



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 14-02914

Fac ID: 1431401678

DATE: 8/30/2005

Bunge North America Company, L.L.C.
Jerri Thibaut
2885 Sharon Road
Cincinnati, OH 45241

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 8/30/2005
Effective Date: 8/30/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-02914

Application Number: 14-02914
Facility ID: 1431401678
Permit Fee: **\$0**
Name of Facility: Bunge North America Company, L.L.C.
Person to Contact: Jerri Thibaut
Address: 2885 Sharon Road
Cincinnati, OH 45241

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

**2885 Sharon Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):

Second modification of F006, a column grain drying system, issued in PTI 14-02914 on 12/12/02, due to a change in emissions factors.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. 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

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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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant

Tons Per Year

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PM	23.22
PM10	0.82
SO2	0.049
NOx	8.2
OC	0.9
CO	6.9

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Emissions Unit ID: F006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-08(B)
F006 - 18.7 MMBTU/hr Grain Column Drying System - Modification	OAC rule 3745-31-05(A)(3)	
	40 CFR Part 60 Subpart DD	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-07(B)(1)	

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Emissions Unit ID: F006

Applicable Emissions
Limitations/Control Measures

5.3 lbs PM/hr, 23.22 TPY PM
0.19 lb PM10/hr, 0.82 TPY
PM10

Emissions from dryer burner
only:

0.0006 lb SO2/MMBTU, 0.049
TPY SO2

0.10 lb NOx/MMBTU, 8.2 TPY
NOx

0.011 lb OC/MMBTU, 0.9 TPY
OC

0.084 lb CO/MMBTU, 6.9 TPY
CO

See term B.1.

The requirements of this rule
also include compliance with
the requirements of OAC rule
3745-17-07(A)(1),
3745-17-07(B)(1),
3745-17-08(B) and 40 CFR
Part 60 Subpart DD.

Exempt, column plate
perforation less than 2.4 mm
diameter.

Visible particulate emissions
from any stack shall not exceed
20 percent opacity, as a six-
minute average, except as
specified by rule.

Visible particulate emissions
from any fugitive dust

emissions point shall not exceed
20 percent opacity, as a three-
minute average, except as
specified by rule.

Reasonably available control
measures shall be utilized to
prevent fugitive particulate
emissions from becoming
airborne.

Modification Issued: 8/30/2005**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas as the fuel for the dryer burner and small perforation sizes to minimize particulate emissions.
- 2.b** The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. The external perforation size on the column dryer shall not exceed 1.59 mm (millimeters) for the lower heating section and 1.98 mm for the upper heating section.

C. Monitoring and/or Recordkeeping Requirements

- 1. None

D. Reporting Requirements

- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the emission limitations as outlined. Also, the report shall include the reason for the exceedance and the steps taken to resolve the violation. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

E. Testing Requirements

- 1. Compliance with the visible particulate emissions limitations outlined in OAC rule 3745-17-07(A)(1) and 3745-17-07(B)(1) shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
- 2. Emissions Limitation:
5.3 lbs/hr PM

Modification Issued: 8/30/2005**Applicable Compliance Method:**

The PM emissions are calculated by adding the PM emissions from the grain column dryer and the PM emissions from the dryer burner. The PM emissions from the grain column dryer are calculated by multiplying the amount grain dried (tons/hr) [dryer capacity (bushels/hour) times the density of the grain dried (lbs/bushel) times 1 ton/2000 lbs] times the emission factor (0.043 lbs/ton). The emissions factor was provided in PTI application 14-02914 submitted February 1, 1993. The PM emissions from the dryer burner are calculated by multiplying the hourly fuel usage(MMft3/hr) times the emission factor (lb/MMft3). The emission factor is taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

3. Emissions Limitation:
23.22 TPY PM

Applicable Compliance Method:

The PM emissions are calculated by adding the PM emissions from the grain column dryer and the PM emissions from the dryer burner. The PM emissions from the grain column dryer are calculated by multiplying the amount grain dried (tons/hr) [dryer capacity (bushels/hour) times the density of the grain dried (lbs/bushel) times 1 ton/2000 lbs] times the emission factor (0.043 lbs/ton) times the operating hours times 1 ton/2000 lbs. The emissions factor was provided in PTI application 14-02914 submitted February 1, 1993. The PM emissions from the dryer burner are calculated by multiplying the annual fuel usage(MMft3/yr) times the emission factor (lb/MMft3) times 1 ton/2000 pounds. The emission factor is taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

4. Emissions Limitation:
0.19 lb PM10/hr

Applicable Compliance Method:

The PM10 emissions are calculated by adding the PM10 emissions from the grain column dryer and the PM10 emissions from the dryer burner. The PM10 emissions from the grain column dryer are calculated by multiplying the hourly PM emissions times (1 - 0.991). The percent PM10 emissions was taken from RACM Table 2.5-2. The PM10 emissions from the dryer burner are calculated by multiplying the hourly fuel usage(MMft3/hr) times the emission factor (lb/MMft3). The emission factor is taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

5. Emissions Limitation:

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0.82 TPY PM10

Applicable Compliance Method:

The PM10 emissions are calculated by adding the PM10 emissions from the grain column dryer and the PM10 emissions from the dryer burner. The PM10 emissions from the grain column dryer are calculated by multiplying the annual PM emissions times (1 - 0.991). The percent PM10 emissions was taken from RACM Table 2.5-2. The PM10 emissions from the dryer burner are calculated by multiplying the annual fuel usage(MMft3/yr) times the emission factor (lb/MMft3) times 1 ton/2000 pounds. The emission factor is taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

6. Emissions Limitation for dryer burner:

0.10 lb NOx/MMBTU

0.011 lb OC/MMBTU

0.0006 lb SO2/MMBTU

0.084 lb CO/MMBTU

Applicable Compliance Method:

The emissions are calculated by dividing the emission factors by the heat content of the fuel burned. The emission factors are taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

7. Emission Limitation for dryer burner:

8.2 TPY NOx

6.9 TPY CO

0.049 TPY SO2

0.9 TPY OC

Applicable Compliance Method:

The emissions are calculated by multiplying the fuel usage times the emission factors and converting the pounds into tons. The emission factors are taken from AP-42, Fifth Edition, Chapter 1.4, Natural Gas Combustion (7/98).

F. Miscellaneous Requirements

1. None