



AIR QUALITY CLASS I OPERATING PERMIT SIGNIFICANT REVISION

PERMIT NUMBER: OP26M1-016

PERMIT EXPIRES: February 27, 2030

DWEE ID: 85814

Program ID: AIR 011 00050

Permit Issued To: Valero Renewable Fuels Company, LLC
Name of Source in Application: Valero Renewable Fuels Company, LLC (doing business as Valero Albion Plant)

Mailing Address: P.O. Box 188, Albion, Nebraska 68620

Source Location: 2615 260th Street, Albion, Boone County, Nebraska

Revised Operating Permit(s): Operating permit OP24R1-033 issued February 28, 2025

The above Operating Permit is hereby revised as follows: Two existing conditions, III.(A) and III.(D), are being edited and reissued in their entirety. All other provisions of the original permit are still in effect and, in concert with this revision, constitute the effective operating permit.

Pursuant to Title 129, Chapter 10, of the Nebraska Air Quality Regulations amended September 22, 2022, the public has been notified by prominent advertisement of this significant revision and the thirty (30) day period allowed for comments has elapsed. No other terms or conditions of the operating permits described above are being revised or otherwise modified by this document. This revision does not trigger any additional requirements under Nebraska Title 129.

Except as provided above, all other provisions of the original permit are still in effect and, in concert with this revision, constitute the effective operating permit. This operating permit revision shall be attached to the original operating permit and maintained with it henceforth.

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 facility shall assure that the operation and maintenance of all equipment is in compliance with all of the conditions of this permit.

The undersigned issues this document on behalf of the Director in accordance with Title 129 – Nebraska Air Quality Regulations.

DRAFT

Date

Reuel S. Anderson, Administrator
Permitting & Engineering Division

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III.(D): Specific Conditions for DDGS Storage, and Loadout This condition incorporates the revisions requested in construction permit CP26-004: increasing in the pound per hour (lb/hr) permit limitations for particulate matter for the Distillers' Dried Grains Solubles Storage and Loadout Baghouse (C-50). The source also proposed to incorporate Compliance Assurance Monitoring (CAM) requirements under EP-50.	5
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III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(A) Specific Conditions for Grain Handling and Hammermilling

(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 #OP24R1-033 issued February 28, 2025, construction permit CP26-004 issued July 6, 2026, and significant operating permit modification application OP26M1-016 submitted April 30, 2026, including any supporting information received prior to issuance of this permit:

Emission Point ID#:			
Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-10			
C-10: Grain Conveyor Baghouse, 99% Control Efficiency, installed in 2007	EU-01: Grain Conveyor, 185.6 tons/hr maximum capacity; installed in 2007	None	None
Emission Point ID#: EP-20			
C-20: Hammermill Baghouse, 99% Control Efficiency, installed in 2024	EU-02: Hammermill #1, 185.6 tons/hr maximum capacity; installed in 2007	None	None
	EU-03: Hammermill #2, 185.6 tons/hr maximum capacity; installed in 2007		
	EU-04: Hammermill #3, 185.6 tons/hr maximum capacity; installed in 2007		
	EU-05: Hammermill #4, 185.6 tons/hr maximum capacity; installed in 2007		

(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 Point				
Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-10				
PM (Filterable)	0.32 lb/hr ^[1]	Three 1-hour test runs or test method average	Construction Permit CP26-004, Condition III.(A)(2) issued July 6, 2026	No
PM ₁₀ ^[2]	0.32 lb/hr ^[1]	Three 1-hour test runs or test method average		No
Opacity	< 20 Percent ^[3]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-20				
PM (Filterable)	1.29 lb/hr	Three 1-hour test method average	Construction Permit CP26-004, Condition III.(A)(2) issued July 6, 2026	Yes ^[4]
PM ₁₀ ^[2]	1.29 lb/hr	Three 1-hour test method average		Yes ^[4]
Opacity	< 20 Percent ^[3]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] Compliance with Conditions III.(A)(3)(b) demonstrates compliance with the PM limitations.

^[2] Filterable and Condensable

^[3] Compliance with Condition III.(A)(3)(c) demonstrates compliance with the opacity limitation.

^[4] Compliance with this limit is demonstrated through testing in accordance with Condition III.(A)(2)(b).

(b) In order to demonstrate compliance with Condition III.(A)(2), the source shall conduct a performance test for PM (filterable) and PM₁₀ (filterable and condensable) on C-20 hammermill baghouse, emission point, EP-20, while all associated controlled units are operating. The performance test shall be conducted in accordance with Condition I.(M). [Title 129, Chapter 6, Section 003.13; Title 129, Chapter 15, Section 005.01]

(i) The performance test shall be conducted within one (1) year of permit issuance.

(3) Operational and Monitoring Requirements:

(a) All emissions from the emission units identified in Condition III.(A)(1) shall be controlled as follows: EU-01 shall be controlled by the Grain Conveyor Baghouse (C-10); and EU-02, EU-03, EU-04, and EU-05 shall be controlled by the Hammermill Baghouse (C-20) [Construction Permit CP26-004, Condition III.(A)(3)(a), issued July 6, 2026].

(b) Operation and maintenance of each baghouse (C-10 and C-20) shall be in accordance with the following requirements [Construction Permit CP26-004, Condition III.(A)(3)(b), issued July 6, 2026]:

(i) The baghouse shall be operated and be controlling emissions at all times when the associated emission units are in operation.

(ii) The baghouse shall be equipped with an operational pressure differential indicator. Pressure differential indicator readings shall be recorded at least once each day that

the associated baghouse is operating.

- (iii) Baghouse filter bags are to be inspected and/or replaced as often as necessary to ensure proper operation or more frequently as indicated by pressure differential indicator readings or other indication of bag failure.
- (iv) Observations at least once each day during daylight hours of baghouse operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is needed. If corrective action is required, it shall occur immediately.

(c) A source representative shall conduct visible emissions surveys for each emission point, EP-10 and EP-20, on a daily basis. These surveys shall be conducted during daylight hours while each emission unit is operating under normal conditions [Title 129, Chapter 6, Section 003.03; 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).

(d) The source shall operate baghouse C-10 in accordance with its respective CAM plan submitted by the source on June 29, 2026, and shall operate baghouse C-20 in accordance with its respective CAM plan submitted by the source on February 3, 2026. The CAM requirements include, but are not limited to, the following (See Attachments A and E) [40 CFR 64.6(c); Title 129, Chapter 6, Section 010]:

- (i) CAM requirements for pressure differential indicator:

1. A minimum pressure differential of 0.05 inches of water shall be maintained during operation.
2. Pressure differential is measured across the system.
3. The pressure differential will be recorded a minimum of once per day during operations.

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

(4) Recordkeeping and Reporting Requirements:

- (a) The source shall keep records documenting the date, time, and pressure differential reading for each day the associated baghouse is in operation [Construction Permit CP26-004, Condition III.(A)(5)(a), issued July 6, 2026].
- (b) The source shall keep filter replacement records including the date the filter replacement occurred and the type of filter installed [Construction Permit CP26-004, Condition III.(A)(5)(b), issued July 6, 2026].
- (c) The source shall keep records documenting the date, time, observations, and corrective actions taken for each day the associated baghouse is in operation [Construction Permit CP26-004, Condition III.(A)(5)(c), issued July 6, 2026].
- (d) The results of each visible emissions survey for each emission point (EP-10 and EP-20) 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 15, Section 001.04]:
 - (i) The emission points included in the survey.
 - (ii) All emission points from which visible emissions occurred (except for water vapor).

- (iii) Emission points for which the emission units were not in operation during the survey.
- (iv) Each entry shall be dated and initialed by the person conducting the visible emissions survey.
- (e) The source shall maintain the following CAM-related records for baghouse C-10 in accordance with its respective CAM plan submitted by the source on June 29, 2026, and maintain the following CAM-related records for baghouse C-20 in accordance with its respective CAM plan submitted by the source on February 3, 2026. The CAM requirements include, but are not limited to, the following (See attachment A and E) [Title 129, Chapter 6, Section 010]:
 - (i) Records of all excursions.
 - (ii) Records of all corrective actions taken in response to excursions.
 - (iii) All reporting and recordkeeping as required by 40 CFR 64.9.

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(D) Specific Conditions for DDGS Storage, and Loadout

(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 #OP24R1-033 issued February 28, 2025, construction permit CP26-004 issued July 6, 2026, and significant operating permit modification application OP26M1-016 submitted April 30, 2026, including any supporting information received prior to issuance of this permit:

Emission Point ID#			
Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-50			
C-50: DDGS Storage and Loadout Baghouse	EU-31: DDGS Storage Silos, installed in 2007	None	None
	EU-32: DDGS Conveyor, installed in 2007		
	EU-33: DDGS Truck and Rail Loadout Spout, installed in 2007		

(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 Point ID#: EP-50				
Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
PM (Filterable)	0.39 lb/hr ^[1]	Three 1-hour test runs or test method average	Construction Permit CP26-004, Condition III.(D)(2)(a), issued July 6, 2026	No
PM ₁₀	0.39 lb/hr ^[2]	Three 1-hour test runs or test method average	Construction Permit CP26-004, Condition III.(D)(2)(a), issued July 6, 2026	No
Opacity	< 20 Percent ^[3]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] Filterable only

^[2] Filterable and Condensable

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

(3) Operational and Monitoring Requirements:

- (a) All emissions from the emission units identified in Condition III.(D)(1) shall be controlled by pollution control equipment as follows: EU-31, EU-32, and EU-33 shall be controlled by the DDGS Storage and Loadout Baghouse (C-50) [Construction Permit CP26-004, Condition III.(D)(3)(a), issued July 6, 2026].
- (b) Operation and maintenance of each baghouse shall be in accordance with the following requirements: [Construction Permit CP18-062, CP26-004, Condition III.(D)(3)(b), issued July 6, 2026]
 - (i) The baghouse shall be operated and be controlling emissions at all times when the associated emission units are in operation.
 - (ii) The baghouse shall be equipped with an operational pressure differential indicator. Pressure differential indicator readings shall be recorded at least once each day that the associated baghouse is operating.
 - (iii) Baghouse filter bags are to be inspected and/or replaced as often as necessary to ensure proper operation or more frequently as indicated by pressure differential indicator readings or other indication of bag failure.
 - (iv) Observations at least once each day during daylight hours of baghouse operation shall be conducted to determine whether there are visible emissions from the stack, leaks, noise, or other indications that corrective action is needed. If corrective action is required, it shall occur immediately.
- (c) DDGS storage and loadout operations shall be located inside a building [Construction Permit CP26-004, Condition III.(D)(3)(c), issued July 6, 2026].
- (d) A source representative shall conduct visible emissions surveys for emission point EP-50 on a daily basis. These surveys shall be conducted during daylight hours while each emission unit is operating under normal conditions [Title 129, Chapter 6, Section 003.03; 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).
- (e) The source shall operate the DDGS Storage and Loadout Baghouse (C-50) in accordance with the Compliance Assurance Monitoring (CAM) Plan, submitted by the source on June 29, 2026. The CAM requirements include, but are not limited to, the following (See Attachment F) [40 CFR 64.6(c); Title 129, Chapter 6, Section 010]:
 - (i) CAM requirements for pressure differential indicator:
 - 1. A minimum pressure differential of 0.05 inches of water shall be maintained during operation.
 - 2. Pressure differential is measured across the system.
 - 3. The pressure differential will be recorded a minimum of once per day during operations.
 - (ii) The source shall comply with the obligations to conduct monitoring and fulfill other obligations as specified in 40 CFR 64.7 and 64.9.

(4) Recordkeeping and Reporting Requirements:

- (a) The source shall keep records documenting the date, time, and pressure differential reading for each day the associated baghouse is in operation [Construction Permit CP26-004, Condition III.(D)(5)(a), issued July 6, 2026].
- (b) The source shall keep filter replacement records including the date the filter replacement occurred and the type of filter installed [Construction Permit CP26-004, Condition III.(D)(5)(b), issued July 6, 2026].
- (c) The source shall keep records documenting the date, time, observations, and corrective actions taken for each day the associated baghouse is in operation [Construction Permit CP26-004, Condition III.(D)(5)(c), issued July 6, 2026].
- (d) The results of each visible emissions survey for emission point (EP-50) 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 15, Section 001.04]:
 - (i) The emission points included in the survey.
 - (ii) All emission points from which visible emissions occurred (except for water vapor).
 - (iii) Emission points for which the emission units were not in operation during the survey.
 - (iv) Each entry shall be dated and initialed by the person conducting the visible emissions survey.
- (e) The source shall maintain the following CAM-related records for the DDGS Storage and Loadout Baghouse (C-50) in accordance with its respective CAM plan, submitted by the source on June 29, 2026. The CAM requirements include, but are not limited to, the following (See attachment F) [Title 129, Chapter 6, Section 010]:
 - (i) Records of all excursions.
 - (ii) Records of all corrective actions taken in response to excursions.
 - (iii) All reporting and recordkeeping as required by 40 CFR 64.9.

Attachment E:
Compliance Assurance Monitoring Plan
Grain Conveyor Baghouse Stack (EP-10)

Compliance Assurance Monitoring Plan for Valero Renewable Fuels Company, LLC – dba Valero Albion Plant

EP-10/C-10 – Grain Conveyor Baghouse

I. Background

A. Emissions Unit

Description: EU-01 Grain Conveyor

Facility: Valero Renewable Fuels Company, LLC dba Valero Albion Plant

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Nebraska Administrative Code (NAC) Title 129, Chapters 2 and 3

PM/PM₁₀ Emission Limit: 0.32 lb/hr

Current Monitoring Requirements:

- 1) Monitor and record daily differential pressure
- 2) Perform daily observations of leaks, noise, or other indications that corrective action is necessary.

C. Control Technologies

Fabric Filter Baghouse (C-10)

II. Fabric Filter Control System (EP-10/C-10) Monitoring Approach

A. Indicator

Pressure differential will be used as the performance indicator.

B. Measurement Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 1.

Table 1. Monitoring Approach

I. Indicator	Pressure differential
A. Measurement Approach	Pressure differential across the baghouse is measured with a pressure differential gauge.
II. Indicator Range	An excursion is defined as a pressure differential outside of 0.05 to 6.0 in. H ₂ O.
A. Corrective Action	Excursions trigger a response per 40 CFR 64.7(d) and reporting and recordkeeping per 40 CFR 64.9.

B. QIP Threshold	An accumulation of excursions outside the indicator range of greater than or equal to 5 percent of total operating time for a reporting period, excluding periods of startup, shutdown, and malfunction.
III. Performance Criteria	
A. Data Representativeness	Pressure differential is measured across the system
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	Calibrate, maintain, and operate instrumentation in accordance with manufacturer's recommendation.
D. Monitoring Frequency	Pressure differential is monitored continuously.
Data Collection Procedure	Pressure differential is manually recorded daily.
Averaging Period	N/A
E. Record Keeping	Maintain for a period of five (5) years records of electronic media and corrective actions taken in response to excursions.
F. Reporting	Number, duration, and cause of any excursion and the corrective action taken.
Frequency	Semiannually

III. Justification

- A. Background
 PM and PM₁₀ emissions from the Grain Conveyor System are controlled by the Grain Conveyor Baghouse.
- B. Rationale for Selection of Performance Indicator
 Baghouses operate by collecting particulate on porous fabric bags, thus resulting in a pressure differential across the system. The gas stream is passed through the fabric which results in pressure; too much pressure indicates a possible plugging of the system and too little indicates possible bag breakage. Therefore, pressure drop is the best indicator of baghouse performance.
- C. Rationale for Selection of Indicator Ranges
 Baghouses remove dust from a gas stream by passing the stream through a porous fabric. Particles form a porous cake on the fabric that acts as the filtration device. This porous cake is routinely removed and collected and returned to the process. Baghouses are highly efficient for controlling filterable PM and PM₁₀. Baghouses are subject to failure if they are not properly operated and maintained. An indicator pressure drop of 0.05 to 6 inches of water is recommended to achieve the required control efficiency.

The selected QIP threshold for the pressure differential is greater than or equal to 5 percent of total operating time excluding periods of startup, shutdown, and malfunction during a semi-annual reporting period. If the QIP threshold is exceeded during a semi-annual reporting period, a QIP will be developed and implemented.

Attachment F:
Compliance Assurance Monitoring Plan
DDGS Storage and Loadout Baghouse Stack (EP-50)

Compliance Assurance Monitoring Plan for Valero Renewable Fuels Company, LLC – dba Valero Albion Plant

EP-50/C-50 – DDGS Storage and Loadout

I. Background

A. Emissions Unit

Description: EU-31 DDGS Storage Silos
EU-32 DDGS Conveyor
EU-33 DDGS Rail Loadout Spout

Facility: Valero Renewable Fuels Company, LLC dba Valero Albion Plant

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Nebraska Administrative Code (NAC) Title 129, Chapter 3
PM/PM₁₀ Emission Limit: 0.39 lb/hr

Current Monitoring Requirements:

- 1) Monitor and record daily differential pressure
- 2) Perform daily observations of leaks, noise, or other indications that corrective action is necessary.

C. Control Technologies

Fabric Filter Baghouse (C-50)

II. Fabric Filter Control System (EP-50/C-50) Monitoring Approach

A. Indicator

Pressure differential will be used as the performance indicator.

B. Measurement Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 1.

Table 1. Monitoring Approach

I. Indicator	Pressure differential
A. Measurement Approach	Pressure differential across the baghouse is measured with a pressure differential gauge.
II. Indicator Range	An excursion is defined as a pressure differential outside of 0.05 to 6.0 in. H ₂ O.
A. Corrective Action	Excursions trigger a response per 40 CFR 64.7(d) and reporting and recordkeeping per 40 CFR 64.9.

B. QIP Threshold	An accumulation of excursions outside the indicator range of greater than or equal to 5 percent of total operating time for a reporting period, excluding periods of startup, shutdown, and malfunction.
III. Performance Criteria	
A. Data Representativeness	Pressure differential is measured across the system
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	Calibrate, maintain, and operate instrumentation in accordance with manufacturer's recommendation.
D. Monitoring Frequency	Pressure differential is monitored continuously.
Data Collection Procedure	Pressure differential is manually recorded daily.
Averaging Period	N/A
E. Record Keeping	Maintain for a period of five (5) years records of electronic media and corrective actions taken in response to excursions.
F. Reporting	Number, duration, and cause of any excursion and the corrective action taken.
Frequency	Semiannually

III. Justification

- A. Background
 PM and PM₁₀ emissions from the DDGS Storage and Loadout System are controlled by the DDGS Storage and Loadout Baghouse.
- B. Rationale for Selection of Performance Indicator
 Baghouses operate by collecting particulate on porous fabric bags, thus resulting in a pressure differential across the system. The gas stream is passed through the fabric which results in pressure; too much pressure indicates a possible plugging of the system and too little indicates possible bag breakage. Therefore, pressure drop is the best indicator of baghouse performance.
- C. Rationale for Selection of Indicator Ranges
 Baghouses remove dust from a gas stream by passing the stream through a porous fabric. Particles form a porous cake on the fabric that acts as the filtration device. This porous cake is routinely removed and collected and returned to the process. Baghouses are highly efficient for controlling filterable PM and PM₁₀. Baghouses are subject to failure if they are not properly operated and maintained. An indicator pressure drop of 0.05 to 6 inches of water is recommended to achieve the required control efficiency.

The selected QIP threshold for the pressure differential is greater than or equal to 5 percent of total operating time excluding periods of startup, shutdown, and malfunction during a semi-annual reporting period. If the QIP threshold is exceeded during a semi-annual reporting period, a QIP will be developed and implemented.