



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SHELBY COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 05-11781

DATE: 3/5/2002

Cargill
Keith Kuhlman
2400 Industrial Drive
Sidney, OH 45365-8952

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 **\$1000** 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

SWDO

IN



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 05-11781

Application Number: 05-11781
APS Premise Number: 0575010160
Permit Fee: **To be entered upon final issuance**
Name of Facility: Cargill
Person to Contact: Keith Kuhlman
Address: 2400 Industrial Drive
Sidney, OH 45365-8952

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

**2400 Industrial Drive
Sidney, Ohio**

Description of proposed emissions unit(s):

Modification of Soybean Oil Refinery, Emissions Unit P031, to allow for an increase of throughput and an increase of emissions from 35.64 to 55.0 tons OC per rolling, 12-month summation.

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

Cargill

Facility ID: 0575010160

PTI Application: 05-11781

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 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:
 - 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 record keeping 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 record keeping 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.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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

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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.

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

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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 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.

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

12. 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.

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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 Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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. 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

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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.

5. 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.

6. 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.

7. 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).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

9. 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>
VOC	55.0

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions****Compliance with promulgated national emission standards for hazardous air pollutants (NESHAP)****I. Additional Terms and Conditions**

The permittee shall demonstrate compliance with 40 CFR 63, Subpart GGGG by April 12, 2004, the effective date for existing facilities subject to this subpart of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for source categories. The emission requirements from 40 CFR 63, Subpart GGGG limit the number of gallons of hazardous air pollutant (HAP) lost per ton of listed oilseed (soybean) processed.

II. Operational Restrictions

The facility shall follow the procedures developed in the startup, shutdown, and malfunction (SSM) plan as required in Section A.III.7 below.

III. Monitoring and/or Record keeping Requirements

1. For each operating month the permittee shall calculate the compliance ratio, comparing the actual HAP loss to the allowable HAP loss for the previous 12 operating months**, as calculated in the following equations. When the compliance ratio is less than or equal to 1.00, the source is in compliance with the HAP emissions requirements for the previous operating month (a), or rolling 12 months (b).

a. The following equation (Equation 1 from 63.2840) shall be used to determine each monthly compliance ratio:

$$\text{Compliance Ratio} = \text{actual HAP loss} / \text{allowable HAP loss}$$

The allowable HAP loss for conventional soybean desolventizer, for soybean products = 0.2 gallons per ton of soybean

b. After the first twelve calendar months of operation following the issuance of this permit, the compliance ratio shall be calculated at the end of each operating calendar month using Equation 2* of Section 63.2840; Equation 2 can also be expressed as a function of total solvent loss as follows:

$$\text{Compliance Ratio} = (f) \times (\text{actual solvent loss}) / (0.64) \times \sum ((\text{oilseed}^*) \times (\text{SLF}))$$

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Where:

f = the weighted average volume fraction of HAP in the solvent received during the previous 12 operating months, as determined from testing and/or as required in Section A.III.4 (Section 63.2854 of the MACT), 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 the previous 12 operating months, as determined in Section A.III.3 (Section 63.2853 of the MACT)

oilseed = tons of soybean processed during the previous 12 operating months, as determined in Section A.III.5 (Section 63.2855 of the MACT)

SLF = the corresponding solvent loss factor (gal/ton) for soybean processing, listed in Table 1 of CFR 63.2840; 0.2 gallons/ton for conventional soybean production

* since there is only one oilseed processed (soybean), the summations is for each shipment received, and the option to process more than one oilseed has been removed from the Equation 2; the equation can be re-adjusted if an application is received for an oilseed other than soybean.

** An operating month, as defined in Section 63.2872, is any month in which a source processes a listed oilseed, excluding any entire calendar or accounting month*** in which the source operated under an "initial startup period" as described in Section 63.2850(c)(2) or (d)(2) and as defined in Section 63.2872, or a "malfunction period" as described in Section 63.2850(e)(2) and as defined in Section 63.2872; any solvent and oilseed used during these periods shall be excluded from the compliance ratio [63.2840(b)(4) and (b)(5)].

*** An accounting month, as partially defined in Section 63.2872, is the time interval defined by a business firm during which corporate economic and financial factors are determined on a consistent and regular basis. Prior to the effective date of this rule, the facility may determine the solvent loss on an "accounting month basis", rather than a "calendar month basis", if the 12 complete accounting months are approximately of equal duration in a calendar year (Section 63.2853(a)(1)).

- c. The permittee shall maintain records of the following information:
- i. The gallons of extraction solvent (hexane) received in each delivery;

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- ii. The volume fraction of each HAP (n-hexane) exceeding 1 percent by volume in each delivery of extraction solvent (hexane);
 - iii. The weighted average volume fraction of HAP (n-hexane) in extraction solvent (hexane) received since the end of the last operating month as determined in accordance with 40 CFR, Part 63, Section 63.2854(b)(2);
 - iv. The solvent (hexane) losses, calculated as required in Sections A.III.2 and A.III.3;
 - v. The amount of soybean processed during each operating month;
 - vi. The monthly compliance ratio, calculated as in Section A.III.a above; and
 - vii. After the first 12 calendar months (or accounting months) of operation, the rolling 12 month compliance ratio, calculated as in Section A.III.b above.
2. By the end of each calendar month following an operating month*, the permittee shall determine the total solvent loss in gallons for the previous operating month. The total solvent loss for an operating month includes all solvent losses that occur during normal operating periods within the operating month. After 12 or more operating months have been documented, the permittee shall also determine the 12 operating months rolling sum of actual solvent loss in gallons, by summing the monthly actual solvent loss for the previous 12 operating months. The 12 operating months, rolling sum of solvent loss is the "actual solvent loss", which is used to calculate the compliance ratio as described in Section 63.2840(a). To determine the actual solvent loss from an emission unit/source, the permittee shall follow the procedures in the plan for demonstrating compliance. The permittee shall maintain monthly records of the following solvent (hexane) inventory and usage:
 - a. The dates that defines each operating status period during a calendar month;
 - b. The source operating status, categorized as described in Table 1 of 63.2853;
 - c. The beginning and ending solvent inventory (gallons of extraction solvent (hexane) in the inventory on the first and last day of each normal operating period);
 - d. Gallons of extraction solvent (hexane) received, purchased, and recovered during the operating period;
 - e. Solvent inventory adjustments, which may include control and performance efficiency testing;
 - f. The total solvent (hexane) loss for each calendar month, regardless of the operating status of the facility's emissions units covered by this standard;
 - g. The actual solvent (hexane) loss, in gallons, for each operating month, calculated as per Section A.III.3 below; and

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- h. The total actual rolling 12 operating month solvent (hexane) loss, in gallons, at the end of each operating month, calculated as per Section A.III.3 below and summed for each rolling 12 months, as required by Section 63.2853(c).
3. The following equation shall be used to determine the actual solvent loss occurring during all normal operating periods recorded within a calendar month:

$$\text{monthly actual solvent loss (gal)} = \sum_{i=1}^n (\text{SOLV}_B - \text{SOLV}_E + \text{SOLV}_R + \text{or} - \text{SOLV}_A)$$

SOLV_B = gallons of solvent in the inventory at the beginning of normal operating period "i"

SOLV_E = gallons of solvent in the inventory at the end of normal operating period "i"

SOLV_R = gallons of solvent received between the beginning and ending inventory dates of normal operating period "i"

SOLV_A = gallons of solvent added or removed from the extraction solvent inventory during normal operating period "i"

n = number of normal operating periods in a calendar month.

- a. The actual solvent loss is the total solvent losses during normal operating periods for the previous 12 operating months. After the initial 12 operating months following the effective date of this standard, the facility shall determine the actual solvent loss by summing the monthly actual solvent losses for the previous 12 operating months. Following the first 12 month record, the permittee shall record the actual solvent loss by the end of each calendar month following an operating month, and determine an overall weighted average volume fraction of HAP in solvent received for the previous 12 operating months, as required in Section A.III.4; and.
- b. Actual solvent loss does not include losses that occur during operating status periods listed below. If any one of these four operating status periods span an entire month, then the month is treated as nonoperating and there is no compliance ratio determination for such a month:
- i. Nonoperating periods as described in Table 1, Section 63.2853(a)(2)(ii);
 - ii. Initial startup periods as described in Section 63.2850(c)(2) or (d)(2);
 - iii. Malfunction periods as described in Section 63.2850(e)(2); and
 - iv. Exempt operation periods as described in Table 1, Section 63.2853(a)(2)(v).

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4. In order to calculate the volume fraction of HAP in the extraction solvent, as a 12 operating months weighted average, the permittee shall determine and maintain records of the following:
- a. A record of the volume fraction of each HAP comprising more than 1 percent by volume of the extraction solvent in each delivery of solvent, including solvent recovered from off-site oil, determined as follows:
 - i. EPA Method 311 of Appendix A of Part 63, a material safety data sheet, the manufacturer's certificate of analysis*, or an approved alternative method shall be used to determine the HAP content of each delivery of the extraction solvent (hexane); and/or
 - ii. The Administrator/Director may require a test using EPA Method 311 to confirm the reported HAP content in the extraction solvent.

* a certificate of analysis shall list the test method(s) and analytical results that determine the chemical properties of the solvent and the volume percentage of all HAP components present in the solvent, at quantities greater than 1 percent by volume
 - b. The weighted average volume fraction of HAP in the extraction solvent each operating month:
 - i. The weighted average volume fraction of HAP for an operating month shall include all solvent received since the end of the last operating month, regardless of the operating status at the time of the delivery; and
 - ii. The monthly weighted average volume fraction of HAP shall be determined by summing the products of the HAP volume fraction of each delivery, and the volume of each delivery, and dividing the sum by the total volume of all deliveries as expressed in the following equation:

$$\text{Monthly weighted average HAP content of extraction solvent (volume fraction)} = \frac{\sum_{i=1}^n (\text{received } i * \text{content } i)}{\text{(total received)}}$$

received i = gallons of extraction solvent received in delivery "i"
 content i = the volume fraction of HAP in extraction solvent delivery "i"
 total received = total gallons of extraction solvent received since the end of the previous operating month.
 n = number of extraction solvent deliveries since the end of the previous operating month.
 - c. After the facility has processed soybean oil for 12 operating months, the volume fraction of HAP in the extraction solvent, as a 12 operating months weighted average; calculated by summing the products of the monthly weighted average HAP volume fraction and

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corresponding volume of solvent received, and dividing by the total volume of solvent received for the 12 operating months, using the following formula:

$$\text{12-month weighted average HAP content in solvent received (volume fraction)} = \frac{\sum_{i=1}^{12} (\text{received } i * \text{content } i)}{(\text{total received})}$$

received *i* = gallons of extraction solvent received in operating month "*i*"
 content *i* = average volume fraction of HAP in extraction solvent received in operating month "*i*" as determined in accordance with Section A.III.4.a, above
 total received = total gallons of extraction solvent received during the previous 12 operating months.

The result shall be recorded at the end of each calendar month, following an operating month, and shall be applied in Equation 2 of Section A.III.1.b above (from Section 63.2840) to determine the compliance ratio.

5. The permittee shall use the following formula to determine the quantity of oilseed (soybean) processed during normal operating periods, recorded within a calendar month (*i*):

$$\text{monthly quantity of oilseed processed (tons)} = \sum_{n=1}^n (\text{seed}_B - \text{seed}_E + \text{seed}_R + \text{or} - \text{seed}_A)$$

Where:

seed_B = tons of oilseed in the inventory at the beginning of normal operating period "*i*"

seed_E = tons of oilseed in the inventory at the end of normal operating period "*i*"

seed_R = tons of oilseed received during normal operating period "*i*"

seed_A = tons of oilseed added or removed from the oilseed inventory during normal operating period "*i*"

n = number of normal operating periods in the calendar month during which this type oilseed was processed

i = operating period of one calendar month or one accounting month

The quantity of soybean oil processed is the total tons of oil processed during normal operating periods in the previous 12 operating months. The 12 operating months-quantity of soybean oil processed shall be used to calculate the compliance ratio as described in Equation 2, of Section A.III.1 (Section 63.2840 of the MACT).

6. The permittee shall develop and implement a written plan for demonstrating compliance with 40

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CFR 63, Subpart GGGG. The plan shall provide the detailed procedures that will be followed to monitor and record data necessary for demonstrating compliance with this subpart, and the procedures that will be followed for quantifying solvent loss. The plan shall include the following:

- a. The name and address of the owner or operator;
 - b. The physical address of the vegetable oil production process;
 - c. A detailed description of all methods of measurement used to determine solvent losses, HAP content of solvent, and the tons of each type of oilseed processed;
 - d. When each measurement will be made;
 - e. Examples of each calculation that will be used to determine compliance;
 - f. Example logs of how data will be recorded; and
 - g. A plan to ensure that the data continue to meet compliance demonstration needs.
7. The permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan in accordance with Section 63.6(e)(3) and implement the plan, when applicable. The permittee shall complete the SSM plan before April 12, 2004, the compliance date for an existing facility. The SSM plan must be incorporated by reference in the Title V permit and must be kept on-site and readily available as long as the facility is operational. The SSM plan shall provide detailed procedures for operating and maintaining the facility to minimize emissions during a qualifying SSM event, a malfunction period as per Section 63.2850(e)(2), or initial startup period as per the Sections 63.2850(c)(2) or (d)(2). The SSM plan shall specify a program of corrective action for malfunctioning processes and air pollution control equipment and reflect the best practices now in use by the facility to minimize emissions. The permittee shall record the following information at the end of any calendar month, in which an initial startup period or malfunction period occurred, beginning on the compliance date:
- a. A description and date of the SSM event, its duration, and reason it qualifies as an initial startup or malfunction;
 - b. An estimate of the solvent (hexane) loss in gallons for the duration of the initial startup or malfunction period; and
 - c. A checklist or other mechanism to indicate whether the SSM plan was followed during the initial startup or malfunction period.

IV. Reporting Requirements

1. The permittee shall submit an Initial Notification for Existing Sources, to the Ohio EPA Southwest District Office, within 120 days after the effective date of this subpart (8/10/01). This notification shall include the following:
 - a. The name and address of the owner or operator;
 - b. The physical address of the vegetable oil production process;
 - c. Identification of the relevant standard, (vegetable oil production NESHAP), and compliance date;
 - d. A brief description of the source, including the types of listed oilseeds (soybean) processed, nominal operating capacity, and type of desolventizer(s) used; and

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- e. A statement designating the source as a major source of HAP or a demonstration that the source meets the definition of an area source*.

* An area source is a source that is not a major source and is not collocated within a plant site with other sources that are individually or collectively a major source.

2. The permittee shall submit a Notification of Compliance Status to the Ohio EPA Southwest District Office no later than 60 days after* determining the initial 12 operating months compliance ratio. It shall be signed by the official responsible for facility compliance, who shall certify its accuracy,

attesting to whether the affected emissions units are in compliance. This notification shall include the following:

- a. The name and address of the owner or operator;
- b. The physical address of the vegetable oil production process;
- c. Each listed oilseed type processed during the previous 12 operating months;
- d. Each HAP identified under Section 63.2854(a), as being present in concentrations greater than 1 percent by volume, in each delivery of solvent received during the 12 operating months period used for the initial compliance determination;
- e. A statement designating the source as a major source of HAP or a demonstration that the source qualifies as an area source; and
- f. A compliance certification indicating whether the facility was in compliance with all of the requirements of this subpart, throughout the 12 operating months used for the initial compliance determination. This notification must include the following:
 - i. Certification that the plan for demonstrating compliance (as described in Section 63.2851) and SSM plan (as described in Section 63.2852) are complete and available on-site for inspection;
 - ii. Certification that procedures are being followed as described in the plan for demonstrating compliance; and
 - iii. Certification that the compliance ratio is less than or equal to 1.00.

* for an existing source, this notification would be no later than 50 calendar months after the effective date of the NESHAP (36 calendar months for compliance, 12 operating months to record data, and 2 calendar months to complete the report).

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3. The permittee shall submit an Annual Compliance Certification to the Ohio EPA Southwest District Office 12 calendar months after the submission of the Notification of Compliance Status. The Annual Compliance Certification provides the compliance status for each operating month during the 12 calendar month period. The report is due 60 days after the end of each 12-month period. This notification shall include the following:
 - a. The name and address of the owner or operator;
 - b. The physical address of the vegetable oil production process;
 - c. Each listed oilseed type processed during the 12 calendar months period covered by the report;
 - d. Each HAP identified under Section 63.2854(a), as being present in concentrations greater than 1 percent by volume, in each delivery of extraction solvent received during the 12 calendar months period covered by the report;
 - e. A statement designating the facility as a major source of HAP or a demonstration that the source qualifies as an area source; and
 - f. A compliance certification to indicate whether the facility was in compliance for each compliance determination made during the 12 calendar months period covered by the report, which shall include the following:
 - i. Certification that the procedures described in the plan for demonstrating compliance have been followed during the reporting period; and
 - ii. Certification that the compliance ratio was less than or equal to 1.00.
4. The permittee shall submit a Deviation Notification Report, to the Ohio EPA Southwest District Office, for each compliance determination in which the compliance ratio exceeds 1.00, as determined in Section A.III.1.a or b above. The Deviation Notification Report shall be submitted by the end of the month following the calendar month in which it is determined the deviation occurred. This deviation report shall include the following:
 - a. The name and address of the owner or operator;
 - b. The physical address of the vegetable oil production process;
 - c. Each listed oilseed type processed during the 12 operating months period in which the deviation occurred; and
 - d. The ratio comprising the deviation, as calculated in Section A.III.1.
5. The permittee shall submit a periodic Startup, Shutdown, and Malfunction (SSM) report, to the Ohio EPA Southwest District Office, by the end of the calendar month following each month in which the initial startup period or malfunction period occurred. The SSM report must include the following:
 - a. The name, title, and signature of a source's responsible official who is certifying that the report accurately states that all actions taken during the initial startup or malfunction period were consistent with the SSM plan;
 - b. A description of events occurring during the time period, the date and duration of the events, and reason the time interval qualifies as an initial startup period or malfunction

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- period; and
- c. An estimate of the solvent loss during the initial startup or malfunction period with supporting documentation.
6. The permittee shall submit an Immediate Startup, Shutdown, and Malfunction (SSM) report, to the Ohio EPA Southwest District Office, if a startup, shutdown, and/or malfunction event is not conducted as specified in the facility's SSM plan. The Immediate SSM report consists of a telephone call or facsimile transmission to the Ohio EPA Southwest District Office within 2 working days after starting actions inconsistent with the facility SSM plan, followed by a letter within 7 working days after the end of the event. The letter must include the following:
 - a. The name, title, and signature of a source's responsible official who is certifying the accuracy of the report, an explanation of the event, and the reasons for not following the SSM plan;
 - b. A description and date of the SSM event, its duration, and reason it qualifies as a SSM; and
 - c. An estimate of the solvent loss for the duration of the SSM event with supporting documentation.
 7. The permittee shall submit a Significant Modification Notification for any significant modification* as is defined in Section 63.2872. An initial notification of modification shall be submitted to the Ohio EPA Southwest District Office 30 days prior to initial startup of the significant modified source. The Significant Modification Notification must include the following:
 - a. The expected startup date of the modified source; and
 - b. A description of the significant modification including a list of the equipment that will be replaced or modified. If the significant modification involves changes other than adding or replacing extractors, desolventizer-toasters (conventional and specialty), and meal dryer-coolers, then the permittee shall also include the fixed capital cost of the new components, expressed as a percentage of the fixed capital cost to build a comparable new vegetable oil production process; supporting documentation for the cost estimate; and documentation that the proposed changes will significantly affect solvent losses.

Notification of actual startup of the modified source shall be submitted within 15 days of initial startup, and shall include the following:

- a. The initial startup date of the modified source;
- b. An indication whether the facility has elected to operate under an initial startup period subject to Section 63.2850(d)(2);
- c. The anticipated duration of any initial startup period; and
- d. A justification for the anticipated duration of any initial startup period.

* for any modification fitting the definition of "modification in OAC 3745-31-01, a new PTI application will need to be submitted.

V. Testing Requirements

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Emission Limitation:

compliance ratio less than or equal to 1.00, when comparing the actual HAP loss to the allowable HAP loss for the previous 12 operating months, as calculated in CFR 63.2840, using the applicable solvent loss factor (for conventional soybean oil) found in Table 1 of the same Section.

Compliance Method:

Compliance shall be demonstrated based upon the calculations, extraction solvent testing results or documentation of HAP composition, and record keeping requirements specified in the Sections A.III.1 through 5.

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

None

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>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - Soybean Oil Refinery (Modification) The terms in this permit supersede those of PTI 05- 7864, previously issued on 9/16/98.	OAC rule 3745-31-05(A)(3)	Volatile Organic compounds (VOC) emissions shall not exceed 13.0 lbs/hour, as a daily average. VOC emissions shall not exceed 4.84 tons/month. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31- 05(D).
	OAC rule 3745-21-07(G)(2)	See Section A.II.1.
	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 55.0 tons per rolling, 12-month summation.
	40 CFR 63, Subpart GGGG	See Part II Facility Specific Terms & Conditions and Section A.I.2 below.

2. Additional Terms and Conditions

- 2.a The permittee shall demonstrate compliance with 40 CFR 63, Subpart GGGG by April 12, 2004, the effective date for existing facilities subject to this National Emission Standard for Hazardous Air Pollutants (NESHAP) for source categories. The emission requirements from 40 CFR 63, Subpart GGGG limit the number of gallons of hazardous air pollutant (HAP) lost per ton of listed oilseed (soybean) processed, as it is calculated in the compliance ratio, as determined in the Facility Terms & Conditions, Part II, Section A.III.1.

Emissions Unit ID: **P031**

- 2.b** The hexane employed to extract soybean oil (refined in this emission unit) from the seed is subject to 40 CFR 63, Subpart GGGG, and the solvent loss and weighted average volume fraction of HAP in the solvent (hexane) is used to demonstrate the facility's compliance. However, the hexane remaining in the oils has been inventoried, prior to the oil refinery process, therefore the emissions calculated from gas chromatography testing for the residual hexane in the oil, in Section A.III.2, do not contribute to the calculation of the compliance ratio, found in the Facility Specific Terms and Conditions, Part II, Section A.III.1.

II. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).
2. The maximum annual production rate for this emissions unit shall not exceed 550,000 tons of soybean oil processed, based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record each month the company identification for each liquid organic material/solvent employed and documentation indicating whether or not the liquid organic material is a photochemically reactive material, as defined by OAC 3745-21-01(C)(5).
2. The permittee shall maintain monthly records of the following information:
 - a. The month and year;
 - b. The amount of in-house soybean oil processed, in tons/month;
 - c. The amount of outside soybean oil processed, in tons/month;
 - d. The combined amount of in-house and outside soybean oil processed, i.e., [(b) + (c)], in tons/month;
 - e. The rolling, 12-month summation of in-house and outside soybean oil processed, in tons;
 - f. The average hexane content of the in-house soybean oil, in ppm, with the average determined from the testing results from Section A.III.3 below and the volume each sample represents;
 - g. The average hexane content of the outside soybean oil, in ppm, with the average determined from the testing results from Section A.III.4 below and the volume each sample represents;

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- h. The total VOC, hexane, emissions from soybean oil, i.e., [(b)*(f) + (c)*(g)], in tons;
 - i. The rolling, 12-month summation of VOC, hexane, emissions from soybean oil, in tons;
 - j. The total number of hours the emissions unit was in operation; and
 - k. The average hourly VOC emissions from soybean oil, i.e., [(h)/(j)], in pounds per hour.
3. On a daily basis, the permittee shall collect a representative sample of in-house oil processed through this emissions unit. At the end of each calendar month, the daily samples shall be combined into a composite sample and analyzed to determine the average hexane content of the in-house oil using a gas chromatograph (GC). The test results shall be in parts per million (ppm). The GC shall be operated and maintained in accordance with the manufacturer's instructions.
 4. The permittee shall collect a representative sample of each shipment of outside soybean oil received for processing through this emissions unit. At the end of each calendar month the daily samples shall be combined into a composite sample and analyzed to determine the average hexane content of the outside oil using a GC. The test results shall be in ppm. The GC shall be operated and maintained in accordance with the manufacturer's instructions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA, Southwest District Office) that identify all periods during which any photochemically reactive material was employed in this emissions unit. These reports are due by the dates specified in Part I - General Terms and Conditions, Section A.1.c.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. The average hourly VOC emission rate (13.0 lbs/hr);
 - b. The monthly allowable VOC emission rate (4.84 tons/month);
 - c. The rolling, 12-month VOC emission limitation (55.0 tons/year); and
 - d. The rolling, 12-month production rate limitation (550,000 tons of soybean oil processed).

These reports are due by the dates specified in Part I - General Terms and Conditions, Section A.1.c.

V. Testing Requirements

Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

13.0 lbs VOC/hr

Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.2.

2. Emission Limitation:

4.84 tons VOC/month

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.2.

3. Emission Limitation:

55.0 tons VOC as a rolling, 12-month summation

Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III.2.

VI. Miscellaneous Requirements

None

**Cargil
PTI A**

Emissions Unit ID: **P031**

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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 Refinery (Modification) The terms in this permit supersede those of PTI 05-7864, previously issued on 9/16/98.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

The permit to install for this emissions unit (P031) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

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TLV (mg/m³): 176.2

Maximum Hourly Emission Rate (lbs/hr): 3.9

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 188.3

MAGLC (ug/m³): 4,200.7

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Cargil

PTI A

Emissions Unit ID: P031

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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 05-11781

A. Source Description

Cargill, Inc. - Soybeans Division (Cargill) is a soybean processing facility that produces soybean oil and meal. Furthermore, Cargill refines and hydrogenates the soybean oil. This facility is located at 2400 Industrial Drive, Sidney, Shelby County (Facility ID 0575010160).

B. Facility Emissions and Attainment Status

The VOC potential to emit for Cargill exceeds 250 TPY. Therefore, to ensure that this modification does not exceed the significant net emission increases threshold level of 40 TPY VOC - Cargill has requested a net emission increase of 33.94 TPY.

Shelby County is designated attainment for ozone and all criteria pollutants.

C. Source Emissions

The average actual VOC emissions for this air contaminant source for 1999 and 2000 is 21.06 tons. The requested Synthetic Minor limitation is 55.0 tons. Therefore, the net emission increase is 33.94 tons VOC.

D. Conclusion

The VOC emissions limitation (55.0 tons per rolling, 12-month sum), the production rate limitation (550,000 tons of soybean oil processed per rolling, 12-month sum), and the record keeping requirements will ensure that VOC emissions will remain below significant net emission increases. Thereby, this source modification will not trigger PSD review.

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Emissions Unit ID: **P031**

NEW SOURCE REVIEW FORM B

PTI Number: 05-11781 Facility ID: 0575010160

FACILITY NAME Cargill

FACILITY DESCRIPTION Modification of Soybean Oil Refinery, Emissions Unit P031, to allow for an increase of throughput and an increase of emissions from 35.64 to 55.0 tons VOC per rolling, 12-month summation. CITY/TWP Sidney

SIC CODE 2075 SCC CODE 3 02 019 97 EMISSIONS UNIT ID P031

EMISSIONS UNIT DESCRIPTION Soybean Oil Refinery (Terms in this permit supersede those of PTI 05-7864, previously issued on 9/16/98.)

DATE INSTALLED upon issuance

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	13.0 lbs/hr	21.06 tons	13.0 lbs/hr	55.0 tons
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 BAT is compliance with the average hourly, monthly and rolling 12-month VOC emissions limitations; the rolling, 12-month soybean oil throughput limitation; and record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES YES NO

IDENTIFY THE AIR CONTAMINANTS: n-Hexane and Isohexane