



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/14/2014

Certified Mail

Loren Keske
Bunge North America (East) LLC
751 East Farming Street
Marion, OH 43302

Facility ID: 0351010002
Permit Number: P0115024
County: Marion

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 12/9/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office



Response to Comments

Facility ID:	0351010002
Facility Name:	Bunge North America (East) LLC
Facility Description:	Soybean Oil Mills
Facility Address:	751 EAST FARMING STREET MARION, OH 43302 Marion County
Permit:	P0115024, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Marion Star on 12/12/2013. The comment period ended on 01/11/2014.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: None



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for Bunge North America (East) LLC

Facility ID:	0351010002
Permit Number:	P0115024
Permit Type:	Renewal
Issued:	1/14/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Bunge North America (East) LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	11
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	19
1. F002, 0351010002F002.....	20
2. F003, 0351010002F003.....	23
3. F004, 0351010002F004.....	25
4. F005, 0351010002P902.....	30
5. P025, 0351010002P025	33
6. P027, 0351010002P027	36
7. P901, 0351010002P901	39
8. P903, 0351010002P903	44
9. P905, 0351010002P905	48
10. P906, 0351010002P906	54



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0351010002
Facility Description: Soybean Oil Mills
Application Number(s): A0048113
Permit Number: P0115024
Permit Description: Renewal Title V operating permit for a soybean oil mill facility.
Permit Type: Renewal
Issue Date: 1/14/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0108265

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bunge North America (East) LLC
751 EAST FARMING STREET
MARION, OH 43302

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director



Preliminary Proposed Title V Permit
Bunge North America (East) LLC
Permit Number: P0115024
Facility ID: 0351010002
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:
 - (1) 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.
 - (2) 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 paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Ohio EPA DAPC, Northwest District Office 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit
Bunge North America (East) LLC
Permit Number: P0115024
Facility ID: 0351010002
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

1. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

a) P048 - north elevator central vacuum cleaning system.

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P903 and P905 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR, Part 64)



Preliminary Proposed Title V Permit
Bunge North America (East) LLC
Permit Number: P0115024
Facility ID: 0351010002
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F002, 0351010002F002

Operations, Property and/or Equipment Description:

Column grain dryer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.
c.	OAC rule 3745-31-05 (PTI #03-5261, issued 10/5/00)	4.94 lbs fugitive particulate emissions (PE)/hour and 12.40 tons fugitive PE/yr 4.84 lbs nitrogen oxides (NOx)/hour and 12.20 tons NOx/yr See b)(2)c. and b)(2)d.
d.	40 CFR, Part 60, Subpart DD	See b)(2)e.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The 4.18 pounds fugitive PE/hour and 2.88 lbsNOx/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

d. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the use of column plate perforations not to



exceed 0.078 inch in diameter, compliance with the terms and conditions of this permit and compliance with 40 CFR Part 60, Subpart DD.

- e. The emission limitation established by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

c) **Operational Restrictions**

- (1) The permittee shall not operate this emissions unit more than 5040 hours per rolling, 12-month period.

[OAC rule 3745-77-07(A)(1) and PTI #03-5261]

- (2) The permittee shall not dry more than 90 tons per hour in this emission unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-5261]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following daily records for this emissions unit:

- a. the total hours the emissions unit was in operation;
- b. the total material throughput, in tons/day; and
- c. the average hourly production rate [d)(1)a. divided by d)(1)b.].

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the operating hours for each month; and
- b. the rolling, 12-month numbers of the operating hours.

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

e) **Reporting Requirements**

- (1) The company shall submit semi-annual reports to the NWDO, Division of Air Pollution Control, summarizing the information for terms and conditions d)(1) and d)(2).

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

f) **Testing Requirements**

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:



a. Emission Limitations:

4.94 lbs fugitive PE/hr and 12.40 tons fugitive PE/yr

Applicable Compliance Method:

Compliance may be determined as follows:

- i. multiply the maximum hourly throughput (tons/hour) by the emission factor from AP-42, Table 9.9.1-1 (revised 5/98) of 0.22 pound PE/ton by a control factor of $(1-0.9)^*$;
- ii. multiply the maximum hourly natural gas combustion rate (mm cu. ft./hour) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 pounds PE (filterable)/mm cu. ft.; and
- iii. $\text{sum f}(1).i + \text{f}(1).ii$.

*The control efficiency of the perforations is assumed to be 90%.

The annual limitation was developed by multiplying the lbs/hr limitation by the maximum annual operating schedule of 5040 hrs/yr, and then dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

b. Emission Limitations:

4.84 lbsNOx/hr and 12.20 tons NOx/yr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hour) by the emission factor from AP-42, Table 1.4-1 (revised 3/98) of 100 pounds NOx/mm cu. ft.

If required, compliance with the hourly NOx emission limitation shall be determined pursuant to Methods 1-5 and 7, 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr limitation by the maximum annual operating schedule of 5040 hrs/yr, and then dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-5261]

g) Miscellaneous Requirements

- (1) None.



2. F003, 0351010002F003

Operations, Property and/or Equipment Description:

grain rail and truck loadout

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emission unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



3. F004, 0351010002F004

Operations, Property and/or Equipment Description:

grain storage pile

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3) (PTI #03-13342, issued 7/20/06)	0.66 ton fugitive particulate emissions (PE)/year from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile and wind erosion from the grain (corn) storage pile no visible emissions, except for one minute during any one-hour observation period from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile. no visible emissions, except for one minute during any one-hour observation period from wind erosion from the grain (corn) storage pile. utilization of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from grain (corn) receiving, load-in and load-out of the grain (corn) storage pile [See Sections b)(2)c., b)(2)d. and b)(2)g.] utilization of best available control measures that are sufficient to minimize



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		or eliminate visible emissions of fugitive dust from wind erosion from the grain (corn) storage pile [See Sections b)(2)e. through b)(2)g.]

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- c. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the use of "choked flow" while unloading to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for the load-in and load-out operations of the storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- e. The permittee shall employ best available control measures for wind erosion from the surface of the storage pile for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining a low storage pile height to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measure(s) shall be employed for wind erosion from the storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary if the storage pile is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.



- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 100,800 tons of grain.

[OAC rule 3745-77-07(A)(1) and PTI #03-13342]

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the load-in operation at the storage pile on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of the load-out operation at the storage pile on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from the storage pile surface on a weekly basis.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (4) No inspection shall be necessary for wind erosion from the surface of the storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of the storage pile, and wind erosion from the surface of the storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]



- (7) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the quantity, in tons, of grain (corn) received and stored; and,
 - b. the total year-to-date quantity, in tons, of grain (corn) received and stored [the sum of "a" for each month].

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- (8) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and,
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(8)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]



- (2) The permittee shall submit annual reports that summarize the annual throughput for this emissions unit. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.66 ton fugitive PE/year

Applicable Compliance Method: The permittee shall calculate the annual emission rate by multiplying the tons grain/year [from d)(7)b.] by an emission factor of 0.013 pound PE/ton (as there is no emissions factor for this type of operation, the emission factor from AP-42 Table 13.2.4 (revised 1/95) for aggregate storage piles was assumed to be a worst-case scenario).

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

- b. Emission Limitation: no visible emissions, except for one minute during any one-hour observation period

Applicable Compliance Method: Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #03-13342]

g) Miscellaneous Requirements

- (1) None.



4. F005, 0351010002P902

Operations, Property and/or Equipment Description:

elevator rail receiving

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17131, issued 2/1/07)	18.92 tons fugitive particulate emissions (PE)/yr 4.61 tons fugitive particulate matter less than 10 microns in size (PM10)/yr See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.
d.	40 CFR, Part 60, Subpart DD	See b)(2)d.

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of an enclosure, compliance with the terms and conditions of this permit, and compliance with 40 CFR Part 60, Subpart DD.

b. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

c. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

d. The permittee shall not cause to be discharged into the atmosphere any fugitive emission from:



- b. any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-17131]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-17131, issued on February 1, 2007: **[e)(1)b.]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 18.92 tons fugitive PE/yr

Applicable Compliance Method: The tons of fugitive PE/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.032 lb PE/ton, the maximum hourly throughput rate of 450 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

- b. Emission Limitation: 4.61 tons fugitive PM10/yr

Applicable Compliance Method: The tons of fugitive PM10/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.0078 lb PM10/ton, the maximum hourly throughput rate of 450 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

- c. Emission Limitation: The permittee shall not cause to be discharged into the atmosphere any fugitive emission from any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



5. P025, 0351010002P025

Operations, Property and/or Equipment Description:

north storage aspiration

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)b.
b.	OAC rule 3745-17-11(B)	73.0 lbs particulate emissions(PE)/hour
c.	40 CFR, Part 60, Subpart DD	See b)(2)c.

(2) Additional Terms and Conditions

- a. The permittee shall employ a baghouse to control all PE from this emissions unit.
- b. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart DD.
- c. The permittee shall not cause to be discharged into the atmosphere any fugitive emission from:
 - i. any grain handling operation which exhibits greater than 10 percent opacity.
- d. Pursuant to Consent Order No. 2:06 CV-02209-MPM-DGB, as filed on January 16, 2007 and modified on June 30, 2010, the outlet concentration of PE from baghouse stack serving this emissions unit shall be limited to 0.010 grain per dry standard cubic foot (dscf) of exhaust gases.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible PE were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible PE.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

- b. Emission Limitation: The permittee shall not cause to be discharged into the atmosphere any fugitive emission from: any grain handling operation which exhibits greater than 10 percent opacity.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation: 0.01 gr PE/dscf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the outlet concentration in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[Per the USEPA Consent Decree and on June 30, 2006, the company conducted emissions testing that demonstrated compliance with the 0.01 gr PE/dscf limitation.][OAC rule 3745-77-07(C)(1) and USEPA Consent Decree]

- g) Miscellaneous Requirements

- (1) None.



6. P027, 0351010002P027

Operations, Property and/or Equipment Description:

south storage aspiration

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-11(B)	75.0 lbs PE/hour

(2) Additional Terms and Conditions

a. The permittee shall employ a baghouse to control all PE from this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible PE were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible PE.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 75.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed outlet grain loading



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

(0.005 grain/cu. ft) by the total maximum volumetric air flow rate (23,720 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. P901, 0351010002P901

Operations, Property and/or Equipment Description:

SOYBEAN MEAL LOADOUT

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI #P0105227 issued 10/30/09)	Filterable particulate matter equal to or less than 10microns in size (PM ₁₀) shall not exceed 0.003 grain per dry standard cubic foot(dscf) and 0.92 ton per year combined, from any stack(s) serving emissions units P901and P906. See b)(2)a. See b)(2)b.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to voluntary restrictions established in this permit.
c.	OAC rule 3745-17-07(B)	See b)(2)b.
d.	OAC rule 3745-17-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. All stack emissions of particulate matter are PM₁₀.

b. This permit to install (PTI) takes into account the following voluntary restrictions as proposed by the permittee for the purpose of establishing practically and legally enforceable limitations representing the potential to emit for point source emissions of particulate matter less than or equal to 10 microns in size (PM₁₀) from emission units P901 and P906, combined:



- i. use of an enclosure aspirated to a baghouse achieving a maximum outlet concentration of 0.003 gr/dscf for filterable PM_{10} .
 - ii. a visible emission restriction not to exceed 0% opacity, as a 6-minute average from the baghouse stack serving emission units P901 and P906.
 - iii. no visible fugitive particulate emissions from the enclosure for emissions unit P901.
 - c. This emissions unit is exempt from the visible limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
 - d. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
 - e. It should be noted that the requirements of New Source Review are not applicable to emissions unit P901. The soybean meal loadout is an "existing" emissions unit (installed before January 1, 1974) and is not undergoing a modification as defined in OAC rule 3745-31-01. Emissions unit P901 is contained in this PTI at the request of the permittee for purposes of establishing practically and legally enforceable limitations representing the potential to emit for this emissions unit [see b)(2)b.]
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the stack and the enclosure (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operation log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
 - [OAC rule 3745-77-07(C)(1) and PTI #P0105227]
 - (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0105725, issued on October 30, 2009: **[d)(1)]**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record



keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible PE were observed from the stack serving this emissions unit;
- b. all days during which any visible fugitive PE were observed from the enclosure (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.; and
- c. any corrective actions taken to eliminate the visible fugitive PE from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0105227]

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0105725, issued on October 30, 2009: **[e)(1)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.003 grain filterable PM₁₀/dscf

Applicable Compliance Method:

The filterable gr/dscf limitation was established in accordance with a rated outlet concentration of the manufacturer's guaranteed fabric filter grain loading.

If required, the permittee shall demonstrate compliance with the filterable gr PM₁₀/dscf by testing in accordance with Methods 201/201A of 40 CFR, Part 51,



Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI #P0105227]

- b. Emission Limitation:
0.92 ton filterable PM₁₀/year

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum outlet concentration of 0.003 gr filterable PM₁₀/dscf and the maximum volumetric air flow rate (8,000 acfm) and using the following conversion factors in order to covert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 lbs. Therefore, provided compliance is demonstrated with the 0.003 gr filterable PM₁₀/dscf limitation, compliance with the annual limitation shall be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #P0105227]

- c. Emission Limitation:
Visible stack PE shall not exceed 0% opacity, as a 6-minute average except as provided by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #P0105227]

- d. Emission Limitation:
No visible fugitive PE from the enclosure for this emissions unit.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 22.

[OAC rule 3745-77-07(C)(1) and PTI #P0105227]



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



8. P903, 0351010002P903

Operations, Property and/or Equipment Description:

north truck dump

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	73.0 lbs PE/hour
e.	40 CFR, Part 64	See sections d) and e).

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The permittee shall employ a baghouse to control all the PE from this emissions unit

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are visible emissions checks. When the visible emissions show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (2) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (4) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:

- a. checking the bags / filters for deterioration or degradation;
- b. checking the cleaning system for proper operation; and
- c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program are considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (5) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:



- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible PE were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation: 73.0 lbs PE/hour

Applicable Compliance Method: The permittee may determine compliance with this limitation by multiplying the manufacturer-guaranteed maximum outlet concentration (0.005 grain/cu. ft) by the total maximum volumetric air flow rate (22,500 cu. ft/minute) through the baghouse and by 60, and then dividing by 7000.

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



9. P905, 0351010002P905

Operations, Property and/or Equipment Description:

south truck dump with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-07(B)	See b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-31-05(A)(3) (PTI #03-17073, issued 5/18/06)	7.75 tons fugitive particulate matter less than 10 microns in size (PM10)/year 23.65 tons fugitive particulate emissions (PE)/year 0.005 grains (gr) PM10/dry standard cubic foot (dscf) and 2.18 tons PM10/year [See b)(2)e.] See b)(2)f. and b)(2)g.
f.	40 CFR, Part 60, Subpart DD	no process emission (from baghouse) of particulate matter shall be discharged that exhibits greater than 0% opacity. no fugitive emission (from truck unloading station) shall be discharged that exhibits greater than 5% opacity. See b)(2)h.
g.	40 CFR, Part 64	See sections d) and e).



- (2) Additional Terms and Conditions
 - a. The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart DD.
 - b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
 - c. Bunge North America (East) LLC is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.
 - d. The emission limitation specified by this rule is less stringent than the emission limitation (gr/dscf) established pursuant to OAC rule 3745-31-05(A).
 - e. All stack emissions of particulate matter are PM10.
 - f. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a baghouse with a maximum outlet concentration of 0.005 gr PM10/dscf.
 - g. The requirements of this rule also include compliance with the opacity requirements of 40 CFR Part 60 Subpart DD.
 - h. The gr/dscf emission limitation specified by this rule (for the baghouse) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are visible emissions checks. When the visible emissions show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]
 - (2) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.



[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

- (4) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program are considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (5) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
 - a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions



are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-17073, issued on May 18, 2006: **[d)(6).]** The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained Permit to Install #03-17073, issued on May 18, 2006: **[d)(1).]** The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]



f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations: 0.005 gr PM10/dscf, 2.18 tons PM10/yr

Applicable Compliance Method: The 0.005 gr/dscf limitation is the established BAT maximum outlet concentration for the baghouse.

If required, the permittee shall demonstrate compliance with the mass emission limitation by testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

The annual emission limitation was established by multiplying the maximum outlet concentration of 0.005 gr PM10/dscf, a maximum volumetric flow rate of 11,600 acfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lb/7000 grains, a maximum operating schedule of 8760 hrs/yr, and then a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

b. Emission Limitation: 23.65 tons fugitive PE/year

Applicable Compliance Method: Compliance with the tons of fugitive PE limitation shall be demonstrated by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.180 lb PE/ton, the maximum hourly throughput rate of 600 tons/hr, the capture efficiency of 95% (1-0.95) and the maximum annual operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

c. Emission Limitation: 7.75 tons fugitive PM10/year

Applicable Compliance Method: Compliance with the tons of fugitive PM10/yr limitation shall be demonstrated by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.059 lb PM10/ton, the maximum hourly throughput rate of 600 tons/hr, the capture efficiency of 95% (1-0.95) and the maximum annual operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

d. Emission Limitation: no process emission (from baghouse) of particulate matter shall be discharged that exhibits greater than 0% opacity



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation above by testing conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- e. Emission Limitation: no fugitive emission (from truck unloading station) shall be discharged that exhibits greater than 5% opacity

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation above by testing conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17073]

- g) Miscellaneous Requirements

- (1) None.



10. P906, 0351010002P906

Operations, Property and/or Equipment Description:

2-3 track rail unloading

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI #P0105725 issued 12/06/10)	Filterable particulate matter equal to or less than 10microns in size (PM ₁₀) shall not exceed 0.21 lb/hr and 0.92 ton per year combined, from any stack(s) serving emissions units P901and P906. See b)(2)a. See b)(2)b. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI #P0105725 issued 12/06/10)	6.31 tons fugitive particulate emissions (PE)/year 1.54 tons fugitive particulate matter less than 10 microns in size (PM10/year)
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)f.
f.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

a. All stack emissions of particulate matter are PM₁₀.

b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD).



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

- i. use of an enclosure aspirated to a baghouse achieving a maximum outlet grain loading concentration of 0.003 gr/dscf for filterable P_{M10}.
 - ii. a visible emission restriction not to exceed 0% opacity, as a 6-minute average from the baghouse stack serving emission units P901 and P906.
 - iii. a visible fugitive particulate emissions restriction not to exceed 20% opacity as a 3-minute average from the enclosure for emissions unit P906.
- c. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year
- e. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - f. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
 - g. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
 - h. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County.
- c) Operational Restrictions
- (1) The following operational restriction is being established for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:



- a. All PE from this emissions unit shall be vented to a duct collection system capable of achieving a maximum outlet concentration of 0.003 gr/dscf for PM₁₀.

[OAC rule 3745-77-07(A)(1) and PTI #P0105727]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operation log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the enclosure (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operation log:

- a. The location and color of the emissions;
- b. Whether the emissions are representative of normal operations;
- c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. The total duration of any visible emission incident; and
- e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]



- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0105727, issued on December 6, 2010: **[d)(1)]**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:

a. For stack emissions:

- i. all days during which any visible PE were observed from the stack serving this emissions unit;
- ii. any corrective actions taken to eliminate the visible fugitive PE from the stack and/or visible emissions of fugitive dust.

b. For fugitive emissions:

- i. all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- ii. any corrective actions taken to minimize or eliminate the visible fugitive PE.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0105727, issued on December 6, 2010: **[d)(1)a.]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:



a. Emission Limitation:

0.003 grain filterable PM₁₀/dscf

Applicable Compliance Method:

The filterable gr/dscf limitation was established in accordance with a rated outlet concentration of the manufacturer's guaranteed fabric filter grain loading. If required, the permittee shall demonstrate compliance with the filterable gr PM₁₀/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

b. Emission Limitations:

0.21 lb PM₁₀/hr and 0.92 ton filterable PM₁₀/yr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum outlet concentration of 0.003 grains PM₁₀/dscf by a maximum volumetric air flow of 8,000 acfm, and applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr.

The annual limitation was established by multiplying the maximum outlet concentration of 0.003 gr filterable PM₁₀/dscf and the maximum volumetric air flow rate (8,000 acfm) and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 lbs. Therefore, provided compliance is demonstrated with the 0.003 gr filterable PM₁₀/dscf limitation, compliance with the annual limitation shall be demonstrated.

If required, demonstration of the maximum volumetric air flow rate shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1-4.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

c. Emission Limitation:

6.31 tons fugitive PE/yr

Applicable Compliance Method:

The tons of fugitive PE/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.032 lb PE/ton, the maximum hourly throughput rate of 150 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the



enclosure and control requirements, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

d. Emission Limitations:

1.54 tons fugitive PM10/yr

Applicable Compliance Method:

The tons of fugitive PM10/yr limitation was developed by multiplying the AP-42 emission factors from Table 9.9.1-1 (5/03) of 0.0078 lb PM10/ton, the maximum hourly throughput rate of 150 tons/hr, the capture efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hours/year and dividing by 2000. Therefore, provided compliance is demonstrated with the enclosure and control requirements, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

e. Emission Limitation:

Visible stack PE shall not exceed 0% opacity, as a 6-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]

f. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average from the enclosure for this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #P0105727]



Preliminary Proposed Title V Permit

Bunge North America (East) LLC

Permit Number: P0115024

Facility ID: 0351010002

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.