI. The pressure drop across each baghouse on a weekly basis when in operation.
- VII. The water pressure and water flow rate of each wet collector on a daily basis when in operation.

Note: The water flow meters shall be installed no later than 90 days after permit issuance.

c. i. **Volatile Organic Material Requirements (VOM)**

- A. Pursuant to Construction Permit #14080014, the VOM emissions of all cereal production lines at the source attributable to use of VOM containing materials (i.e., excluding VOM emissions attributable to combustion and roasting or other processing of solid materials), shall not exceed 17.7 tons/month and 177.0 tons/year. [T1]

ii. **Compliance Method (VOM Requirements)**

**Monitoring**

- A. Pursuant to 39.5(7) (b) and (d), the supplier's certification sheet for each VOM containing material shall be on file.

**Recordkeeping**

- B. Pursuant to 39.5(7) (b) and (e) of the Act, the Permittee shall maintain the following records for the QNG and RTE lines:
  - I. VOM content of VOM containing materials used, by type or class on a monthly basis (e.g., lbs/gallon or lbs/lb), with supporting documentation.
  - II. Usage of VOM containing materials, by type or class on a monthly basis (e.g., gallons/month or lbs/month).
  - III. VOM emissions, (tons/month and tons/year), with supporting calculations, which records shall be compiled on at least a semi-annual basis.

d. i. **Nitrogen Oxide Requirements (NO<sub>x</sub>)**

- A. Pursuant to Construction Permit #09110038, emissions for NO<sub>x</sub> for each of the QNG line shall not be more than 1.1 tons/year. [T1]

ii. **Compliance Method (NO<sub>x</sub> Requirements)**

**Monitoring**

- A. Pursuant to 39.5(7) (b) and (e) of the Act, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month and the preceding 11 month (running 12 months total).

Recordkeeping

- B. Pursuant to 39.5(7) (b) and (e) of the Act, the Permittee shall maintain the following records for each RTE and QNG lines:

- i. Total nitrogen oxide (NO<sub>x</sub>) emissions (tons/mo and tons/year), with all supporting data and calculations.

e. i. Sulfur Dioxide Requirements

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO<sub>2</sub>)

Recordkeeping

- A. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain a record demonstrating that the natural gas fired by the ovens meets the definition of pipeline natural gas, as provided by 35 IAC 211.4720.
- B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for SO<sub>2</sub> from the emission units in the Section 4.2.1 (ppm), with supporting calculations.

f. i. Operational and Production Requirements

- A. Pursuant to Construction Permit #14080014, the total usage of volatile organic material (VOM) in flavorings, colorings, and other liquid materials used on all cereal production lines at the source (i.e., cereal lines QNG (1,2,3) and RTE lines (1, 2, 3, and 6)) shall not exceed 17.7 tons/month and 177.7 tons/year. [T1]
- B. Pursuant to Construction Permit #14080014, the design capacity of the QNG line 1, 2 and 3 shall not exceed 8000 lbs/hr each. [T1]
- C. Pursuant to Construction Permit #19030008, the design capacity of the RTE lines shall not exceed 5,000 lbs/hr for RTE Line 1. [T1]
- D. Pursuant to Construction Permit #09110038, the design capacity of the RTE lines shall not exceed 4400 lbs/hr for RTE Line 2, 5000 lbs/hr for RTE Line 3, and 8500 lbs/hr for RTE Line 6. [T1]
- E. Pursuant to Section 39.5(7) (a) of the Act, the Permittee shall only combust natural gas in the ovens that meets the definition of pipeline natural gas, as provided by 35 IAC 211.4720.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Maintain the records of the design capacity for each of the QNG lines and the RTE lines.
- B. The Permittee shall maintain records of the following items related from the QNG and RTE lines:

- I. Usage of VOM containing materials, by type or class on a monthly basis (tons/month, tons/year)
- II. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for RTE and QNG lines. These records shall include, at a minimum the following:
  1. Design capacity (lb/hr).

### 3. Non-Applicability Determinations

- a. The RTE lines and QNG lines are not subject to 35 IAC 215.301, because the RTE lines and QNG lines are not photochemically reactive.
- b.
  - i. The Cereal Line Units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for PM emissions because the cereal line units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
  - ii. The cereal line units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for pollutants other than PM emissions because the cereal line units do not use an add-on control device for these pollutants.
- c. The RTE and QNG ovens are not subject to 35 IAC 216.121 because the ovens have an actual heat input lower than 2.9 MW (10 mmBtu/hr).
- d. The RTE lines and QNG lines are not subject to 35 IAC 212.322, because the RTE lines and QNG lines were built after April 14, 1972.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

### 4.3 Pancake Lines

#### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Pancake Lines 1, 2	PM(Opacity), PM	2004	N/A	Fabric Filter (11)	Pressure Gauge

#### 2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act. In addition, each emission unit that is in Section 5 shall comply with the applicable requirements in Section 5.1.

##### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 112.123(b) or 35 IAC 112.124.

##### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the pancake lines in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the pancake lines, maintenance and repair and/or adjustment of the operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each Method 9 and Method 22 conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions or opacity measurement, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

##### b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (see Section 7.2)

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

- B. Pursuant to Construction Permit #14080014, particulate matter emissions for the pancake lines combined shall not exceed .3 lb/hour and 1.3 tons/year. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7) (a) and (d) of the Act, the Permittee shall conduct inspections of the control measures at least once per year for the purpose of verifying that the control measures for the associated equipment are in place and being properly implemented.
- B. Pursuant to 39.5(7) (b) of the Act, the Permittee shall monitor the pressure drop across each fabric filter on a weekly basis when in operation.

Recordkeeping

- C. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation of the pancake lines, in hrs/mo and hrs/yr.
- II. Weight of materials being conveyed used in the pancake lines, in lbs/mo and lbs/yr.
- III. A file containing the method used by the Permittee to determine emissions of PM from the pancake lines, with supporting documentation.
- IV. The emissions of PM from the pancake lines, in lbs/mo and tons/yr (12 month rolling average), with supporting calculations.
- V. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for PM from the pancake lines (lb/hr), with supporting calculations.
- VI. The pressure drop across each fabric filter on a weekly basis when in operation.

**3. Non-Applicability Determinations**

- a. The pancake lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the pancake lines do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
- b. The pancake lines are not subject to 35 IAC 212.322, because the pancake lines were built after April 14' 1972.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7) (f) of the Act. Addresses are included in Attachment 3.

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.3.2(a)(i) and 4.3.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.



#### 4.4 Boilers

##### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Boiler 1 (26.8 mmBtu) Natural Gas Fired	PM(Opacity), PM, SO <sub>2</sub> , VOM, CO, NO <sub>x</sub> , HAP	1973	N/A	None	None
Boiler 2 (24.5 mmBtu) Natural Gas Fired	PM(Opacity), PM, SO <sub>2</sub> , VOM, CO, NO <sub>x</sub> , HAP	2007	N/A	None	None

##### 2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

###### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 112.123(b) or 35 IAC 112.124.

###### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boilers in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boilers, maintenance and repair and/or adjustment of the operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each Method 9 and Method 22 conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions or opacity measurement, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

###### b. i. Particulate Matter Requirements (PM)

- A. Pursuant to Construction Permit #07050060 for Boiler 2, emissions shall not exceed the following limits: [T1]

Pollutant	Emissions (Lbs/Hour)	Emissions (Tons/Year)
PM	0.2	0.9

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of the boiler continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for the following:
- i. Monthly and annual emissions of PM/PM<sub>10</sub> emissions (tons/month and tons/year) with supporting data or calculations.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for PM from the boilers (lbs/hr), with supporting calculations.

c. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

- A. Pursuant to Construction Permit #07050060 for Boiler 2, emissions shall not exceed the following limits: [T1]

Pollutant	Emissions (Tons/Year)
SO <sub>2</sub>	0.4

ii. Compliance Method (SO<sub>2</sub> Requirements)

Monitoring

- A. Pursuant to Construction Permit #07050060, emissions for Boiler 2 shall be determined from a running total of 12 months of data. [T1]

Recordkeeping

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration.
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of Boiler 2 continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for the following:

- i. Monthly and annual emissions of SO<sub>2</sub> emissions (tons/month and tons/year) with supporting data or calculations.

d. i. **Volatile Organic Material Requirements (VOM)**

- A. Pursuant to Construction Permit #07050060 for Boiler 2, emissions shall not exceed the following limits: [T1]

Pollutant	Emissions (Lbs/Hour)	Emissions (Tons/Year)
VOM	0.1	0.6

ii. **Compliance Method (VOM Requirements)**

**Monitoring**

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total). [T1]

**Recordkeeping**

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of the boiler continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Sections 39.5(7)(b) and (d), the Permittee shall maintain the following records related to VOM emissions from the boilers:
- i. Monthly and annual emissions of VOM (tons/month and tons/year) with supporting data or calculations.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for VOM from the boilers (lbs/hr), with supporting calculations.

e. i. **Carbon Monoxide Requirements (CO)**

- A. Pursuant to 35 IAC 216.121, Pursuant to 35 IAC 216.121, the emission of carbon monoxide(CO) from the boilers shall not exceed 200 ppm, corrected to 50 percent excess air.
- B. Pursuant to Construction Permit #07050060 for Boiler 2, emissions shall not exceed the following limits: [T1]

Pollutant	Emissions (Lbs/Hour)	Emissions (Tons/Year)
CO	2.1	9.2

ii. **Compliance Method (CO Requirements)**

**Monitoring**

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration.
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of the boiler continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for the following:
  - i. Monthly and annual emissions of CO emissions (tons/month and tons/year) with supporting data or calculations.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for CO from the boilers, in ppm and lbs/hr, with supporting calculations.

f. i. Nitrogen Oxide Requirements (NO<sub>x</sub>)

- A. Pursuant to Construction Permit #07050060 for Boiler 2, emissions shall not exceed the following limits: [T1]

Pollutant	Emissions (Lbs/Hour)	Emissions (Tons/Year)
NO <sub>x</sub>	2.5	11.0

ii. Compliance Method (NO<sub>x</sub> Requirements)

Monitoring

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration.
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of the boiler continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for the following:
  - i. Monthly and annual emissions of NO<sub>x</sub> emissions (tons/month and tons/year) with supporting data or calculations.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for NO<sub>x</sub> from the boilers (lbs/hr), with supporting calculations.

g. i. **Hazardous Air Pollutant Requirements (HAP)**

- A. Pursuant to Construction Permit #07050060 for Boiler 2, emissions will not exceed the following limits: [T1]

Pollutant	Emissions (Lbs/Hour)	Emissions (Tons/Year)
Individual HAP	0.1	0.6
Total HAP	0.2	0.9

ii. **Compliance Method (HAP Requirements)**

**Monitoring**

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total). [T1]

**Recordkeeping**

- B. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have information for each startup and shutdown, including date, time and duration.
- C. Pursuant to 40 CFR 60.7(b), Boiler 2 shall have for any incident in which the operation of the boiler continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
- D. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for the following:
- i. Monthly and annual emissions of HAP emissions (tons/month and tons/year) with supporting data or calculations.
- E. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of data for the maximum hourly emission rates for single and total HAP from the boilers (lbs/hr), with supporting calculations.

h. i. **Operational and Production Requirements**

- A. Pursuant to 40 CFR 60.40c(a), the Permittee shall comply with 40 CFR 60 Subpart Dc for Boiler 2, as shown in condition 4.4.2(h) (ii) (B).
- B. Pursuant to Construction Permit #07050060, natural gas shall be the only fuel fired in Boiler 2. [T1]
- C. Pursuant to Section 39.5(7) (a) of the Act, natural gas shall be the only fuel fired in Boiler 1.

ii. **Compliance Method (Operational and Production Requirements)**

**Monitoring**

- A. Pursuant to Construction Permit #07050060, compliance with annual limits for Boiler 2 for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to 40 CFR 60.48c(g), the Permittee must maintain the following record of natural gas usage for Boiler 2 (scf/month and scf/year).
- C. Pursuant to 40 CFR 60.7(b), shall have for any incident in which the operation of Boiler 2 continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.

**3. Non-Applicability Determinations**

- a. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD, because the source is not a major source of Hazardous Air Pollutants (HAP) emissions, i.e., the source's potential to emit any single HAP is less than 10 tons/year and any combination of HAP is less than 25 tons/year.
- b. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers, 40 CFR Part 63 Subpart JJJJJ, because the boilers are gas fired boilers as defined by 40 CFR 63.11195(e).
- c.
  - i. The boilers are not subject to SO<sub>2</sub> limitations in 35 IAC 214.122, 214.161 or 214.162, because they exclusively burn natural gas.
  - ii. The boilers are not subject to SO<sub>2</sub> limitations in 35 IAC 214.141, because the boilers are not located in Peoria or Chicago.
- d. The boilers are not subject to 35 IAC 215.301, because pursuant to 35 IAC 215.303, fuel combustion sources are not applicable.
- e. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.
- f. Boiler 1 is not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc, because it was not constructed, modified, or reconstructed after June 9, 1989.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), 4.4.2(d)(i), 4.4.2(e)(i), 4.4.2(f)(i), 4.4.2(g)(i), and 4.4.2(h)(i).

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

## Section 5 - Additional Title I Requirements

### 1. Construction Permits

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.



## Section 6 - Insignificant Activities Requirements

### 1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Gas Turbines and Engines between 112 KW and 1,118 KW (150 and 1,500 HP) that are emergency or standby units.	1	35 IAC 201.210(a) (16)

#### a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Conditions 5.1, 6.4 and 7.3:

#### i. National Emission Standards for Hazardous Air Pollutants (NESHAP)

- A. Pursuant to 40 CFR 63 Subpart ZZZZ - NESHAP for Stationary Reciprocating Internal Combustion Engines (CI RICE), the Permittee shall comply with the following requirements:
  - I. Emergency stationary CI RICE requirements of 40 CFR 63 Subpart ZZZZ, Table 2d (set labeled 4);
  - II. Monitoring, operational, and maintenance requirements of 40 CFR 63.6625(e), (f), (h), and (i);
  - III. General compliance requirements of 40 CFR 63.6605;
  - IV. Existing emergency and black start stationary RICE located at an area source of HAP work or management requirements of 40 CFR 63 Subpart ZZZZ, Table 6 (set labeled 9);
  - V. Operate according to the requirements of 40 CFR 63.6640(f)(1) and (2); and
  - VI. Maintain the records described in 40 CFR 63.6655(a), (e), and (f).

### Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Various Material Storage and Handling Equipment	43	35 IAC 201.210(a) (2) or (a) (3)
Parts Washers	2	35 IAC 201.210(a) (2) or (a) (3)
Equipment used to melt or apply < 50,000 lbs/yr of wax where no organic solvent has been added.	43	35 IAC 201.210(a) (7)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	1	35 IAC 201.210(a) (11)

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Printing operations with aggregate organic solvent usage < 750 gallons/yr from all printing lines at the source (including organic solvent from inks, diluents, fountain solutions, and cleaning materials).	13	35 IAC 201.210(a) (14)
Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed.	10	35 IAC 201.210(a) (17)
Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions.	1	35 IAC 201.210(a) (18)
Two (2) Chewy Lines	2	35 IAC 201.210(a) (2) and (3)
One (1) Central Vacuum System	1	35 IAC 201.210(a) (1) and 201.211
Three (3) Bulk unloading systems	3	35 IAC 201.210(a) (2) and (3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a) (4).	20	35 IAC 201.210(a) (4)
Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).	2	35 IAC 201.210(a) (10)

### 3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

### 4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(a) ), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 214.305, the sulfur content of all distillate fuel oil used by the process emission sources must not exceed 15 ppm.
- e. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

- f. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b) (2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- g. Pursuant to construction Permit # 14080014, the PM emissions of the central Vacuum System shall not exceed 0.6 lbs/hour and 2.6 tons/year.

## 5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

## 6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

### a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
  - A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lbs/hr and tons/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD

- iii. Pursuant to Sections 39.5(12) (a) (i) (b) and 39.5(12) (b) (iii) of the Act, the permit shield described in Section 39.5(7) (j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

**b. Notification Required at Renewal**

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

**c. Notification Not Required**

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7) (a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
  - i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.5(7) (a) of the Act as follows:
  - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.5(7)(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

<b>2. PM Process Weight Rate Requirements</b>
---

**a. New Process Emission Units - 35 IAC 212.321**

New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54  
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8  
B = 0.16

iii. Limits for New Process Emission Units: [35 IAC 212.321(c)]

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

**3. 40 CFR 63 Subpart A Requirements (NESHAP)**

**a. 40 CFR 63 Subpart A and ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

Pursuant to 40 CFR 63 Subpart A and ZZZZ, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	Additional terms defined in 40 CFR 63.6675.
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5	No	Preconstruction Review and Notification Requirements	
40 CFR 63.6	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.7	No	Performance Testing Requirements	
40 CFR 63.8	Yes	Monitoring Requirements	ZZZZ contains specific requirements for monitoring at 40 CFR 63.6625.
40 CFR 63.9	No	Notification Requirements	
40 CFR 63.10	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.11	No	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	
40 CFR 63.16	No	Performance Track Provisions	

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD



## Section 8 - State Only Requirements

### 1. Permitted Emissions for Fees

- a. The annual emissions from the source solely for purposes of "Duty to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following: [Section 39.5(18)(a)(ii) of the Act]

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	180.32
Sulfur Dioxide	(SO <sub>2</sub> )	0.242
Particulate Matter	(PM)	162.18
Nitrogen Oxides	(NO <sub>x</sub> )	35.06
HAP, not included in VOM or PM	(HAP)	0
Total		377.80

- b. The overall source emissions shall be determined by adding emissions of the above pollutants from all emission units (not including insignificant activities) on a calendar year basis. The Permittee shall maintain records of annual emissions for fee purposes. [Section 39.5(18)(a)(ii) of the Act]

**Attachment 1 - List of Emission Units at This Source**

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Preprocessing Plants	Flaking and groats processing operations
4.2	Cereal Lines	Dry cereal process lines
4.3	Pancake Lines	Pancake mixing and packaging operations
4.4	Boilers	Operations for energy generation

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

## Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
GHG	Greenhouse gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H <sub>2</sub> S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound
m	Meter

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

## Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #3</p> <p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #3 1101 Eastport Plaza Drive, Suite 100 Collinsville, Illinois 62234</p> <p>Phone No.: 618/346-5120</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Quaker Manufacturing LLC - Danville Plant  
I.D. No.: 183020AET  
Permit No.: 96030114

Date Received: 4-1-2019  
Date Issued: 12-31-2019  
Date Revision Issued: TBD

**Attachment 4 - Example Certification by a Responsible Official**

<b>SIGNATURE BLOCK</b>	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
<p>I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))</p> <p>AUTHORIZED SIGNATURE:</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>BY: _____</p> <p style="text-align: center;">AUTHORIZED SIGNATURE</p> <p>_____</p> <p style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</p> </div> <div style="width: 45%;"> <p>_____</p> <p style="text-align: center;">TITLE OF SIGNATORY</p> <p>_____/_____/_____</p> <p style="text-align: center;">DATE</p> </div> </div>	

Quaker Manufacturing LLC - Danville Plant  
 I.D. No.: 183020AET  
 Permit No.: 96030114

Date Received: 4-1-2019  
 Date Issued: 12-31-2019  
 Date Revision Issued: TBD