



**Statement of Basis**

**Air Quality Construction Permit**

**Aberdeen Energy**

**Mina, South Dakota**

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## 1.0 Background

On January 22, 2007, the South Dakota Department of Environment and Natural Resources (DENR) issued Aberdeen Energy's Title V air quality permit #28.0502-26 to construct and operate a dry corn mill ethanol production plant located in Mina, South Dakota. Aberdeen Energy was permitted to produce 104.5 million gallons of undenatured ethanol per 12-month rolling period. The following revisions were made to the Title V air quality operating permit since the Title V air quality operating permit was issued in January 2007:

1. On July 16, 2007, the permit was modified to increase the ethanol production limit to 120 million gallons of undenatured ethanol per year, increase the grain processing to 1,250,000 tons per year, increase dried distillers grain production to 392,000 tons per year, and increase the allotted emission for the dryer system;
2. On May 29, 2009, the permit was modified to use dust suppressant on unpaved roads and parking lots instead of paving these areas to control fugitive dust emissions and revising particulate matter emission limits for certain units;
3. On September 28, 2009, the permit was modified for the addition of a grain dryer, receiving pit, and storage bin and to decrease the short term particulate matter emission limit on the cooling drum based on stack test results; and
4. On September 7, 2010, the permit was modified to increase the operational limits on the grain dryer and receiving pit, increase the volatile organic compound short term limit for a fermentation system, increase the nitrogen oxide and carbon monoxide emission limits for a thermal oxidizer, and revise the major source threshold value for PSD criteria pollutants based on EPA's final rule.

On July 27, 2011, DENR received an application from Aberdeen Energy to renew its Title V air quality operating permit. The Title V air quality operating permit was renewed on May 7, 2012. The following revisions were made to the Title V air quality operating permit since the Title V air quality operating permit was issued in May 2012:

1. On May 7, 2012, the permit was modified to change the equipment and permit conditions. The following is a list of changes:
  - a. The maximum operating rate for the following equipment was adjusted:
    - i. Elevator leg associated with Unit #1 was increased from 140 to 156 tons of grain per hour;
    - ii. Unit #2 (grain milling) was increased from 33.6 to 37 tons of grain per hour per hammer mill;
    - iii. Unit #3 (fermentation system) was increased from 87,122 to 96,802 gallons of mash per hour;
    - iv. Unit #4 (distillation system) was increased from 12,000 to 15,000 gallons of ethanol per hour;

- v. The maximum operating rate for dried distillers grain and solubles dryers A, B, C, and D was increased from 41 to 46 tons of dried distillers grain and solubles per hour per dryer system;
  - vi. Unit #5 (cooling drum) was increased from 82 to 91 tons of dried distillers grain and solubles per hour;
  - vii. Unit #6 (dried distillers grain and solubles silo and load out) was increased from 500 to 560 tons per hour;
  - viii. Unit #8 (flare) was decreased from 6.4 to 3.2 million Btus per hour heat input;
  - ix. Unit #17 (grain receiving storage bin) was increased from 10,000,000 to 18,000,000 bushels per year; and
  - x. Unit #4 (thermal oxidizers) was increased from 122 to 150 million Btus per hour.
- b. The short term limit for particulate matter 10 microns in diameter or less (PM10) for Unit #5 (cooling drum) was increased from 0.3 to 0.5 pounds per hour;
  - c. The short term limit for sulfur dioxide for Unit #4 (distiller process) was decreased from 0.45 to 0.225 pounds per tons of dried distillers grain and solubles produced;
  - d. Eliminated the ethanol load out limit for Unit #7 (permit condition 7.13);
  - e. Increased the ethanol production limit from 120 to 130 million gallons of undenatured ethanol per 12-month rolling period;
  - f. Increased the grain processing limit from 1,250,000 to 1,360,000 tons of grain per 12-month rolling period;
  - g. Increased the dried distillers grain and solubles production limit from 392,000 to 425,000 tons per 12-month rolling period;
  - h. Eliminated the initial performance tests required in permit condition 17.7, 17.8, 17.9, 17.10, and 17.11;
  - i. Revised permit condition 17.12 to specify on continual compliance will be demonstrated instead of initial demonstration of compliance;
  - j. Eliminated permit condition 19.4 which requires a nitrogen oxide monitoring plan; and
  - k. Included an operational limit for the grain dryer of 6,000 hours per year.
2. On April 8, 2013, the permit was modified to remove the aspiration of the dried distillers grains and solubles (DDGS) load out arm from the Unit #6 baghouse unit and reduce the nitrogen oxides short term limit for Unit #4 from 48 pounds per hour to 36 pounds per hour.

On October 1, 2014, DENR determined that the application to install a pre-condenser for Unit #3 did not have the potential to increase emissions and that the proposed construction project was exempt from being required to obtain an air quality construction permit.

## 1.1 Existing Equipment

Table 1-1 provides a list of the units presently permitted which was taken from the current Title V air quality operating permit issued as amended on August 14, 2013 along with equipment permitted in construction permits #28.0502-26-01C and #28.0502-26-02C.

**Table 1-1 – Description of Permitted Units, Operations, and Processes**

<b>Unit</b>	<b>Description</b>	<b>Maximum Operating Rate</b>	<b>Control Device</b>
<b>#1</b>	Grain receiving. Trucks and railcars dump grain into two receiving pits located in a partially enclosed building. Elevator legs transport grain to storage bins.	420 tons of grain per hour	Baghouse
	Elevator legs transport grain to a day bin.	156 tons of grain per hour	
	Behlen Grain Storage Bin A	750,000 bushels	
	Behlen Grain Storage Bin B	750,000 bushels	
<b>#2</b>	Grain milling. Grain is milled in one of four hammer mills.	37 tons of grain per hour per hammer mill	Baghouse
<b>#3</b>	Fermentation system. The fermentation process occurs in seven fermenters and liquid beer is stored in a beer well.	96,802 gallons of mash per hour	Wet scrubber
<b>#4</b>	Distillation process. The distillation process distills the liquid beer. The distillation process consists of the beer stripper, rectifier, side stripper, molecular sieve, condensers, and evaporators.	15,000 gallons of ethanol produced per hour	Thermal oxidizer and heat recovery boiler system #1 and #2.
	DDGS dryers A and B. Each dryer has a multi cyclone to collect product and low NOx burners. The dryers are fired with natural gas.	45 million Btus per hour per dryer and 46 tons of dried distiller grain and solubles per hour	
	DDGS dryers C and D. Each dryer has a multi cyclone to collect product and low NOx burners. The dryers are fired with natural gas.	45 million Btus per hour per dryer and 46 tons of dried distiller grain and solubles per hour	
	The thin stillage and solids fractions of the wet distiller grain and solubles are separated by six centrifuges.	Not applicable	
	Slurry tank, process vent mixer, and yeast tank.	Not applicable	
	Biomethanator associated with Unit #8.	Not applicable	
	Cooling drum.	See Unit #5	
	Thermal oxidizer and heat recovery boiler system #1 with low NOx burners. The thermal oxidizer is fired with natural gas.	150 million Btus per hour heat input	
	Thermal oxidizer and heat recovery boiler system #2 with low NOx burners. The thermal oxidizer is fired with natural gas.	150 million Btus per hour heat input	

<b>Unit</b>	<b>Description</b>	<b>Maximum Operating Rate</b>	<b>Control Device</b>
#5	Cooling drum for dried distiller grain and solubles.	91 tons of dried distillers grain per hour	Baghouse. Exhaust gases may be routed to one of the two thermal oxidizers associated with Unit #4.
#6	Dried distiller grain and solubles silo and load out.	560 tons of dried distillers grain per hour	Baghouse
#7	Submerged truck loading rack.	36,000 gallons of denatured ethanol per hour	Flare
	Rail car loading rack.	120,000 gallons of denatured ethanol per hour	
	Flare fired with natural gas.	12.4 million Btus per hour heat input	
#8	Biomethanator.	Not applicable	Flare. Methane from the biomethanator process may be routed to Unit #4.
	Flare fired with natural gas.	3.2 million Btus per hour heat input	
#9	Fire pump fired with distillate oil.	300 horsepower heat output	Not applicable
#10	Industrial cooling tower	Not applicable	Not applicable
#11	Tank 001 – An aboveground storage tank with an internal floating roof. The tank will store ethanol.	200,000 gallons	Not applicable
#12	Tank 002 – An aboveground storage tank with an internal floating roof. The tank will store ethanol.	200,000 gallons	Not applicable
#13	Tank 003 – An aboveground storage tank with an internal floating roof. The tank will store gasoline.	200,000 gallons	Not applicable
#14	Tank 004 – An aboveground storage tank with an internal floating roof. The tank will store denatured ethanol.	1,500,000 gallons	Not applicable
#15	Tank 005 – An aboveground storage tank with an internal floating roof. The tank will store denatured ethanol.	1,500,000 gallons	Not applicable
#16	2009 Brock grain dryer, model #BCT6000, fired by natural gas.	68.2 million Btu per hour heat input and 226.6 tons of grain per	Not applicable

<b>Unit</b>	<b>Description</b>	<b>Maximum Operating Rate</b>	<b>Control Device</b>
		hour	
<b>#17</b>	Grain receiving. Trucks dump grain into receiving pits. Elevator legs transport grain to a storage bin.	560 tons of grain per hour	Not applicable
	Storage bin.	18,000,000 bushels per year	
<b>#18</b>	Tank 007 – An aboveground storage tank with an internal floating roof. The tank will store undenatured ethanol.	1,000,000 Gallons	Not Applicable

## 1.2 Proposed Changes

Aberdeen Energy submitted an application to DENR on April 28, 2015 to increase annual production or throughput capacity from 130 million gallons per year to 140 million gallons of undenatured ethanol per year. Aberdeen Energy proposed the following production increases:

1. Increase denaturant throughput from 3.2 million gallons per year to 3.5 million gallons per year;
2. Increase denatured ethanol throughput from 133.2 million gallons per year to 143.5 million gallons per year;
3. Increase corn processed from 1,358,209 tons per year (permit condition 8.10 limits corn processing to 1,360,000 tons per 12-month rolling period) to 1,462,687 tons per year;
4. Increase DDGS processed from 347,100 tons per year (permit condition 8.11 limits corn processing to 806,000 tons per 12-month rolling period) to 457,089.55 tons per year on a dry mass basis; and
5. Increase wet cake processed from 1,084,688 tons per year to 1,428,405 tons per year on a wet mass basis.

The proposed increase of annual production at the facility would require additional receipts and processing of corn, additional throughput of product through storage tanks, additional loadout of product to railcars or trucks, and shipping of additional DDGS/MDGS (modified/wet distillers grain with solubles) by truck.

Aberdeen Energy indicated that the proposed production increase will not include any physical changes at the facility.

## 2.0 New Source Performance Standards

DENR reviewed the New Source Performance Standards listed in 40 CFR Part 60 to determine if any of the federal New Source Performance Standards are applicable to the proposed changes for this facility. The following may be applicable:

## **2.1 Standards for Grain Elevators – Subpart DD**

The provisions under 40 CFR Part 60, Subpart DD is applicable to the following grain elevators:

1. The provisions of this subpart are applicable to any grain terminal elevator, which has a permanent grain storage capacity of 2,500,000 bushels. A grain terminal storage elevator means any grain elevator except those located at animal food manufacturers, pet food manufactures, cereal manufacturers, breweries, and livestock feedlots; or
2. The provisions of this subpart are applicable to any grain storage elevator, which has a permanent grain storage capacity of 1,000,000 bushels. A grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant; and
3. Commences construction, modification, or reconstruction after August 3, 1978.

Aberdeen Energy is considered a grain terminal elevator. Based on the last renewal and permit modifications, the permanent enclosed grain storage capacity of Aberdeen Energy is 1,023,000 bushels. Therefore, the permanent grain storage for this capacity is less than 2,500,000 bushels and this subpart is not applicable to Aberdeen Energy's increase in production.

## **2.2 Other Applicable New Source Performance Standards**

DENR reviewed the other New Source Performance Standards and determined that there are no other standards applicable to Aberdeen Energy's proposed changes.

## **3.0 New Source Review**

In accordance with ARSD 74:36:10:01, the New Source Review regulations apply to areas of the state which are designated as nonattainment pursuant to the Clean Air Act for any pollutant regulated under the Clean Air Act. This facility is located near Mina, South Dakota, which is in attainment or unclassifiable for all the criteria air pollutants regulated under the Clean Air Act. Therefore, Aberdeen Energy's proposed changes are not subject to a New Source Review.

## **4.0 Prevention of Significant Deterioration**

Any stationary source which emits or has the potential to emit 250 tons per year or more of any air pollutant is considered a major source and is subject to prevention of significant deterioration (PSD) requirements (ARSD 74:36:09 – 40 CFR. Part 52.21(b)(1)). Any stationary source which emits or has the potential to emit 100 tons per year or more of any air pollutant and is one of the 28 named PSD source categories is subject to PSD requirements (ARSD 74:36:09 – 40 CFR. Part 52.21(b)(1)). The following is a list of regulated pollutants under the PSD program:

1. Total suspended particulate (PM);
2. Particulate matter with a diameter less than or equal to 10 microns (PM<sub>10</sub>);

3. Particulate matter with a diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>);
4. Sulfur dioxide (SO<sub>2</sub>);
5. Nitrogen oxides (NO<sub>x</sub>);
6. Carbon monoxide (CO);
7. Ozone – measured as volatile organic compounds (VOC);
8. Lead;
9. Greenhouse gases (carbon dioxide, nitrous oxide, methane, etc.)
10. Fluorides;
11. Sulfuric acid mist;
12. Hydrogen sulfide;
13. Reduced sulfur compounds; and
14. Total reduced sulfur.

If the source is considered one of the 28 named PSD source categories listed in Section 169 of the Federal Clean Air Act, the major source threshold is 100 tons per year of any regulated air pollutant, except for greenhouse gases. The major source threshold for all other sources is 250 tons per year of any regulated air pollutant, except for greenhouse gases.

The Environmental Protection Agency (EPA) recently published and implemented a final rule that no longer lists ethanol plants as a chemical manufacturing plant. Therefore, Aberdeen Energy is not classified as a chemical manufacturing plant or one of the 28 listed source categories for PSD regulations and the major source threshold is 250 tons per year, except for greenhouse gases.

On June 24, 2014, the US Supreme Court decided greenhouse gases may not be regulated under the PSD program unless the facility requires a PSD permit for the other regulated air pollutants. Therefore, the greenhouse gas emissions from the proposed change will not be reviewed unless the proposed change is subject to a PSD review.

#### **4.1 Potential to Emit Criteria Pollutants**

DENR uses stack test results to determine air emissions whenever stack test data is available from the source or a similar source. When stack test results are not available, DENR relies on manufacturing data, material balance, EPA's Compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1) document, the applicant's application, or other methods to determine potential air emissions.

Currently, Aberdeen Energy has a production limit of 130 million gallons of undenatured ethanol while truck load out is limited to 110 million gallons of denatured ethanol during any 12-month rolling period as stated in the existing Title V air quality operating permit. In the application, Aberdeen Energy proposed to increase production to 140 million gallons of undenatured ethanol.

The production increase does not increase the potential emissions from the facility because potential emissions are based on the maximum design of the equipment. Since there is no physical change to the equipment and no increase in potential emissions, the proposed change will not change the permitting status of Aberdeen Ethanol. Aberdeen Ethanol is still considered a

major source under the title V air quality operating permit program and is not subject to a PSD review.

## **4.2 PSD Summary**

As long as compliance is maintained, Aberdeen Energy will continue to be considered a minor source under the PSD program. Based on the US Supreme Court's recent decision and since Aberdeen Energy is not applicable to the PSD program, a review for greenhouse gas emissions is not warranted or required.

## **5.0 National Emission Standards for Hazardous Air Pollutants**

DENR reviewed 40 CFR Part 61 to determine the applicability to the proposed changes to this facility to any of the subparts and determined that none are applicable.

## **6.0 Maximum Achievable Control Technology (MACT) Standards**

### **6.1 Potential Hazardous Air Pollutant (HAP) Emissions**

The federal Maximum Achievable Control Technology Standards are applicable to both major and area sources of HAPs. A major source of HAPs is defined as having the potential to emit 10 tons or more per year of a single HAP or 25 tons per year or more of a combination of HAPs. An area source is a source that is not a major source of HAPs. Aberdeen Energy is currently considered to be an area source of HAPs. HAP emission calculations were submitted with the application.

Potential HAP emissions are based on the maximum design capacity of the equipment. Since there will be no physical change to the equipment, Aberdeen Energy is still considered an area source of HAP emissions.

### **6.2 Chemical Processing Plants – Subpart FFFF**

On November 10, 2003, EPA finalized the maximum achievable control technology standard under 40 CFR Part 63, Subpart FFFF. This rule applies to the following chemical processing plants:

1. Those facilities that produce chemicals classified using the 1987 Standard Industrial Classification Manual of a code indicated by 282, 283, 284, 285, 286, 287, 289, or 386; and
2. Those facilities that are a major source of hazardous air pollutants. A major source of hazardous air pollutants has the potential to emit 10 tons of a single hazardous air pollutant and/or 25 tons of all hazardous air pollutants;

Aberdeen Energy's Standard Industrial Classification code is 2869, which falls underneath the code of 286. Aberdeen Energy has previously requested operational restrictions that maintain hazardous air pollutants emissions less than the major source threshold under the Title V air quality operating permit program. Aberdeen Energy did not propose any changes to the current hazardous air pollutant limits based on the proposed production increase. Aberdeen Energy operates control equipment that reduces the hazardous air pollutant emissions which will continue be made enforceable. Taking the enforceable limitations into account, the enforceable limitations are only applicable to the wet scrubbers, thermal oxidizers, etc. Currently, Aberdeen Energy is not applicable to this MACT standard and is considered an area source. The proposed production increase at Aberdeen Energy will not change applicability to this federal regulation.

### **6.3 Chemical Manufacturing Area Sources – Subpart VVVVVV**

On October 29, 2009, EPA finalized the MACT standard under 40 CFR Part 63, Subpart VVVVVV. This rule applies to all new or existing chemical manufacturing process units located at an area source of hazardous air pollutants that meet the following:

1. The chemical manufacturing process unit uses as feedstock, generates as byproducts, or produces as products any of the hazardous air pollutants listed in Table 1 of the subpart;
2. The chemical manufacturing process unit is located at an area source of hazardous air pollutants; and
3. The hazardous air pollutants listed in the Table of the subpart are present in the feedstock or generated or produced in the chemical manufacturing process unit and present in process fluid, at concentrations greater than 0.1 percent for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR § 1910.1200(d)(4), and greater than 1.0 percent for non-carcinogens.

A chemical manufacturing process unit includes all process vessels, equipment, and activities necessary to operate a chemical manufacturing process that produces a material or a family of materials described by North American Industry Classification System (NAICS) code 325. A chemical manufacturing process unit consists of one or more unit operations and any associated recovery devices. It also includes each storage tank, transfer operation, surge control vessel, and bottoms receiver associated with the production of such NAICS code 325 materials. NAICS code 325193 – Ethyl Alcohol Manufacturing, is comprised primarily in manufacturing denatured alcohol and non-potable ethyl alcohol, ethanol, or grain alcohol. An existing chemical manufacturing process unit is defined as a chemical manufacturing facility where construction or reconstruction occurred prior to October 6, 2008.

Aberdeen Energy's operations were constructed in 2007 and produces non-potable ethanol. Aberdeen Energy is considered an existing area source and produces acetaldehyde as a byproduct during its operations, which is considered a carcinogenic. Subpart VVVVVV requires that concentration of carcinogenic compounds be equal to or less than 0.1 percent.

On September 4, 2013, Aberdeen Energy submitted documentation of testing of acetaldehyde in their stack tests and using industry standards, they show their process concentrations are less than 0.06 parts per million which is less than 0.1%. Therefore, this subpart is not applicable to

Aberdeen Energy and the proposed changes at Aberdeen Energy will not change applicability to this federal regulation.

#### **6.4 Non-Gasoline Organic Liquids Distribution – Subpart EEEE**

On November 10, 2003, EPA finalized this MACT standard under 40 CFR Part 63. This rule applies to the following chemical processing plants

1. Those facilities that produce chemicals classified using the 1987 Standard Industrial Classification Manual of a code indicated by 282, 283, 284, 285, 286, 287, 289, or 386; and
2. Those facilities that are a major source of hazardous air pollutants. A major source of hazardous air pollutants has the potential to emit 10 tons of a single hazardous air pollutant and/or 25 tons of all hazardous air pollutants.

Aberdeen Energy's Standard Industrial Classification code is 2869, which falls underneath the code of 286. Aberdeen Energy's current permit has an emission limitation that requires Aberdeen Energy to maintain its hazardous air pollutant emissions below the major source thresholds. The proposed production increase at Aberdeen Energy will not change applicability to this federal regulation. Currently, Aberdeen Energy is not applicable to this MACT standard. The proposed production increase at Aberdeen Energy will not change applicability to this federal regulation.

#### **6.5 Applicable MACT Standards**

DENR reviewed 40 CFR Part 63 to determine the applicability for the proposed changes to this facility to any of the subparts and determined that no additional subparts are applicable.

### **7.0 State Requirements**

Aberdeen Energy's existing operations are covered under a Title V air quality operating permit. In accordance with ARSD 74:36:20:01, a construction permit is required for all modifications to an existing source. There are exemptions to this rule under ARSD 74:36:20:04, but the proposed operational change is not exempt because the proposed change will increase emissions.

#### **7.1 State Particulate Matter and Sulfur Dioxide Emission Limits**

In accordance with ARSD 74:36:06:02 and 74:36:06:03, establish state emission limits for total suspended particulate matter and sulfur dioxide. In addition, ARSD 74:36:12:01 establishes a visible emission limit of 20 percent opacity for each unit. The proposed changes at Aberdeen Energy will not affect currently applicability to either the state particulate matter or sulfur dioxide emission limits.

## 7.2 Performance Tests

Aberdeen Energy has previously requested limits and conducted performance testing to prove compliance with the permitted short-term limits. The permit will contain a facility limit of 238 tons per year for particulate matter, nitrogen oxide, volatile organic compounds, and carbon monoxide for Aberdeen Energy's operations.

*Table 7-1 – Summary of Stack Test Results*

Date	Unit	Pollutant	Results	Current Limit	Percent
Feb. 2015	#3	VOC/HAPs	<7.14 pounds per hour	15.0 pounds per hour	47.6%
	#4	VOC/HAPs	0.011 pounds per ton DDGS	0.15 pounds per ton DDGS	7.3%
March 2013	#5	VOC/HAPs	<0.18 pounds per hour	4.0 pounds per hour	4.5%

Previous stack testing was conducted at a production rate of 130 million gallons per year of undenatured ethanol which is less than 90% of the proposed increases at the facility which is why stack testing will be required.

Although, recent stack testing at Aberdeen Energy indicates compliance the facility will be required to test for the following criteria air pollutants due to proposed production increase:

1. Units #3, #4, and #5: volatile organic compounds.

## 8.0 Recommendation

Any source operating in South Dakota that meets the definition of a major source for any criteria pollutant is required to obtain a Title V air quality operating permit. A major source is defined as having the potential to emit greater than 100 tons per year of a criteria pollutant or greater than or equal to 10 tons per year of a single hazardous air pollutant, or greater than or equal to 25 tons per year of a combination of hazardous air pollutants. In addition, sources subject to federal New Source Performance Standards or national emission standards for hazardous air pollutants must obtain a Title V air quality operating permit, unless otherwise noted in the state or federal rule.

Aberdeen Energy's potential emissions are greater than the major source threshold for criteria air pollutants and subject to several New Source Performance Standards and Maximum Achievable Control Technology Standards. Therefore, Aberdeen Energy is required to operate under a Title V air quality operating permit. To change operational limitations in the current Title V air quality operating permit, Aberdeen Energy proposed to increase production by obtaining construction permit #28.0502-26-04C. Although Aberdeen Energy did not request changes in the maximum operating rates for Units #2 and #4, DENR recommends increasing the maximum operating rates of those units that are shown in the permit.

Based on the above findings, Aberdeen Energy's construction permit #28.0502-26-04C is required to construct and operate within the requirements stipulated in the following regulations:

1. ARSD 74:36:06 – Regulated Air Pollutant Emissions;
2. ARSD 74:36:08 – National Emission Standards for Hazardous Air Pollutants;
3. ARSD 74:36:11 – Stack Performance Testing;
4. ARSD 74:36:12 – Control of Visible Emissions; and
5. ARSD 74:36:13 - Continuous emission monitoring systems.

Based on the information submitted in the air quality permit application, DENR recommends conditional approval to issue construction permit #28.0502-26-04C. Any questions pertaining to this permit recommendation should be directed to Ashley Brakke, Engineer II, South Dakota Department of Environment and Natural Resources.