



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 08-04789**

**Fac ID: 0857041124**

**DATE: 9/11/2007**

Cargill Inc  
Angie Duvall  
3201 Needmore Rd  
Dayton, OH 45414-0000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



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**Permit To Install  
Terms and Conditions**

**Issue Date: 9/11/2007  
Effective Date: 9/11/2007**

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**FINAL PERMIT TO INSTALL 08-04789**

Application Number: 08-04789  
Facility ID: 0857041124  
Permit Fee: **\$2250**  
Name of Facility: Cargill Inc  
Person to Contact: Angie Duvall  
Address: 3201 Needmore Rd  
Dayton, OH 45414-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3201 Needmore Rd  
Dayton, Ohio**

Description of proposed emissions unit(s):

**Chapter 31 modification replacing PTI 08-04215 issued 7/10/01 for B006 only to increase emissions.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

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## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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**4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **12. Air Pollution Nuisance**

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The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing

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of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
SO <sub>2</sub>	9.80
CO	114.9
VOC	7.52
Particulates	11.0
NO <sub>x</sub>	279

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. Nitrogen Oxides (NO<sub>x</sub>) Budget Trading Program

OAC Chapter 3745-14

- a. In restating the applicable requirements of this Chapter, it is not the Agency's intent to make these requirements, in any way, more stringent than the rules.
- b. The following regulated non-electrical generating units are subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NO<sub>x</sub> allowance allocations listed below:

Emissions Unit	Annual Allowance for Calendar Years 2004 through 2007
B004 - Coal Boiler	131
B006 - Boiler #4	1

- c. The emissions units identified in Section A.1.b above are NO<sub>x</sub> budget units under OAC rule 3745-14-01(C)(1).
- d. The NO<sub>x</sub> authorized account representative shall submit a complete NO<sub>x</sub> budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NO<sub>x</sub> authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NO<sub>x</sub> budget permit application and issue or deny a NO<sub>x</sub> budget permit.
- e. Beginning May 31, 2004, the owners and operators of each NO<sub>x</sub> budget source and each NO<sub>x</sub> budget unit at the source shall hold NO<sub>x</sub> allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NO<sub>x</sub> allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NO<sub>x</sub> emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.

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- f. NO<sub>x</sub> allowances shall be held in, deducted from, or transferred among NO<sub>x</sub> allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.
- g. A NO<sub>x</sub> allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NO<sub>x</sub> allowance was allocated.
- h. Each ton of NO<sub>x</sub> emitted in excess of the NO<sub>x</sub> budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NO<sub>x</sub> budget unit that has excess emissions in any control period shall surrender the NO<sub>x</sub> allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.
- i. When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NO<sub>x</sub> allowance to or from a NO<sub>x</sub> budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NO<sub>x</sub> budget permit of the NO<sub>x</sub> budget unit by operation of law without any further review.
- j. Except as provided below, the Director shall revise the NO<sub>x</sub> budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NO<sub>x</sub> budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NO<sub>x</sub> allowance to or from the compliance accounts of the NO<sub>x</sub> budget units covered by the permit or the overdraft account of the NO<sub>x</sub> budget source covered by the permit.

- k. The owner or operator of a NO<sub>x</sub> budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).
- l. The owners and operators of the NO<sub>x</sub> budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)
  - i. the account certificate of representation for the NO<sub>x</sub> authorized account representative for the NO<sub>x</sub> budget unit and all documents that demonstrate the truth of the statements in the account certificate of

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representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NO<sub>x</sub> authorized account representative;

- ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;
  - iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NO<sub>x</sub> budget trading program; and
  - iv. copies of all documents used to complete a NO<sub>x</sub> budget permit application and any other submission under the NO<sub>x</sub> budget trading program or to demonstrate compliance with the requirements of the NO<sub>x</sub> budget trading program.
- m. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NO<sub>x</sub> emission rate, NO<sub>x</sub> concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72.

The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

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- n. The owner or operator of a unit that is not subject to an Acid Rain emissions limitation shall comply with the requirements of 40 CFR 75.62, except that the monitoring plan is only required to include the information required by Subpart H of 40 CFR Part 75.
- o. The NO<sub>x</sub> authorized account representative of the NO<sub>x</sub> budget unit shall submit the reports and compliance certifications required under the NO<sub>x</sub> budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.
- p. Each submission under the NO<sub>x</sub> budget trading program shall be submitted, signed, and certified by the NO<sub>x</sub> authorized account representative for each NO<sub>x</sub> budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NO<sub>x</sub> authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NO<sub>x</sub> budget sources or NO<sub>x</sub> budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NO<sub>x</sub> authorized account representative for a NO<sub>x</sub> budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.

- q. The NO<sub>x</sub> authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NO<sub>x</sub> budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October

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30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.

- r. The NO<sub>x</sub> authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
  - i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
  - ii. for a unit with add-on NO<sub>x</sub> emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NO<sub>x</sub> emissions.
- s. The NO<sub>x</sub> authorized account representative for a NO<sub>x</sub> budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NO<sub>x</sub> authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.
- t. For each control period in which one or more NO<sub>x</sub> budget units at a source are subject to the NO<sub>x</sub> budget emission limitation, the NO<sub>x</sub> authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units.

The NO<sub>x</sub> authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NO<sub>x</sub> budget emission limitation for the control period covered by the report:

- i. identification of each NO<sub>x</sub> budget unit;
- ii. at the NO<sub>x</sub> authorized account representative's option, the serial numbers of the NO<sub>x</sub> allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;

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- iii. at the NO<sub>x</sub> authorized account representative's option, for units sharing a common stack and having NO<sub>x</sub> emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
  - iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.
- u. In the compliance certification report under Section A.1.t.iv above, the NO<sub>x</sub> authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NO<sub>x</sub> budget units at the source in compliance with the NO<sub>x</sub> budget trading program, whether each NO<sub>x</sub> budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NO<sub>x</sub> budget trading program applicable to the unit, including all the following:
- i. whether the unit was operated in compliance with the NO<sub>x</sub> budget emission limitation;
  - ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NO<sub>x</sub> emissions to the unit, in accordance with OAC rule 3745-14-08;
  - iii. whether all the NO<sub>x</sub> emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
  - iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.

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If a change is required to be reported under Section A.1.u.iv above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.

- v. The NO<sub>x</sub> authorized account representative shall submit a complete NO<sub>x</sub> budget permit renewal application for the NO<sub>x</sub> budget source covering the NO<sub>x</sub> budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.
- w. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NO<sub>x</sub> budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.
- x. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NO<sub>x</sub> monitoring system designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on-site and available for inspection during regular office hours.
- y. The NO<sub>x</sub> authorized account representative of the NO<sub>x</sub> budget units at this facility may submit a petition under 40 CFR 75.66 to the Director and the Administrator requesting approval to apply an alternative to any requirement of the NO<sub>x</sub> Budget Trading Program.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment - (B006) - 318.5 MMBtu/hr Natural Gas and No. 2 Oil-Fired CB Package Boiler 4**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	<p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.1 lb/mmBtu of actual heat input.</p> <p>Carbon monoxide (CO) emissions shall not exceed 26.21 lbs/hr and 114.9 tons per year (TPY) as a rolling, 12-month summation.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 1.72 lbs/hr and 7.52 TPY as a rolling, 12-month summation.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 279 TPY as a rolling, 12-month summation.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Db and OAC rules 3745-17-10(B)(1), 3745-21-08(B) and 3745-31-05(C).</p>
OAC rule 3745-31-05(C)	<p>SO<sub>2</sub> emissions shall not exceed 9.80 TPY as a rolling, 12-month summation.</p> <p>Particulate emissions (PE) shall not exceed 11.0 TPY as a rolling, 12-month summation.</p>
OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.
40 CFR Part 60, Subpart Db	<p>NO<sub>x</sub> emissions shall not exceed 0.20 lb/mmBtu of actual heat input, as a 30-day rolling average.</p> <p>Visible PE shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of no more than 27% opacity.</p>
OAC rule 3745-17-07(A)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60, Subpart Db.

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OAC rule 3745-18-06(D)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See Section A.I.2.b below.
OAC rules 3745-31-21 through 3745-31-27 (non-attainment New Source Review)	See Section A.I.2.c below.

## 2. Additional Terms and Conditions

**2.a** The 26.21 lbs CO/hour and 1.72 lbs VOC/hour emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these emissions limitations.

**2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

**2.c** The requirements of non-attainment New Source Review (NSR) are applicable but non-compliance with NSR is resolved through the Consent Decree, *United States v. Cargill, Incorporated*, (Civil Action No. 05-2037 JMR/FLN), which was lodged with the United States District Court for the District of Minnesota on September 1, 2005.

## II. Operational Restrictions

1. The annual No. 2 fuel oil usage for this emissions unit shall not exceed 1,150,000 gallons based upon a rolling, 12-month summation of the No. 2 fuel oil usage rates.
2. The maximum sulfur content of the fuel oil burned in this emissions unit shall not exceed 0.1%, by weight.
3. The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

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### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following:
  - a. An identification of each type of fuel burned.
  - b. The amount of each fuel type burned, in gallons for No. 2 fuel oil, and in mmcf for natural gas.
2. The permittee shall maintain monthly records of the following:
  - a. The rolling, 12-month summation of natural gas usage, in mmcf.
  - b. The rolling, 12-month summation of the No. 2 fuel oil usage, in gallons.
  - c. The monthly PE, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emissions rates, in tons.
  - d. The rolling, 12-month summation of the PE, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emissions rates, in tons.
3. The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO<sub>x</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the director (the Regional Air Pollution Control Agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

4. The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

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- a. emissions of NO<sub>x</sub> in parts per million on an instantaneous (one-minute) basis;
  - b. emissions of NO<sub>x</sub> in all units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits or linearity checks;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-

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Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.

6. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month No. 2 fuel oil usage limitation.
  - b. All exceedances of the fuel oil sulfur content limitation.
  - c. All exceedances of the rolling, 12-month PE, NO<sub>x</sub>, SO<sub>2</sub>, CO, and/or VOC emissions limitations.

These reports are due by the date prescribed in Part I - General Terms and Conditions of this permit under section (A)(1).

2. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit quarterly reports by January 31, April 30, July 31, and October 31 of each year to the Regional Air Pollution Control Agency, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.
  - b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - iii. the location of the continuous NO<sub>x</sub> monitor;

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- iv. the exceedance report as detailed in (a) above;
- v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits or linearity checks;
- ix. results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

\* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emission Limitation -

SO<sub>2</sub> emissions shall not exceed 0.1 lb/mmBtu of actual heat input.

Applicable Compliance Method -

When firing natural gas, compliance with the emissions limitation may be determined by dividing the emission factor 0.6 lb SO<sub>2</sub>/mmcf (AP-42, Table 1.4-2, 7/98) by 1,020 mmBtu/mmcf.

When firing No. 2 fuel oil, compliance may be determined by the monitoring and record keeping requirements specified in A.III.5 of this permit.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 6.

b. Emission Limitation -

CO emissions shall not exceed 26.21 lbs/hr.

Applicable Compliance Method -

When firing natural gas, compliance with the emissions limitation may be determined by multiplying the maximum hourly heat input of the emissions unit (318.5 mmBtu/hr) by the emission factor 84 lb CO/mmcf (AP-42, Table 1.4-1, 7/98) and dividing by 1,020 mmBtu/mmcf.

When firing No. 2 fuel oil, compliance with the emissions limitation may be determined by multiplying the maximum hourly heat input of the emissions unit (318.5 mmBtu/hr) by the emission factor 5 lb CO/1000 gal (AP-42, Table 1.3-1, 9/98) and dividing by 137 mmBtu/1000 gal.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 10.

c. Emission Limitation -

CO emissions shall not exceed 114.9 TPY as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and shall be determined by:

- i. multiplying the natural gas usage for the month by the emission factor 84 lb CO/mmcf (AP-42, Table 1.4-1, 7/98) and dividing by 2000 lbs/ton.

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- ii. multiplying the No. 2 fuel oil usage for the month by the emission factor 5 lb CO/1000 gal (AP-42, Table 1.3-1, 9/98) and dividing by 2000 lbs/ton.
- iii. the rolling, 12-month CO emission rate shall be the sum of i and ii above for the rolling, 12-month period.

- d. Emission Limitation -  
VOC emissions shall not exceed 1.72 lbs/hr.

Applicable Compliance Method -

When firing natural gas, compliance with the emissions limitation may be determined by multiplying the maximum hourly heat input of the emissions unit (318.5 mmBtu/hr) by the emission factor 5.5 lb VOC/mmcf (AP-42, Table 1.4-2, 7/98) and dividing by 1,020 mmBtu/mmcf.

When firing No. 2 fuel oil, compliance with the emissions limitation may be determined by multiplying the maximum hourly heat input of the emissions unit (318.5 mmBtu/hr) by the emission factor 0.2 lb VOC/1000 gal (AP-42, Table 1.3-3, 9/98) and dividing by 137 mmBtu/1000 gal.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 18, 25 or 25A, as appropriate.

- e. Emission Limitation -  
VOC emissions shall not exceed 7.52 TPY as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and shall be determined by:

- i. multiplying the natural gas usage for the month by the emission factor 5.5 lb VOC/mmcf (AP-42, Table 1.4-2, 7/98) and dividing by 2000 lbs/ton.
- ii. multiplying the No. 2 fuel oil usage for the month by the emission factor 0.2 lb VOC/1000 gal (AP-42, Table 1.3-3, 9/98) and dividing by 2000 lbs/ton.
- iii. the rolling, 12-month VOC emission rate shall be the sum of i and ii above for the rolling, 12-month period.

- f. Emission Limitation -

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NO<sub>x</sub> emissions shall not exceed 279 TPY as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and A.III.4.

g. Emission Limitation -

SO<sub>2</sub> emissions shall not exceed 9.80 TPY as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and shall be determined by:

- i. multiplying the natural gas usage for the month by the emission factor 0.6 lb SO<sub>2</sub>/mmcf (AP-42, Table 1.4-2, 7/98) and dividing by 2000 lbs/ton.
- ii. multiplying the No. 2 fuel oil usage for the month by the emission factor determined by the monitoring and record keeping requirements specified in A.III.5 of this permit and dividing by 2000 lbs/ton.
- iii. the rolling, 12-month SO<sub>2</sub> emission rate shall be the sum of i and ii above for the rolling, 12-month period.

h. Emission Limitation -

PE shall not exceed 11.0 TPY as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and shall be determined by:

- i. multiplying the natural gas usage for the month by the emission factor 7.6 lb PE/mmcf (AP-42, Table 1.4-2, 7/98) and dividing by 2000 lbs/ton.
- ii. multiplying the No. 2 fuel oil usage for the month by the emission factor 2 lb PE/1000 gal (AP-42, Table 1.3-1, 9/98) and dividing by 2000 lbs/ton.
- iii. the rolling, 12-month PE emission rate shall be the sum of i and ii above for the rolling, 12-month period.

i. Emission Limitation -

PE shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method -

When firing natural gas, compliance with the emissions limitation may be determined by dividing the emission factor 7.6 lb PE/mmcf (AP-42, Table 1.4-2, 7/98) by 1,020 mmBtu/mmcf.

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When firing No. 2 fuel oil, compliance with the emissions limitation may be determined by dividing the emission factor 2 lb PE/1000 gal (AP-42, Table 1.3-1, 9/98) by 137 mmBtu/1000 gal.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 5.

- j. Emission Limitation -  
NO<sub>x</sub> emissions shall not exceed 0.20 lb/mmBtu of actual heat input, as a 30-day rolling average.

Applicable Compliance Method -  
Compliance with the emissions limitation shall be based upon record keeping specified in A.III.2 and A.III.4.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 7.

- k. Emission Limitation -  
Visible PE shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of no more than 27% opacity.

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Applicable Compliance Method -

If required, compliance shall be determined by visible emission evaluations performed using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

1. The terms for emissions unit B006 in this permit supercede those identified in PTI 08-04215 issued 7/10/2001 and represents 9.8 TPY increase in PE, 0.5 TPY increase in SO<sub>2</sub> emissions, 157.7 TPY increase in NO<sub>x</sub> emissions, 64.2 increase in CO emissions and 4.2 TPY increase in VOC emissions.

This modification is performed in accordance with the Consent Decree entered on March 3, 2006. The Consent Decree also requires Cargill to install controls to reduce NO<sub>x</sub> emissions to 0.06 lb/mmBtu (83.7 TPY) by March 3, 2011. This will reduce NO<sub>x</sub> emissions by 40.6 TPY from the limits included in PTI 08-04215 issued 7/10/2001.

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment - (B006) - 318.5 MMBtu/hr Natural Gas and No. 2 Oil-Fired CB Package Boiler 4**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit B006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane

TLV (mg/m<sup>3</sup>): 176.24

Maximum Hourly Emission Rate (lbs/hr): 0.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.92

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MAGLC (ug/m3): 4,196

2. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

#### **IV. Reporting Requirements**

1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None