



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/11/2013

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0339010005
Permit Number: P0113390
Permit Type: Administrative Modification
County: Huron

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Bunge N.A.**

Facility ID:	0339010005
Permit Number:	P0113390
Permit Type:	Administrative Modification
Issued:	4/11/2013
Effective:	4/11/2013



Division of Air Pollution Control
Permit-to-Install
for
Bunge N.A.

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Final Permit-to-Install
Bunge N.A.
Permit Number: P0113390
Facility ID: 0339010005
Effective Date: 4/11/2013

Authorization

Facility ID: 0339010005
Facility Description: Soybean oil mill.
Application Number(s): M0002132, M0002134
Permit Number: P0113390
Permit Description: Administrative modification to revise short-term organic compound limitations for conventional and speciality oil extraction operations. Revisions involve establishing a rolling, 12-month organic compound limit and removing hourly and monthly short-term limits. Administrative modification will also serve to reflect that emissions unit P051 was not modified in accordance with PTI 03-13369 and the effective requirements for emissions unit P051 were originally established in PTI 03-13045.
Permit Type: Administrative Modification
Permit Fee: \$200.00
Issue Date: 4/11/2013
Effective Date: 4/11/2013

This document constitutes issuance to:

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

of a Permit-to-Install for the emissions unit(s) identified on the following page.

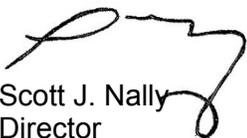
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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 Permit-to-Install for the emissions unit(s) listed in this section 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 emissions unit(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 emissions unit(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



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0113390
Permit Description: Administrative modification to revise short-term organic compound limitations for conventional and speciality oil extraction operations. Revisions involve establishing a rolling, 12-month organic compound limit and removing hourly and monthly short-term limits. Administrative modification will also serve to reflect that emissions unit P051 was not modified in accordance with PTI 03-13369 and the effective requirements for emissions unit P051 were originally established in PTI 03-13045.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P043
Company Equipment ID:	Conventional Hexane Extraction
Superseded Permit Number:	03-13045
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P051
Company Equipment ID:	Specialty Soybean Extraction
Superseded Permit Number:	03-13369
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Bunge N.A.
Permit Number: P0113390
Facility ID: 0339010005
Effective Date: 4/11/2013

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. 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 re-issuance, or modification.



- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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 ORC section 3704.08.
 - (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.
- d) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required 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 Ohio EPA DAPC, Northwest District Office. 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 (i.e., postmarked) 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently



removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Final Permit-to-Install
Bunge N.A.
Permit Number: P0113390
Facility ID: 0339010005
Effective Date: 4/11/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Bunge N.A.
Permit Number: P0113390
Facility ID: 0339010005
Effective Date: 4/11/2013

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.



Final Permit-to-Install
Bunge N.A.
Permit Number: P0113390
Facility ID: 0339010005
Effective Date: 4/11/2013

C. Emissions Unit Terms and Conditions



1. P043, Conventional Hexane Extraction

Operations, Property and/or Equipment Description:

soybean oil extraction (with hexane) - conventional (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)	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)i.
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)i.
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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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 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 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.



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.

- (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.)

- (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

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.

- (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.

- (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

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)a.]

Applicable Compliance Method:

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

d. Emission Limitation:

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.

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).

g) Miscellaneous Requirements

(1) None.



2. P051, Specialty Soybean Extraction

Operations, Property and/or Equipment Description:

soybean oil extraction (with hexane and alcohol) - specialty (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)	0.388 gal 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)i.
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)j.
d.	40 CFR 63.2830 et seq. (MACT - Subpart GGGG)	See 40 CFR 63.2840 [Table 1 (ix)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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 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.
- (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.
- 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 baghouses(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.

- (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.)

- (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).



- (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

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 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.

- (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.

- (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

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)a.]

Applicable Compliance Method:
 Compliance shall be based on the requirements specified in b)(2)a through b)(2)c.



- 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 Limitation:
2.30 lb PE /hr, 10.1 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.

- 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.