

# Minnesota Pollution Control Agency

REB:

January 2, 2004

Mr. James F. Freeman, III  
Chief Executive Officer  
Gopher State Ethanol  
882 West 7<sup>th</sup> Street  
St. Paul, Minnesota 55102

RE: **Notice of Verification** for the July 24-25, 2003, Performance Test on Gopher State Ethanol's DDGS Storage Baghouse Pursuant to EPA/State Consent Decree and MPCA Test Plan Approval Letter, Dated, September 4, 2003

Dear Mr. Freeman:

Minnesota Pollution Control Agency (MPCA) staff has reviewed the final test report for the test conducted on the emission unit referenced above at the Gopher State Ethanol (GSE) facility located in St. Paul, Minnesota. The test report, received on September 9, 2003, was not reviewed by MPCA staff until late December 2003, following the completion of the GSE control feasibility analysis.

MPCA staff has determined that the test results demonstrate the following under test conditions:

**SUMMARY OF PERFORMANCE TEST RESULTS**

<b>Emission Unit Tested</b>	<b>Limitation Basis</b>	<b>Pollutant</b>	<b>Test Result (lbs./hr. unscaled)</b>	<b>Compliance Status</b>
DDGS Storage Baghouse (SV009)	EPA/State Consent Degree	Volatile Organic Carbons (VOC)	Volatile Organic Carbons (VOC) <ul style="list-style-type: none"> <li>• Tot. VOC = 1.1</li> <li>• Acetaldehyde = &lt;0.07</li> <li>• Acrolien = &lt;0.20</li> <li>• Methanol = &lt;0.07</li> <li>• Ethanol = 1.29</li> <li>• Acetic Acid = 0.15</li> <li>• 2-Furaldehyde = 0.08</li> <li>• Lactic Acid = 0.25</li> <li>• Ethyl Acetate = 0.04</li> <li>• Formaldehyde = 0.04</li> </ul>	<b>Verified</b>
DDGS Storage Baghouse (SV009)	EPA/State Consent Degree	Particulate Matter (PM)	Particulate Matter (PM) 0.9 lbs./hr.	<b>Verified</b>

Note: VOC results reported above, determined as Carbon, are the average of three consecutive test runs.

Table References:

- (A) Filterable particulate matter as determined by United States Environmental Protection Agency (EPA) Method 5.
- (B) Total hydrocarbons as determined by United States Environmental Protection Agency (EPA) Method 25A.
- (C) Speciated VOC/HAPS as determined by United States Environmental Protection Agency (EPA) Method 18/NCASI 98.01 employing Methods 1-5 isokinetically.

1. The tests were conducted with an average beer feed rate 240.4 gal/min. and a syrup feed rate of 32.92 gal/min. These parameters are within the ranges defined in the approved test.

Mr. James F. Freeman, III

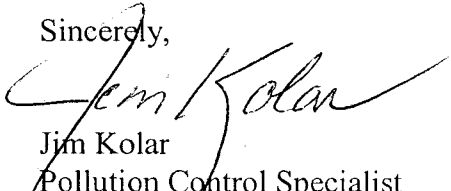
Page 3

2. If an operating/production limit is exceeded, it must be reported in accordance with the deviation reporting requirements of Minn. R. 7007.0800, subp. 6(A).
3. The operating conditions met the worst-case operating condition as defined in the approved test plan. However, please be aware that should operating practices change such that the current definition of worst-case becomes outdated, the MPCA may require a performance test at the new worst-case condition.
4. The Emission Inventory rule, Minn. R. 7019.3000-7019.3100. requires the calculation of emissions based on an established hierarchy. In the absence of Continuous Emission Monitor (CEM) data meeting the requirements of Minn. R. 7019.3040, the next method of calculation, a performance test, must be used. When a performance test for particulate matter, particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers, carbon monoxide, nitrogen oxides, sulfur oxides, volatile organic compounds or lead is conducted and meets the requirements of Minn. R. 7017.2001-7017.2060, the results must be used to calculate emissions, unless specified otherwise by Minn. R. 7019.3000-7019.3100. It is the Company's responsibility to ensure the results of performance tests are accounted for in their annual emission inventory submittal. Note that the final decision to approve the emission factor for any given inventory year will be made by the Emission Inventory Coordinator.

If you have questions or comments regarding the content of this letter, please contact me at (651) 297-8663.

Your continued cooperation is appreciated.

Sincerely,



Jim Kolar  
Pollution Control Specialist  
Majors Water and Land Section  
Majors and Remediation Division

JK:lh

cc: Bob Berg, MPCA  
Darryl Weakley, MPCA  
David Beil, MPCA  
AQD Correspondence File No. 1353