



AIR QUALITY CLASS I OPERATING PERMIT

PERMIT NUMBER: OP26R1-022

DWEE ID: 006272

Program ID: AIR 037-00018

Permit Issued To: Cargill Meat Solutions Corporation
Name of Source in Application: Cargill Meat Solutions Corporation
Mailing Address: P.O. Box 544, Schuyler, Nebraska, 68661
Source Location: 590 Road 9, Schuyler, Colfax County, Nebraska

Project Description: This operating permit approves the operation of a beef slaughter, rendering, fabrication facility, and associated waste treatment plant.

Standard Industrial Classification (SIC) Code(s): 2011, Meat Packing Plants

North American Industry Classification System (NAICS) Code: 311611, Animal (except poultry) Slaughtering

Superseded Operating Permit(s): Operating permit OP21R1-014 issued November 30, 2021

Pursuant to Title 129, Chapter 10, of the Nebraska Air Quality Regulations amended September 28, 2022, the public has been notified by prominent advertisement of the proposed operation of an air contaminant source and the thirty (30) day period allowed for comments has elapsed. This Operating Permit approves the operation of a beef slaughter, rendering, fabrication facility, and associated waste treatment plant. This Operating Permit approves the operation of this source as identified in the Air Quality Operating Permit Application OP26R1-022 received May 22, 2026, including any supporting information received prior to issuance of this permit. Additional details on the source, including estimated pollutant emissions, can be found in the accompanying Fact Sheet.

Compliance with this permit shall not be a defense to any enforcement action for violation of an ambient air quality standard. Unless otherwise noted the conditions of this permit are enforceable by the United States Environmental Protection Agency (USEPA) and the Nebraska Department of Water, Energy, and Environment (DWEE). The permit holder, owner, and operator of the source shall assure compliance with all of the terms and conditions in this permit and the Attachments.

The undersigned issues this document on behalf of the DWEE Director in accordance with Title 129 – Nebraska Air Quality Regulations amended June 28, 2026.

DRAFT

Date

Reuel S. Anderson, Administrator
Permitting & Engineering Division

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ABBREVIATIONS, SYMBOLS, and UNITS OF MEASURE

AP-42	Compilation of Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources	NESHAP	National Emission Standards for Hazardous Air Pollutants
BACT	Best Available Control Technology	NO ₂	Nitrogen Dioxide
Btu	British Thermal Unit	NO _x	Nitrogen Oxides
bu	Bushel	N ₂ O	Nitrous Oxide
CAA	Clean Air Act	NSPS	New Source Performance Standard
CE	Control Equipment	NSR	New Source Review
cf	Cubic Feet	OP	Operating Permit
CFC	Chlorofluorocarbons	PAL	Plant-wide Applicability Limit
CEMS	Continuous Emissions Monitoring System	Pb	Lead
CFR	Code of Federal Regulations	PEMS	Predictive Emissions Monitoring System
CO	Carbon Monoxide	PM	Particulate Matter
CO ₂	Carbon Dioxide	PM _{2.5}	Particulate Matter with an aerodynamic diameter equal to or less than 2.5 microns
CO _{2e}	Carbon Dioxide Equivalent	PM ₁₀	Particulate Matter with an aerodynamic diameter equal to or less than 10 microns
COMS	Continuous Opacity Monitoring System	PM ₁₀ (total)	Filterable and condensable particulate matter
CP	Construction Permit	ppb	Parts per Billion
Director	Director of the DWEE	ppm	Parts per Million
dscf	Dry Standard Cubic Feet	ppmv	Parts per Million by Volume
dscfm	Dry Standard Cubic Feet per Minute	ppmvd	Parts per Million by Volume, dry basis
DWEE	Nebraska Department of Water, Energy, and Environment	PSD	Prevention of Significant Deterioration
EMIS	Emergency Management Information System	PTE	Potential to Emit
EQC	Environmental Quality Council	scf	Standard Cubic Feet
EP	Emission Point	SIC	Standard Industrial Classification
EU	Emission Unit	SIP	State Implementation Plan
FIP	Federal Implementation Plan	SO ₂	Sulfur Dioxide
FR	Federal Register	SO _x	Sulfur Oxides
ft	Feet	Title 129	Title 129, Nebraska Air Quality Regulations
FTIR	Fourier Transform Infrared	TDS	Total Dissolved Solids
GHGs	Greenhouse Gases	tpy	Tons per year
HAP	Hazardous Air Pollutant(s)	TRS	Total Reduced Sulfur
hp	Horsepower	TSP	Total Suspended Particulate Matter
hr	Hour	USEPA	United States Environmental Protection Agency
lb	Pound	UTM	Universal Transverse Mercator
LDAR	Leak Detection and Repair	VHAP	Volatile Hazardous Air Pollutant
LNB	Low NO _x Burner	VMT	Vehicle Miles Traveled
MACT	Maximum Achievable Control Technology	VOC	Volatile Organic Compound
Mgal	One Thousand Gallons	yr	Year
MMBtu	One Million British Thermal Units		
MMgal	One Million Gallons		
MMscf	One Million Standard Cubic Feet		
MSDS	Material Safety Data Sheet		
n/a	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

I. STANDARD CONDITIONS

The following Standard Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit.

(A) Regulatory authority:

- (1) Title 40 Protection of Environment, Code of Federal Regulations that apply to the source including those found at 40 CFR Part 52, Subpart CC or 40 CFR Part 70, Appendix A (federally enforceable requirements); and
 - (a) The State Implementation Plan (SIP) approved Title 129 as amended September 28, 2022 cited in this permit and denoted by an asterisk (*) are federally enforceable. When Title 129 as amended June 28, 2026 cited in this permit becomes SIP approved and federally enforceable it will supersede Title 129 as amended September 28, 2022.
- (2) The Environmental Protection Act, Neb. Rev. Stat. §§ 81-1501 to 81-1532, and Nebraska Administrative Code Title 129 as amended June 28, 2026 (Title 129).

(B) The source shall allow the DWEE, USEPA or an authorized representative, upon presentation of credentials (Neb. Rev. Statute §81-1504; Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11) to:

- (1) Enter upon the source's premises during reasonable hours where a source subject to this permit is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (2) Have access to and copy, during reasonable hours, any records that must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (3) Inspect during reasonable hours any facilities, pollution control equipment, including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (4) Sample or monitor, during reasonable hours, substances or parameters for the purpose of ensuring compliance with the permit or applicable requirements.

(C) All requested permit amendments and revisions must adhere to the requirements of Title 129, Chapter 9*; Title 129, Chapter 9).

(D) The following methods may be used to determine compliance with the term and conditions in this permit ((Title 129, Chapter 15, Section 005.08)*; Title 129, Chapter 15, Section 005.08):

- (1) Any compliance test method specified in the State Implementation Plan;
- (2) Any test or monitoring method approved for the source in a permit issued pursuant to Title 129, Chapters 3*, 4*, or Chapter 13, Section 004*; Title 129, Chapters 3, 4, or Chapter 13, Section 004;
- (3) Any test or monitoring method provided for in Title 129; or
- (4) Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in Condition I.(D)(1) through (3).

(E) Application for review of plans or advice furnished by the Director will not relieve the source of legal compliance with any provision of these regulations, or prevent the Director from enforcing or implementing any provision of these regulations ((Title 129, Chapter 1, Section 001.06)*; Title 129,

Chapter 1, Section 001.06).

- (F) If and when the Director declares an air pollution episode as defined in Title 129, Chapter 2, Section 006.01*; Title 129, Chapter 2, Section 006.01, the source shall immediately take all required actions listed in Title 129, Appendix II, Paragraph 1.1*, 1.2*, and 1.3*; Title 129, Appendix II, Paragraph 1.1, 1.2, and 1.3, respectively, until the Director declares the air pollution episode terminated ((Title 129, Chapter 2, Section 006.03)*; Title 129, Chapter 2, Section 006.03).
- (G) Recordkeeping: To ensure compliance with this permit, records shall be maintained as outlined below. Records include: electronic and/or paper copies of all application materials, notifications, reports, test protocols, test results, and plans; and, electronic and/or original paper copies of all required monitoring results, measurements, inspections, and observations (Title 129, Chapter 15, Section 005.06*; Title 129, Chapter 15, Section 005.06; Neb. Rev. Stat. §81-1504):
- (1) All records required by this permit shall be kept for a minimum of five (5) years and shall be clear and readily accessible to DWEE representatives during an inspection, unless otherwise specified in this permit.
 - (2) Monthly calculations and records required throughout this permit shall be compiled no later than the fifteenth (15th) day of each calendar month and shall include all records and calculations generated through the previous calendar month, unless otherwise specified in this permit. ((Title 129, Chapter 6, Section 003.03)*; Title 129, Chapter 6, Section 003.03).
 - (3) The source shall keep the following records for each malfunction, start-up and shutdown where emissions were, or may have been, in excess of an emission limitation or standard ((Title 129, Chapter 11, Sections 002 and 005, Chapter 15, Sections 006.02, 006.04, and 006.05)*; Title 129, Chapter 11, Sections 002 and 005, Chapter 15, Sections 006.02, 006.04, and 006.05):
 - (a) The identity of the equipment.
 - (b) Reason for, or cause of, the malfunction, shutdown, or start-up.
 - (c) Duration of period of excess emissions.
 - (d) Date and time of the malfunction, shutdown, or start-up.
 - (e) Physical and chemical composition of pollutants whose emissions are affected by the action.
 - (f) Methods, operating data, and/or calculations used to determine these emissions.
 - (g) Quantification of emissions in the units of the applicable emission control regulation.
 - (h) All measures utilized to minimize the extent and duration of excess emissions during the malfunction, shutdown, and start-up.
 - (4) The source shall keep records of maintenance performed on components of permitted emission units that would affect or potentially affect the emission rate of that unit and on control and monitoring equipment associated with the permitted emission unit ((Title 129, Chapter 15, Sections 005.06, 006.06B and 006.06E)*; Title 129, Chapter 15, Sections 005.06, 006.06B and 006.06E).
 - (5) All records of opacity readings, instrument readings, visual equipment inspections, logbook/sheet entries, and any other record of equipment performance shall identify the individual who entered the record, except for continuously generated electronic records.
 - (6) Operation and maintenance manuals, or equivalent documentation, detailing proper operation and maintenance of all permitted emission units, required control equipment and required monitoring equipment shall be kept for the life of the equipment.

- (H) All permitted emission units, associated emissions conveyances, required control equipment, and required monitoring equipment shall be properly installed, operated, and maintained (Title 129 Chapter 6, Sections 003.01* and 003.13*; Chapter 15, Section 005.06*; Title 129 Chapter 6, Sections 003.01 and 003.13; Chapter 15, Section 005.06; Neb. Rev. Stat. §81-1504 and §81-1506).
- (1) All emissions from emission units using required controls shall be captured and routed through associated emission conveyances to the required control equipment, except for uncaptured emissions described in the permit application and any additional information submitted prior to permit issuance.
- (2) All equipment must be maintained to minimize the amount of uncontrolled pollutants that are released to the atmosphere. Proper equipment maintenance activities may include repair or replacement, and include, but are not limited to activities in response to the following:
- (a) cracks, holes or gaps,
 - (b) broken, cracked, or otherwise damaged seals or gaskets, and
 - (c) broken, missing or open hatches, access covers, caps, or other closure devices.
- (I) When the source makes physical or operational changes to an emissions unit or associated control equipment that may cause an increase in emissions that makes the original testing not representative of current operating conditions or emissions, the source shall submit a notification of the change. Such notification shall be received by DWEE within fifteen (15) days after such change. The DWEE may require performance testing based on review of the specific changes identified in the notification and the resulting potential impact on emissions from the unit(s) and/or performance of the control equipment ((Title 129, Chapter 15, Section 005.01)*; Title 129, Chapter 15, Section 005.01).
- (1) This notification requirement applies to emissions units and/or control equipment that meet the following requirements, except as provided in Condition I.(I)(5):
- (a) Emissions from the emissions unit and/or control equipment is subject to an emissions limit;
 - (b) A valid performance test has been conducted for the pollutant to which the emissions limit applies;
 - (c) Changes that may cause emissions to increase or invalidate prior testing include, but are not limited to, increasing the capacity of an emissions unit, changing the operational parameters of any control equipment outside of the range allowed for under this permit that makes the control equipment less efficient, changing the type of scrubber packing, or increasing the inlet pollutant loading of any control equipment.
- (2) For emission units that have had a performance test conducted after January 1, 2012, the source shall make a one-time notification to the DWEE within fifteen (15) days of when there is a 10% increase in daily production/throughput rate, over the tested rate recorded during the most recent valid performance test unless otherwise specified in this permit. If there are subsequent 10% increases over the rate most recently notified to the DWEE, the source shall make a one-time notification to the DWEE of each such subsequent increase. This will not apply to emissions that already have emission rates that are normalized to production and/or throughput rates.
- (3) The notification shall include the date of the changes, a description of the changes made, and an evaluation of the expected impact on emissions from the emissions units and/or control equipment.
- (4) The following definitions apply for purposes of Condition I.(I)(2) above:

- (a) “rate” shall mean the production or throughput of an emissions unit in the same units of production or throughput as the “tested rate” as defined below; and,
 - (b) “tested rate” shall mean the production or throughput rate of an emissions unit as recorded in the most recent valid performance test and reported to the DWEE in the source’s written copy of the test results, or test report, documenting the maximum capacity of the unit(s). The tested rate shall be extrapolated to daily. Examples include, but are not limited to, tons per hour to tons per day or gallons per hour to gallons per day.
- (5) The above notification requirements do not apply when compliance with the emission limitation is demonstrated through the use of a CEMS, PEMS or COMS.
- (J) No person shall cause or allow emissions, from any source, which are of an opacity equal to or greater than twenty percent (20%), as evaluated by an EPA approved method, or recorded by a continuous opacity monitoring system operated and maintained pursuant to 40 CFR Part 60 Appendix B except as provided for in Title 129, Chapter 15, Sections 001.05* or 001.06*; Title 129, Chapter 15, Sections 001.05 or 001.06 ((Title 129, Chapter 15, Section 001.04)*; Title 129, Chapter 15, Section 001.04).
- (K) Open fires are prohibited except as allowed by Title 129, Chapter 15, Section 002*; Title 129, Chapter 15, Section 002.
- (L) Particulate Matter – General Requirements ((Title 129, Chapter 15, Section 003)*; Title 129, Chapter 15, Section 003):
 - (1) The source shall not cause or permit the handling, transporting or storage of any material in a manner which allows particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the property line.
 - (2) The source shall not cause or permit the construction, use, repair or demolition of a building, its appurtenances, a road, a driveway, or an open area without applying all reasonable measures to prevent particulate matter from becoming airborne and remaining visible beyond the property line. Such measures include, but are not limited to, paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and planting and maintenance of vegetative ground cover.
- (M) Testing:
 - (1) Performance testing if required by this permit or required by the DWEE shall be completed as follows:
 - (a) The source shall provide the DWEE a written notice at least thirty (30) days prior to testing to afford the DWEE an opportunity to have an observer present. The DWEE may, in writing, approve a notice of less than 30 days. If the testing is pursuant to an underlying requirement contained in a federal rule, the notice provisions of the underlying requirement apply ((Title 129, Chapter 15, Section 005.03)*; Title 129, Chapter 15, Section 005.03).
 - (b) The notification required by Condition I.(M)(1)(a) shall include the following ((Title 129, Chapter 15, Section 005.03)*; Title 129, Chapter 15, Section 005.03):
 - (i) Facility Name, Address and FID number.
 - (ii) Company Name, Address and Contact Person’s name.
 - (iii) Test schedule including date and estimated start time of testing.
 - (iv) List all applicable regulatory requirements that testing is being conducted for (permit condition, MACT, NSPS, etc.).

- (v) Types of pollutants to be sampled including applicable emission limits and demonstration requirements.
- (vi) Test methods and documentation of any proposed variations from the specified procedures and reason for variance.
- (c) Testing shall be conducted according to the methodologies found in Title 129, Chapter 15, Section 005.02*; Title 129, Chapter 15, Section 005.02, or other DWEE approved methodologies ((Title 129, Chapter 15, Section 005.02)*; Title 129, Chapter 15, Section 005.02).
- (d) Performance tests shall be performed under those representative (normal) conditions that: represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. ((Title 129, Chapter 15, Section 005)*; Title 129, Chapter 15, Section 005).
- (e) Performance tests shall be conducted for a minimum of three (3) one-hour runs unless another run-time is specified by the applicable Subpart or as deemed appropriate by the DWEE.
- (f) The source shall monitor and record the operating parameters for process and control equipment during the performance testing required in the permit.
- (g) A certified written copy of the test results, signed by the person conducting the test, shall be provided to the DWEE within sixty (60) days of completion of the test, unless a different time period is specified in the underlying requirements of an applicable federal rule, and will, at a minimum, contain the following items ((Title 129, Chapter 15, Section 005.02G)*; Title 129, Chapter 15, Section 005.02G):
 - (i) A description of:
 - 1. The operating parameters for the emissions unit during testing. Examples include, but are not limited to, production rates, process throughputs, firing rates of combustion equipment, or fuel usage; and,
 - 2. The operating parameters for the control equipment during testing. Examples include, but are not limited to, baghouse fan speeds, scrubber liquid flow rates, or pressure drop across the control device.
 - (ii) Copies of all data sheets from the test run(s).
 - (iii) A description and explanation of any erroneous data or unusual circumstance(s) and the cause for such situation.
 - (iv) A final conclusion section describing the outcome of the testing device.

II. GENERAL OPERATING PERMIT CONDITIONS

The following General Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit. Terms and conditions of this permit are in accordance with the requirements of Title 129, Chapter 6, Section 003*; Title 129, Chapter 6, Section 003.

(A) Submittals/Reporting:

All submittals, including reports, required by Condition II.(A) and Condition I.(M)(1)(g) shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete ((Title 129, Chapter 1, Section 002.89; Chapter 6, Sections 002.06 and 003.11)*; Title 129, Chapter 1, Section 002.92; Chapter 6, Sections 002.06 and 003.11).

The source shall submit reports to the DWEE as follows:

- (1) The source shall submit a report of all instances of deviations from permit requirements including monitoring requirements stated in the permit every six (6) calendar months to the DWEE. The report for the first six (6) months (January through June) shall be submitted by September 30 of each year. The report for the second six (6) months (July through December) shall be submitted by March 31 of the following year ((Title 129, Chapter 6, Section 003.03B)*; Title 129, Chapter 6, Section 003.03B).
- (2) The source shall report all deviations from permit requirements, including those attributable to start-ups, shutdowns or malfunctions, the probable cause of such deviations, and any corrective actions or preventive measures taken. The probable cause, corrective actions, or preventive measures do not have to be provided if that information has already been submitted in other reports to the DWEE, such as for 40 CFR 60.7; however reported deviations must reference these other reports. All reports of deviations must be submitted within the time frame as per Conditions II.(A)(2)(a), (b), and (c) below ((Title 129, Chapter 6, Sections 003.03B and 003.03B4; and Chapter 15, Sections 006.04 and 006.05)*; Title 129, Chapter 6, Sections 003.03B and 003.03B4; and Chapter 15, Sections 006.04 and 006.05).
- (a) Any deviation resulting from emergency or upset conditions shall be reported within two (2) working days of the date on which the source first becomes aware of the deviation. The initial report may be submitted without a certification by the responsible official, as required by Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with the information required under Condition II.(A)(2) and any corrected or supplemental information required concerning the deviation.
- (b) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as is practicable. The report may be submitted initially without a certification by a responsible official in accordance with Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with any corrected or supplemental information required concerning the deviation.
- (c) All other deviations shall be reported as per Condition II.(A)(1).
- (3) The source shall submit completed emission inventories electronically utilizing the State and Local Emissions Inventory System (SLEIS) for the preceding calendar year to the DWEE by March 31 of each year ((Title 129, Chapter 11)*; Title 129, Chapter 11).
- (4) The source shall submit fees, due July 1 of each year, based on the actual emission tonnage, up to and including 4,000 tons per year for each regulated pollutant for fee purposes, as established in the emission inventory for the previous calendar year ((Title 129, Chapter 1,

Section 002.88; Chapter 6, Sections 003.07 and 009)*; Title 129, Chapter 1, Section 002.91; Chapter 6, Sections 003.07 and 008).

- (5) Certification of compliance with the terms and conditions of this permit, including emission limitations, standards, or work practices, for the preceding calendar year, shall be submitted to DWEE and to U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>) or by mail to Nebraska Air Compliance Coordinator, U.S. EPA, Region 7, ECAD/AB, 11201 Renner Boulevard, Lenexa, KS 66219 by March 31 each year. The report shall be certified by a responsible official in accordance with Condition II.(A) and shall include the following ((Title 129, Chapter 6, Section 003.11)*; Title 129, Chapter 6, Section 003.11).
- (a) The identification of each term or condition of the permit that is the basis of the certification.
 - (b) The compliance status;
 - (c) A determination of whether compliance was continuous or intermittent; and
 - (d) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (6) Any emissions due to malfunctions, unplanned shutdowns, and ensuing start-ups that are, or may be in excess of applicable emission limitations shall be reported to the DWEE in accordance with Condition II.(A)(2)(a).
- (B) The source shall comply with 40 CFR Part 82, Protection of the Stratospheric Ozone. Affected controlled substances include, but are not limited to: chlorofluorocarbon (CFC) and hydrochlorofluorocarbon (HCFC) refrigerants, solvents and propellants, halons, carbon tetrachloride, and methyl chloroform (specific affected controlled substances are listed in 40 CFR Part 82, Subpart A, Appendices A, (Class I) and B (Class II)).
- The following subparts and Sections of 40 CFR Part 82 are conditions of this permit:
- Subpart A - Production and Consumption Controls
 - Subpart B - Servicing of Motor Vehicle Air Conditioners
 - Subpart E - Labeling of Products Using Ozone-Depleting Substances: Sections 82.106 Warning statement requirements, 82.108 Placement of warning statement, 82.110 Form of label bearing warning statement, and 82.112 Removal of label bearing warning statement.
 - Subpart F - Recycling and Emissions Reduction: Sections 82.156 Required practices, 82.158 Standards for recycling and recovery equipment, 82.161 Technician certification, and 82.166 Reporting and recordkeeping requirements
 - Subpart G - Significant New Alternatives Policy Program
- (C) This permit is issued for a fixed term of five (5) years. A timely renewal application is one that is submitted to the DWEE a minimum of six (6) months and a maximum of eighteen (18) months before permit expiration. Provided a timely and complete renewal application has been submitted, the conditions of this permit shall continue until the effective date of a new permit. ((Title 129, Chapter 6, Sections 002.01C and 003.02)*; Title 129, Chapter 6, Sections 002.01C and 003.02).
- (D) The source shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Nebraska Environmental Protection Act and/or the Federal Clean Air Act, and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application ((Title 129, Chapter 6, Section

003.06A)*; Title 129, Chapter 6, Section 003.06A).

- (E) It shall not be a defense for the source in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit ((Title 129, Chapter 6, Section 003.06B)*; Title 129, Chapter 6, Section 003.06B).
- (F) This permit may be modified; revoked, reopened, and reissued; or terminated for cause in accordance with Title 129 and Title 115- Rules of Practice and Procedure. 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 supersede any permit condition ((Title 129, Chapter 6, Section 003.06C)*; Title 129, Chapter 6, Section 003.06C).
- (G) Conditions under which this permit will be reopened, revoked and reissued or terminated during its term for cause, include but are not limited to ((Title 129, Chapter 6, Section 003.09; Title 129, Chapter 9, Section 006)*; Title 129, Chapter 6, Section 003.09; Title 129, Chapter 9, Section 006):
- (1) Additional applicable requirements under the Nebraska Environmental Protection Act or the Federal Clean Air Act, which become applicable to this source with a remaining permit term of three (3) or more years. No such reopening will occur if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended;
 - (2) Additional requirements, including excess emissions requirements, that become applicable to an affected source under the acid rain program under Title 129 Chapter 5*; Title 129 Chapter 5.
- (H) This permit does not convey any property rights of any sort, or any exclusive privilege ((Title 129, Chapter 6, Section 003.06D)*; Title 129, Chapter 6, Section 003.06D).
- (I) The source shall furnish to the DWEE, within the time specified by the DWEE, any information requested by the DWEE in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the source shall also furnish to the DWEE copies of records required to be kept in accordance with the permit or, for information claimed to be confidential, the source may furnish such records along with a claim of confidentiality pursuant to Title 115 - Rules of Practice and Procedure ((Title 129, Chapter 6, Section 003.06E)*; Title 129, Chapter 6, Section 003.06E).
- (J) The provisions of this operating permit incorporate all applicable requirements contained in all previously issued active construction permits. Although the previously issued construction permits are still active, this operating permit will be the compliance and enforcement instrument for all applicable requirements incorporated into the operating permit (40 CFR 70.2 – Applicable Requirements (2)).
- (K) In the event of a challenge to any portions of this permit, the unchallenged permit requirements shall remain valid ((Title 129, Chapter 6, Section 003.05)*; Title 129, Chapter 6, Section 003.05).
- (L) Changes allowed without an operating permit revision ((Title 129, Chapter 9, Section 007)*; Title 129, Chapter 9, Section 007).
- (1) The source may make the changes identified in Condition II.(L)(1)(a) within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapter 12*; Chapter 13, Sections 001*, 002*, 003*, and 004*; Title 129, Chapter 12; Chapter 13, Sections 001, 002, 003 and 004; the change does not require a construction permit under Chapters 3* or 4*; Chapters 3 or 4; and the change does not result in the emissions allowable under the permit (whether expressed therein as a rate of emissions or in the terms of total emissions) being exceeded. The permit shield in Condition II.(M) shall not apply to any change

- made under this condition ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01).
- (a) Changes in the configuration of the facility's equipment, as defined in Section 502(b)(10) of the Act ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01). Written notification of these changes shall be sent to the DWEE and the administrator of EPA as follows:
- (i) Non-Emergencies ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01).
1. Written notification shall be received by the DWEE a minimum of seven (7) days in advance of the proposed changes;
- (ii) Emergencies ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01):
1. Initial notification shall be made within two (2) working days of the date on which the source first becomes aware of the need for the change;
 2. A follow-up written notification shall be submitted as soon as practicable; and,
 3. The notifications shall include an explanation of the nature of the emergency.
- (iii) Required information ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01):
1. A brief description of the change within the permitted source;
 2. The date on which the change will occur;
 3. Any change in emissions; and,
 4. Any permit term or condition that is no longer applicable as a result of the change.
- (iv) A copy of the notification shall be attached to the source's copy of the operating permit (40 CFR Part 70.4(b)(12)).
- (2) The source may make changes that are not defined as Section 502(b)(10) changes under the Act within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapters 12* or 13*, Sections 001*, 002*, 003*, and 004*; Title 129, Chapters 12 or 13, Sections 001, 002, 003, and 004; and the change is not a change which would require a construction permit under Chapters 3* or 4*; Chapters 3 or 4 ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (a) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (b) The source shall provide contemporaneous written notice to the Director and the Administrator of EPA, except for changes that qualify as insignificant activities under the provisions of Title 129, Chapter 6, Sections 002.05C and 002.05D*; Title 129, Chapter 6, Sections 002.05C and 002.05D. Such written notice shall include ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02):
- (i) A description of each change;
 - (ii) The date the change will be made;
 - (iii) A description of any change in emissions;

- (iv) A list of the pollutants emitted; and,
 - (v) A list of any applicable requirements that would apply as a result of the change, including terms and conditions established in the relevant operating permit for synthetic minor purposes.
 - (c) A copy of the notification in Condition II.(L)(2)(b) shall be attached to the source's copy of the operating permit.
 - (d) Any change under Condition II.(L)(2) shall not qualify for a permit shield under Title 129, Chapter 6, Section 003.12*; Title 129, Chapter 6, Section 003.12 ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
 - (e) The source shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and emissions resulting from those changes ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
 - (f) Upon review of a notice submitted in accordance with Condition II.(L)(2)(b), the DWEE may require a source to apply for an operating permit if the change does not meet the requirements of Condition II.(L)(2) ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (3) Testing requirements:
- (a) Testing may be required if a change reported under Condition II.(L)(1) or II.(L)(2) involves an emissions unit that was previously tested ((Title 129, Chapter 6, Section 003.03; Title Chapter 15, Section 005)*; Title 129, Chapter 6, Section 003.03; Title Chapter 15, Section 005).
- (M) A permit shield is granted ((Title 129, Chapter 6, Section 003.12)*; Title 129, Chapter 6, Section 003.12).
- (1) During the term of this permit compliance with Conditions I.(G), (H), (J), and (L); Conditions II.(A), (B), (D) and (N); and Condition III constitutes compliance with all applicable requirements. The origin and/or authority for each applicable requirement are identified in the condition.
 - (2) The permit shield does not affect:
 - (a) The emergency provisions of Neb. Rev. Stat. §81-1507 of the Nebraska Environmental Protection Act;
 - (b) The USEPA's authority under the provisions of Section 303, Emergency Powers, of the Clean Air Act;
 - (c) Liability for any violation of applicable requirements or applicable requirements under the Federal Clean Air Act prior to or at the time of permit issuance;
 - (d) The applicable requirements of Chapter 5*; Chapter 5.
 - (e) The authority of the DWEE or USEPA to obtain information; or
 - (f) Any other permit provisions, terms, or conditions, including, but not limited to, construction permits issued pursuant to Chapter 3*; Chapter 3 or permits issued pursuant to other State authorities and Titles.
 - (3) The DWEE has determined the requirements specifically identified in the following table are not applicable to this source. Therefore, a permit shield is granted as allowed under Title 129, Chapter 6, Section 003.12*; Title 129, Chapter 6, Section 003.12:

Requirement	Shield Request Basis and Determination
NSPS Subpart Dc; Title 129, Chapter 12, Section <u>001.04*</u> ; Title 129, Chapter 12, Section <u>001.05</u> ; 40 CFR 60.42c(a-c,f); <u>§60.42c(e,g,i)</u> ; <u>§60.42c(h)(2-3)</u> ; <u>§60.43c(a-b)</u> ; <u>§60.44c(a-g, i-j)</u> ; <u>§60.45c(a)(1-7)</u> ; <u>§60.45c(b)</u> ; <u>§60.46c(a-d,f)</u> ; <u>§60.47c(b)</u>	NSPS Dc applies to boilers for which construction, modification, or reconstruction commenced after June 9, 1989 with design heat input capacities of 10 to 100 MMBtu/hr. Boilers 1, 3, and 31 were constructed after 1989 and each have a design heat input capacities between 10 and 100 MMBtu/hr; therefore, are subject to requirements of NSPS Dc. The source asked to be shielded from specific requirements of NSPS Dc that are not applicable to the boilers.
NSPS Subpart Dc; Title 129, Chapter 12, Section <u>001.04*</u> ; Title 129, Chapter 12, Section <u>001.05</u>	NSPS Dc applies to boilers for which construction, modification, or reconstruction commenced after June 9, 1989 with design heat input capacities of 10 to 100 MMBtu/hr. EP-2 was constructed in 1982 and has not been modified or reconstructed since June 2, 1989; therefore, NSPS Dc does not apply.

- (N) When applicable, the source shall comply with the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions, Risk Management Plan (RMP), as part of the compliance certification submitted under Condition II.(A)(5). The source shall submit a certification statement that the source is in compliance with all requirements of Part 68, including the registration and submission of the RMP (40 CFR 68.215(a); Title 129, Chapter 6, Section 003.10*; Title 129, Chapter 6, Section 003.10).

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(A) Specific Conditions for boilers

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-022 received May 22, 2026, CP01-0008 issued January 8, 2002, and CP05-0053 issued August 4, 2006, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-1			
N/a	EU-1: Boiler, maximum permitted capacity: 32.5 MMBtu/hr; permitted fuel type: natural gas or biogas from the anaerobic waste treatment lagoons, installed in 1992	40 CFR Part 60, Subpart A; Title 129, Chapter 12, Section <u>001.01*</u> ; Title 129, Chapter 12, Section <u>001.01</u>	None ^[1]
		40 CFR Part 60, Subpart Dc; Title 129, Chapter 12, Section <u>001.05*</u> ; Title 129, Chapter 12, Section <u>001.06</u>	None ^[1]
Emission Point ID#: EP-2			
N/a	EU-2: Boiler, maximum permitted capacity: 52 MMBtu/hr; permitted fuel type: natural gas or biogas from the anaerobic waste treatment lagoons, installed in 1982	None	None ^[1]
		None	None ^[1]
Emission Point ID#: EP-3			
CE-3: Low NO _x Burner	EU-3: Boiler, maximum permitted capacity: 52 MMBtu/hr; permitted fuel type: natural gas, installed in 1996	40 CFR Part 60, Subpart A; Title 129, Chapter 12, Section <u>001.01*</u> ; Title 129, Chapter 12, Section <u>001.01</u>	None ^[1]

		40 CFR Part 60, Subpart Dc; Title 129, Chapter 12, Section <u>001.05*</u> ; Title 129, Chapter 12, Section <u>001.06</u>	None ^[1]
Emission Point ID#: EP-31			
N/a	EU-31: Boiler, maximum permitted capacity: 60.243 MMBtu/hr; permitted fuel type: natural gas, installed in 2020	40 CFR Part 60, Subpart A; Title 129, Chapter 12, Section <u>001.01*</u> ; Title 129, Chapter 12, Section <u>001.01</u>	None ^[1]
		40 CFR Part 60, Subpart Dc; Title 129, Chapter 12, Section <u>001.05*</u> ; Title 129, Chapter 12, Section <u>001.06</u>	None ^[1]

^[1] Emission units EU-1, EU-2, EU-3, and EU-31 are exempt because they are gas-fired boiler due to the restriction of this OP; if the source modifies this permit in the future to add fuel oil or tallow in as allowable fuels, then these emission units would be subject to NESHAP Subparts A and JJJJJ.

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-1				
PM (Filterable)	14.82 lb/hr ^[1]	Three 1-hour test runs or test method average	Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20 Percent ^[2]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129,	No

			Chapter 15, Section <u>001.04</u>	
Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-2				
PM (Filterable)	21.25 lb/hr ^[1]	Three 1-hour test method average	Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20 Percent ^[2]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-3				
PM (Filterable)	21.25 lb/hr ^[1]	Three 1-hour test method average	Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20 Percent ^[2]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002; Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-31				
PM (Filterable)	30.60 lb/hr ^[1]	Three 1-hour test method average	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u>	No

Opacity	< 20 Percent ^[2]	6 Minutes	Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No
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^[1] Compliance with Condition III.(A)(3)(c), (d), (e) and (g) demonstrates compliance with the PM (filterable) limitation. Compliance with this limit is further demonstrated by potential emission rates, which are less than the permitted limits. See the fact sheet attachment for further details.

^[2] Compliance with Condition III.(A)(3)(c), (d), (e) and (g) demonstrates compliance with Opacity limitation.

(b) The source shall comply with all applicable emission limitations and testing requirements in NSPS Subparts A and Dc for emission units EU-1, EU-3, and EU-31 [Construction Permit, CP01-0008, Condition III.(H), issued January 8, 2002; Title 129, Chapter 12, Sections 001.01* and 001.05*; Title 129, Chapter 12, Sections 001.01 and 001.06].

(i) The source is subject to the applicable emission limitations requirements of 40 CFR §60.42c, and §60.43c

(ii) The source is subject to the applicable testing requirements of 40 CFR §60.44c, §60.45c.

(3) Operational and Monitoring Requirements:

(a) The source shall comply with all applicable operational and monitoring requirements in NSPS Subparts A and Dc for emission units EU-1, EU-3, and EU-31 [Construction Permit, CP01-0008, Condition III.(H), issued January 8, 2002; Title 129, Chapter 12, Sections 001.01* and 001.05*; Title 129, Chapter 12, Sections 001.01 and 001.06].

(i) The source is subject to the operational and monitoring requirements of 40 CFR §60.46c, §60.47c

(b) Emission unit EU-31 shall not operate during any day when emission units EU-1, EU-2, and EU-3 have all been in operation [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

(c) Emission unit EU-2 shall only combust natural gas or biogas from the anaerobic waste treatment lagoons [Construction Permit, CP05-0053, Conditions XIII.(A)(2) and XIII.(A)(3), issued August 4, 2006].

(d) Emission unit EU-3 shall only combust natural gas [Construction Permit, CP05-0053, Conditions XIII.(A)(2) and XIII.(A)(3), issued August 4, 2006].

(e) Emission unit EU-1 shall only combust natural gas or biogas [Construction Permit, CP01-0008, Condition XIII.(A)(1), issued January 8, 2002].

(f) Low NO_x burners shall be used when emission unit EU-3 is in operation [Construction Permit, CP01-0008, Condition XIII.(I), issued January 8, 2002].

(g) Emission unit EU-31 shall only combust natural gas [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

(4) Recordkeeping and Reporting Requirements:

(a) The source shall comply with all applicable recordkeeping and reporting requirements in NSPS Subpart Dc for emission units EU-1, EU-3, and EU-31 [40 CFR 60 Subparts A and Dc]

(i) The source is subject to the applicable recordkeeping and reporting requirements of 40 CFR §60.48c.

- (b) The source shall comply with all applicable recordkeeping and reporting requirements in NSPS Subpart Dc for emission units EU-1, EU-3, and EU-31 [Construction Permit, CP01-0008, Condition III.(H), issued January 8, 2002; Title 129, Chapter 12, Section 001.05*; Title 129, Chapter 12, Section 001.06].
 - (i) The source shall record and maintain records of the amounts of each fuel combusted during each day in each boiler {40 CFR 60.48c(g)} unless EPA Region VII approves an alternative record-keeping frequency. [Construction Permit CP01-0008, Condition III.(H)(4), issued January 8, 2002].
- (c) The source shall maintain daily records indicating when emission units EU-1, EU-2, EU-3, and EU-31 are in operation [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (d) The source shall maintain records documenting the grade or type of fuel for each fossil fuel burning unit to document compliance with Conditions III.(A)(3)(c), III.(A)(3)(d), III.(A)(3)(e), and III.(A)(3)(g) [Construction Permit CP01-0008, Condition XIII.(K)(1), issued January 8, 2002; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(B) Specific Conditions for Rendering Processes

(1) Permitted Emission Points:

(a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application #OP26R1-022, received May 22, 2026, and #CP02-0002, issued July 26, 2005, #CP05-0053, issued August 4, 2006, and #CP01-0008, issued January 8, 2002, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-4			
CE4A: primary cyclone and CE4B: secondary cyclone	EU-4: Blood Dryer; maximum permitted capacity: 7.4 MMBtu/hr; permitted fuel type: natural gas	None	None
		None	None
Emission Point ID#: EP-5			
CE5A: Cyclone and CE5B: Scrubber	EU-5: Bone Dryer; maximum permitted capacity: 40 MMBtu/hr; permitted fuel type: natural gas	None	None
		None	None
Emission Point ID#: EP-13			
CE13a-b: Entrainment Traps followed by CE13c-d: Heat Exchangers followed by a CE13e: Venturi	EU-13: Dupps Steam Cooker #1	None	None
		None	None
	EU-14: Dupps Steam Cooker #2	None	None
		None	None
Emission Point ID#: EP-15			
N/a	EU-15: Dry Blood Storage ^[1]	None	None
		None	None
Emission Point ID#: EP-16			
N/a	EU-16: Dry Blood Loadout	None	None
		None	None
Emission Point ID#: EP-17			
CE17A: Cyclone CE17B: Cyclone	EU-17: Separator	None	None
		None	None
Emission Point ID#: EP-18			
N/a	EU-18: Gel Bone Storage	None	None
		None	None

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-19			
N/a	EU-19: Gel Bone Storage	None	None
		None	None
Emission Point ID#: EP-20			
N/a	EU-20: Sizing Shaker	None	None
		None	None
Emission Point ID#: EP-21			
N/a	EU-21: Meat and Bone Meal Vibrating Separators	None	None
		None	None
Emission Point ID#: EP-22			
N/a	EU-22: Meat and Bone Meal Grinding: two (2) hammermills	None	None
		None	None
Emission Point ID#: EP-23			
N/a	EU-23: Meat and Bone Meal Storage	None	None
		None	None
Emission Point ID#: EP-24			
N/a	EU-24: Meat and Bone Meal Loadout	None	None
		None	None

^[1]The control equipment (baghouse – CE15) is not federally enforceable; therefore, the source cannot account for the control efficiency when calculating emissions.

(2) Emission Limitations and Testing Requirements:

Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-4				
PM (Filterable)	4.44 lb/hr	Three 1-hour test runs or test method average	Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002	No
Opacity	< 20 Percent ^[4]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002	No

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-5				
PM (Filterable)	17.38 lb/hr	Three 1-hour test runs or test method average	Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002	No
Opacity	< 20 Percent ^[5]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002	No
Emission Point ID#: EP-13				
PM (Filterable)	38.23 lb/hr ^{[1][2]}	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3]	6 Minutes	Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002	No
Emission Point ID#: EP-15, EP-16				
PM (Filterable)	5.52 lb/hr ^{[1][2]} (each)	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3] (each)	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-17				
PM (Filterable)	22.74 lb/hr ^{[1][2]}	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-18, EP-19				
PM (Filterable)	8.56 lb/hr ^{[1][2]} (each)	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01*</u> ; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3] (each)	6 Minutes	Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-20				
PM (Filterable)	22.74 lb/hr ^{[1][2]} (each)	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01*</u> ; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3] (each)	6 Minutes	Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-21, EP-22, EP-23, EP-24				
PM (Filterable)	20.44 lb/hr ^{[1][2]} (each)	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01*</u> ; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20 Percent ^[3] (each)	6 Minutes	Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] The process weight rate limitation in this table is based on the maximum design throughput of the emission unit. The process weight rate limit will vary with the actual throughput in accordance with Title 129, Chapter 15, Table 15-2*, Title 129, Chapter 15, Table 15-2.

^[2] Compliance with this limit is demonstrated by potential emission rates, which are less than the permitted limits. See the fact sheet attachment for further details.

^[3] Compliance with Condition III.(B)(3)(i) demonstrates compliance with the Opacity limitation.

^[4] Compliance with Condition III.(B)(3)(b) and III.(B)(3)(g) demonstrates compliance with the Opacity limitation.

^[5] Compliance with Condition III.(B)(3)(c) and III.(B)(3)(g) demonstrates compliance with the Opacity limitation.

(3) Operational and Monitoring Requirements:

- (a) Emission units EU-4 and EU-5 shall only use natural gas [Construction Permit CP05-0053, Condition XIII.(A)(4), issued August 4, 2006].
- (b) Emissions from EU-4 shall be controlled by CE4A and CE4B. Operation of the cyclones (CE4A and CE4B) shall be in accordance with the following requirements: [Construction Permit CP05-0053, Condition XIII.(M), issued August 4, 2006]
 - (i) Cyclones (CE4A and CE4B) shall be operated at all times EU-4 is in operation

- [Construction Permit CP05-0053, Condition XIII.(M)(1), issued August 4, 2006].
- (ii) Cyclones (CE4A and CE4B) shall be properly installed, operated, and maintained [Construction Permit CP05-0053, Condition XIII.(M)(2), issued August 4, 2006].
 - (iii) Routine observations (at least once each day cyclone CE4A and CE4B are in operation) shall be conducted to determine whether there are visible emissions from the stack, leaks, or other indications that may necessitate corrective action. Corrective action shall be taken immediately if necessary [Construction Permit CP05-0053, Condition XIII.(M)(3), issued August 4, 2006].
- (c) Emissions from EU-5 shall be controlled by CE5A and CE5B. Operation of cyclone (CE5A) and scrubber (CE5B) shall be in accordance with the following requirements: [Construction Permit CP02-0002, Condition XIII.(L), issued July 26, 2005]
- (i) Cyclone (CE5A) and scrubber (CE5B) shall be operated at all times EU-5 is in operation [Construction Permit CP02-0002, Condition XIII.(L)(1), issued July 26, 2005].
 - (ii) Cyclone (CE5A) and scrubber (CE5B) shall be properly installed, operated, and maintained [Construction Permit CP02-0002, Condition XIII.(L)(2), issued July 26, 2005].
 - (iii) Cyclone (CE5A) and scrubber (CE5B) shall each be equipped with an operation pressure differential indicator. CE5B shall also be equipped with a flow meter for the scrubbing solution. The pressure indicators and flow meter shall be properly installed, operated, calibrated and maintained [Construction Permit CP02-0002, Condition XIII.(L)(3), issued July 26, 2005].
 - (iv) The pressure differential and flow rate readings shall be recorded at least once each day that the associated cyclone and/or scrubber are operating. [Construction Permit CP02-0002, Condition XIII.(L)(4), issued July 26, 2005]
 - (v) Routine observations (at least once each day cyclone (CE5A) and scrubber (CE5B) are in operation) shall be conducted and documented to determine whether there are visible emissions from the stack, leaks, or other indications that may necessitate corrective action. Corrective action shall be taken immediately if necessary [Construction Permit CP02-0002, Condition XIII.(L)(5), issued July 26, 2005].
- (d) Emissions from EU-17 shall be controlled by CE17A and CE17B. Operation of the cyclones (CE17A and CE17B) shall be in accordance with the following requirements: [Title 129, Chapter 6, Sections 003.03 and 003.11*; Title 129, Chapter 6, Sections 003.03 and 003.11]
- (i) Cyclones (CE17A and CE17B) shall be operated at all times EU-4 is in operation [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (ii) Cyclones (CE17A and CE17B) shall be properly installed, operated, and maintained [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (iii) Routine observations (at least once each day cyclones CE17A and CE17B are in operation) shall be conducted to determine whether there are visible emissions from the stack, leaks, or other indications that may necessitate corrective action. Corrective action shall be taken immediately if necessary [Title 129, Chapter 6, Section 003.03].
- (e) Emission units EU-13 and EU-14 shall only use steam [Construction Permit CP01-0008, Condition XIII.(A)(9), issued January 8, 2002].

- (f) Emissions from EU-13 and EU-14 shall be controlled by CE13a-e. Control equipment shall be properly operated at all times the associated emission units are in operation. [[Title 129, Chapter 6, Sections 003.03* and 003.11*; Title 129, Chapter 6, Sections 003.03 and 003.11].
- (g) A source representative shall conduct visible emissions surveys for emission point (EP-4 and EP-5) on a weekly basis. These surveys shall be conducted during daylight hours while each emission unit is operating under normal conditions [Title 129, Chapter 6, Sections 003.03* and 003.11* and Chapter 15, Section 001.04*; Title 129, Chapter 6, Sections 003.03 and 003.11 and Chapter 15, Section 001.04].
- (i) For deviation reporting purposes, visible emissions (excluding water vapor) from any emission point shall be considered a deviation and shall be reported in accordance with Condition II.(A).
- (h) A source representative shall conduct visible emissions surveys for emission points (EP-13, EP-15, EP-16, EP-17, EP-18, EP-19, EP-20, EP-21, EP-22, EP-23 and EP-24) shall be conducted in accordance with the Condition III.(B)(3)(g)(i). These surveys shall be conducted during daylight hours while each emission unit is in operation [Title 129, Chapter 6, Sections 003.03* and 003.11* and Chapter 15, Section 001.04*; Title 129, Chapter 6, Sections 003.03 and 003.11 and Chapter 15, Section 001.04].
- (i) A source representative shall conduct visible emissions surveys in accordance with the schedule below. For deviation reporting purposes, visible emissions from any emission point shall be considered a deviation. Reporting requirements are in Condition II.(A).
 - 1. The surveys shall be conducted once per week for four (4) consecutive weeks.
 - 2. If visible emissions, excluding water vapor, are not observed for four (4) consecutive weeks, then the frequency of surveys shall be once (1) per month.
 - 3. Observation of visible emissions other than water vapor from an emission point shall result in a return to the survey frequency of once per week for at least four (4) weeks for that emission point. After four (4) consecutive weeks of no additional visible emissions observations other than water vapor, the survey frequency of the emission point shall return to once per month.
- (i) The source shall operate scrubber (CE5B) in accordance with the Compliance Assurance Monitoring (CAM) Plan, received by the DWEE (formerly NDEE) on March 25, 2016. The CAM requirements include, but are not limited to, the following (See Attachment A) [40 CFR 64.6(c); Title 129, Chapter 6, Section 010*; Title 129, Chapter 6, Section 009]
 - (i) CAM requirements for the scrubber inlet flow rate indicator:
 - 1. The scrubber recirculation and/or make-up water flow rate shall be continuously monitored using flow meters.
 - 2. Upon issuance of this permit, an excursion is defined as a scrubber inlet water flow rate < 100 gallons per minute (gpm).
 - A. An excursion triggers an immediate response per 40 CFR 64.7(d) and reporting and recordkeeping per 40 CFR 64.9.
 - (ii) The source shall comply with the obligations to conduct monitoring and fulfill other obligations as specified in 40 CFR 64.7 through 64.9.
- (j) The source shall operate cyclone (CE4B) in accordance with the Compliance Assurance

Monitoring (CAM) Plan, received by the DWEE (formerly NDEE) on March 25, 2016. The CAM requirements include, but are not limited to, the following (See Attachment A) [40 CFR 64.6(c); Title 129, Chapter 6, Section 010*; Title 129, Chapter 6, Section 009]

(i) CAM requirements for the cyclone:

1. Visible emission surveys conducted once per week on the cyclone (EP-4).
2. Upon issuance of this permit, an excursion is defined as any visible emissions.
 - A. An excursion triggers an immediate response per 40 CFR 64.7(d) and reporting and recordkeeping per 40 CFR 64.9.

(ii) The source shall comply with the obligations to conduct monitoring and fulfill other obligations as specified in 40 CFR 64.7 through 64.9.

(4) Recordkeeping and Reporting Requirements:

- (a) Routine observations (at least once each day cyclones (CE4A and CE4B) are in operation) shall be documented to demonstrate and verify compliance with Conditions III.(B)(3)(c)(iii) [Construction Permit CP05-0053, Condition XIII.(M)(3), issued August 4, 2006].
- (b) Records for cyclone (CE5A) and scrubber (CE5B) to document compliance with Condition III.(B)(3)(d) shall include the following: [Construction Permit CP02-0002, Condition XIII.(K)(3), issued July 26, 2005; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (i) Records documenting when daily inspections were conducted with a description, including operating parameters (e.g., pressure differential and scrubber flow readings) and any atypical observations [Construction Permit CP02-0002, Condition XIII.(K)(3)(a), issued July 26, 2005; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (ii) Records documenting when routine maintenance and corrective actions were performed with a description of the maintenance and/or corrective action performed [Construction Permit CP02-0002, Condition XIII.(K)(3)(b), issued July 26, 2005].
 - (iii) Records documenting equipment failures, malfunctions, or other variations, including time of occurrence, remedial action taken, and when corrections were made [Construction Permit CP02-0002, Condition XIII.(K)(3)(c), issued July 26, 2005; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (iv) Calibration records for the pressure differential indicator and flow meter [Construction Permit CP02-0002, Condition XIII.(K)(3)(d), issued July 26, 2005]
 - (v) Manufacturer's documentation regarding design, installation, operation, and maintenance for all permitted equipment. These records will be kept for the life of the equipment [Construction Permit CP02-0002, Condition XIII.(K)(3)(e), issued July 26, 2005; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (c) Records for cyclones 17A and 17B to document compliance with Condition III.(B)(3)(e) and III.(B)(3)(g) shall include the following: [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03]
 - (i) Records documenting when daily inspections were conducted with a description, including operating parameters (e.g., pressure differential and scrubber flow readings) and any atypical observations [Title 129, Chapter 6, Section 003.03*; Title 129,

Chapter 6, Section 003.03].

- (ii) Records documenting when routine maintenance and corrective actions were performed with a description of the maintenance and/or corrective action performed [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (iii) Records documenting equipment failures, malfunctions, or other variations, including time of occurrence, remedial action taken, and when corrections were made [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (iv) Calibration records for the pressure differential indicator and flow meter [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (v) Manufacturer's documentation regarding design, installation, operation, and maintenance for all permitted equipment. These records will be kept for the life of the equipment [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (d) The pressure differential and flow rate readings shall be recorded at least once each day that cyclone (CE5A) and scrubber (CE5B) are operating [Construction Permit CP02-0002, Condition XIII.(L)(4), issued July 26, 2005; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (e) Manufacturer's documentation for CE5A, CE5B, CE4A, CE4B shall be kept on site and readily available to Department representatives [Construction Permit CP02-0002, Conditions XIII.(L)(2) and (L)(3), issued July 26, 2005; Construction Permit CP05-0053, Condition XIII.(M)(2), issued August 4, 2006; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (f) Manufacturer's documentation for CE17A and CE17-B, shall be kept on site and readily available to Department representatives [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
- (g) The source shall maintain records documenting the grade or type of fuel to document compliance with Conditions III.(B)(3)(a) and III.(B)(3)(b) [Construction Permit CP01-0008, Condition XIII.(K)(1), issued January 8, 2002].
- (h) The results of each visible emissions survey shall be recorded in a log, which shall include, at a minimum, the following items [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03]:
 - (i) If the source conducts visible emission surveys in accordance with Condition III.(B)(3)(h) or III.(B)(3)(i), the following shall be recorded:
 1. The emission points included in the survey.
 2. All emission points from which visible emissions occurred (except for water vapor).
 3. Emission points for which the emission units were not in operation during the survey.
 4. Each entry shall be dated and initialed by the person conducting the visible emissions survey.
- (i) The source shall maintain the following CAM-related records [Title 129, Chapter 6* Title 129, Chapter 6]:
 - (i) Records of all CAM excursions.

- (ii) Records of all corrective actions taken in response to CAM excursions.
- (iii) All reporting and recordkeeping as required by 40 CFR 64.9.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(C) Specific Conditions for Wastewater Treatment Operations

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application #OP26R1-023, received March 4, 2021, #CP01-0008, issued January 8, 2002, #CP05-0053, issued August 4, 2006, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-12			
CE-12: EU-12 Flare: 51 MMBtu/hr biogas (burns waste biogas not used in the boilers), 0.15 MMBtu/hr propane pilot burner, installed 2021	Two (2) Covered Anaerobic Lagoons	None	None

(2) Emission Limitations and Testing Requirements:

Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-12				
PM (Filterable)	17.38 lb/hr ^{[1][2]}	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u> ; Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002	No
Opacity	< 20 Percent ^[1]	6 Minutes	Title 129, Chapter 15, Section <u>001.04*</u> ; Title 129, Chapter 15, Section <u>001.04</u> ; Construction Permit CP01-0008, Condition XIII.(E), issued January	No

			8, 2002	
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^[1] Compliance with Condition III.(C)(3)(b) demonstrates compliance with PM (filterable) and Opacity limitations.

^[2] Compliance with this limit is demonstrated by potential emission rates, which are less than the permitted limits. See the fact sheet attachment for further details.

(3) Operational and Monitoring Requirements:

(a) The wastewater treatment lagoons shall be covered to capture the biogas generated from the anaerobic process. The biogas shall be flared (EP-12) and/or burned by emission units EU-1 and EU-2 [Construction Permit CP05-0053, Condition XIII.(B), issued August 4, 2006; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

(b) The emission unit EU-12 shall only combust biogas or propane [Construction Permit CP01-0008, Condition XIII.(A)(8), issued January 8, 2002].

(4) Recordkeeping and Reporting Requirements:

The source shall keep an inspection/maintenance log or similar records for the lagoon covers to demonstrate compliance with Condition III.(C)(3)(a). The records shall document when inspections are performed, the findings from each inspection, and a description of maintenance and corrective actions performed as a result of the inspections. Each entry shall be signed or initialed and dated by the individual who conducted the inspection, maintenance, and/or corrective action [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(D) Specific Conditions for Reciprocating Internal Combustion Engines (RICE)

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-022, received March 4, 2021, CP01-0008, issued January 8, 2002, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-6			
N/A	EU-6: Emergency Reciprocating Internal Combustion Engine (RICE), spark ignition, maximum permitted capacity: 100 kW; permitted fuel type: natural gas, installed 1995	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
		None	40 CFR Part 63, NESHAP Subpart <u>ZZZZ</u> ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>
Emission Point ID#: EP-7			
N/A	EU-7: Emergency RICE, spark ignition, maximum permitted capacity: 100 kW; permitted fuel type: natural gas, installed 1989	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
		None	40 CFR Part 63, NESHAP Subpart <u>ZZZZ</u> ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-8			
N/A	EU-8: Emergency RICE, spark ignition, maximum permitted capacity: 100 kW; permitted fuel type: natural gas, installed 1992	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
		None	40 CFR Part 63, NESHAP Subpart ZZZZ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>
Emission Point ID#: EP-9			
N/A	EU-9: Emergency RICE, spark ignition, maximum permitted capacity: 100 kW; permitted fuel type: natural gas, installed 1996	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
		None	40 CFR Part 63, NESHAP Subpart ZZZZ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>
Emission Point ID#: EP-10			
N/A	EU-10: Emergency RICE, compression ignition, maximum permitted capacity: 300 kW; permitted fuel type: diesel fuel, installed 2000	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>

		None	40 CFR Part 63, NESHAP Subpart ZZZZ; Title 129, Chapter 13, Section <u>002.78*</u> ; Title 129, Chapter 13, Section <u>002.79</u>
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(b) When allowed by NESHAP Subpart ZZZZ, the source has flexibility to change compliance options for each emission unit during the term of this permit. When changing emission unit compliance options, the source shall notify the DWEE, in writing, a minimum of 30 days prior to the change. The notification shall include the following: [Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11]

1. The date of the change; and,
2. The new compliance option that has been chosen

(2) Emission Limitations and Testing Requirements:

(a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Emission Points ID#: EP-6, EP-7, EP-8, EP-9				
Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
PM (Filterable)	0.89 lb/hr ^[1] (each)	Three 1 hour test runs or test method average	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u> ; Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002	No
Opacity	< 20 Percent ^[3] (each)	6 Minutes	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u> ; Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002	No
Emission Point ID#: EP-10				
PM (Filterable)	0.89 lb/hr ^[1]	Three 1 hour test method average	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u> ; Construction Permit CP01-0008, Condition XIII.(C), issued January 8, 2002	No
Opacity	< 20 Percent ^[3]	6 Minutes	Title 129, Chapter 15, Section <u>001.02*</u> ; Title 129, Chapter 15, Section <u>001.02</u> ; Construction Permit CP01-0008, Condition XIII.(E), issued January 8, 2002	No

^[1] Compliance with Condition III.(D)(3)(a) demonstrates compliance with PM and Opacity limitations.

- [2] Compliance with this limit is demonstrated by potential emission rates, which are less than the permitted limits. See the fact sheet attachment for further details.
- [3] Compliance with Condition III.(D)(3)(d) demonstrates compliance with the Opacity limitation.

(b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart ZZZZ for emission units EU-6, EU-7, EU-8, EU-9, and EU-10 [Title 129, Chapter 13, Section 002.78*; Title 129, Chapter 13, Section 002.79].

(i) The source is subject to the emission limitations and testing requirements of 40 CFR §63.6603

(3) Operational and Monitoring Requirements:

(a) Emission units EU-6, EU-7, EU-8 and EU-9 shall only combust natural gas [Construction Permit CP01-0008, Condition XIII.(A)(6), issued January 8, 2002].

(b) Emission units EU-10 shall combust only diesel fuel [Construction Permit CP01-0008, Condition XIII.(A)(7) and (D), issued January 8, 2002; Title 129, Chapter 6, Sections 003.03* and 003.13*; Chapter 15, Section 001.02*; Chapter 13 Section 002.78*; Title 129, Chapter 6, Sections 003.03 and 003.13; Chapter 15, Section 001.02; Chapter 13 Section 002.78].

(i) The sulfur content of the diesel fuel burned shall not exceed 15 ppm [40 CFR §63.6604(b) → §80.510(b); Title 129, Chapter 13 Section 002.78*; Title 129, Chapter 13 Section 002.79].

(c) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart ZZZZ for emission units EU-6, EU-7, EU-8, EU-9, and EU-10 [Title 129, Chapter 13 Section 002.78*; Title 129, Chapter 13 Section 002.79].

(i) The source is subject to the operational and monitoring requirements of 40 CFR §63.6605, §63.6625, and §63.6640

(d) A source representative shall conduct visible emissions surveys for emission point (EP-10) on a weekly basis. These surveys shall be conducted during daylight hours while emission unit, EU-10, is operating under normal conditions [Title 129, Chapter 6, Sections 003.03* and 003.11*, and Chapter 15, Section 001.04*; Title 129, Chapter 6, Sections 003.03 and 003.11, and Chapter 15, Section 001.04].

(i) For deviation reporting purposes, visible emissions (excluding water vapor) from any emission point shall be considered a deviation and shall be reported in accordance with Condition II.(A).

(4) Recordkeeping and Reporting Requirements:

(a) The source shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart ZZZZ for emission units EU-6, EU-7, EU-8, EU-9, and EU-10 [Title 129, Chapter 13, Section 002.78*; Title 129, Chapter 13, Section 002.79].

(i) The source is subject to the recordkeeping and reporting requirements of 40 CFR §63.6650, §63.6655

(b) The source shall maintain records documenting the grade or type of fuel to document compliance with Condition III.(D)(3)(a) [Construction Permit CP01-0008, Condition XIII.(K)(1), issued January 8, 2002].

(c) The source shall maintain records of the sulfur content (in ppm), of the fuel delivered, as provided by the fuel supplier to document compliance with Condition III.(D)(3)(b) [Construction Permit CP01-0008, Condition XIII.(K)(2), issued January 8, 2002].

- (d) The results of each visible emissions survey shall be recorded in a log, which shall include, at a minimum, the following items [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03]:
 - (i) If the source conducts visible emission surveys in accordance with Condition III.(D)(3)(d), the following shall be recorded:
 - 1. The emission points included in the survey.
 - 2. All emission points from which visible emissions occurred (except for water vapor).
 - 3. Emission points for which the emission units were not in operation during the survey.
 - 4. Each entry shall be dated and initialed by the person conducting the visible emissions survey.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(E) Specific Conditions for Haul Roads

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application #26R1-022, received May 22, 2026, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-25			
N/A	EU-25: Cattle Haul Road - Paved	None	None
Emission Point ID#: EP-26			
N/A	EU-26: Bone/Blood Road - Paved	None	None
Emission Point ID#: EP-27			
N/A	EU-27: Blood Plasma Haul Road - Paved	None	None
Emission Point ID#: EP-28			
N/A	EU-28: Box Meat haul Road - Paved	None	None
Emission Point ID#: EP-29			
N/A	EU-29: Paunch Haul road – Paved and Unpaved	None	None

(2) Emission Limitations and Testing Requirements:

Except for applicable requirements prescribed in Standard Condition I and General Condition II, this condition establishes no additional specific limitations and testing requirements for the emission points or emission units identified in Condition III.(E)(1).

(3) Operational and Monitoring Requirements:

- (a) The source shall use Best Management Practices (BMPs) to control emissions from the haul roads as required in Condition I.(L) [Title 129, Chapter 15, Sections 003.01* and 003.02*; Title 129, Chapter 15, Sections 003.01 and 003.02].
- (b) A representative of the source shall conduct a survey of the plant property and haul roads to determine if visible fugitive emissions are being generated and leaving source property on a weekly basis. Usage of Best Management Practices (BMPs) to control fugitive dust shall be taken upon observation of visible fugitive emissions leaving the source property. Documentation of all corrective actions and daily surveys shall be maintained in a log [Title 129, Chapter 15, Sections 003.01* and 003.02*; Title 129, Chapter 15, Sections 003.01 and 003.02].

(4) Recordkeeping and Reporting Requirements:

- (a) Records of visible fugitive emissions surveys taken during weekly operation and a description of corrective action(s) taken, if any, shall be maintained in a log [Title 129,

Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

- (b) A description of the BMPs shall be kept on-site [Title 129, Chapter 6, Section 003.03*;
Title 129, Chapter 6, Section 003.03].

IV. SPECIFIC CONDITIONS FOR MULTIPLE AFFECTED EMISSION POINTS:

Condition IV contains a description of emission points, control equipment, emission units, and relevant standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-022, received May 22, 2026, including any supporting information received prior to issuance of this permit

(A) Source- Wide Emissions Limitations

- (1) Combined potential emissions from emission points identified in Condition IV.(A)(2) shall not equal or exceed the following limits in any period of twelve (12) consecutive rolling calendar months: [Construction Permit CP05-0053, Condition XIII.(N) issued August 4, 2006; Title 129, Chapter 6, Section 001.02*, 003.0*, and 003.13A*; Title 129, Chapter 6, Section 001.02, 003.0, and 003.13A]
 - (a) 100.0 tons of VOC
 - (b) 10.0 tons of any individual HAP
 - (c) 5.0 tons of Lead
 - (d) 25.0 tons of total combined HAPs
- (2) Permitted Emission Points: Emission points identified in operating permit application OP26R1-022, received May 22, 2026, and any other supporting information received prior to issuance of this permit, are listed below:

Control Equipment ID# and Description	Emission Unit Description ^[1]
Emission Point ID#: EP-1	
N/a	EU-1: Boiler, maximum permitted capacity: 32.5 MMBtu/hr; permitted fuel type: natural gas or biogas
Emission Point ID#: EP-2	
N/a	EU-2: Boiler, maximum permitted capacity: 52 MMBtu/hr; permitted fuel type: natural gas or biogas from the anaerobic waste treatment lagoons
Emission Point ID#: EP-12	
CE-12: EU-12 Flare: 51 MMBtu/hr biogas (burns waste biogas not used in the boilers), 0.15 MMBtu/hr propane pilot burner	Two (2) Covered Anaerobic Lagoons

^[1]More detailed descriptions of the control equipment and emission units are in Condition III. (A) and (C).

(3) Testing Requirements:

Performance testing, if required, shall be conducted in accordance with Condition I.(M).

(4) Operational and Monitoring Requirements:

- (a) Biogas samples shall be collected at the discharge of the compressor blower at least monthly when biogas is being combusted, using the sampling method of the Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air, Second Edition, Compendium Method TO-15, Section 8, or another approved technique. If more than one sample is collected during a month, all samples will be averaged for that month [Construction Permit, CP05-0053, Condition XIII.(N)(1), issued August 4, 2006].

- (b) The biogas piping from the anaerobic lagoons to the flare and boilers shall be equipped with an operational flow meter to record the total biogas flow rate, Q_{biogas} . The flow meter shall be properly installed, maintained, and shall be calibrated at least once per year [Construction Permit, CP05-0053, Condition XIII.(N)(2), issued August 4, 2006; Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11].
- (c) Biogas samples shall be analyzed for sulfur concentration (C_{sulfur}) using ASTM Method D 5504 or another approved method. SO_2 emissions (E_{biogas}) shall be calculated on a monthly basis, using biogas flowrate and sulfur concentration. SO_2 emissions for each period of 12 consecutive calendar months shall also be calculated [Construction Permit, CP05-0053, Condition XIII.(N)(3), issued August 4, 2006].

$$E_{\text{biogas}} = C_{\text{sulfur}} * Q_{\text{biogas}} * 64 \text{ lb SO}_2/\text{mole} * 1 \text{ mole}/29 \text{ lb air} * 1 \text{ lb air}/12.282 \text{ scf} * 1 \text{ ton}/2000 \text{ lbs}$$

Where:

E_{biogas} = biogas emissions (ton/mo)

C_{sulfur} = sulfur conc. (ppmv)

Q_{biogas} = biogas flow rate (MMscf/mo)

- (d) Samples shall be collected in approved containers and analyzed using appropriate ASTM Method. The current approved method is ASTM D5504 (sulfur compounds). The approved container is a sulfur-inert cylinder [Construction Permit, CP05-0053, Condition XIII.(N)(4), issued August 4, 2006].
- (5) Recordkeeping and Reporting Requirements:
- (a) The source shall record monthly total biogas flow and make this information readily available to DWEE representatives [Construction Permit CP05-0053, Condition XIII.(N)(2), issued August 4, 2006].
 - (b) To demonstrate compliance with Condition IV.(A)(4)(c) above, the owner or operator of the source shall keep records of sulfur concentration from samples [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (c) To demonstrate compliance with Condition IV.(A)(1) above, the owner or operator of the source shall keep records of the emissions calculations required by Conditions IV.(A)(4)(c) [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].
 - (d) Manufacturer's documentation for the flow meter shall be kept on site and readily available to DWEE representatives [Construction Permit CP05-0053, Condition XIII.(N)(2), issued August 4, 2006].
 - (e) To demonstrate compliance with Condition IV.(A)(4)(b) above, the owner or operator of the source shall keep records of maintenance and calibration of flow meters [Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 6, Section 003.03].

IV. SPECIFIC CONDITIONS FOR MULTIPLE AFFECTED EMISSION POINTS:

(B) Source-Wide Facility Access Restrictions

(1) Operational and Monitoring Requirements:

- (a) Permanent fencing made of durable materials shall be installed to adequately restrict public access, defining the property inside the fence as non-ambient air. This fencing shall comply with the following requirements [Construction Permit, CP01-0008, Condition XIII.(G), issued January 8, 2002]:
 - (i) A perimeter chain-link fence with a minimum height of six (6) feet above ground level shall be maintained at the east, south, and west property boundaries. A split rail fence monitored by surveillance cameras shall be maintained at the north property boundary.
 - (ii) "NO TRESPASSING" signs shall be installed at all gated entrances and at a maximum interval of 250 feet along the perimeter of the facility.
 - (iii) A guard shack or surveillance cameras shall be used at each gate/opening in the fence. A protocol shall be submitted for review to the DWEE within 90 days after issuance of this permit for the use of surveillance cameras, including those required to monitor the north property boundary

Attachment A
CAM Plan

Cargill Meat Solutions
Compliance Assurance Monitoring
(CAM) Plan
Schuyler, NE

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Compliance Assurance Monitoring (CAM) Plan
Cargill Meat Solutions - Schuyler, NE

1.0 Background

Compliance Assurance Monitoring (CAM) is required for affected sources under 40 CFR 64. A CAM plan detailing the applicability and proposed monitoring approach of affected sources is required to be included as part of the 40 CFR 70 (Title V) operating permit renewal process. The Cargill Meat Solutions located in Schuyler, NE was issued a Nebraska Department of Environment and Energy (NDEE) Class I Operating Permit OPSP-0351 on June 20, 2006 and expired on June 20, 2011. A significant revision (OPSPMOD-0032) was issued on June 25, 2007. A renewal application was submitted to NDEE by Cargill Meat Solutions in December 2010.

The following bullet items identify the applicability requirements for CAM as applied to individual emission units at a facility.

- Emission unit is located at a major source that is required to obtain a Title V permit;
- Emission unit is subject to emission limitation or standard for an applicable pollutant;
- Emission unit uses a control device to achieve compliance with the emission limitation;
- Potential pre-control emissions of applicable pollutants (with limits) from the emission unit are at least 100 percent of major source amount (100 tons per year); and,
- Emission unit is not otherwise exempt and does not use a Continuous Emission Monitor (CEM) for the applicable pollutant.

2.0 Applicability

Permitted emission units at the Schuyler Beef Processing facility were evaluated to determine which emission units have specific emission limitations and are equipped with control devices to maintain compliance with the emission limitations. Pre-control potential emissions were estimated for those emission units that were determined to have both an emission limitation and associated control equipment in order to determine if the uncontrolled emissions were greater than 100 percent of the major source amount. The pre-control potential emissions were “back-calculated” using the specific pollutant emission limitation in conjunction with estimated control equipment efficiency. A complete listing of the emission sources and CAM applicability was included on Form 4.4.1 CAM Applicability in the renewal application. Follow up questions during the application review led to a modification to the applicability for EU 4 – Blood Dryer and EU 5 – Bone Dryer.

Based on the CAM applicability calculations, it was determined that the following emission sources and associated control equipment types must be included in the CAM plan.

Table 1. Emission Units Subject to CAM Requirements.

Emission Unit I.D.	Emission Point Number	Emission Unit Description	Control Equipment	Applicable Pollutant
4	4	Blood Dryer	Primary Cyclone Secondary Cyclone	Particulate
5	5	Bone Dryer	Cyclone Wet Scrubber	Particulate

As indicated in Table 1, two different control equipment technologies were identified for inclusion in the CAM plan: scrubber and cyclone. The following sections are organized by control technology type and detail the various monitoring approaches and justifications for each control technology type.

3.0 Scrubber (PM/PM10 Control)

The Cargill Meat Solutions facility uses a scrubber to control emissions of particulate matter (PM/PM10) generated from Bone Dryer (EU 5). The scrubber follows a receiving cyclone. The scrubber is the primary control device and is included in this CAM plan.

The PM laden air stream enters the scrubber where water absorbs the PM as the air stream passes through the liquid. The control of PM is dependent primarily on an adequate supply of water to absorb the PM. Water make-up rate and recirculation rate are monitored.

3.1 Monitoring Approach

Table 2 summarizes the monitoring approach for the scrubber control device associated with the Bone Dryer.

Table 2. PM/PM10 Scrubber Monitoring Approach	
I. Indicator	Scrubber Recirculation Water Flow and/or Make-up Flow
A. Measurement Approach	This scrubber is equipped with a flowmeter to continuously monitor scrubber recirculation water flow and/or make-up flow
II. Indicator Range	Indicator No. 1 Scrubber Water Make-up Flow > 100 gpm for the Bone Dryer
III. Performance Criteria	If the scrubber recirculation water flow is out of the expected operating range or make-up flow below criteria, corrective action shall be taken return the flow to its proper operating range.
A. Representativeness	The scrubber water flow meters are installed at a representative location on the scrubber recirculation water pump discharge and make-up water line
B. Monitoring Frequency	Daily manual readings
C. QA/QC Practices	Annual inspection of scrubber water flow meters

D. Data Collection	Scrubber water flow meter readings, in units of gallons per minute will be collected and manually recorded and maintained.
E. Averaging Period	Weekly review of data.

3.2 *Justification*

The indicator used to monitor scrubber operation is scrubber recirculation and/or make-up water flow by continuous instruments. These dryers have been tested and demonstrated compliance in the past operating at these conditions. Changes in scrubber water flow are a good indication of problems (plugging, fouled packing, etc.) which would indicate potential problems with PM/PM10 control.

4.0 **Cyclone (PM/PM10 Control)**

The Cargill Meat Solutions facility uses a cyclone to collect particulate matter generated from the EU 4 – Blood Dryer. The secondary cyclone follows a receiving cyclone. The second cyclone is the primary control device and is included in this CAM plan.

The cyclone removed PM by centrifugal and inertial forces, induced by forcing particulate laden gas to change direction.

4.1 *Monitoring Approach*

Table 3 summarizes the monitoring approach for the cyclone control device associated with the Blood Dryer.

Table 3. Cyclone Monitoring Approach	
I. Indicator	Visible Emissions Inspections
A. Measurement Approach	The cyclone performance is monitored by observing visible emissions
II. Indicator Range	No visible emissions. Visible emission inspections are performed by qualified personnel
III. Performance Criteria	If visible emissions are observed, corrective action shall be taken to eliminate the visible emissions
A. Representativeness	NA
B. Monitoring Frequency	Visible emission observations are conducted once per week
C. QA/QC Practices	Qualified personnel perform visible emission inspection

D. Data Collection	Visible emission observations will be manually recorded and maintained
E. Averaging Period	NA

4.2 *Justification*

The indicator used to monitor cyclone operation is a visible emissions check. Qualified plant personnel will perform weekly visible emission checks. If visible emissions are present, this indicates an excursion and corrective action will be initiated. All excursions will be documented and reported.

Visible emission inspections provide a reasonable assurance of compliance, indicating that the baghouse is operating properly and is achieving the desired control efficiency.

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