



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL

MARION COUNTY

Application No: 03-08866

Fac ID: 0351010002

DATE: 8/29/2006

Bunge North America (East) LLC

Evan Taulbee

751 E Farming St

Marion, OH 43302

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section

Division of Air Pollution Control

CC: USEPA

NWDO

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **03-08866** FOR AN AIR CONTAMINANT SOURCE FOR
Bunge North America (East) LLC

On 8/29/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Bunge North America (East) LLC**, located at **751 E Farming St, Marion, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-08866:

Soybean meal extraction, soybean meal desolventizing toasting, drying, cooling and soybean meal cooler.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-08866

Application Number: **03-08866**
APS Premise Number: **0351010002**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **Bunge North America (East) LLC**
Person to Contact: **Evan Taulbee**
Address: **751 E Farming St
Marion, OH 43302**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**751 E Farming St
Marion, OHIO**

Description of modification:
Soybean meal extraction, soybean meal desolventizing toasting, drying, cooling and soybean meal cooler.

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

Bunge North America (East) LLC

Facility ID: **0351010002**

PTI Application: 03-08866

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

Bunge North America (East) LLC

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

SOURCE OPERATION 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 and regulations.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|-------------------------------------------|--------------------------------------------------------------------------|
|-------------------------------|-------------------------------------|--------------------------|-------------------------------------------|--------------------------------------------------------------------------|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Bunge North America (East) LLC** located in **MARION** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| P039(modification) | Soybean Meal Extraction w/condenser adsorber | Compliance w/ terms and conditions in this permit and use of condenser & adsorber | 3745-31-05 3745-21-07 | 0.24 gal/ton of crushed soybeans based on a 365 day rolling average 65.32 tons/rolling 30 day period 392 tons/rolling twelve month period |
| P040 (modification) | Soybean meal desolventizing, tuasting, drying, cooling | Compliance w/ elimination | 3745-31-05 3745-17-11 3745-1707 | 2.72 lb/hr TSP 2.72 lb/hr PM10 20% opacity as a 6-minute average, except as provided by rule. |
| P046 (modification) | Soybean meal cooler w/cyclone | Compliance w/ terms and conditions in this permit and use of cyclone. | 3745-31-05 3745-17-11 3745-17-07 | .01 gr/dscf (1.5 lbs PM/hr) |

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| VOC | 392. |
| PM | 18.51 |
| PM ₁₀ | 11.91 |

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown

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of the associated air pollution sources.

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AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. VOC emissions from the hexane extraction operation emanate from Ohio EPA Source No.'s P039, P040 and P046. It is impractical to attempt to determine emission rates on a source-by-source basis. The VOC emission rates of this permit represent the allowable emissions from all three sources.
2. Hexane consumption/emission rates from the hexane extraction operation shall be determined on a "mass balance" basis. Consumption/emission rates shall not exceed the following levels:
 - A. Hexane consumption in sources P039, P040 and P046 shall not exceed 140,000 gallons (392 tons) per rolling twelve month period;
 - B. The emissions of hexane from sources P039, P040 and P046 shall not exceed 0.24 gallons per ton crushed soybeans (.000671 pounds of hexane per pound of crushed soybeans), based on a 365-day rolling weighted average; and
 - C. The short-term loss of hexane from sources P039, P040 and P046 shall not exceed 65.32 tons in any rolling 30 day period.
3. The company shall maintain daily records which contain the following information for sources P039, P040 and P046:
 - A. The total quantity of soybeans weighted in the preparation process before the hexane extraction operation;
 - B. The change in the amount of hexane inventory;
 - C. The 365-day rolling weighted average hexane loss rate (gallons per ton of crushed soybeans, and pounds hexane per pound crushed soybeans);
 - D. The amount of hexane lost in the previous 30-day period (tons per rolling 30-day period);
 - E. All incidences of startup or shutdown of these sources (this should include all amounts of hexane that are routinely added to the system or returned to the storage tank due to startup or shutdown. This amount of hexane is process hexane that is present in the system during shutdown and needs to be

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charged back into the system during startup. The amount of hexane used to "recharge" the system should not be interpreted as a "hexane loss" in calculating emission rates.);

- F. Dates of scheduled cleaning/maintenance; and
 - G. Dates of any process upsets.
4. The company shall notify the Ohio EPA within forty-five days of any exceedance of the emission limitations/usage restrictions in this permit. The company shall submit quarterly reports documenting all exceedances of the emission limitations/usage restrictions of this permit to the Ohio EPA Northwest District Office. For each exceedance, the company shall also provide the following additional information:
- A. The cause of the excursion; and
 - B. The action that has been taken and/or will be taken to correct the violation and prevent further occurrences.
5. All reports are to be submitted to Ohio EPA Northwest District Office, 347 N. Dunbridge Rd., Bowling Green, OH 43402.