

STREET ADDRESS:

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Columbus, OH 43215-1099

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JAN 12 1996

MAILING A.

P.O. Box
Columbus, OH 43216-10**SOUTHWEST DISTRICT**

Re: Permit to Install
Shelby County
Application No: 05-7365
NSPS
SYNTHETIC MINOR

CERTIFIED MAIL

November 1, 1995

CARGILL, INCORPORATED
MICHAEL HOERLE
2400 INDUSTRIAL DRIVE
SIDNEY, OH 45365-8952

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,



Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
SOUTHWEST DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

Permit to Install Terms and Conditions

Application No. 05-7365
APS Premise No. 0575010160
Permit Fee: \$12200.00

Name of Facility: CARGILL, INCORPORATED

Person to Contact: MICHAEL HOERLE

Address: 2400 INDUSTRIAL DRIVE
SIDNEY, OH 45365-8952

Location of proposed source(s): 2400 INDUSTRIAL DRIVE
SIDNEY, OHIO

Description of proposed source(s):
INSTALLATION OF ADDITIONAL CRACKERS AND FLAKERS WITH A FACIL
ITY-WIDE SOYBEAN THROUGHPUT INCREASE.

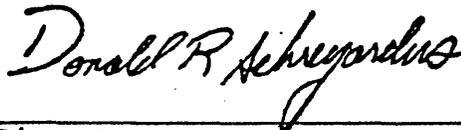
Date of Issuance: November 1, 1995

Effective Date: November 1, 1995

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

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(S)

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 prove to be inadequate or 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.

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

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

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, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for CARGILL, INCORPORATED located in Shelby County. The sources 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>
P004	Headhouse EL-4	Use of enclosures and fabric filters, usage and opacity limits	3745-31-05 3745-17-11 3745-17-07 40 CFR Part 60 Subpart DD	3.0 lbs of Particulates per hour and 0% opacity
P005	Soybean Scalper EL-5	Use of enclosures and fabric filters, usage and opacity limits	3745-31-05 3745-17-11 3745-17-07 40 CFR Part 60 Subpart DD	0.54 lb of Particulates per hour and 0% opacity
P006	Grain Dryer EL-6	Use of enclosure and perforations in column plate less than or equal to 0.094 inches in diameter	3745-31-05 3745-17-11 3745-17-07 40 CFR Part 60 Subpart DD	21.6 lbs of particulates per hour; 20% opacity;
P007	Soybean Cracking Mills PR-1	Use of enclosure and fabric filters, usage and opacity limits	3745-31-05 3745-17-11 3745-17-07	0.41 lbs of particulates per hour and 10% opaci
P009	Dehuller and Classification	Use of enclosures and fabric filters, usage and opacity limits	3745-31-05 3745-17-07 3745-17-11	0.41 lb of Particulates per hour and 10% c

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P010	Flaker	Use of enclosures and cyclones, usage and opacity limits	3745-31-05 3745-17-07 3745-17-11	3.32 lbs of particulates per hour and 20% opacity
P011	Hull grinder #140	Use of enclosures and fabric filters, usage and opacity limits	3745-31-05 3745-17-07 3745-17-11	0.02 lbs of particulates per hour and 10% opacity
P012	Soybean Conditioner	Use of enclosures and cyclone, usage and opacity limits	3745-31-05 3745-17-07 3745-17-11	2.3 lbs of particulates per hour and 20% opacity
P015	Meal Grinder	Use of enclosures and fabric filters, usage and opacity limitations	3745-31-05 3745-17-07 3745-17-11 3745-21-07(G)	0.19 lb of particulates per hours; 10% opacity; and 50 tons of combined VOC emissions from sources P015, P016, P018, P030, P032, P033, P901, and P902 per month
P018	Soybean Extractor	Use of solvent recovery system; throughput and emission limits	3745-31-05 3745-21-07(G)	50 tons of combined VOC emissions from sources P015, P016, P018, P030, P032, P033, P901 and P902 per month
P024	Soybean Aspirator	Use of enclosure, cyclone and fabric filters	3745-31-05 3745-17-07 3745-17-11	0.04 lbs of particulates per hour, and 10% opacity

<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>
P032	Meal Storage (West)	Use of fabric filters	3745-31-05 3745-17-07 3745-17-11 3745-21-07(G)	0.55 lb of particulates per hour, 10% opacity, and 50 tons of combined VOC emissions from sources P015, P016, P018, P030, P032, P033, P901 and P902 per month
P033	Meal Storage (East)	Use of fabric filters	3745-31-05 3745-17-07 3745-17-11 3745-21-07(G)	0.55 lb of particulates per hour, 10% opacity, and 50 tons of combined VOC emissions from sources P015, P016, P018, P030, P032, P033, P901 and P902 per month

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	340
Particulates	93.87
PM ₁₀	21.55

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P004	Headhouse	DD
P005	Scalper	DD
P006	Grain Dryer	DD

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and OEPA Southwest District Office - DAPC
401 East Fifth Street
Dayton, Ohio 45402-2911

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 OEPA Southwest District Office - DAPC, 401 East Fifth Street, Dayton, Ohio 45402-2911.

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 OEPA Southwest District Office - DAPC, 401 East Fifth Street, Dayton, Ohio 45402-2911.

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 of the associated air pollution sources.

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.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The overall volatile organic compound (VOC) emissions from the crush operation, which includes: sources P015, meal grinder; P016, meal screening; P018, soybean oil extractor; P030, the dryer/cooler; P032 and P033, the two meal storage tanks; P901, the truck loadout; and P902, the railcar loadout, at this facility, shall not exceed 340 tons per rolling 12 month period and 50 tons per month.
2. The amount of soybeans processed at this facility shall not exceed 945,000 tons per rolling 12 month period.
3. The crush operation hexane disappearance shall not exceed 0.04% by weight of soybean throughput, based on a 12 month rolling average.

In order to assure federal enforceability, for the first twelve calendar months after the effective date of this PTI, the cumulative hexane disappearance shall be calculated at the end of each month using the previous 12 months of data.

During the first twelve months after the effective date of this PTI, this facility shall maintain monthly records that indicate the amount of hexane disappearance, for each month and the cumulative total, in percent disappearance by weight of soybean throughput.

4. The following air contaminant sources shall be equipped with enclosures that minimize or eliminate fugitive dust emissions: sources P004 through P007, the head house, scalper, grain dryer, cracking mills, P009 through P012, dehuller, flaker, hull grinding, conditioner, P015, meal grinder, P024, aspirator.
5. The air contaminant sources at this facility shall be equipped with the following control systems:
 - A. sources P004, P005, P007, P009, P011, P015, P032, and P033 shall be equipped with fabric filters;
 - B. sources P010 and P012 shall be equipped with cyclones;
 - C. source P006, grain dryer, shall be equipped with a settling chamber and column plate, with perforations of not greater than 0.094 inches in diameter; and
 - D. source P024, soybean aspirator, shall be equipped with a cyclone and fabric filters.
6. The visible emissions from the air contaminant sources at this facility shall not exceed the following:

- A. 0% opacity from sources P004 and P005;
 - B. 10% opacity from the control devices for sources P007, P009, P011, P015, P024, P032 and P033; and
 - C. 20% opacity from sources P006, P010, and P012.
7. The amount of soybean material processed through the sources at this facility shall not exceed the following:
- A. 13,800 tons per day for source P004;
 - B. 4,320 tons per day for sources P005, P006, and P024;
 - C. 2,928 tons per day for sources P007 and P009;
 - D. 2.716 tons per day for sources P010 and P012;
 - E. 194 tons per day for source P011; and
 - F. 2,183 tons per day for source P015.
8. The particulate emissions, in pounds per hour, for each of the sources shall not exceed the following:
- A. 3.00 pounds from source P004;
 - B. 0.54 pounds from source P005;
 - C. 21.6 pounds from source P006;
 - D. 0.41 pounds for sources P007 and P009, each;
 - E. 3.32 pounds for source P010;
 - F. 0.02 pounds for source P011;
 - G. 2.3 pounds for source P012;
 - H. 0.19 pounds for source P015;
 - I. 0.04 pounds for source P024; and
 - J. 0.55 pounds for sources P032 and P033, each.
9. This facility shall maintain the following daily records on the materials employed in the sources P004, P005, P007, P010, P011, and P015:
- A. the amount of soybeans, in tons, processed in source P004, the head house;
 - B. the amount of soybeans, in tons, processed in source P005, the scalper;
 - C. the amount of soybeans, in tons, processed in source P007, the cracking mills;
 - D. the amount of soybean material, in tons, processed in source P010, the flaker;
 - E. the amount of soybean hulls, in tons, processed in source P011, the hull grinder; and
 - F. the amount of soybean meal material, in tons, processed, in source P015, the meal grinder.

This facility shall maintain monthly records that list the following information for material processed in the soybean crushing operation:

- A. the amount of solvent in the inventory at the beginning of the month, in tons;
- B. the amount of solvent added to the inventory, during the month, in tons;

- C. the amount of solvent in the inventory at the end of each month, in tons;
- D. the amount of solvent lost from the solvent inventory for the month, in tons*;
- E. the amount of soybeans crushed, in tons;
- F. the amount of solvent lost, in percent by weight of the soybeans crushed**; and
- G. the 12 month rolling average solvent lost, in percent by weight of soybeans crushed***.

* For item D, the calculated monthly solvent loss from the inventory for the soybean crushing operation should be determined in accordance with the following equation:

$$\text{SOL1} = \text{sol. added (item B)} - [\text{sol. begin (item A)} - \text{sol. end (item C)}]$$

where:

SOL1 = the amount of solvent lost, in tons.

** For item F, the amount of solvent lost, in percent by weight of the soybeans crushed for the soybean crushing operation should be determined in accordance with the following equation:

$$\text{SOL/SOY} = [\text{SOL1/soybean crushed (item E)}] \times 100\%$$

where:

SOL/SOY = the amount of solvent lost, in percent by weight of the soybeans crushed.

*** For item G, the 12 month rolling average amount of solvent lost, in percent by weight of the soybeans crushed for the soybean crushing operation should be determined in accordance with the following equation:

$$\text{AVG.12} = (\text{TSOL.1/TSOYC}) \times 100\%$$

where:

AVG.12 = the 12 month rolling average amount of solvent lost, in percent by weight of soybeans crushed.

TSOL1 = the total amount of solvent lost for the last 12 months, in tons.

TSOYC = the total amount of soybeans crushed for the last 12 months, in tons.

The above daily and monthly records shall be maintained in the company's files for a period of at least three years and shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

This facility shall submit quarterly reports that summarize all of the exceedances of the emission and/or usage limitations in these terms and conditions. These reports shall be submitted by February 15, May 15, August 15, and November 15 of each calendar year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

This facility shall submit an annual report that summarizes all of the above information, for each source, for the previous calendar year. The report shall be submitted by February 15 of each calendar year.

10. This facility shall conduct, or have conducted, emission stack test(s) in order to demonstrate compliance with the allowable mass emission rate requirement for sources P004, P005, P007, P009 through P012, P015, and P024. The emission tests shall be conducted in accordance with test methods and procedures approved by the US EPA. The tests shall be conducted under maximum production rates unless otherwise specified or approved by the Ohio EPA.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the source operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA field office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA field office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information regarding the source operating parameters.

A comprehensive written report on the results of the emission tests shall be submitted within 30 days following completion of the tests.

