



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

5/19/2014

Certified Mail

Ms. Donna Moot
Bunge N.A.
605 Goodrich Rd
P.O. Box 369
Bellevue, OH 44811

Facility ID: 0339010005
Permit Number: P0115976
County: Huron

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 4/11/2014. 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:	0339010005
Facility Name:	Bunge N.A.
Facility Description:	soybean oil mill.
Facility Address:	605 Goodrich Rd P.O. Box 369 Bellevue, OH 44811 Huron County
Permit:	P0115976, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Norwalk-Reflector on 04/15/2014. The comment period ended on 05/15/2014.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

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 N.A.

Facility ID:	0339010005
Permit Number:	P0115976
Permit Type:	Renewal
Issued:	5/19/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Bunge N.A.

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Authorization

Facility ID: 0339010005
Facility Description: Soybean oil mill.
Application Number(s): A0045759, M0002133
Permit Number: P0115976
Permit Description: Title V renewal for a soybean oil mill including: grain receiving and loadout operations, bean bowl operations, dehulling, aspiration, cooling, extraction, aeration storage, grain dryers, boilers and various insignificant emissions units.
Permit Type: Renewal
Issue Date: 5/19/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0107395

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

Bunge N.A.
605 Goodrich Rd
P.O. Box 369
Bellevue, OH 44811

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
Director



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

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 maintenancerequests, 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 N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. The following emissions units located at this facility are subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(j):
 - a) B005 – #2 Gas Fired Boiler (PBR06223); and
 - b) B008 – #8 Gas Fired Boiler (PBR06224).

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitation 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 the SIP-approved versions of OAC Chapters 3745-17, 3745-21 and/or 40 CFR, Part 63, Subpart DDDDD and/or 40 CFR, Part 60, Subpart Kb and/or 40 CFR, Part 63, Subpart ZZZZ.
 - a) B005 – #2 Gas Fired Boiler (PBR06223);
 - b) B007 – #2 Deodorizer Steam Generator – two 6.12 mmBtu/hr NG Fired (PTI 03-1733);
 - c) B008 – #8 Gas Fired Boiler (PBR06224);
 - d) B012 - 4.9 mmBtu/hr NG Fired Steam Generator;
 - e) P011 - Hull Refining, soybean cleaning (screeners and aspirators) - baghouses (PTI 03-13045);
 - f) P013 – P013 - Bean Flaking - Conventional flaking rolls and aspiration (PTI P0105990);
 - g) P016 - Bean Cleaning, whole bean screen, aspiration, weigh, scaling;
 - h) P020 - Millfeed Grinding - Millfeed screen and hull grinders (PTI 03-13045);
 - i) P023 - Meal Transfer Process -Conveyors, legs from process to storage (PTI P0107183);
 - j) P034 - Bean Conditioning - Conventional rotary bean dryer;
 - k) P035 - Bean Cracking - Cracking rolls (PTI 03-9532);
 - l) P052 - Bulk Truck Loadout - w/choke flow &baghouse (PTI 03-4114);
 - m) P053 - Grinder #1 -P.G./Conc - Grinder, classifier, and filter (PTI 03-4114);
 - n) P054 - Grinder #2 -P.G./Conc - Grinder, classifier, and filter (PTI 03-4114);
 - o) P055 - Grinder #3 -P.G./Conc - Grinder, classifier, and filter (PTI 03-4114);
 - p) P057 - Bulk Storage Bins - Concentrate storage bins w/baghouses (PTI 03-4114);
 - q) P058 - Grinding & packaging aspiration (PTI 03-4114);
 - r) P061 - Promosoy Conveying to Grinding -from concentrate to grinding (PTI 03-4114);
 - s) P062 - Prom-Ext Conveying to Packaging w/2 baghouses (PTI 03-4114);
 - t) P063 - Conc/P&G Vacuum Cleaner System (PTI 03-4639);
 - u) P064 - Promosoy Vacuum Cleaner System (PTI 03-4639);
 - v) P065 - Prep Central Vacuum Cleaner System (PTI 03-5828);
 - w) P067 - Bleaching Earth Receiving - unloading and transfer system (PTI 03-6854);
 - x) P069 - Warehouse Bag-dump station w/Baghouse (PTI 03-6843);
 - y) P073 - Soybean Centrolex Packaging System (PTI 03-7780);
 - z) P075 - Bulk filter aid storage and transfer system (PTI 03-8237);
 - aa) P076 - Bucket Elevator Leg W/ DistTurnhead, Conveyors - Baghouse (PTI 03-7977);
 - bb) P077 - Clean Bean Conveying (PTI 03-13045);
 - cc) P078 - Mine Run B Product - B Plant Mine Run conveying to Grinding (PTI 03-9547);
 - dd) P079 - No. 4 Concentrate Grinder (PTI 03-9547);



- ee) P080 - No. 5 Concentrate Grinder (PTI 03-9547);
- ff) P081 - B Plant Concentrate Conveying from Grinding to Storage (PTI P0107395);
- gg) P082 - Concentrate Packaging Aspiration system (PTI P0104848);
- hh) P083 - No. 6 Concentrate Grinder (PTI P0104848);
- ii) P084 - TSPC - Soy Protein ingredient transfer, with baghouse (PTI 03-13292);
- jj) P087 - TSPC Cooler - Textured soy protein cooler, with baghouse (PTI 03-13292);
- kk) P088 - TSPC Fines - Textured soy protein fines, with baghouse (PTI 03-13292);
- ll) P089 - TSPC Textured soy protein reject transfer, with baghouse (PTI 03-13292);
- mm) P090 - TSPC Textured soy protein aspiration, with baghouse (PTI 03-13292);
- nn) P091 - TSPC Vacuum system with baghouse (PTI 03-13292);
- oo) P117 - Bag & Box Dump Station for Soy Fiber Ground (SFG) (PTI 03-16169);
- pp) P118 - Conveying to holding bin for Soy Fiber Ground (SFG) (PTI 03-16169);
- qq) P119 - Conveying to grinder for Soy Fiber Ground (SFG) (PTI 03-16169);
- rr) P120 - Grinder for Soy Fiber Ground (SFG) (PTI 03-16169);
- ss) P121 - 176 hp Lift Station Pump Engine;
- tt) P122 – 220 rpm (60 hp) Air Compressor;
- uu) P123 – 960 hp Emergency Generator;
- vv) P124 – 287 hp Fire Pump Engine;
- ww) P125 – 265 hp Fire Pump Engine;
- xx) P126 – 265 Fire Pump Engine.
- yy) T005 - 15K gal. Promosoy Dump Tank (PTI 03-5143); and
- zz) T006 - 13.5K gal. Ethanol Storage Tank (PTI 03-5143).

[Authority for term: OAC rule 3745-77-07(A)(13)]

4. The following boilers are designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart:

- a) B005 – #2 Gas Fired Boiler;
- b) B007 – #2 Deodorizer Steam Generator; and
- c) B008 – #8 Gas Fired Boiler; and
- d) B012 – 4.9 mmBtu/hr NG Fired Steam Generator.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart DDDDD]

5. Emissions units #B005 and B008 meet the definition of existing boilers or process heaters with a heat input capacity of 10 mmBtu per hour or greater; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500(a)(3), (f), and Table 3
General Requirements	63.7505(a), 63.7565 and Table 10
Initial Compliance Requirements	63.7530(e)
Tune-up Requirements	63.7515(d) and Table 3
Continuous Compliance Requirements	63.7540(a)(10) and (a)(13)



Reporting Requirements	63.7545(a), (f), (h), 63.7550(a), (b), (c)(1) and Table 9
Record Keeping Requirements	63.7555(a), (i) and (j) and 63.7560

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart DDDDD]

6. Emissions units B007 and B012 meet the definition of existing boilers or process heaters with a heat input capacity of less than 10 mmBtu per hour; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500(a)(3), (e), (f) and Table 3
General Requirements	63.7505(a), 63.7565 and Table 10
Initial Compliance Requirements	63.7530(e)
Tune-up Requirements	63.7515(d) and Table 3
Continuous Compliance Requirements	63.7540(a)(11) and (a)(13)
Reporting Requirements	63.7545(a), (f), (h), 63.7550(a), (b), (c)(1) and Table 9
Record Keeping Requirements	63.7555(a), (i) and (j) and 63.7560

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart DDDDD]

7. The emergency compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, EU# P124, P125 and P126, installed before 6/12/06, shall meet the requirements of Part 63, Subpart ZZZZ no later than 05/03/13.

General Compliance Requirements	63.6605(a), (b), 63.6665 and Table 8
Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(f), (h) and (i)
Continuous Compliance Requirements	63.6635(a), (b), (c), 63.6640(a), (b) and (f)
Reporting Requirements	63.6650(a), (b), (c), (d), (f) and Table 7
Record Keeping Requirements	63.6655(a), (d), (e), (f), 63.6660 and Table 6

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart ZZZZ]

8. The compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, EU# P122, installed before 6/12/06, shall meet the requirements of Part 63, Subpart ZZZZ no later than 05/03/13.



General Compliance Requirements	63.6605(a), (b), 63.6665 and Table 8
Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(e), (h), (i) and Table 2c
Continuous Compliance Requirements	63.6640(a), (b) and Table 6
Reporting Requirements	63.6650(a), (b), (c), (d), (f) and Table 7
Record Keeping Requirements	63.6655(a), (d), (e), 63.6660 and Table 6

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart ZZZZ]

- The compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The new stationary CI RICE, EU# P121, installed on or after 06/12/06, shall meet the requirements of Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, Part 60, Subpart IIII.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart ZZZZ]

- The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 60, Subpart IIII, in accordance with 40 CFR Parts 60.4200 through 60.4219 (including the Table(s) and Appendix(ices) referenced in Subpart IIII).

The following emissions units in this permit are subject to the aforementioned requirements: P121 (176 horsepower lift station pump engine).

The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart IIII, including the following sections:

Certification Emission Standards	60.4202(a)
Continuous Compliance	60.4206
Fuel Requirements	60.4207(b)
Monitoring, Installation, Operation and Maintenance Requirements	60.4209(a) & 60.4211(a), (f), and (g)
Testing Requirements	60.4212 (a) and (c)
Notification, Reporting and Recordkeeping	60.4214(b) and (c)
Special Fuel Requirements	60.4217



General Provisions	60.4218 and Table 8
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[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart IIII]

11. The compression ignition (CI) reciprocating internal combustion engine(s) (RICE), greater than 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, EU#P123, installed before 12/19/02, shall meet the requirements of Part 63, Subpart ZZZZ no later than 06/15/07.

The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f), and the permittee shall meet the following requirements contained in 40 CFR Part 63, Subpart ZZZZ:

General Compliance	63.6605(a) and (b)
Emission and Operating Limitations	63.6600(c)
Continuous Compliance Requirements	63.6640(f)(2)
Record Keeping Requirements	63.6655(e), 63.6660(a), (b), and (c)
General Provisions	63.6665 and Table 8

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63, Subpart ZZZZ]



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C. Emissions Unit Terms and Conditions



1. B010, #10 Gas Fired Boiler

Operations, Property and/or Equipment Description:

boiler - 91.2 mmBtu/hr for natural gas, 86.9 mmBtu/hr for number 2 fuel oil / degummed soy oil 'biofuel' / blend (up to 60 percent biofuel) as backup

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 operations(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. 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.	40 CFR 60.40c et seq. (NSPS Subpart Dc)	See b)(2)b. and c)(1)
b.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
c.	OAC rule 3745-18-06(D)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)b.
e.	40 CFR 63.7480 et. seq. (MACT Subpart DDDDD)	See b)(2)d., c)(3), d)(4), e)(3) and f)(1) The emissions from the boiler shall not exceed the following emission limitations, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in: Table 2 for existing units: 6.2E-02lb of filterable particulate matter (PM)/MMBtu of heat input; or 2.0E-04lb of Total Selected Metals (TSM)/MMBtu of heat input; and 1.1E-03lb of hydrogen chloride (HCl)/MMBtu of heat input; and 2.0E-06lb of mercury (Hg)/MMBtu of heat input; and 1130 ppm carbon monoxide (CO) by



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>volume on a dry basis, corrected to 3% O₂, 3-run average</p> <p>OR output limits (option)</p> <p>7.5E-02lb of PM/MMBtu of steam output; and</p> <p>2.5E-04lb of TSM/ MMBtu of steam output; and</p> <p>1.4E-03lb of hydrogen chloride (HCl)/MMBtu of steam output; and</p> <p>2.5E-06lb of mercury (Hg)/MMBtu of steam output; and</p> <p>0.13lb CO/MMBtu of steam output, 3-run average</p> <p>Boilers subject to emission standards in Table 2 shall also meet the work practice standards identified in Table 3 during startup and shutdown of the unit and the tune-up requirements, as applicable, in Table 3.</p> <p>The permittee shall demonstrate compliance with the limits published in the final amendments to Subpart DDDDD, as required by the subpart.</p>
f.	40 CFR 63.1-15 (40 CFR 63.7575 Table 10 of Subpart DDDDD)	Table 10 in Section 63.7575 of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	OAC rule 3745-31-05(A)(3) [PTI 03-11260 issued July 1, 1998]	<p><u>when firing natural gas:</u></p> <p>0.140 lb nitrogen oxides (NO_x)/mmBtu of actual heat input (12.8 lbsNO_x/hr, 56.1 tons NO_x/yr)</p> <p>0.134 lb carbon monoxide (CO)/mmBtu of actual heat input (12.2 lbs CO/hr, 53.4 tons CO/yr)</p> <p>0.014 lb particulate emissions</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>(PE)/mmBtu of actual heat input (1.25 lbs PE/hr, 5.48 tons PE/yr)</p> <p>0.007 lb volatile organic compounds (VOC)/mmBtu of actual heat input (0.65 lb VOC/hr, 2.85 tons VOC/yr)</p> <p>0.0006 lb sulfur dioxide (SO₂)/mmBtu of actual heat input (0.055 lb SO₂/hr, 0.24 ton SO₂/yr)</p>
	<p>OAC rule 3745-31-05(A)(3) [PTI 03-11260 issued July 1, 1998 cont.]</p>	<p><u>when firing number 2 fuel oil / 'biofuel':</u></p> <p>0.161 lbNO_x/mmBtu of actual heat input (14.0 lbsNO_x/hr, 61.3 tons NO_x/yr)</p> <p>0.136 lb CO/mmBtu of actual heat input (11.8 lbs CO/hr, 51.7 tons CO/yr)</p> <p>0.016 lb PE/mmBtu of actual heat input (1.40 lbs PE/hr, 6.13 tons PE/yr)</p> <p>0.014 lb organic compounds (OC)/mmBtu of actual heat input (1.18 lbs OC/hr, 5.17 tons OC/yr)</p> <p>0.50 lb sulfur dioxide (SO₂)/mmBtu of actual heat input (43.4 lbs SO₂/hr, 190 tons SO₂/yr)</p> <p>See b)(2)a.</p>

(2) Additional Terms and Conditions

- a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR 60.40c et seq. (NSPS Subpart Dc).

Best available technology (BAT) for this emissions unit has been determined to be the use of low-NO_x burners.

- b. The applicability of OAC rule 3745-17-07(A) and 40 CFR 60.43c (c) for this emissions unit overlap, and result in opacity restrictions as follows:



- i. when firing natural gas: visible emissions not more than 20 percent opacity (6-minute average), except for one 6-minute period in any sixty minutes of not more than 60 percent opacity.
- ii. when firing No. 2 fuel oil / 'biofuel': visible emissions not more than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. This requirement shall apply at all times, including periods of startup or shutdown lasting no longer than three hours, and malfunction periods which conform with OAC 3745-17-07(A)(3)(c).
- iii. when firing No. 2 fuel oil / 'biofuel': visible emissions not more than 20 percent opacity (6-minute average), except for one 6-minute period in any sixty minutes of not more than 60 percent opacity. This requirement shall apply for periods of startup or shutdown lasting longer than three hours, and malfunction periods which do not conform with OAC 3745-17-07(A)(3)(c).
- c. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. This emissions unit meets the definition of existing boilers or process heaters with a heat input capacity of greater than 10 mmBtu per hour; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500(a)(1), (a)(3), (f) and Table 3
Operating Limits	63.7500(a)(2) and Table 4
General Compliance Requirements	63.7505(a), (c), 63.7515(d), 63.7540(a)(10), (a)(13), 63.7565 and Table 10
Fuel Analyses, Specification and Procedures	63.7521(a) – (e), (h) and Table 6
Initial Compliance Demonstration Requirements	63.7530(a) – (c), (e), (f), (h) and Table 7

[40 CFR, Part 63, Subpart DDDDD]

c) Operational Restrictions

- (1) The permittee shall combust oil in the affected facility that contains not greater than 0.5 weight percent sulfur.

[OAC 3745-77-07(A)(1), PTI 03-11260, and 40 CFR 60.42c (d)]

- (2) The permittee shall burn only natural gas, number two fuel oil, and/or biofuel (soybean oil) in this emissions unit.



[OAC 3745-77-07(A)(1) and PTI 03-11260]

- (3) The permittee shall comply with the applicable requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Monitoring, Installation, Operation and Maintenance Requirements	63.7525(a), Table 4 and Table 7
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[40 CFR, Part 63, Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep records of fuel oil supplier certification, which shall include the following information:
 - a. The name of the oil supplier.
 - b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.
 - c. The sulfur content of the oil.

[OAC 3745-77-07(C)(1); PTI 03-11260; and 40 CFR 60.48c (e)(11), and (f)]

- (2) The permittee shall record and maintain records of the amounts of natural gas combusted during each month. For months where fuel oil or biofuel is fired, the permittee shall also record and maintain records of the amounts of such oil fired for each applicable day.

[OAC 3745-77-07(C)(1), PTI 03-11260, and 40 CFR 60.48c (g)(2)]

- (3) For each day during which the permittee burns a fuel other than either natural gas, number two fuel oil, or biofuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

- (4) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Record Keeping Requirements	63.7530(e), (f), 63.7555(a), (d), (i), (j) and 63.7560(a) - (c)
Continuous Compliance Requirements	63.7535(a) – (d), 63.7540(a), (b) and (d) and Table 8

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]



e) Reporting Requirements

- (1) The permittee shall submit reports of the records of fuel oil supplier certifications from d)(1). The report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

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 3745-77-07(C)(1); PTI 03-11260; and 40 CFR 60.48c (d), (e)(11), and (j)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, number two fuel oil, or biofuel, was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

- (3) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Reporting Requirements	63.7530(e), (f), 63.7545(a), (d), (e), (g), (h), 63.7550(a) – (d), (h) and Table 9
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OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

f) Testing Requirements

- (1) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Testing Requirements	63.7510(a)(1), (a)(2), (b) - (e), 63.7515(a) - (f), 63.7520(a) - (f), and Table 5
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OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

- (2) Unless otherwise approved by the Director (the Ohio EPA, Northwest District Office), the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. Fuel oil / soybean oil biofuel blend (up to 60% biofuel):

The emissions testing shall be conducted within 60 days after beginning any use of these fuels under this permit.



- b. Fuel oil / soybean oil biofuel blend (up to 60% biofuel):

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for SO₂ and visible emissions (VE).
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

NO_x: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A
CO: Methods 1 through 4 and 10, 40 CFR, Part 60, Appendix A

SO₂: Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A
VE: Method 9, 40 CFR, Part 60, Appendix A
- d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

- (3) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):
 - a. Emission Limitation(s): (natural gas)

0.140 lbNO_x/mmBtu of actual heat input (12.8 lbsNO_x/hr, 56.1 tons NO_x/yr)



Applicable Compliance Method:

The permittee may demonstrate compliance with the lbNOx/mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (mmcu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 50 pounds NOx/mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lbNOx/hr emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 50 lbNOx/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lbNOx/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

See also f)(1).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

b. Emission Limitation(s): (natural gas)

0.134 lb CO/mmBtu of actual heat input (12.2 lbs CO/hr, 53.4 tons CO/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb CO/mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (mmcu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 pounds CO/mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb CO/hr emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 lb CO/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

See also f)(1).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

c. Emission Limitation(s): (natural gas)

0.014 lb PE/mmBtu of actual heat input (1.25 lbs PE/hr, 5.48 tons PE/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb PE/mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (mm



cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 7.6 pounds PE/mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb PE/hr emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 7.6 lb PE/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PE/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

d. Emission Limitation(s): (natural gas)

0.007 lb VOC/mmBtu of actual heat input (0.65 lb VOC/hr, 2.85 tons VOC/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb VOC/mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 pounds VOC/mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb VOC/hr emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb VOC/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb VOC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 4 and 25.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

e. Emission Limitation(s): (natural gas)

0.0006 lb SO₂/mmBtu of actual heat input (0.055 lb SO₂/hr, 0.24 ton SO₂/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb SO₂/mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (mm



cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 pounds SO₂/mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb SO₂/hr emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 lb SO₂ /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 4 and 6.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

f. Emission Limitation(s): (fuel oil / biofuel)

0.161 lbNO_x/mmBtu of actual heat input (14.0 lbsNO_x/hr, 61.3 tons NO_x/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lbNO_x/mmBtu emission standard by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 20 pounds NO_x/1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lbNO_x/hr emission limitation may be determined by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 20 lbNO_x/1000 gal. of fuel oil. Compliance with the annual emission limitation may be demonstrated by multiplying the lbNO_x /hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

See also f)(1).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

g. Emission Limitation(s): (fuel oil / biofuel)

0.136 lb CO/mmBtu of actual heat input (11.8 lbs CO/hr, 51.7 tons CO/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb CO/mmBtu emission standard by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 5 pounds CO/1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (mmBtu/hr).



Compliance with the lb CO/hr emission limitation may be determined by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 5 lb CO/1000 gal. of fuel oil. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

See also f)(1).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

h. Emission Limitation(s): (fuel oil / biofuel)

0.016 lb PE/mmBtu of actual heat input (1.40 lbs PE/hr, 6.13 tons PE/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb PE/mmBtu emission standard by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 2 pounds (filterable) PE/1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb PE/hr emission limitation may be determined by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 2 lb PE/1000 gal. of fuel oil. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PE/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 5.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

i. Emission Limitation(s): (fuel oil)

0.014 lb OC/mmBtu of actual heat input (1.18 lbs OC/hr, 5.17 tons OC/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb OC/mmBtu emission standard by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-3 (revised 09/98) of 0.56 pounds TOC/1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (mmBtu/hr).

Compliance with the lb OC/hr emission limitation may be determined by multiplying the maximum hourly oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-3 (revised 09/98) of 0.56 lb TOC/1000 gal.



of fuel oil. Compliance with the annual emission limitation may be demonstrated by multiplying the lb OC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 4, and 18, 25, and/or 25A.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

j. Emission Limitation(s): (fuel oil)

0.50 lb SO₂/mmBtu of actual heat input (43.4 lbs SO₂/hr, 190 tons SO₂/yr)

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb SO₂/mmBtu emission standard by multiplying the maximum hourly fuel oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 142(S) pounds SO₂/1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (mmBtu/hr). S = fuel sulfur content, in weight percent

Compliance with the lb SO₂/hr emission limitation may be determined by multiplying the maximum hourly fuel oil combustion rate (1000's gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 20 lb SO₂/1000 gal. of fuel oil. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR 60, Appendix A, Methods 1- 4, and 6.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

k. Visible Emission Limitation(s):

Visible PE shall not exceed 20% opacity, as a six-minute average [See b)(2)b.]

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-11260]

l. Sulfur Content Limitation(s):

0.5 weight per cent sulfur in fuel oil



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

Applicable Compliance Method(s):

Compliance shall be based on the record keeping requirements as specified in d)(1).

[OAC 3745-77-07(C)(1) and PTI 03-11260]

g) Miscellaneous Requirements

- (1) Note: This emissions unit had a Prevention of Significant Deterioration (PSD) netting determination associated with PTI 03-11260.



2. F003, Bean Bowl #2, Soft Cover

Operations, Property and/or Equipment Description:

bean bowl #2 (soft cover) with choke loader, telescopic spout - grain storage

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 operations(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. 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 03-3408 issued July 13, 1988]	12.8 tons fugitive particulate emissions (PE)/yr See b)(2)a.
b.	40 CFR 60.302(b)(2) (NSPS Subpart DD)	Visible fugitive PE shall not exceed 0% opacity, as a six-minute average.
c.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
d.	OAC rule 3745-17-08(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of 40 CFR 60.300 et seq. (NSPS Subpart DD).

Best available technology (BAT) for this emissions unit has been determined to be the use of choke loader(s) and telescopic spout(s).

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. The facility 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(B)(1).

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

[OAC 3745-77-07(C)(1) and PTI 03-3408]

e) Reporting Requirements

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

- a. all days during which any visible particulate emissions were observed from this emissions unit; and
- b. any corrective actions taken to eliminate the visible 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 3745-77-07(C)(1) and PTI 03-3408]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:

12.8 tons fugitive PE/yr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum hourly throughput (tons/hour) by the emission factor from AP-42, Table 9.9.1-1 (revised 04/03) of 0.061 pound PE/ton, then by a control factor of (1-.9)*, then by 8760 hr/yr, and then dividing by 2000 lb/ton.

*The emission reduction efficiency of the enclosures is assumed to be 90%.

[OAC 3745-77-07(C)(1) and PTI 03-3408]



b. Emission Limitation:

Visible fugitive PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with USEPA Reference Method 9 as set forth in "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03(B)(3), and in 40 CFR 60.675(c)(1), as may be applicable.

[OAC 3745-77-07(C)(1) and PTI 03-3408]

g) Miscellaneous Requirements

(1) None.



3. F004, Berico Grain Dryer

Operations, Property and/or Equipment Description:

natural gas fired column grain dryer modification

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 operations(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. 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.	40 CFR 60.300 et seq. (NSPS Subpart DD)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) [PTI 03-6388 as modified May 24, 2000]	2.04 lbs fugitive particulate emissions (PE)/hr, 8.94 tons fugitive PE/yr 1.96 lbs fugitive nitrogen oxides (NOx)/hr, 8.58 tons fugitive NOx/yr There shall be no fugitive visible PE from this emissions unit. See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	See b)(2)c.
d.	OAC rule 3745-17-08(B)(1)	See b)(2)d.

(2) Additional Terms and Conditions

a. The column plate perforations shall not exceed 0.094 inch.

[40 CFR 60.302(a)(1)]

b. The requirements of this rule also include compliance with the requirements of 40 CFR 60.300 et seq. (NSPS Subpart DD).

c. 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).



- d. The facility 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(B)(1).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
2.04 lbs fugitive PE/hr
8.94 tons fugitive PE/yr

Applicable Compliance Method:

Compliance may be determined by the sum of 'a' and 'b' 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-.9);*
 - ii. multiply the maximum hourly natural gas combustion rate (mmcu. ft./hour) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 pounds PE (filterable)/mmcu. ft.
 - *The control efficiency of the perforations is assumed to be 90%.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-6388]
 - b. Emission Limitations:
1.96 lbs fugitive NOx/hour



8.58 tons fugitive 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 07/98) of 100 pounds NOx/mm cu. ft.

The annual allowable NOx limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-6388]

c. Emission Limitation:

There shall be no fugitive visible PE from this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with USEPA Reference Method 22 as set forth in "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

[OAC 3745-77-07(C)(1) and PTI 03-6388]

g) Miscellaneous Requirements

(1) None.



4. F011, Aeration-Grain Storage

Operations, Property and/or Equipment Description:

Aeration fans for 32 grain storage silos

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 operations(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. 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 03-0637 issued July 23, 1997]	5.17 lbs fugitive particulate emissions (PE)/hr, 22.6 tons fugitive PE/yr Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
c.	OAC rule 3745-17-08(B)(1)	See b)(2)b.

(2) Additional Terms and Conditions

a. 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).

b. The facility 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(B)(1).

c) Operational Restrictions

(1) The permittee shall maintain the air velocities through each bin at or below 0.3 feet per second.

[OAC rule 3745-77-07(A)(1) and PTI 03-0637]

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 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 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 3745-77-07(C)(1) and PTI 03-0637]

e) Reporting Requirements

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

- a. all days during which any visible particulate emissions were observed from this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible 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 3745-77-07(C)(1) and PTI 03-0637]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

5.17 lbs fugitive PE/hr, 22.6 tons fugitive PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by multiplying the estimated maximum aeration gas particulate concentration of 0.003 gr/dscf by the total maximum volumetric air flow rate of 201,000 acfm, then multiplying by lb/7000 grains and 60 minutes/hour.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-0637]

b. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation listed above shall be determined in accordance with 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) through (B)(3)(d) of OAC rule 3745-17-03.

[OAC 3745-77-07(C)(1) and PTI 03-0637]

g) Miscellaneous Requirements

(1) None.



5. P006, E&W Elevator House Aspiration System

Operations, Property and/or Equipment Description:

elevator house aspiration system, with 2 baghouses (parallel) (modification)

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 operations(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. 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 3745-17-11(B)(2)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. 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 Huron County.

b. This emissions unit is exempt from the visible particulate emission 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.

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 N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



6. P021, Primary Dehulling

Operations, Property and/or Equipment Description:

Primary dehulling consisting of a gravity separator, 6-aspirators and bin.

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 operations(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. 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), as effective 11/30/01 [PTI P0105990 issued May 4, 2010]	0.005 grain (gr) of particulate matter 10 microns or less (PM ₁₀) per dry standard cubic foot (dscf) 5.34 tons of PM ₁₀ /yr Visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity, as a six minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [PTI P0105990 issued May 4, 2010]	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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 the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM₁₀ emissions from this air contaminant source since the potential to emit is less than 10 tons per year.

The potential to emit for this emissions unit is 5.34 tons of PM₁₀/year* and is based on a maximum grain loading rate of 0.005 grain/dscf from a product recovery baghouse, a maximum volumetric air flow rate (acfm**), 60 min/sec, 1 lb/7000 grains, and 1 ton/2000 lbs.

* All emissions of particulate matter are PM₁₀.

** The acfm has been deemed confidential and is listed under trade secret information in the permittee's application.

- c. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Huron County.
- d. The emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.50 and 10.00 inches of water.

[OAC 3745-77-07(C)(1) and PTI P0105990]

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the



cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1) and PTI P0105990]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in e)(1)a. above where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(1)a. where prompt corrective action, that would bring the pressure drop into compliance within the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[OAC 3745-77-07(C)(1) and PTI P0105990]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.005 grain of PM₁₀/dscf

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse controlling this emissions unit. If required, the permittee shall demonstrate compliance in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

[OAC 3745-77-07(C)(1) and PTI P0105990]

b. Emission Limitation:

5.34 tons of PM₁₀/year



Applicable Compliance Method:

The annual limitation was developed by multiplying a maximum hourly emission rate of 1.22 lbs of PM₁₀/hour by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. The maximum hourly emission rate was determined by multiplying a maximum outlet concentration of 0.005 grain/dscf by a maximum volumetric air flow rate (acfm*) from a product recovery baghouse, 60 min/hr, and 1 lb/7000 grains. Therefore, provided compliance is shown with the maximum outlet concentration, it shall be a rebuttable presumption that compliance w/ the annual emission limitation has been attained.

* The acfm has been deemed confidential and is listed under trade secret information in the permittee's application.

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

[OAC 3745-77-07(C)(1) and PTI P0105990]

c. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 0% opacity as a six minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI P0105990]

g) Miscellaneous Requirements

- (1) None.



7. P043, Conventional Hexane Extraction

Operations, Property and/or Equipment Description:

Conventional hexane extraction with 3 cyclones, a condenser and an absorber

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 P0113390, issued April 11, 2013]	0.388 gal of OC (hexane) 'loss' per ton of soybean processed (rolling 6-month average, for emissions units P043 and P051 combined) [See c)(1)] 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined [See c)(1.)] 5.48 lbs particulate emissions (PE)/hr, 24.0 tons PE/yr See b)(2)j.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)k.
d.	40 CFR 63.2830 et seq. (MACT - Subpart GGGG)	See 40 CFR 63.2840 [Table 1 (ix)] hexane loss restrictions [See b)(2)b. through b)(2)i.]
e.	40 CFR 63.1-15 (40 CFR 63.2870 Table 1 of Subpart GGGG)	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

a. The hourly particulate emissions limits are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation. Based on this hourly potential emissions rate, the unrestricted potential to emit particulate emissions from this emissions unit, based on 8,760 hours/365 days of operation per year, is 24.0 tons PE per year.

b. Hazardous Air Pollutant (HAP) loss requirements:

i. The emission requirements limit the number of gallons of HAP lost per ton of listed oilseeds processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual HAP loss to the allowable HAP loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872, is any calendar month in which a source processes a listed oilseed, excluding any entire calendar month in which the source operated under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2). Equation 1 of this section follows:

$$\text{Compliance Ratio} = \text{Actual HAP Loss} / \text{Allowable HAP Loss}$$

ii. Equation 1 of this section can also be expressed as a function of total solvent loss as shown in Equation 2 of this section. Equation 2 of this section follows:

$$\text{Compliance Ratio} = \frac{[(f) \times (\text{Actual Solvent Loss})]}{[0.64 \times (\text{Oilseed}_c \times \text{SLF}_c) + (\text{Oilseed}_s \times \text{SLF}_s)]}$$

Where:

f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months, as determined in 40 CFR 63.2854, dimensionless.

0.64 = The average volume fraction of HAP in solvent in the baseline performance data, dimensionless.

Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in 40 CFR 63.2853.

Oilseed (soybean) = Tons of oilseed processed during the previous 12 operating months, as shown in 40 CFR 63.2855 (c = conventional soybean from P043, s = specialty soybean from P051).

SLF = The corresponding solvent loss factor (gal/ton) for conventional oilseed listed in Table 1 (0.2 for conventional, 1.7 for specialty).

[40 CFR 63.2840(a)]



- c. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating month using Equation 2 of this section. When calculating the compliance ratio, consider the following conditions and exclusions:
- i. If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the permittee must categorize the month as an operating month, as defined in 40 CFR 63.2872.
 - ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.
 - iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month, as defined in 40 CFR 63.2872. Exclude any non-operating months from the compliance ratio determination.
 - iv. If the source is subject to an initial startup period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.
 - v. If the source is subject to a malfunction period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.
- [40 CFR 63.2840(b)]
- d. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the HAP emission requirements for the previous operating month.
- [40 CFR 63.2840(c)]
- e. The permittee shall:
- i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862.
 - ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).
 - iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.
- [40 CFR 63.2850(a)(4), (5), and (6)]
- f. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.



[40 CFR 63.2850(b)]

- g. Existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in b)(2)g.i or b)(2)g.ii as follows:
- i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.
 - ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(d)]

- h. Existing or new sources experiencing a malfunction: A malfunction is defined in 40 CFR 63.2. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in b)(2)h.i or b)(2)h.ii as follows:
- i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
 - ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of



the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(e)]

- i. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP.

[40 CFR 63.2852]

- j. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

Best available technology (BAT) for this emissions unit has been determined to be the use of (a) cyclone(s) for control of PE.

- k. The emission limitation specified by OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) Hexane consumption /loss, i.e., emission rates from the hexane extraction operations in emissions units P043 and P051 combined shall be determined on a "mass balance" basis. Consumption, i.e. emission rate, shall not exceed the following levels:
 - a. total hexane consumption in emissions units P043 and P051 shall not exceed 285,400 gallons (811 tons)/rolling 12-month period; and
 - b. total hexane consumption in emissions units P043 and P051 shall not exceed 0.388 gallon/ton crushed soybeans, based on a 6-month rolling, weighted average.

[OAC rule 3745-77-07(A)(1) and PTI P0113390]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and



maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone(s) is 0.5 to 10 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- (2) The permittee shall collect and record the following information each month, for emission units P043 and P051, combined:
- a. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation;
 - b. the total amount of hexane inventory lost in gallons/month;
 - c. the 6-month rolling weighted average hexane loss rate (gallons per ton of crushed soybeans, and pounds hexane per pound crushed soybeans);
 - d. the amount of hexane emitted in tons/month; and



e. the amount of hexane emitted in tons /rolling 12-month.

(Note: It is recognized that data, records, and calculations used for compliance with MACT Subpart GGGG standards may also serve as data, records, and calculations for this section where applicable.)

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2862(b)	compliance plan and SSM plan retention on-site
63.2862(c)	records for hexane mass balance calculations
63.346(d)	records for calculation of rolling 12- month averages and the 'compliance ratio'
63.2862(e)	records for startup, shutdown, and malfunction events
63.2863	records retention

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG and PTI P0113390]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the cyclone(s) was outside of the range specified by the manufacturer;
- b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:



- a. any exceedances of the 0.388 gal of OC (hexane) 'loss' per ton, from emissions units P043 and P051 combined; and

any exceedance of the 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined.

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

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2860(c)	significant modification notifications, as applicable
63.2861(a)	annual compliance certification
63.2861(b)	deviation notification report
63.2861(c)	periodic startup, shutdown, and malfunction report
63.2861(d)	immediate startup, shutdown, and malfunction report

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG and PTI P0113390]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

811 tons of OC (hexane) per rolling, 12-month period, from emissions units P043 and P051 combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2)e.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- b. Emission Limitation:

0.388 gal of OC (hexane) 'loss' per ton of soybean processed [rolling 6-month average]



Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2)c.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

c. Emission Limitation:

hexane loss restrictions [See b)(2)b.]

Applicable Compliance Method:

Compliance shall be based on the requirements specified in b)(2)b. through b)(2)d.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

d. Emission Limitations:

5.48 lb fugitive PE/hr, 24.0 ton/yr

Applicable Compliance Method:

The hourly particulate emissions limits are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitations, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as 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) and PTI P0113390]

g) Miscellaneous Requirements

(1) None.



8. P050, Centrolex Process

Operations, Property and/or Equipment Description:

Acetone process - Vic carbon adsorber, fugitive losses

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 operations(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. 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 P0110013, issued May 7, 2012]	18.53 tons acetone/month (point and fugitive) 139.23 tons acetone per rolling, 12-month period

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the amount of acetone employed in this emissions unit (the input rate of acetone into the process), in pounds;

b. the amount of acetone, in pounds, that remains dissolved in the wastewater (from carbon adsorption regeneration, condenser, and distillation solvent recovery processes) and, therefore, is not emitted by this emissions unit*;

c. the amount of acetone, in pounds, that is removed from this emissions unit and incinerated, and whether or not the incineration was performed on site or off site;



- d. the acetone emissions from the process $\{d)(1)a - [d)(1)b + d)(1)c\}$, in pounds; and
- e. the monthly acetone emission rate from this operation [summation of d)(1)d for the calendar month] in tons.

*volume of wastewater x acetone wastewater concentration. acetone concentration is a constant in this calculation, developed conservatively from company wastewater analysis (about 550 ppm by wt.).

[OAC 3745-77-07(C)(1) and PTI P0110013]

- (2) In conjunction with the recordkeeping requirements in d)(1), the permittee shall maintain records of the tons of acetone per rolling, 12-month period.

[OAC 3745-77-07(C)(1) and PTI P0110013]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following for this emissions unit:
 - a. any exceedance of the 18.53 tons acetone/month limit; and
 - b. exceedance of the 139.23 tons of acetone per rolling, 12-month period.

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

[OAC 3745-77-07(C)(1) and PTI P0110013]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

18.53 tons acetone/month (point and fugitive)

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(1).

[OAC 3745-77-07(C)(1) and PTI P0110013]

b. Emission Limitation:

139.23 tons acetone per rolling, 12-month period



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2).

[OAC 3745-77-07(C)(1) and PTI P0110013]

g) Miscellaneous Requirements

(1) None.



9. P051, Specialty Soybean Extraction

Operations, Property and/or Equipment Description:

Specialty soybean extraction with 3 baghouses and a condenser

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 P0113390, issued April 11, 2013]	0.388 gallon of OC (hexane) 'loss' per ton of soybean processed (rolling 6-month average, for emissions unit P043 and P051 combined) [See c)(2)] 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined [See c)(1)] 58.0 tons OC (alcohol) /month, from emissions units P051 and P060 combined (point and fugitive) 552 tons of OC (alcohol) per rolling 12-month period, from emissions units P051 and P060 combined [See c)(2)] 2.30 lbs particulate emissions (PE)/hr, 10.1 tons PE/yr See b)(2)j.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)k.
d.	40 CFR 63.2830 et seq. (MACT - Subpart GGGG)	See 40 CFR 63.2840 [Table 1 (ix)] hexane loss restrictions [See b)(2)b through b)(2)i.]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1-15 (40 CFR 63.2870 Table 1 of Subpart GGGG)	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

a. The hourly particulate emissions limits are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation. Based on this hourly potential emissions rate, the unrestricted potential to emit particulate emissions from this emissions unit, based on 8,760 hours/365 days of operation per year, is 10.1 tons PE per year.

b. Hazardous Air Pollutant (HAP) loss requirements:

i. The emission requirements limit the number of gallons of HAP lost per ton of listed oilseeds processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual HAP loss to the allowable HAP loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872, is any calendar month in which a source processes a listed oilseed, excluding any entire calendar month in which the source operated under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2). Equation 1 of this section follows:

$$\text{Compliance Ratio} = \text{Actual HAP Loss} / \text{Allowable HAP Loss}$$

ii. Equation 1 of this section can also be expressed as a function of total solvent loss as shown in Equation 2 of this section. Equation 2 of this section follows:

$$\text{Compliance Ratio} = \frac{[(f) \times (\text{Actual Solvent Loss})]}{[0.64 \times (\text{Oilseed}_c \times \text{SLF}_c) + (\text{Oilseed}_s \times \text{SLF}_s)]}$$

Where:

f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months, as determined in 40 CFR 63.2854, dimensionless.

0.64 = The average volume fraction of HAP in solvent in the baseline performance data, dimensionless.



Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in 40 CFR 63.2853.

Oilseed (soybean) = Tons of oilseed processed during the previous 12 operating months, as shown in 40 CFR 63.2855 (c = conventional soybean from P043, s = specialty soybean from P051).

SLF = The corresponding solvent loss factor (gal/ton) for conventional oilseed listed in Table 1 (0.2 for conventional, 1.7 for specialty).

[40 CFR 63.2840(a)]

- c. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating month using Equation 2 of this section. When calculating your compliance ratio, consider the following conditions and exclusions:
- i. If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the permittee must categorize the month as an operating month, as defined in 40 CFR 63.2872.
 - ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.
 - iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month, as defined in 40 CFR 63.2872. Exclude any non-operating months from the compliance ratio determination.
 - iv. If the source is subject to an initial startup period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.
 - v. If the source is subject to a malfunction period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.

[40 CFR 63.2840(b)]

- d. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the HAP emission requirements for the previous operating month.

[40 CFR 63.2840(c)]

- e. The permittee shall:
- i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862.



- ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).
- iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.

[40 CFR 63.2850(a)(4), (5), and (6)]

- f. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.

[40 CFR 63.2850(b)]

- g. Existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in b)(2)g.i or b)(2)g.ii as follows:

- i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.
- ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(d)]

- h. Existing or new sources experiencing a malfunction: A malfunction is defined in 40 CFR 63.2. In general, it means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If an existing or new source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonably necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the permittee must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction



and, therefore, do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the permittee must choose to comply with one of the options listed in b)(2)h.i or b)(2)h.ii as follows:

- i. Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and one of the options listed in 40 CFR 63.2850(e)(1)(i) through (iii).
- ii. Malfunction period. Throughout the malfunction period, you must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(e)]

- i. The permittee must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3). The permittee must complete the SSM plan before the compliance date for the source. The permittee must also keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining your source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2850(e)(2) malfunction period, or the 40 CFR 63.2850(d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedures may come from plans developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of these NESHAP.

[40 CFR 63.2852]

- j. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

Best available technology (BAT) for this emissions unit has been determined to be the use of (a) baghouse(s) for control of PE.

- k. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) Hexane consumption /loss, i.e., emission rates from the hexane extraction operations in emissions units P043 and P051 combined shall be determined on a "mass balance" basis. Consumption, i.e. emission rates, shall not exceed the following levels:

- a. total hexane consumption in emissions units P043 and P051 shall not exceed 285,400 gallons (811 tons)/rolling 12-month period; and



- b. total hexane consumption in emissions units P043 and P051 shall not exceed 0.388 gallon/ton crushed soybeans, based on a 6-month rolling, weighted average.

[OAC rule 3745-77-07(A)(1) and PTI P0113390]

- (2) Alcohol consumption /loss, i.e., emission rates from the alcohol extraction operations in emissions units P051 and P060 combined shall be determined on a "mass balance" basis. Consumption, i.e. emission rates, shall not exceed the following levels:

- a. total alcohol consumption in emissions units P051 and P060 shall not exceed 162,400 gallons (552 tons)/rolling 12-month period;
- b. the short-term loss of alcohol from emissions units P051 and P060 shall not exceed 58.0 tons /month.

[OAC rule 3745-77-07(A)(1) and PTI P0113390]

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

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



The acceptable range for the pressure drop across the baghouse(s) is 0.5 to 10 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- (2) The permittee shall collect and record the following information each month, for emission units P043 and P051, combined:
- a. the total quantity of soybeans weighed in the preparation process before the hexane extraction operation;
 - b. the total amount of hexane inventory lost in gallons/month;
 - c. the 6-month rolling weighted average hexane loss rate (gallons per ton of crushed soybeans, and pounds hexane per pound crushed soybeans);
 - d. the amount of hexane emitted in tons/month; and
 - e. the amount of hexane emitted in tons/rolling 12-month.

(Note: It is recognized that data, records, and calculations used for compliance with MACT Subpart GGGG standards may also serve as data, records, and calculations for this section where applicable.)

[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- (3) The permittee shall collect and record the following information each month, for emission units P051 and P060, combined:
- a. the total amount of alcohol inventory lost in gallons/month;
 - b. the amount of alcohol emitted in tons/month;
 - c. the amount of alcohol emitted in tons/rolling 12-month; and
 - d. all incidents of startup or shutdown of the emission units. (This should include all amounts of alcohol that are routinely added to the system or returned to the storage tanks due to startup or shutdown. This amount of alcohol is process alcohol that is present in the system during times of continuous operation, but will drain out of the system during shutdown and needs to be charged back into the system prior to startup. The amount of alcohol used to "recharge" the system should not be interpreted as an "alcohol loss" in calculating emission rates).



[OAC rule 3745-77-07(C)(1) and PTI P0113390]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2862(b)	compliance plan and SSM plan retention on-site
63.2862(c)	records for hexane mass balance calculations
63.346(d)	records for calculation of rolling 12-month averages and the 'compliance ratio'
63.2862(e)	records for startup, shutdown, and malfunction events
63.2863	records retention

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart GGGG and PTI P0113390]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time when the pressure drop across the baghouse(s) was outside of the range specified by the manufacturer;
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC rule 3745-77-07(A)(1) and PTI P0113390]

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. any exceedances of the 0.388 gal of OC (hexane) 'loss' per ton from emissions units P043 and P051, combined;
 - b. any exceedance of the 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051, combined;



- c. any exceedances of the 58.0 tons OC (alcohol) /month, from emissions units P051 and P060, combined; and
- d. any exceedance of the 552 tons of OC (alcohol) per rolling 12-month period, from emissions units P051 and P060, combined.

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

[OAC rule 3745-77-07(A)(1) and PTI P0113390]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart N, including the following sections:

63.2860(c)	significant modification notifications, as applicable
63.2861(a)	annual compliance certification
63.2861(b)	deviation notification report
63.2861(c)	periodic startup, shutdown, and malfunction report
63.2861(d)	immediate startup, shutdown, and malfunction report

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart GGGG and PTI P0113390]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

811 tons of OC (hexane) per rolling, 12-month period, from emissions units P043 and P051 combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2)e.

b. Emission Limitation:

0.388 gal of OC (hexane) 'loss' per ton of soybean processed [rolling 6-month average]



Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(2)c.

c. Emission Limitation:

hexane loss restrictions [See b)(2)b.]

Applicable Compliance Method:

Compliance shall be based on the requirements specified in b)(2)b. through b)(2)d.

d. Emission Limitation:

58.0 tons OC (alcohol) /month, from emissions units P051 and P060, combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(3)c.

e. Emission Limitation:

552 tons of OC (alcohol) per rolling 12-month period, from emissions units P051 and P060, combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(3)d.

f. Emission Limitations:

2.30 lb PE/hr, 10.1 ton PE/yr

Applicable Compliance Method:

The hourly particulate emissions limits are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitations, compliance with the annual emission limitations shall also be demonstrated.



g. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as 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).

g) Miscellaneous Requirements

(1) None.



10. P060, Ethanol Soybean Extraction

Operations, Property and/or Equipment Description:

Ethanol soybean extraction operation with condenser: modified emission limitations due to the changes to P051 (above)

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 operations(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. 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 P0116301 issued February 19, 2014]	58.0 tons OC (alcohol)/month, from emissions units P051 and P060, combined (point and fugitive) 552 tons of OC (alcohol) per rolling, 12-month period, from emissions units P051 and P060, combined [See c)(1)]

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Alcohol consumption /loss, i.e., emission rates from the alcohol extraction operations in emissions units P051 and P060 combined shall be determined on a "mass balance" basis. Consumption, i.e., emission rates shall not exceed the following levels:

a. total stack ethanol emissions from emissions units P051 and P060 shall be limited to 11.3 pounds/hour;

b. total alcohol consumption in emissions units P051 and P060 shall not exceed 162,400 gallons (552 tons) per rolling, 12-month period; and

c. the short-term loss of hexane from emissions units P051 and P060 shall not exceed 58.0 tons per month.

[OAC 3745-77-07(A)(1) and PTI P0116301]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month, for emission units P051 and P060 combined:
 - a. the total amount of alcohol inventory lost in gallons/month;
 - b. the amount of alcohol emitted in tons/month;
 - c. the amount of alcohol emitted in tons/rolling, 12-month; and
 - d. all incidents of startup or shutdown of the emission units. (This should include all amounts of alcohol that are routinely added to the system or returned to the storage tanks due to startup or shutdown. This amount of alcohol is process alcohol that is present in the system during times of continuous operation, but will drain out of the system during shutdown and needs to be charged back into the system prior to startup. The amount of alcohol used to "recharge" the system should not be interpreted as an "alcohol loss" in calculating emission rates).

[OAC 3745-77-07(C)(1) and PTI P0116301]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. any exceedances of the 58.0 tons OC (alcohol) /month, from emissions units P051 and P060, combined; and
 - b. any exceedance of the 552 tons of OC (alcohol) per rolling, 12-month period, from emissions units P051 and P060 combined.

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

[OAC 3745-77-07(C)(1) and PTI P0116301]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

58.0 tons OC (alcohol)/month, from emissions units P051 and P060, combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(1).



[OAC 3745-77-07(C)(1) and PTI P0116301]

b. Emission Limitation:

552 tons of OC (alcohol) per rolling 12-month period, from emissions units P051 and P060, combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(1).

[OAC 3745-77-07(C)(1) and PTI P0116301]

g) Miscellaneous Requirements

(1) None.



11. P066, Soybean Meal Cooler

Operations, Property and/or Equipment Description:

Soybean meal cooler with a cyclone: modified by adding a stacked tray extension to the system, thereby increasing throughput

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 operations(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. 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 03-13045 issued June 14, 2001]	3.66 lbs particulate emissions (PE)/hr, 16.0 tons/yr 2.93 tons particulate matter less than 10 microns in size (PM10)/hr, 12.8 tons PM10/year See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

Best available technology (BAT) for this emissions unit has been determined to be the use of a cyclone.

b. The emission limitation specified by OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.



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

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cyclone during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the cyclone on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the cyclone is 0.5 to 10 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1) and PTI 03-13045]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time when the pressure drop across the cyclone was outside of the range specified by the manufacturer;



- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC 3745-77-07(C)(1) and PTI 03-13045]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

3.66 lbs fugitive PE/hr, 16.0 tons fugitive PE/yr

Applicable Compliance Method:

The hourly PE limit was established in accordance with the results of emissions testing (August 1979) on a similar unit, and adjusting for capacity difference between the two units.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13045]

- b. Emission Limitations:

3.14 lbs fugitive PM10/hr, 13.7 tons fugitive/yr

Applicable Compliance Method:

The hourly PE limit was established in accordance with the results of emissions testing (August 1979) on a similar unit, and adjusting for capacity difference between the two units. (80% of PE is PM10, based on determination by permittee)

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is



shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13045]

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as 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 3745-77-07(C)(1) and PTI 03-13045]

g) Miscellaneous Requirements

(1) None.



12. P085, Extruder Aspiration

Operations, Property and/or Equipment Description:

Extruder aspiration 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 operations(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. 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 03-13292 issued September 29, 1999]	0.84 lb particulate emissions (PE)/hr, 3.68 tons PE/year 0.005 grain (g)r PE/dry standard cubic foot (dscf) See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

Best Available Technology (BAT) for this emission unit has been determined to be the use of a control system consisting of a baghouse with a maximum outlet concentration of 0.005 gr/dscf.

b. The emission limitation specified by OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.



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

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 10 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1) and PTI 03-13292]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);



- b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC 3745-77-07(C)(1) and PTI 03-13292]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.005 gr PE/dscf
0.84 lb PE/hr, 3.68 tons PE/year

- Applicable Compliance Method:

The 0.005 gr PE/dscf limitation is the established maximum outlet concentration for the baghouse. Compliance with the lb/hr limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (19,600 acfm - the portion of total air flow associated with this emissions unit), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13292]

- b. Emission Limitation:

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



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

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 3745-77-07(C)(1) and PTI 03-13292]

g) Miscellaneous Requirements

(1) None.



13. P086, TSPC Dryer

Operations, Property and/or Equipment Description:

Textured soy protein dryer 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 operations(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. 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 03-13292 issued September 29, 1999]	0.43 lb particulate emissions (PE)/hr, 1.88 tons PE/year 0.005 grain (gr) PE/dry standard cubic foot (dscf) See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A).

Best Available Technology (BAT) for this emission unit has been determined to be the use of a control system consisting of a baghouse with a maximum outlet concentration of 0.005 gr/dscf.

b. The emission limitation specified by OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.



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

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 10 inches of water.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1) and PTI 03-13292]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);



- b. an identification of each incident of deviation described in (a) above where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

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

[OAC 3745-77-07(C)(1) and PTI 03-13292]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.005 gr PE/dscf
0.43 lb PE/hr, 1.88 tons PE/year

Applicable Compliance Method:

The 0.005 gr PE/dscf limitation is the established maximum outlet concentration for the baghouse. Compliance with the lb/hr limitation may be determined by multiplying the maximum baghouse outlet concentration of 0.005 gr/dscf by the baghouse's maximum volumetric air flow rate (10,000 acfm - the portion of total air flow associated with this emissions unit), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13292]

- b. Emission Limitation:

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



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

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 3745-77-07(C)(1) and PTI 03-13292]

g) Miscellaneous Requirements

(1) None.



14. P901, Truck Meal/Hull Loadout Process

Operations, Property and/or Equipment Description:

Truck Meal Loadout Process with Blower, Cyclone, and 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 operations(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. 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)(a) [PTI P0104501 issued April 7, 2009]	<p><u>Fugitive Emissions from Truck Loading</u> 30.31 tons of particulate emissions (PE)/year</p> <p>Visible fugitive PE shall not exceed 20% opacity as a three-minute average from truck loading operations</p> <p><u>Stack Emissions from Baghouse</u> 6.62 tons of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀)/year;</p> <p>0.0035 gr PM10/dry standard cubic foot (dscf) [see b)(2)f.]</p> <p>See b)(2)a.</p> <p>Visible PE shall not exceed 0% opacity as a six-minute average from the baghouse stack</p>
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 3745-17-07(A)	See b)(2)e.



(2) Additional Terms and Conditions

- a. The "Best Available Technology (BAT) control requirements for this emissions unit has been determined to be:
 - i. use of a mechanical choke load out spout; and
 - ii. use of an aspiration system vented to a baghouse for the fugitive emissions generated from loading operation using the mechanical choke load out spout. The baghouse shall achieve a maximum outlet concentration of 0.0035 gr PM10/dscf.
- 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. Solae 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 OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. The visible PE emission limitation specified by OAC rule 3745-17-07(A) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. All particulate matter emissions from the baghouse stack are PM10.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for (a) any visible particulate emissions from the baghouse stack serving the truck loading operations and (b) fugitive visible emissions from the truck loading operation. 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. for visible particulate emissions from the baghouse stack serving the truck loading operation:
 - i. the color of the emissions;
 - ii. the total duration of any visible emissions incident; and
 - iii. any corrective actions taken to eliminate the visible emissions.



- b. for fugitive particulate emissions from the truck loading operation:
 - i. the color and location of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to 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 (iv) above or continue the 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 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 3745-77-07(C)(1) and PTI P0104501]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the baghouse stack serving the truck loading operation;
 - b. all days during which any abnormal visible fugitive particulate emissions were observed from the truck loading operation; and
 - c. any corrective actions taken to eliminate the visible particulate emissions and abnormal 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 3745-77-07(C)(1) and PTI P0104501]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

30.31 tons of fugitive PE/year (fugitive from truck loading operation)

Applicable Compliance Method:

The permittee shall demonstrate compliance by applying a 60% capture efficiency to fugitive emissions generated from the loading operation. The fugitive emissions from the loading operation were calculated by multiplying a maximum soybean throughput of 120 tons/hr, a maximum operating schedule of 8760hrs/yr, an emission factor of 0.27 lb of PE/ton of meal (AP-42 Section 9.11.1, Vegetable Oil Processing [11/95]), conversion factors of ton/2000 lbs and 0.797 tons of meal per ton of soybeans, and applying a 33% control efficiency for use of a mechanical choke spout.

[OAC 3745-77-07(C)(1) and PTI P0104501]

b. Emission Limitation:

0.0035 gr PM₁₀/dscf (stack)

Applicable Compliance Method:

The hourly emission limitation was established in accordance with the baghouse equipment manufacturer's guarantee. If required, the permittee shall demonstrate compliance with the gr/dscf limitation 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, Northwest District Office.

[OAC 3745-77-07(C)(1) and PTI P0104501]

c. Emission Limitation:

6.62 tons of PM₁₀/year (stack)

Applicable Compliance Method:

The ton per year emission limitation was developed by multiplying the emission limitation of 0.0035 gr PM₁₀/dscf by the maximum volumetric flow rate (50,400 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the gr/dscf emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0104501]

d. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity as a three-minute average from truck loading operations



Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with 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 3745-77-07(C)(1) and PTI P0104501]

e. Emission Limitation:

Visible PE shall not exceed 0% opacity as a six-minute average from the baghouse stack

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC 3745-77-07(C)(1) and PTI P0104501]

g) Miscellaneous Requirements

(1) None.



15. Emissions Unit Group -Group A: F002,F005,F006,F007,F008,F009,F013,F014,

EU ID	Operations, Property and/or Equipment Description
F002	Column Grain Dryer
F005	truck and rail grain receiving (no. 3 grain dump), with choke flow, partial enclosure and baghouses
F006	truck grain receiving (no. 1 truck dump), with choke flow, partial enclosure and baghouse
F007	truck grain receiving (no. 2 truck dump), with choke flow, partial enclosure and baghouse
F008	Elevator Rail Loadout
F009	Load out spout, No.1 dump shed
F013	Rail loadout-meal top loading choke screw loadout conveyor
F014	#1 Bean Bowl Hard Cover

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 operations(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. 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)(1)	See b)(2)a.
b.	OAC rule 3745-17-08(B)(1)	See b)(2)b.

(2) Additional Terms and Conditions

a. 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).

b. The facility 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(B)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.



Preliminary Proposed Title V Permit

Bunge N.A.

Permit Number: P0115976

Facility ID: 0339010005

Effective Date: To be entered upon final issuance

- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.