

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install 03-13592

**A. Source Description**

Central Soya Company is proposing to modify its existing soybean processing facility in Delphos Ohio, Van Wert County. The proposed modifications are for the facility's soybean oil extraction and recovery system which includes the following: Desolventizing, Toasting, Drying and Cooling (DTDC) system, the Extractor, 3 cyclones, and the mineral oil absorber. This facility also operates other equipment necessary for a soybean processing facility such as grain load-in operations and soybean flake load-out operations. Central Soya Company has requested to limit the annual grain throughput so changes in emissions for VOC and PE would not be considered "major modifications" for PSD purposes.

**B. Facility Emissions**

The facility emits all criteria pollutants, and large amounts of hexane, a hazardous air pollutant. The pollutants that the company has a major source potential to emit for PSD determinations are VOC and SO<sub>2</sub>. Existing permits and SIP restrictions limit the potential emissions of VOC to 383 tons per year (tpy) and SO<sub>2</sub> to approximately 2000 tpy.

**C. Operating Limitations**

The proposed physical modifications are for the facility's soybean oil extraction and recovery system only. For consideration in determining if the project met definition a "major modification" all secondary emissions increases were included and reviewed. Considering all emission changes, the proposed project will result in an increase of particulate emissions of 14.7 tpy and a decrease of VOC emissions of 26 tpy and no significant changes in the other pollutants. Central Soya Company has requested a federally enforceable limit on their annual bean throughput of 647,875 tons of soybeans per rolling 12-month period. This establishes the permit allowable emissions at 37.2 tons of particulate emissions and 357.0 tons of VOC per rolling 12-month period.

**D. Conclusions**

By restricting annual grain throughput of the facility, the terms and conditions of this permit to install will limit the facility's VOC and PE emissions to less than that which would be considered a "major modification". Excursion reports will be required for each emissions unit to ensure compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL  
VAN WERT COUNTY**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-13592**

**DATE: 7/24/2001**

Central Soya Company, Inc  
Mel Holder  
P.O. Box 485 234 South Jefferson Street  
Delphos, OH 458330485

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA                      NWDO                      IN                      MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 03-13592**

Application Number: 03-13592  
APS Premise Number: 0381000011  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Central Soya Company, Inc  
Person to Contact: Mel Holder  
Address: P.O. Box 485 234 South Jefferson Street  
Delphos, OH 458330485

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

**234 S Jefferson Street  
Delphos, Ohio**

Description of proposed emissions unit(s):

**Modifications to the existing Soybean Oil extraction Operations and the Soybean and Soybean Meal Material handling Operations.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 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

Director

Central Soya Company, Inc

Facility ID: 0381000011

PTI Application: 03-13592

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping 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:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

## 2. 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 appropriate Ohio EPA District Office or local air agency 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).

## 3. 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.

## 4. 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.

## 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

Central Soya Company, Inc

PTI Application: 03-13592

Issued: To be entered upon final issuance

Facility ID: 0381000011

## 6. 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 reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. Fees

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

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

Central Soya Company, Inc

Facility ID: 0381000011

PTI Application: 03-13592

Issued: To be entered upon final issuance

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.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. 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.
  - ii. 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.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.

## 10. Permit To Operate Application

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

**Central Soya Company, Inc**

**PTI Application: 03-13592**

**Issued: To be entered upon final issuance**

3745-77-08(C)(3)(d).

**Facility ID: 0381000011**

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **11. 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.

Central Soya Company, Inc

Facility ID: 0381000011

PTI Application: 03-13592

Issued: To be entered upon final issuance

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

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

**4. 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.

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

**Central Soya Company, Inc**

**Facility ID: 0381000011**

**PTI Application: 03-13592**

**Issued: To be entered upon final issuance**

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.

## **6. Construction of New Sources(s)**

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

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

## **7. 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.

## **8. 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).

Centr:

PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance****9. 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.

**10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	37.2
VOC	357.0

12

**Central Soya Company, Inc**

**PTI Application: 03-13592**

**Issued: To be entered upon final issuance**

**Facility ID: 0381000011**

Centr:

PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Centr:  
PTI A

Emissions Unit ID: P031

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	40 CFR Part 60, Subpart DD OAC rule 3745-31-28
P031 - Soybean Oil Extraction and Recovery System Including the Desolventizing, Toasting, Drying and Cooling (DTDC) system, the Extractor, 3 cyclones, and the mineral oil absorber. Modification of PTI #03-7272 (issued 7/21/93) to allow for a increase in soybean throughput.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-21-07(G)	

Centr:

PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

Applicable Emissions

Limitations/Control

Measures

control requirements (see  
A.I.2.a)

see A.I.2.b.

visible PE shall not exceed  
20 percent opacity, as a six-  
minute average

8.5 pounds particulate  
emissions (PE)/hour, 37.2  
tons PE/year,

99.2 lbs volatile organic  
compounds (VOCs)/hr

Hexane Consumption:

0.20 gallon/ton of crushed  
soybeans, based on a rolling  
12-month average

357.0 tons VOC/rolling  
12-month period  
(see A.I.2.g)

none (see A.I.2.c.)

none (see A.I.2.d.)

none (see A.II.1.)

none (see A.I.2.e.)

none (see A.I.2.f.)

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** For particulate emissions, BAT has been determined to be the use of 3 cyclones (one on the DTDC dryer, two on the DTDC cooler). For VOC emissions BAT has been determined to be the use of a mineral oil absorber.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- 2.c** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Van Wert County, which is identified as a P-2 county.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.e** This emissions unit is not an "effected facility" as defined by 40 CFR Part 60 Subpart DD.
- 2.f** This facility is not subject to the requirements of this rule as this modification does not meet the definition of "Reconstruction of a Major MACT Source" as defined OAC rule 3745-31-01.
- 2.g** For the purpose of avoiding PSD permitting requirements, the permittee has requested a federally enforceable restriction of 357.0 tons of VOC/rolling 12-month period based on a soybean throughput restriction (see A.II.3.).

**II. Operational Restrictions**

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The pressure drop across each cyclone shall be maintained within 0.25.-8.0 inches of water while this emissions unit is in operation.
3. The amount of crushed soybeans processed by emissions unit P031 shall not exceed 647,875 tons per rolling 12-month period.

**Note:** This emissions unit has been in operation for over 12 months and, for the purposes of

Emissions Unit ID: P031

demonstrating compliance with the first 12 months of the rolling restrictions, the permittee shall use existing records verified by the Ohio EPA, Northwest District Office (NWDO).

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain documentation the following information for this emissions unit:
  - a. the company identification of each liquid organic material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across each cyclone while this emissions unit is in operation. 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 across each cyclone on a weekly basis.
3. The permittee shall determine the hexane consumption, i.e., the hexane usage in conjunction with the soybean oil extraction operations. The permittee shall collect and record the following information on a monthly basis:
  - a. the quantity of hexane received on site, in gallons;
  - b. the beginning and ending hexane inventory of the working system, in gallons;
  - c. any permanent or temporary inventory adjustments of the working system; An example of a permanent inventory adjustment would be a change in the working capacity of the unit or the removal of hexane from the system due to contamination. An example of a temporary inventory adjustments would be if the emissions unit is in a startup or shutdown period, where hexane has been added to the system or returned to the storage tanks and is not accounted for in condition A.III.3.b. above.
  - d. the hexane consumption, in gallons (the net of a.,b., and c. above); and
  - e. the rolling, 12-month total hexane consumption, in gallons;
4. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
  - a. the quantity of soybeans weighed in the preparation process before the hexane extraction operation, in tons;
  - b. the rolling 12-month quantity of soybeans weighed in the preparation process before the hexane extraction operation, in tons;

Centr:

PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

- c. the average hexane loss rate, in gallons of hexane/ton of crushed soybeans, and in pounds hexane/pound crushed soybeans (condition A.III.3.e. divided by A.III.4.b.); and
- d. the rolling 12-month VOC emissions, in tons {condition A.III.3.e. times the hexane density (5.51 lbs VOC/gallon), divided by 2000lbs/ton}.

Centr:  
PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

#### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any cyclone did not comply with the allowable range specified in section A.II.2. of the terms and conditions of this permit.
3. The permittee shall submit deviation reports that identify any exceedances of the following operational restrictions or emission limitations:
  - a. 647,875 tons of crushed soybeans per rolling 12-month period;
  - b. 0.20 gallon hexane/ton of crushed soybeans as a 12 month rolling average; and
  - c. 357.0 tons of VOC per rolling 12-month period.
4. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 180 days following the modification of this emissions unit in accordance with the terms and conditions of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emissions limitation for PE.
  - c. Method 5 of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the above emissions limitations. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, NWDO.
  - d. The stack on this emissions unit shall be constructed such that the height and port locations meet the minimum requirements necessary to perform Methods 1-4 of 40 CFR

## Part 60, Appendix A.

- e. The testing shall be performed on all cyclones simultaneously while the emissions unit is at its maximum production rate, unless otherwise specified or approved by the Ohio EPA.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emission tests.
  - g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.
2. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- a. Emission Limitation:  
8.5 lbs PE/hour, 37.2 tons PE/year  
  
Applicable Compliance Method:  
Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition A.V.1. Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly limitation by 8760 hours and dividing by 2000 lbs/ton.
  - b. Emission Limitations:  
99.2 lbs VOC/hr  
  
Applicable Compliance Method:  
Compliance with the lbs/hr emission limitation shall be demonstrated by multiplying the maximum daily capacity of this emissions unit (2160 tons of crushed soybeans/day), by 0.20 gallon hexane/ton of crushed soybeans, by the density of hexane (5.51 lbs VOC/gallon), and dividing by 24 hrs/day.

Centr:  
PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

- c. Emission Limitation:  
0.20 gallon hexane/ton of crushed soybeans, as a 12-month rolling average
- Applicable Compliance Method:  
Compliance with this emission limitations shall be demonstrated by the record keeping in condition A.III.4.
- d. Emission Limitation:  
357.0 tons of VOC per rolling 12-month period
- Applicable Compliance Method:  
Compliance with the annual emission limitation shall be demonstrated by the record keeping in condition A.III.4.
- e. Emission Limitation:  
visible PE shall not exceed 20 percent opacity, as a six-minute average
- Applicable Compliance Method:  
If required, compliance with the visible emissions limitations established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

**VI. Miscellaneous Requirements**

1. Within 180 days of operation under the terms and conditions of this permit, the permittee shall develop a written startup, shutdown, and malfunction (SSM) plan. The SSM plan shall provide detailed procedures for minimizing VOC emissions during startup, shutdown, and malfunction periods. The SSM plan must specify operational practices during startup and shutdown periods, a program of corrective action for potentially malfunctioning processes, and a program of action to minimize the duration or occurrence of these events. This plan shall be updated on at least an annual basis and remain consistent with current industry practices.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - Soybean Oil Extraction and Recovery System Including DTDC system, the Extractor, 3 cyclones, and the mineral oil absorber.		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in annual emissions as a result of this proposed modification will be less than

Centr:  
PTI A

Emissions Unit ID: P031

**Issued: To be entered upon final issuance**

1.0 ton for each toxic compound. OAC chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that any process change that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13592 Facility ID: 0381000011  
 FACILITY NAME Central Soya Company, Inc  
 FACILITY DESCRIPTION Soybean Oil Processing Facility CITY/TWP Delphos  
 SIC CODE 2075 SCC CODE 3-02-007-87 EMISSIONS UNIT ID P031  
 EMISSIONS UNIT DESCRIPTION Soybean Oil Extraction System Including DTDC and Extractor  
 DATE INSTALLED (Mod)8/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		8.5	35.0	8.5	37.2
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds		99.2	333.0	99.2	357
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?  
 Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ unkn

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13592 Facility ID: 0381000011

FACILITY NAME Central Soya Company, Inc

FACILITY DESCRIPTION Soybean Oil Processing Facility CITY/TWP Delphos

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

see permit review form

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install 03-13592

A. Source Description

Central Soya Company is proposing to modify it's existing soybean processing facility in Delphos Ohio, Van Wert County. The proposed modifications are for the facility's soybean oil extraction and recovery system which includes the following: Desolventizing, Toasting, Drying and Cooling (DTDC) system, the Extractor, 3 cyclones, and the mineral oil absorber. This will facility also operates other equipment necessary for a soybean processing facility such as grain load-in operations and soybean flake load-out operations. Central Soya Company has requested to limit the annual grain throughput so changes in emissions for VOC and PE would not be considered "major modifications" for PSD purposes.

B. Facility Emissions

The facility emits all criteria pollutants, and large amounts of hexane, a hazardous air pollutant. The pollutants that the company has a major source potential to emit for PSD determinations are VOC and SO2. Existing permits and SIP restrictions limit the potential emissions of VOC to 383 tons per year (tpy) and SO2 to approximately 2000 tpy.

C. Operating Limitations

The proposed physical modifications are for the facility's soybean oil extraction and recovery system only. For consideration in determining if the project met definition a "major modification" all secondary emissions increases were included and reviewed. Considering all emission changes, the proposed project will result in an increase of particulate emissions of 14.7 tpy and a decrease of VOC emissions of 26 tpy and no significant changes in the other pollutants.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13592 Facility ID: 0381000011

FACILITY NAME Central Soya Company, Inc

FACILITY DESCRIPTION Soybean Oil Processing Facility CITY/TWP Delphos

Central Soya Company has requested a federally enforceable limit on their annual bean throughput of 647,875 tons of soybeans per rolling 12-month period. This establishes the permit allowable emissions at 37.2 tons of particulate emissions and 357.0 tons of VOC per rolling 12-month period.

**D. Conclusions**

By restricting annual grain throughput of the facility, the terms and conditions of this permit to install will limit the facility's VOC and PE emissions to less than that which would be considered a "major modification". Excursion reports will be required for each emissions unit to ensure compliance.

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	37.2
VOC	357.0

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13592

Facility ID: 0381000011

FACILITY NAME Central Soya Company, Inc

FACILITY DESCRIPTION Soybean Oil Processing Facility

CITY/TWP Delphos