

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **05-12183**

**A. Source Description**

Cargill, Inc. owns and operates a soybean processing facility, Oilseed Division, in Sidney, Ohio. Cargill is proposing to expand their facility to increase the total soybean crush capacity, increase the production of conventional soybean meal, begin the production of speciality soybean product (white flakes) and build a commercial soy protein isolate plant.

**B. Facility Emissions and Attainment Status**

Cargill, Inc. Oilseed Division is a major stationary source. Cargill is located in Shelby County. Shelby County is attainment for all criteria pollutants.

**C. Source Emissions**

The net emission increases from this project potentially exceed significant levels for PM-10, NO<sub>x</sub>, CO, VOC and SO<sub>2</sub>. For this reason, Cargill has conducted a PSD review for all the aforementioned air contaminants except SO<sub>2</sub>. As part of this permit action, Cargill has requested a federally enforceable SO<sub>2</sub> emissions limitation. The SO<sub>2</sub> emissions limitation applies to the process boilers, emissions units B009, B010 and B011.

In addition, Cargill has requested a federally enforceable PM-10 emissions limitation. The PM-10 emissions limitation applies to Grain Dryers No. 1 and No. 2, emissions units P006 and P034 respectfully. Cargill requested the PM-10 emissions limitations to ensure compliance with the annual PSD increment allowable for PM-10.

**D. Conclusion**

Federally enforceable emissions limitations, fuel usage limitations and material throughput limitations will ensure that contemporaneous emissions will not exceed the significant net emission increase level for SO<sub>2</sub>, nor will emissions from this project exceed the annual PSD increment allowable as modeled for PM-10. The Synthetic Minor will restrict SO<sub>2</sub> emissions from emissions unit B009, B010 and B011. In addition, the Synthetic Minor will restrict PM-10 emissions from emissions units P006 and P034.

A combined fuel oil usage limitation for emissions unit B009, B010 and B011 will effectively limit annual emissions of SO<sub>2</sub> to 23.35 tons. As a result, the total contemporaneous SO<sub>2</sub> emissions for this modification are 24.06 tons.

The combined soybean throughput limitation for emissions units P006 and P034 will limit annual PM-10 emissions to 23.92 tons, and thereby, ensure compliance with the annual PSD increment allowable as modeled for PM-10.

**STAFF DETERMINATION FOR THE APPLICATION TO CONSTRUCT  
UNDER THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS  
FOR CARGILL FOODS  
SIDNEY, OHIO  
PTI NUMBER 05-12183**

**SEPTEMBER 25, 2003**

Ohio Environmental Protection Agency  
Division of Air Pollution Control

Lazarus Government Center  
122 South Front Street  
Columbus, Ohio 43215

The Clean Air Act and regulations promulgated thereunder require that major air pollution sources undergoing construction or modification comply with all applicable Prevention of Significant Deterioration (PSD) provisions and nonattainment area New Source Review requirements. The federal PSD rules govern emission increases in attainment areas for major sources, which are sources with the potential to emit 250 tons per year or more of any pollutant regulated under the Clean Air Act, or 100 tons per year or more if the source is included in one of 28 source categories. In nonattainment areas, the definition of major source is one having at least 100 tons per year potential emissions. A major modification is one resulting in a contemporaneous increase in emissions which exceeds the significance level of one or more pollutants. Any changes in actual emissions within a five-year period are considered to be contemporaneous. In addition, Ohio now has incorporated the PSD and NSR requirements by rule under OAC 3745-31.

Both PSD and nonattainment rules require that certain analyses be performed before a facility can obtain a permit authorizing construction of a new source or major modification to a major source. The principal requirements of the PSD regulations are:

- 1) Best Available Control Technology (BACT) review - A detailed engineering review must be performed to ensure that BACT is being installed for the pollutants for which the new source is a major source.
- 2) Ambient Air Quality Review - An analysis must be completed to ensure the continued maintenance of the National Ambient Air Quality Standards (NAAQS) and that any increases in ambient air pollutant concentrations do not exceed the incremental values set pursuant to the Clean Air Act.

For nonattainment areas, the requirements are:

- 1) Lowest Achievable Emissions Rate (LAER) - New major sources must install controls that represent the lowest emission levels (highest control efficiency) that has been achieved in practice.
- 2) The emissions from the new major source must be offset by a reduction of existing emissions of the same pollutant by at least the same amount, and a demonstration must be made that the resulting air quality shows a net air quality benefit. This is more completely described in the Emission Offset Interpretative Ruling as found in Appendix S of 40 CFR Part 51.
- 3) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing State Implementation Plan (SIP) or are on an approved schedule resulting in full compliance with the SIP.

For rural ozone nonattainment areas, the requirements are:

- 1) LAER - New major sources must install controls that represent the lowest emissions levels (highest control efficiency) that has been achieved in practice.
- 2) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing SIP or are on an approved schedule resulting in full compliance with the SIP.

Finally, New Source Performance Standards (NSPS), SIP emission standards and public participation requirements must be followed in all cases.

### Site Description

The facility is in Clinton Township, in Sidney, Ohio, which is located in Shelby County. This area is classified as attainment for all of the criteria pollutants, particulate matter less than 10 microns, sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds (ozone) and lead.

### Facility Description and Project Introduction

Cargill Foods Sidney proposes to expand operations at its existing facility at 2400 Industrial Drive in Sidney, Ohio. The project will include modifications to existing units and the installation of new units. The table below describes the proposed project activities:

<b>UNIT DESCRIPTION</b>	<b>ACTIVITY</b>	<b>ACTIVITY DESCRIPTION</b>
Soybean Receiving Stations	Modification	Cargill will modify both existing truck receiving stations by enclosing the buildings and venting them to a new baghouse.
Wet Soybean Receiving Systems	Installation	Cargill will install larger conveyor systems to handle the increased workload handled by the existing storage grain legs.
Grain Cleaning, Drying, and Dry Bean Storage	Modification and Installation	Cargill will rebuild the existing grain dryer #1. A new grain cleaning system will be installed with a new baghouse and a new conveyor to grain dryer #2 will be constructed.
Cracking System	Installation	A new cracking system will be installed which will consist of four new soybean crackers.
Dehulling System	Modification and Installation	The baghouses servicing the dehulling system will be switched from an unit which now will have a new baghouse and a new dehuller will be installed with an existing baghouse extended to it. The hull grinder will have two grinders added to it and a larger baghouse will be installed.
Conditioning and Flaking Operation	Installation	Cargill will install a new soybean conditioner and five new flakers while both will be controlled with a new wet scrubber.

Meal Grinding Operation	Installation	The old meal grinding system will be removed and four meal grinders will be installed which will be controlled by a new baghouse.
Extraction (D/T System)	Modification and Installation	Cargill will modify the vegetable oil extraction system to increase its throughput from 1200 to 4000 tons per day. Cargill will modify the existing hexane distillation system, install two dryer decks and replace the existing toaster to handle the increased throughput.
FDS System	Installation	Cargill will install two new flake desolventizing systems controlled by a mineral oil system.
Auxiliary Equipment	Installation	Cargill will replace the existing plant cooling towers with larger ones.
Commercial Isolate Protein Processing Plant	Installation	Cargill will construct a new soy white flake processing plant adjacent to the existing soybean processing plant.
Facility Boiler Plant	Installation	Cargill will install a 185 mmBtu/hr natural gas fired boiler and two 85 mmBtu/hr natural gas fired boilers.

New Source Review (NSR)/PSD Applicability

This process will generate significant levels of criteria pollutant emissions including NO<sub>x</sub>, CO, PM<sub>10</sub> and VOC. For PSD purposes, the Cargill Foods facility is already considered a major facility. A PSD analysis is required for any increase in emissions of a pollutant exceeding the PSD threshold emissions level, or the significance levels. Non-Attainment New Source Review is not applicable, due to attainment status.

Cargill Foods is subject to MACT and NSPS. The facility is subject to 40 CFR Part 63 Subpart GGGG and 40 CFR Part 60 Subpart Db, Dc, & DD respectively.

Short term emissions from this Project are based upon worst case operating conditions. The annual emissions are based on pounds per hour emissions at average operating conditions at 8760 hours or synthetically limited through a throughput restriction.

TABLE 1

PRELIMINARY POLLUTANT EMISSION RATES  
MODIFICATION TO INCREASE EMISSION RATES  
Cargill Foods

<u>AIR POLLUTANT</u>	<u>TOTAL TPY INCREASE</u>	<u>TOTAL TPY ALLOWABLE</u>	<u>PSD THRESHOLD</u>
NO <sub>x</sub>	111.85	111.85	40
CO	121.56	121.56	100
PM/PM <sub>10</sub>	159.39/85.09	159.39/85.09	25/15
SO <sub>2</sub>	23.81	23.81	40
VOC	491.81	805.03	40

## Control Technology Review

As part of the application for any source regulated under the PSD requirements, an analysis must be conducted that demonstrates that Best Available Control Technology (BACT) will be employed by the source. The Cargill Foods facility is subject to PSD regulations which mandate a case-by-case BACT analysis be performed for PSD triggering pollutants. The application used a "top-down" approach to determine the latest demonstrated control techniques and select an appropriate level of control.

The basic steps to be followed are:

Identify all available potential control options;

Eliminate technically infeasible options;

Rank remaining technologies by control effectiveness;

Evaluate the feasible controls by performance and cost analysis; and

Select the most effective control based on energy, environmental and economic impacts (generally, the feasible technology that is also considered to be cost effective).

### **PM-10**

Soybean processing systems which generate particulate emissions fall into two basic categories, dry exhaust, and moist exhaust.

The dry exhaust systems are in the bean, meal, and white flake handling, bean processing, and the meal and white flake finishing areas. The control equipment available and the efficiencies of those controls are in the following table:

<b>PM10 Technology</b>	<b>Range of Control Efficiencies (from AP-42)</b>
Baghouse	99 - 99.9 %
Venturi Scrubber	90 - 99 %
Wet Scrubber	20 - 99%
High Efficiency Cyclone	80 - 96%
Medium Efficiency Cyclone	50 - 85%
Low Efficiency Cyclone	10 - 60%
Gravity Collector	1.5 - 6%

Cargill has chosen to use baghouse technology on all of the dry exhaust sources. Because this is technology that has the highest control efficiency available there will be no need to further consider the analysis for the dry exhaust sources. The emission rate is consistent with the most recent BACT determination for Cargill in Iowa (1998). The rate shall not exceed 0.003 grains per dry standard cubic foot for filterable PM-10.

The oil extraction process requires that soybeans be conditioned with steam, flaked to increase surface area and then extracted with the use of a solvent to remove the oil from the flakes. Because of the process moisture changes, these are processes that emit particulate matter within high moisture exhaust streams. In addition, the flakes are sticky due to the processing. The control technologies for these sources are the same as the dry exhaust. The control efficiencies are also the same. Because of the nature of a wet exhaust stream, a technical feasibility study and a cost effectiveness study was completed for the technologies as summarized in the following table:

<b>PM10 Control</b>	<b>Description</b>
Baghouse	Baghouses provide the highest level of control of particulate emission streams. However, the high moisture content of these exhaust streams and physical properties of the flakes and meal, cause agglomeration, plugging and fouling of the bags. This would eliminate the effect of the baghouse. Therefore, a baghouse is not technically feasible for those operations.
Venturi and Packed Wet Bed Scrubbers	This technology provides the next highest level of control of particulate emission streams; however, a scrubber was found to not be cost effective. To install and operate the scrubber the cost would be roughly \$150,000 per ton for the conditioner and flaker and 23,000 per ton for the dryer/cooling system.
High Efficiency Cyclones	Each moist exhaust source has an intrinsic cyclone present for product recovery. This represents the base case for each system. Installation of an additional cyclone would not result in a lower emission rate. Therefore, this is not considered BACT.

Due to a combination of technical and economic factors, BACT for the moist exhaust sources is "no additional control". This is consistent with recent BACT determinations for these sources.

However, Cargill will be combining the aspiration system exhausts from the flakers and conditioners into one stack and installing a wet scrubber on that stack. Cargill will also be installing a wet scrubber on the stack of the dryer/cooler system. Both of these scrubbers will achieve an emissions rate of 0.002 gr/dscf. Cargill is installing these systems to reduce the emissions of PM-10 so that the proposed project will meet the PSD increment consumption requirements.

## **VOC**

Hexane is used to extract soybean oil from the bean flakes in the extraction process. Soybean flakes are introduced into a hexane extracts the oil out of flakes. The soybean processing systems used at the Sidney facility consists of a conventional DT process and a specialized flake desolventizing system.

The range of control options available for hexane is summarized in the following table:

<b>VOC Control Technology</b>	<b>Control Efficiency</b>
Mineral Oil System (MOS)	99.5%
Thermal Incinerator - recuperative	99.0%

Thermal Incinerator - regenerative	99.0%
Catalytic Incineration	99.0%
Cryogenic Condensation	99.0%
Carbon Adsorption	95.0%
Condensation	80.0%

The RBLC was reviewed to determine if a BACT determination has been made for any DT system at a soybean processing facility. Five soybean processing plants are identified in the RBLC database. All five have MOS as their BACT technology.

For soybean processing facilities, BACT has been determined to be a MOS. The Cargill Sidney facility currently uses MOS with a limit of 0.04 wt% hexane loss and this permit will require the same technology and limit. Since the MOS represents the highest available control efficiency no additional or alternate control systems available were evaluated.

### **NO<sub>x</sub>**

The combustion sources that will be installed as part of this project include:

<b>Emission Source</b>	<b>Size</b>
Commercial Isolate Plant Spray Dryer	114 MMBTU/hr
Commercial Isolate Spent Flake Dryer	60 MMBTU/hr
New Crush Plant Boiler	185 MMBTU/hr
New Protein Boiler #1	85 MMBTU/hr
New Protein Boiler #2	85 MMBTU/hr

The spray dryer and spent flake dryer will burn only natural gas. The boilers will burn natural gas with fuel oil and soybean oil as backup fuels. All of these combustion sources will be equipped with low NO<sub>x</sub> burners from the equipment manufacturer. This represents the base case for these sources.

Two potential add-on NO<sub>x</sub> control technologies have been identified for the use on the combustion systems. These are selective non-catalytic reduction (SNCR) and selective catalytic reduction (SCR).

In SNCR systems, a reagent is injected into the flue gas in the furnace within a narrow temperature window (900°C and 1100°C). Emissions of NO<sub>x</sub> can be reduced by 30% to 50%. SNCR has not been installed on boilers or dryers of the size proposed for this project. This is because the boilers do not have fire boxes that operate at the elevated temperatures necessary to achieve the non-catalytic reaction. Also the available residence time does not meet the requirements of the reaction. Therefore, SNCR is not technically feasible for the size of boilers in this project.

The SCR process involves post-combustion removal of NO<sub>x</sub> from the flue gas with a catalytic reactor while the optimum operating temperature is between 500°F and 850°F. SCR typically is 60 to 90 percent efficient. In the United States, SCR has been applied to natural gas-fired combustion turbines and boilers; however, SCR has not been installed on boilers or spray dryers of the size proposed for this project. This is because the boiler exhaust temperature is below the temperatures necessary to achieve the catalytic reaction. Therefore, SCR is not feasible for these systems.

Consistent with other BACT determinations, the boilers and dryers will be equipped with low NOx burners.

## CO

Alternative controls for CO from the combustion sources include combustion controls and catalytic oxidation. Combustion control is the control technology most often used for natural gas fired systems of the size proposed in this project.

In this alternative, a catalyst would be situated in the flue gas stream that would lower the activation energy of a series of reactions where reactant species (CO, VOC, and O<sub>2</sub>) are converted to carbon dioxide and water. The catalyst promotes combination of the reactant species at lower gas temperatures (600°F to 1150°F) than would be required for uncatalyzed oxidation. CO catalyst technology has never been applied to a institutional sized boiler. Since it has never been applied, catalyst oxidation has not been demonstrated and it is currently unavailable for sources of the size in the proposed project. Therefore, the catalytic oxidation for the control of CO is considered technically infeasible.

The other means of controlling emissions of CO is through the design and operation of the boiler in a manner so as to limit CO formation. Such controls are commonly referred to as combustion controls. In general, a combustion control system maintains the proper conditions to ensure complete combustion through one or more of the following operation design features: low excess air, staged combustion, overfire air, sufficient residence time, and good mixing. In the case of this project, the boilers incorporate design features that enhance uniform fuel/air distribution and mixing to suppress CO formation. This practice also reduces VOC emissions. Because combustion controls are the highest level of control not considered technically infeasible, Cargill will install combustion controls as BACT.

### Ambient Air Quality Monitoring Requirements

The area where the Cargill facility is located is attainment for all criteria pollutants. U.S. EPA regulations require the establishment of baseline air quality in the vicinity of the proposed project. This is normally accomplished using representative air quality monitoring data. Air quality monitoring can be utilized to demonstrate that the project will have less than a threshold impact. This threshold impact is identified as the PSD monitoring de minimus level. If the projected impact from the proposed project exceeds this level, ambient data must be collected or existing representative data must be identified.

Cargill Foods has conducted ambient air quality modeling to determine the potential impact due to the proposed installation. The following are the projected impacts:

<b>Pollutant</b>	<b>Averaging Period</b>	<b>Predicted Concentration</b>	<b>Monitoring De minimus Concentration</b>
PM <sub>10</sub>	24-hour	24.7 ug/m <sup>3</sup>	10 ug/m <sup>3</sup>
NO <sub>x</sub>	Annual	7.0 ug/m <sup>3</sup>	14 ug/m <sup>3</sup>
CO	8-hour	484 ug/m <sup>3</sup>	575 ug/m <sup>3</sup>

Only the potential PM-10 impact exceeded the PSD monitoring de minimus concentration. The Ohio EPA finds that the data from monitoring sites 39-061-4002 (NO<sub>x</sub>), 39-109-0005 (O<sub>3</sub>), 39-113-0008 (PM-10), and 39-113-0028 (CO) provide conservative estimates of the unmodeled source impact for the respective pollutants within the ambient air quality modeling analysis and represent acceptable substitutes for the pre-construction monitoring requirements.

## Modeling

Air quality dispersion modeling was conducted to assess the effect of this modification on the national ambient air quality standards (NAAQS) and PSD increments. ISCST3 (version 00101) was used in the regulatory default, rural dispersion mode. Five years of meteorological data (1987-1991) from Wright-Patterson (13840)Surface and Dayton (93815) upper were used. Building downwash was incorporated into the ISCST3 estimates.

Predicted impacts of PM<sub>10</sub> and NO<sub>x</sub> were above their corresponding PSD significant impact increments. Additional modeling for compliance with both the NAAQS and PSD increments was required. Predicted CO concentrations were below the PSD significant impact increments so no further CO modeling was performed.

## Increment

All areas surrounding the Cargill Foods facility are Class II PSD areas. It is the Ohio EPA policy that no individual project consumes more than 50% of the available PSD increment. The following is the summary of the impact of increment consuming sources (peak annual and PM<sub>10</sub> 6<sup>th</sup> high 24-hour concentration over five years):

<b>Pollutant</b>	<b>Averaging Period</b>	<b>Project Concentration</b>	<b>PSD Increment Concentration</b>
PM <sub>10</sub>	24-hour	24.2 ug/m <sup>3</sup>	30 ug/m <sup>3</sup>
	Annual	6.2 ug/m <sup>3</sup>	17 ug/m <sup>3</sup>
NO <sub>x</sub>	Annual	7.0 ug/m <sup>3</sup>	25 ug/m <sup>3</sup>

The predicted PM<sub>10</sub> 24-hour PSD increment impacts exceed ½ of the available increment. Although impacts from the facility exceed Ohio EPA's policy which provides for future growth by limiting increment consumption, the areal extent of the receptors exceeding ½ the PM<sub>10</sub>, 24-hour PSD increment is limited to the property adjacent to the proposed facility. Ohio EPA initially required the applicant to lower impacts by either reducing emission rates or modifying the source or facility layout. The results of this analysis indicate lower constraining impacts which are below 25 ug/m<sup>3</sup> and provide additional assurance that future growth in the area will not be constrained.

## NAAQS

Existing sources at the facility, existing sources above the PSD significant rates within the Cargill Foods significant impact area (SIA) and sources greater than 100 tons/year outside of the SIA are modeled to determine the combined impact of existing significant sources. A background value is added to account for minor sources not explicitly included in the modeling.

<b>Pollutant</b>	<b>Averaging Period</b>	<b>Predicted Concentration</b>	<b>Concentration W/Background</b>	<b>NAAQS Concentration</b>
PM <sub>10</sub>	24-hour	74.7 ug/m <sup>3</sup>	115.7 ug/m <sup>3</sup>	150 ug/m <sup>3</sup>
	Annual	20.4 ug/m <sup>3</sup>	39.4 ug/m <sup>3</sup>	50 ug/m <sup>3</sup>
NO <sub>x</sub>	Annual	31.6 ug/m <sup>3</sup>	72.6 ug/m <sup>3</sup>	100 ug/m <sup>3</sup>

## Secondary Impact Analysis

Cargill Foods has demonstrated that the predicted pollutant concentrations throughout the study area are below the secondary NAAQS thresholds. The secondary NAAQS are designed to limit the amount of pollutants in the ambient air to levels below those which could have an adverse impact on human welfare, soils and vegetation. The modeling analyses demonstrate that no significant impacts on human welfare, soils or vegetation will occur from the proposed modification.

**Soil and Vegetation:** EPA Air Quality Criteria documents were reviewed for information on pollutants and adverse effects on the type of vegetation and soils in the area. No adverse impact upon soils or vegetation is expected. The modeled concentrations are below the primary and secondary NAAQS limits.

**Visibility:** The Cargill facility is located nearly 350 miles from the closest class I area. Primary or secondary pollutants associated with this project are not anticipated to affect local or class I visibility.

## Toxics Analysis

The Ohio Air Toxics Policy requires evaluation of increases in air toxics above the one ton/year threshold. Emissions rates are modeled to determine whether they exceed the Maximum Acceptable Ground Level Concentration (MAGLC) which is defined under the Air Toxics Policy. There were no air toxic emitted exceeding their MAGLC that are not regulated by the MACT.

## Conclusions

Based upon the review of the permit to install application and the supporting documentation provided by the applicant, the Ohio EPA staff has determined the installation will comply with all applicable State and Federal environmental regulations and that the requirements for BACT are satisfied. Therefore, the Ohio EPA staff recommends that a permit to install be issued to the Cargill Foods Sidney facility for the installation of the plant expansion described in the PTI #05-12183 permit recommendation.



State of Ohio Environmental Protection Agency

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

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 05-12183**

**DATE: 9/25/2003**

Cargill  
Keith Kuhlman  
2400 Industrial Drive 2400 Industrial Drive  
Sidney, OH 453658952

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 **\$33550** will be due. Please do not submit any payment now.

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

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

SWDO

IN

**SHELBY COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL  
SUBJECT TO PREVENTION OF SIGNIFICANT DETERIORATION REVIEW  
FOR CARGILL FOODS**

Public Notice is hereby given that the Staff of the Ohio Environmental Protection Agency (EPA) has recommended to the Director that Ohio EPA issue a draft action of a Permit to Install (PTI) to Cargill Foods in Shelby County, Ohio.

This draft permit proposes allow a modification to a soybean processing facility, Oilseed Division, in Sidney, Ohio. Cargill is proposing to expand their facility to increase the total soybean crush capacity, increase the production of conventional soybean meal, begin the production of speciality soybean product (white flakes) and build a commercial soy protein isolate plant. The allowable emissions are in tons per year:

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	111.85
CO	121.56
SO <sub>2</sub>	23.81
VOC	802.42
PE	159.39
PM-10	85.09

This facility is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by U.S. EPA (40 CFR 52.21).

A draft action (permit no. 05-12183) was issued on September 10, 2003. Within 30 days from the date of this notice, any interested party may submit comments or request a public hearing. Comments are to be sent to Jim Pellegrino, Ohio Environmental Protection Agency, Southwest District Office, 401 East Fifth Street, Dayton, Ohio, 45402-2911.

Further information concerning this application, which is available for public inspection, may be secured from Jim Pellegrino at the Ohio Environmental Protection Agency, Southwest District Office at the above address during normal business hours. Telephone number: (937) 285-6744.



**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 05-12183**

Application Number: 05-12183  
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 2400 Industrial Drive  
Sidney, OH 453658952

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2400 Industrial Drive  
Sidney, Ohio**

Description of proposed emissions unit(s):  
**Expansion of Sidney oilseeds facility to increase soybean meal and soybean oil production and new production of soy white flakes and isolate protein.**

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: 05-12183****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.9 below if no deviations occurred during the quarter.

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance**

- 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.

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance****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

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****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

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance**

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 ninety (90) 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.

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****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**

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. 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 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.

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance****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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**8. Construction Compliance Certification**

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

**Cargill**

**Facility ID: 0575010160**

**PTI Application: 05-12183**

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

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.

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: B009

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.

<u>Pollutant</u>	<u>Tons Per Year</u>
NO <sub>x</sub>	111.85
CO	121.56
SO <sub>2</sub>	23.81
VOC	802.42
PE	159.39
PM-10	85.09

23

**Cargill**

**PTI Application: 05-12183**

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

**Facility ID: 0575010160**

**Cargil****PTI A**

Emissions Unit ID: B009

**Issued: To be entered upon final issuance****Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. MACT "Hammer" Requirements**

1. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers, 40 CFR Part 63, Subpart DDDDD. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts.

Within 60 days of the issuance date of the permit, Part I of the application, an applicability determination, is due.

If the final MACT standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the following information:

- a. for a new affected source, the anticipated date of startup of operation;
  - b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
  - c. any existing federal, State, or local limitations or requirements applicable to the affected source;
  - d. for each affected emission point or group of affected emission points, an identification of control technology in place;
  - e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
  - f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.
2. The Part II application for a MACT determination may, but is not required to, contain the

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance**

following information:

- a. recommended emission limitations for the affected source and support information. (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
  - b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and
  - c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
3. If the NESHAP is promulgated before May 15, 2004, the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
- a. Within 120 days after promulgation of 40 CFR Part 63, Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):
    - i. the name and mailing address of the permittee;
    - ii. the physical location of the source if it is different from the mailing address;
    - iii. identification of the relevant MACT standard and the source's compliance date; (a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP); and
    - iv. a statement confirming the facility is a major source for HAPs.
  - b. Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63, Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:
    - i. the methods used to determine compliance;
    - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures

**Cargill****Facility ID: 0575010160****PTI Application: 05-12183****Issued: To be entered upon final issuance**

- or methods that were conducted;
- iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart DDDDD;
- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart DDDDD.

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

none

**Cargil  
PTI A**

Emissions Unit ID: B009

**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.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

B009 - New crush plant boiler, 185 MMBTU/hr, natural gas and oil-fired, with low-NOx burners	OAC rule 3745-31-05(A)(3)
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OAC rules 3745-31-10 thru 20

Emissions Unit ID: B009

Applicable Emissions Limitations/Control Measures

40 CFR Part 63, Subpart DDDDD

OAC rule 3745-31-05(D)

For natural gas combustion:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu nor 0.11 lb/hr.

Particulate emissions (PE) 0.0019 lb/mmBtu nor 0.35 lb/hr.

For No. fuel oil or soybean oil combustion:

OAC rule 3745-17-07(A)

SO<sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gal nor 103.70 lbs/hr.

PE shall not exceed 2.0 lbs/1000 gal nor 2.64 lbs/hr.

OAC rule 3745-17-10(B)

Visible particulate emissions from the stack shall not exceed 5 percent opacity, as a 6-minute average.

OAC rule 3745-18-06(D)

PE shall not exceed 1.53 tons per rolling, 12-month summation.

OAC rule 3745-21-08(B) and 3745-23-06(B)

See term A.I.2.d for control requirements

Compliance with this rule shall also include compliance with OAC rules 3745-21-08(B), 3745-23-06(B), 3745-31-05(D), 3745-31-10 thru 20, 40 CFR Part 60, Subpart Db, and 40 CFR Part 63, Subpart DDDDD.

40 CFR Part 60, Subpart Db

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 28.36 tons per rolling, 12-month summation.

Carbon monoxide (CO) emissions shall not exceed 29.98 tons per rolling, 12-month summation.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers

**Cargil****PTI A**

Emissions Unit ID: B009

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

<p>(PM-10) shall not exceed 1.53 tons per rolling, 12-month summation.</p>	<p>established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>B010 and B011, combined (See term A.I.2.c).</p>
<p>Volatile organic compound (VOC) emissions shall not exceed 3.24 tons per rolling, 12-month summation.</p>	<p>The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p><u>For natural gas combustion:</u> NOx emissions shall not exceed 0.035 lb/mmBtu nor 6.48 lbs/hr.</p>	<p>The SO<sub>2</sub> emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>CO emissions shall not exceed 0.037 lb/mmBtu nor 6.85 lbs/hr.</p>	<p>The permittee has satisfied the latest available control techniques and operating practices required by committing to comply with the best available technology requirements pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.35 lb/hr.</p>		
<p>VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.74 lb/hr.</p>		
<p><u>For No. fuel oil or soybean oil combustion:</u></p>	<p>The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>NOx emissions shall not exceed 14.0 lbs/1000 gal nor 18.50 lbs/hr.</p>	<p>See terms A.I.2.e., A.II.3., A.III.3. and A.IV.4 for the SO<sub>2</sub> standards.</p>	
<p>CO emissions shall not exceed 5 lbs/1000 gal nor 6.61 lbs/hr.</p>	<p>The NOx emissions limitation specified by this rule is less stringent than the NOx emissions limitations established pursuant to OAC rule 3745-31-10 thru 20.</p>	
<p>PM-10 emissions shall not exceed 1.0 lb/1000 gal nor 1.32 lbs/hr.</p>		
<p>VOC emissions shall not exceed 0.2 lb/1000 gal nor 0.26 lb/hr.</p>	<p>See term Part II.A.</p>	
<p>The visible PE limitation specified by this rule is less stringent than the limitation</p>	<p>SO<sub>2</sub> emissions shall not exceed 23.35 tons per rolling, 12-month summation for emissions unit B009,</p>	

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

- 2.a** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the combined fuel usage limitation for No. 2 fuel oil and/or soybean oil, emissions limitations, and the use of low-NO<sub>x</sub> burners.
- 2.c** The combined emissions of SO<sub>2</sub> from emissions units B009, B010 and B011 shall not exceed 23.35 tons, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of SO<sub>2</sub> (Tons)</u>
1	2.6
1-2	5.1
1-3	7.5
1-4	9.8
1-5	11.8
1-6	13.7
1-7	15.5
1-8	17.4
1-9	18.8
1-10	20.4
1-11	22.0
1-12	23.35

After the first 12 calendar months of operation, compliance with the rolling, 12-month emission limitation for SO<sub>2</sub> shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The permittee shall install, operate and maintain low-NO<sub>x</sub> burners at all times when operating this emissions unit.

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: B009

- 2.e This emissions unit is not subject to the sulfur dioxide compliance and performance testing requirements specified in 40 CFR Part 60.45b and the sulfur dioxide emissions monitoring requirements specified in 40 CFR Part 60.47b because the emissions unit is restricted to firing "very low sulfur oil." As defined in 40 CFR Part 60.41b, "very low sulfur oil" means oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emissions control, has a sulfur dioxide emissions rate equal or less than 0.5 lb per million Btu heat input.

## II. Operational Restrictions

1. The permittee shall burn only natural gas, No. 2 fuel oil or soybean oil in this emissions unit.
2. The maximum combined No. 2 fuel oil and soybean oil fuel usage for emissions units B009, B010 and B011 shall not exceed 595,000 gallons as a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the No. 2 fuel oil and soybean oil usage levels for the combined emissions units B009, B010 and B011 as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Oil Usage</u>
1	65,000
1-2	130,000
1-3	190,000
1-4	250,000
1-5	300,000
1-6	350,000
1-7	395,000
1-8	440,000
1-9	480,000
1-10	520,000
1-11	560,000
1-12	595,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel oil usage figures.

3. The quality of the No. 2 fuel oil and soybean oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to meet the sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input.
4. Pursuant to 40 CFR Part 60, Subpart 60.48b(b)(1), the permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring NO<sub>x</sub> emissions discharged to the atmosphere from this emissions unit.

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

5. Pursuant to 40 CFR Part 60, Subpart 60.48b(a), the permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the opacity of the emissions discharged to the atmosphere from this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, No. 2 fuel oil, or soybean oil the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
  - a. the total amount of combined No. 2 fuel oil and soybean oil employed by emissions units B009, B010 and B011;
  - b. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of No. 2 fuel oil and soybean oil usage figures for B009, B010 and B011;
  - c. the total combined SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;
  - d. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;  
  
also, during the first 12 calendar months of operation, the permittee shall record the cumulative No. 2 fuel oil and soybean oil usage and SO<sub>2</sub> emissions from emissions unit B009, B010, and B011, combined for each calendar month;
  - e. the PE and the rolling, 12-month summation of PE from this emissions unit;
  - f. the NO<sub>x</sub> emissions and the rolling, 12-month summation of NO<sub>x</sub> emissions from this emissions unit;
  - g. the CO emissions and the rolling, 12-month summation of CO emissions from this emissions unit;
  - h. the PM-10 emissions and the rolling, 12-month summation of PM-10 emissions from this emissions unit; and
  - i. the VOC emissions and the rolling, 12-month summation of VOC emissions from this emissions unit.

3. For each shipment of oil received or in-house soybean oil employed for burning in emissions units B009, B010, and B011 the permittee shall maintain records of the total quantity of oil, the permittee's or oil supplier's analyses for sulfur content, heat content and the calculated SO<sub>2</sub> emission rate [the SO<sub>2</sub> emission rate shall be calculated as specified in OAC 3745-18-04(F)]. The records shall also include certification from the fuel oil supplier that the oil meets the definition of distillate oil [see 40 CFR 60.49b(r)]. For the purposes of this requirement, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by Ohio EPA District Office, Southwest District Office.

4. Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

Within 60 days of the date of startup of this emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2. Personnel from Ohio EPA, Southwest District Office, shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to Ohio EPA, Southwest District Office, within 30 days after the test is completed. One copy each of the test results shall be sent to Ohio EPA, Southwest District Office, and Ohio EPA, Central Office. Certification of the continuous NO<sub>x</sub> monitoring system shall be granted upon determination by Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2.

The permittee shall operate and maintain existing equipment to continuously monitor and record NO<sub>x</sub> from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to, parts per million NO<sub>x</sub> on an instantaneous (one-minute) basis, emissions of NO<sub>x</sub> in units of the applicable standard in the appropriate averaging period (e.g., hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting

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

requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days of the date of startup of this emissions unit, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from Ohio EPA, Southwest District Office, shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. One copy each of the test results shall be submitted to Ohio EPA, Southwest District Office, and Ohio EPA, Central Office, pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by Ohio EPA, Central Office, that the system meets all requirements of ORC section 3704.03(I), and 40 CFR Part 60, Appendix B, Performance Specification 1 and ASTM D 6216-98.

Within 60 days of the date of startup of this emissions unit, the permittee shall operate and maintain the continuous opacity monitoring system equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) basis, percent opacity on a 6-minute block average basis, daily zero/span calibration checks, and manual calibration adjustments.

6. Pursuant to 40 CFR Part 60.49b(d), the permittee shall maintain daily records of the following:
  - a. the amount of each fuel combusted; and
  - b. the calculated annual capacity factor for each fuel (the annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month).
7. Pursuant to 40 CFR Part 60.49b(g), the permittee shall maintain the following records each day:
  - a. the calendar date;
  - b. the average hourly NO<sub>x</sub> emission rate (expressed as nitrogen dioxide);
  - c. the 30-day average NO<sub>x</sub> emissions rate, in lb/mmBtu heat input, calculated at the end of each operating day;
  - d. identification of days when NO<sub>x</sub> emissions data were not obtained, including the reason for not obtaining the data and the corrective actions taken to prevent future failures;
  - e. identification of times when emissions data have been excluded from the calculation of the average NO<sub>x</sub> emissions rate and the reasons for excluding the data;
  - f. identification of the "F" factor, (the caloric value of the fuel combusted), used for calculations, method for determination, and type of fuel combusted;
  - g. identification when the NO<sub>x</sub> emissions detected exceeded the full span of the continuous monitoring system;
  - h. descriptions of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with performance Specifications 2 or 3; and
  - i. results of the daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.

#### IV. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

**Cargil  
PTI A**

Emissions Unit ID: B009

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

- c. Actual start-up date (within 15 days after such date); and
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

and

Ohio Environmental Protection Agency  
Southwest District Office  
Supervisor, DAPC  
401 E. Fifth Street  
Dayton, Ohio 45402-2911

- 2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, number two fuel oil or soybean oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month combined emissions limitation for SO<sub>2</sub> and the combined fuel oil usage limitation for emissions units B009, B010 and B011. In addition, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative SO<sub>2</sub> emissions and fuel oil usage levels combined for emissions units B009, B010 and B011.
- 4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Southwest District Office, documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO<sub>x</sub> values in the terms and conditions of this permit. These reports shall also contain the total NO<sub>x</sub> emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Southwest District Office, documenting any continuous NO<sub>x</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: B009

the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

5. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Southwest District Office, documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or the appropriate limit as specified in this permit to install,, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation.

The permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Southwest District Office, documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

6. Pursuant to 40 CFR Part 60.49b(i), the permittee shall submit quarterly reports that identify the information required to be recorded pursuant to 40 CFR Part 60.49b(g) and Section A.III.7.
7. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 1.53 tons;

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

- b. the rolling, 12-month summation for NO<sub>x</sub> emissions of 28.36 tons;
  - c. the rolling, 12-month summation for CO emissions of 29.98 tons;
  - d. the rolling, 12-month summation for PM-10 emissions of 1.53 tons; and
  - e. the rolling, 12-month summation for VOC emissions of 3.24 tons.
8. All quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

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

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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;
  - b. the emissions testing shall be conducted to demonstrate compliance with the allowable CO and NO<sub>x</sub> limitations for each natural gas, No. 2 fuel oil, and soybean oil.;
  - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: U.S. EPA Reference Method 1 thru 4, 7 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office; and,
  - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

**Cargill****PTI Application: 05 12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: B009

Personnel from Ohio EPA shall be permitted to witness the test(s), 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.

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

2. Emissions Limitations:

NOx emissions shall not exceed 0.035 lb/mmBtu nor 6.48 lbs/hr when burning natural gas  
NOx emissions shall not exceed 14.0 lbs/1000 gallons nor 18.50 lbs/hr when burning No. 2 fuel oil or soybean oil.

Applicable Compliance Method:

Compliance with the NOx emission limitations shall be based upon the compliance test as required in Section A.V.1. of this permit.

3. Emissions Limitations:

CO emissions shall not exceed 0.037 lb/mmBtu nor 6.85 lbs/hr when burning natural gas  
CO emissions shall not exceed 5.0 lbs/1000 gallons nor 6.61 lbs/hr when burning No. 2 fuel oil or soybean oil

Applicable Compliance Method:

Compliance with the CO emission limitations shall be based upon the compliance test as required in Section A.V.1. of this permit.

4. Emissions Limitations:

When employing natural gas as fuel:  
SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu nor 0.11 lb/hr  
PE emissions shall not exceed 0.0019 lb/mmBtu nor 0.35 lb/hr  
PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.35 lb/hr.  
VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.74 lb/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum natural gas usage from the burners (185,000 cu.ft/hr) by the emission

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

factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 1.9 lbs PE or PM10/mm cu. ft.; and 0.6 lb SO<sub>2</sub>/mm cu. ft. The VOC emission limitation was established by multiplying the maximum heat input capacity of the boiler, 185 mmBtu/hr, by the manufacturer's emission factor of 0.004 lb/mmBtu.

## 5. Emissions Limitations:

When employing No. 2 fuel oil or soybean oil as fuel:  
SO<sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gallons nor 103.70 lb/hr  
PE emissions shall not exceed 2.0 lbs/1000 gallons nor 2.64 lb/hr  
PM-10 emissions shall not exceed 1.0 lb/1000 gallons nor 1.32 lb/hr.  
VOC emissions shall not exceed 0.2 lb/1000 gallons nor 0.26 lb/hr.

## Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum fuel oil usage from the burners (1321 gal/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.3-1., 1.3-3., and 1.3-6., revised 9/98: 2.0 lbs PE/1000 gal, 1.0 lb PM10/1000 gal.; 0.2 lb VOC/1000 gal.; and 157(0.5 % sulfur content, by weight) lbs SO<sub>2</sub>/1000 gal.

Compliance with the SO<sub>2</sub> emission limitation shall also be determined through the record keeping requirement established in Section A.III.3. of this permit.

## 6. Emissions Limitations:

1.53 tons PE per rolling, 12-month summation;  
28.36 tons NO<sub>x</sub> per rolling, 12-month summation;  
29.98 tons CO per rolling, 12-month summation;  
3.24 tons VOC per rolling, 12-month summation; and  
1.53 tons PM-10 per rolling, 12-month summation

## Applicable Compliance Method:

The emissions limitations above were determined by multiplying the hourly allowable emissions limitation for each pollutant for natural gas combustion, see Sections A.V.2., 3. and 4. of this permit, by 8,760 (hours per year) and dividing the result by 2,000 (pounds per ton). Compliance with the rolling, 12-month emission limitations shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: B009

Annual emissions from combustion of No. 2 fuel oil and soybean oil are less than annual emissions from the combustion of natural gas due to the annual fuel oil usage limitation in term A.II.2. of this permit.

5. Emissions Limitation:

23.35 tons SO<sub>2</sub> per rolling, 12-month summation combined for emissions unit B009, B010 and B011 (See term A.I.2.c)

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

Applicable Compliance Method:

Compliance shall be demonstrated by the operational restrictions in terms A.II.2. and 3, and the record keeping requirements in term A.III.3.

6. Emissions Limitation:

Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated through compliance with the continuous opacity monitor requirement in term A. II.5. and A.III.6.

**VI. Miscellaneous Requirements**

1. Within 180 days of startup of this emissions unit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.
2. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that Performance Specification 1 is maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

**Cargil  
PTI A**

Emissions Unit ID: B009

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

**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>
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**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**

none

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: B010

**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>	
B010 - New protein plant boiler No. 1, 85 mmBtu/hr, natural gas and oil fired, with low-NOx burners	OAC rule 3745-31-05(A)(3)	OAC rules 3745-31-10 thru 20

**Cargil  
PTI A**

Emissions Unit ID: B010

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

	<u>Applicable Emissions Limitations/Control Measures</u>	12-month summation
	<u>For natural gas combustion:</u>	Carbon monoxide (CO) emissions shall not exceed 13.78 tons per rolling, 12-month summation.
OAC rule 3745-17-07(A)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu nor 0.05 lb per hour.	Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.71 ton per rolling, 12-month summation.
OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed 0.0019 lb/mmBtu nor 0.16 lb/hr.	Volatile organic compound (VOC) emissions shall not exceed 1.49 tons per rolling, 12-month summation.
OAC rule 3745-18-06(D)	<u>For No. fuel oil or soybean oil combustion:</u>	<u>For natural gas combustion:</u>
	SO <sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gallons nor 43.10 lbs/hr.	NO <sub>x</sub> emissions shall not exceed 0.035 lb/mmBtu nor 2.98 lbs/hr.
OAC rule 3745-21-08(B) and 3745-23-06(B)	PE shall not exceed 2.0 lbs/1000 gallons nor 1.21 lbs/hr.	CO emissions shall not exceed 0.037 lb/mmBtu nor 3.15 lbs/hr.
	Visible particulate emissions from the stack shall not exceed 5 percent opacity, as a 6-minute average.	PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.16 lb/hr.
		0.34 lb VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.34 lb/hr.
40 CFR Part 60, Subpart Dc	PE shall not exceed 0.71 tons per rolling, 12-month summation.	<u>For No. fuel oil or soybean oil combustion:</u>
	See term A.I.2.d for control requirements	NO <sub>x</sub> emissions shall not exceed 14.0 lbs/1000 gallons nor 8.50 lbs/hr.
	Compliance with this rule shall also include compliance with OAC rules 3745-21-08(B), 3745-23-06(B), 3745-31-05(D), 3745-31-10 thru 20, 40 CFR, Part 60, Subpart Dc, and 40 CFR Part 63, Subpart DDDDD.	CO emissions shall not exceed 5.0 lbs/1000 gallons nor 3.04 lbs/hr.
40 CFR Part 63, Subpart DDDDD		PM-10 emissions shall not exceed 1.0 lb/1000 gallons nor 0.61 lb/hr.
		VOC emissions shall not exceed 0.2 lb/1000 gallons nor 0.12 lb/hr.
OAC rule 3745-31-05(D)	Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 13.03 tons per rolling,	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Cargil****PTI A**

Emissions Unit ID: B010

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

The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The SO<sub>2</sub> emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The permittee has satisfied the latest available control techniques and operating practices required by committing to comply with the best available technology requirements pursuant to OAC rule 3745-31-05(A)(3).

The visible particulate emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

See terms A.II.3., A.III.3. and A.IV.4 for the SO<sub>2</sub> standards.

See term Part II.A.

SO<sub>2</sub> emissions shall not exceed 23.35 tons per rolling, 12-month summation combined for emissions unit B009, B010 and B011 (See term A.I.2.c).

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: B010

**2. Additional Terms and Conditions**

- 2.a** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the combined fuel usage limitation for No. 2 fuel oil and/or soybean oil, emissions limitations, and the use of low-NO<sub>x</sub> burners.
- 2.c** The combined emissions of SO<sub>2</sub> from emissions units B009, B010 and B011 shall not exceed 23.35 tons, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Cargil

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: B010

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of SO<sub>2</sub> (Tons)</u>
1	2.6
1-2	5.1
1-3	7.5
1-4	9.8
1-5	11.8
1-6	13.7
1-7	15.5
1-8	17.4
1-9	18.8
1-10	20.4
1-11	22.0
1-12	23.35

After the first 12 calendar months of operation, compliance with the rolling, 12-month emission limitation for SO<sub>2</sub> shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The permittee shall install, operate and maintain low-NO<sub>x</sub> burners at all times when operating this emissions unit.

## II. Operational Restrictions

- The permittee shall burn only natural gas, No. 2 fuel oil or soybean oil in this emissions unit.
- The maximum combined No. 2 fuel oil and soybean oil fuel usage for emissions units B009, B010 and B011 shall not exceed 595,000 gallons as a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the No. 2 fuel oil and soybean oil usage levels for the combined emissions units B009, B010 and B011 as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Oil Usage</u>
1	65,000
1-2	130,000
1-3	190,000

**Cargil  
PTI A**

Emissions Unit ID: B010

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

1-4	250,000
1-5	300,000
1-6	350,000
1-7	395,000
1-8	440,000
1-9	480,000
1-10	520,000
1-11	560,000
1-12	595,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel oil usage figures.

3. The quality of the No. 2 fuel oil and soybean oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to meet the sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input.

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

1. For each day during which the permittee burns a fuel other than natural gas, No. 2 fuel oil, or soybean oil the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
  - a. the total amount of combined No. 2 fuel oil and soybean oil employed by emissions units B009, B010 and B011;
  - b. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of No. 2 fuel oil and soybean oil usage figures for B009, B010 and B011;
  - c. the total combined SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;
  - d. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;

also, during the first 12 calendar months of operation, the permittee shall record the cumulative No. 2 fuel oil and soybean oil usage and SO<sub>2</sub> emissions from emissions unit B009, B010 and B011, combined, for each calendar month;

Emissions Unit ID: B010

- e. the PE and the rolling, 12-month summation of PE from this emissions unit;
  - f. the NO<sub>x</sub> emissions and the rolling, 12-month summation of NO<sub>x</sub> emissions from this emissions unit;
  - g. the CO emissions and the rolling, 12-month summation of CO emissions from this emissions unit;
  - h. the PM-10 emissions and the rolling, 12-month summation of PM-10 emissions from this emissions unit; and
  - i. the VOC emissions and the rolling, 12-month summation of VOC emissions from this emissions unit.
3. For each shipment of oil received or in-house soybean oil employed for burning in emissions units B009, B010 and B011 the permittee shall maintain records of the total quantity of oil, the permittee's or oil supplier's analyses for sulfur content, heat content and the calculated SO<sub>2</sub> emission rate [the SO<sub>2</sub> emission rate shall be calculated as specified in OAC 3745-18-04(F)]. The records shall also include certification from the fuel oil supplier that the oil meets the definition of distillate oil [see 40 CFR 60.49b(r)].

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

4. For each day that this emissions unit burns No. 2 fuel oil or soybean oil, the permittee shall conduct, or have conducted, an one hour visible particulate emissions test in accordance with the following requirements:
- a. The visible particulate emissions test shall be conducted to demonstrate compliance with the visible particulate limitation outlined in this permit;
  - b. The following test method(s) shall be employed to demonstrate compliance with the visible particulate limitation: Method 9 as outlined in 40 CFR Part 60, Appendix A; and
  - c. The visible particulate emissions test shall be conducted by a certified visible emissions evaluator who has met the specifications of Method 9 outlined in 40 CFR Part 60, Appendix A.

A comprehensive written report on the results of the visible particulate emissions test shall be signed by the person or persons responsible for the test and retained for a period of five years from the date the record was created. This report shall contain the following information:

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- a. A copy of the visible emissions evaluation form; and
  - b. A copy of the visible emissions evaluator certification.
5. Pursuant to 40 CFR Part 60 Subpart Dc, the permittee shall record and maintain records of the amount of natural gas, No. 2 fuel oil and soybean oil combusted during each day in this emissions unit.

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

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

and

Ohio Environmental Protection Agency  
Southwest District Office  
Supervisor, DAPC  
401 E. Fifth Street  
Dayton, Ohio 45402-2911

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas, number two fuel oil or soybean oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month combined emissions limitation for SO<sub>2</sub> and the combined fuel oil usage limitation for emissions units B009, B010 and B011. In addition, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative SO<sub>2</sub> emissions and fuel oil usage levels combined for emissions units B009, B010 and B011.
4. The permittee shall submit quarterly deviation (excursion) reports that identify (a) all days during

Emissions Unit ID: B010

which No. 2 fuel oil or soybean oil were employed by this emissions unit and any visible particulate emissions were observed that exceeded the allowable limitations from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.

5. The permittee shall submit deviation (excursion) reports that identify each day during which records were not maintained on the amount of fuel combusted in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
6. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.71 tons;
  - b. the rolling, 12-month summation for NO<sub>x</sub> emissions of 13.03 tons;
  - c. the rolling, 12-month summation for CO emissions of 13.78 tons;
  - d. the rolling, 12-month summation for PM-10 emissions of 0.71 tons; and
  - e. the rolling, 12-month summation for VOC emissions of 1.49 tons.
7. All quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;
  - b. the emissions testing shall be conducted to demonstrate compliance with the allowable NO<sub>x</sub> and CO limitations;
  - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Method 1 - 4, 7 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office; and,
  - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum

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capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submission of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

**2. Emissions Limitations:**

NOx emissions shall not exceed 0.035 lb/mmBtu nor 2.98 lbs/hr when burning natural gas  
NOx emissions shall not exceed 14.0 lbs/1000 gallons nor 8.50 lbs/hr when burning No. 2 fuel oil  
or soybean oil.

Applicable Compliance Method:

Compliance with the NOx emission limitations shall be based upon the compliance test as required in Section A.V.1. of this permit.

**3. Emissions Limitations:**

CO emissions shall not exceed 0.037 lb/mmBtu nor 3.15 lbs/hr when burning natural gas  
CO emissions shall not exceed 5.0 lbs/1000 gallons nor 3.04 lbs/hr when burning No. 2 fuel oil or  
soybean oil

Applicable Compliance Method:

Compliance with the CO emission limitations shall be based upon the compliance test as required

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: B010

in Section A.V.1. of this permit.

4. Emissions Limitations:

When employing natural gas as fuel:

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu nor 0.05 lb/hr

PE emissions shall not exceed 0.0019 lb/mmBtu nor 0.61 lb/hr

PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.61 lb/hr.

VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.34 lb/hr.

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## Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum natural gas usage from the burners (85,000 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 1.9 lbs PE or PM10/mm cu. ft.; and 0.6 lb SO<sub>2</sub>/mm cu. ft. The VOC emissions limitation was established by multiplying the maximum heat input capacity of the boiler, 85 mmBtu/hr, by the manufacturer's emission factor of 0.004 lb/mmBtu.

## 5. Emissions Limitations:

When employing No. 2 fuel oil or soybean oil as fuel:

SO<sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gallons nor 43.10 lb/hr

PE emissions shall not exceed 2.0 lbs/1000 gallons nor 1.21 lb/hr

PM-10 emissions shall not exceed 1.0 lb/1000 gallons nor 0.61 lb/hr.

VOC emissions shall not exceed 0.2 lb/1000 gallons nor 0.12 lb/hr.

## Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum fuel oil usage from the burners (1321 gal/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.3-1., 1.3-3., and 1.3-6., revised 9/98: 2.0 lbs PE/1000 gal, 1.0 lb PM10/1000 gal.; 0.2 lb VOC/1000 gal.; and 157(0.5 % sulfur content, by weight) lbs SO<sub>2</sub>/1000 gal.

Compliance with the SO<sub>2</sub> emission limitation shall also be determined through the record keeping requirement established in Section A.III.3. of this permit.

## 6. Emissions Limitations:

1.53 tons PE per rolling, 12-month summation;

28.36 tons NO<sub>x</sub> per rolling, 12-month summation;

29.98 tons CO per rolling, 12-month summation;

3.24 tons VOC per rolling, 12-month summation; and

1.53 tons PM-10 per rolling, 12-month summation

## Applicable Compliance Method:

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The rolling, 12-month emissions limitations were determined by multiplying the hourly allowable emissions limitation for each pollutant for natural gas combustion, see Sections A.V.2., 3. and 4. of this permit, by 8,760 (hours per year) and dividing the result by 2,000 (pounds per ton). Compliance with the rolling, 12-month emission limitations shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

Annual emissions from combustion of No. 2 fuel oil and soybean oil are less than annual emissions from the combustion of natural gas due to the annual fuel oil usage limitation in term A.II.2. of this permit.

## 7. Emissions Limitation:

23.35 tons SO<sub>2</sub> per rolling, 12-month summation combined for emissions unit B009, B010 and B011 (See term A.I.2.c)

Applicable Compliance Method:

Compliance shall be demonstrated by the operational restrictions in terms A.II.2. and 3, and the record keeping requirements in term A.III.3.

## 8. Emissions Limitation:

Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated through compliance term A.III.4.

**VI. Miscellaneous Requirements**

none

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: B011

**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>
B011 - New protein plant boiler No. 2, 85 mmBtu/hr, natural gas and oil-fired, with low-NOx burners	OAC rule 3745-31-05(A)(3)  OAC rules 3745-31-10 thru 20

**Cargil  
PTI A**

Emissions Unit ID: B011

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

		Applicable Emissions <u>Limitations/Control Measures</u>
	40 CFR Part 63, Subpart DDDDD	<u>For natural gas combustion:</u>
	OAC rule 3745-31-05(D)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu nor 0.05 lb per hour.
		Particulate emissions (PE) shall not exceed 0.0019 lb/mmBtu nor 0.16 lb/hr.
		<u>For No. fuel oil or soybean oil combustion:</u>
OAC rule 3745-17-07(A)		SO <sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gallons nor 43.10 lbs/hr.
OAC rule 3745-17-10(B)		PE shall not exceed 2.0 lbs/1000 gallons nor 1.21 lbs/hr.
OAC rule 3745-18-06(D)		Visible particulate emissions from the stack shall not exceed 5 percent opacity, as a 6-minute average.
OAC rule 3745-21-08(B) and 3745-23-06(B)		PE shall not exceed 0.71 tons per rolling, 12-month summation.
40 CFR Part 60, Subpart Dc		See term A.I.2.d for control requirements
		Compliance with this rule shall also include compliance with OAC rules 3745-21-08(B), 3745-23-06(B), 3745-31-05(D), 3745-31-10 thru 20, 40 CFR, Part 60, Subpart Dc, and 40 CFR Part 63, Subpart DDDDD.
		Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 13.03 tons per rolling, 12-month summation

**Cargil****PTI A**

Emissions Unit ID: B011

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

Carbon monoxide (CO) emissions shall not exceed 13.78 tons per rolling, 12-month summation.	nor 0.61 lb/hr. VOC emissions shall not exceed 0.2 lb/1000 gallons nor 0.12 lb/hr.	summation combined for emissions unit B009, B010 and B011 (See term A.I.2.c).
Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.71 ton per rolling, 12-month summation.	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).	
Volatile organic compound (VOC) emissions shall not exceed 1.49 tons per rolling, 12-month summation.	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).	
<u>For natural gas combustion:</u> NOx emissions shall not exceed 0.035 lb/mmBtu nor 2.98 lbs/hr.	The SO <sub>2</sub> emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).	
CO emissions shall not exceed 0.037 lb/mmBtu nor 3.15 lbs/hr.	The permittee has satisfied the latest available control techniques and operating practices required by committing to comply with the best available technology requirements pursuant to OAC rule 3745-31-05(A)(3).	
PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.16 lb/hr.	The visible particulate emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).	
0.34 lb VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.34 lb/hr.	See terms A.II.3., A.III.3. and A.IV.4 for the SO <sub>2</sub> standards.	
<u>For No. fuel oil or soybean oil combustion:</u>	See term Part II.A.	
NOx emissions shall not exceed 14.0 lbs/1000 gallons nor 8.50 lbs/hr.	SO <sub>2</sub> emissions shall not exceed 23.35 tons per rolling, 12-month	
CO emissions shall not exceed 5.0 lbs/1000 gallons nor 3.04 lbs/hr.		
PM-10 emissions shall not exceed 1.0 lb/1000 gallons		

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: B011

**2. Additional Terms and Conditions**

- 2.a** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the combined fuel usage limitation for No. 2 fuel oil and/or soybean oil, emissions limitations, and the use of low-NO<sub>x</sub> burners.
- 2.c** The combined emissions of SO<sub>2</sub> from emissions units B009, B010 and B011 shall not exceed 23.35 tons, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Cargil

PTI A

Emissions Unit ID: B011

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of SO<sub>2</sub> (Tons)</u>
1	2.6
1-2	5.1
1-3	7.5
1-4	9.8
1-5	11.8
1-6	13.7
1-7	15.5
1-8	17.4
1-9	18.8
1-10	20.4
1-11	22.0
1-12	23.35

After the first 12 calendar months of operation, compliance with the rolling, 12-month emission limitation for SO<sub>2</sub> shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The permittee shall install, operate and maintain low-NO<sub>x</sub> burners at all times when operating this emissions unit.

## II. Operational Restrictions

- The permittee shall burn only natural gas, No. 2 fuel oil or soybean oil in this emissions unit.
- The maximum combined No. 2 fuel oil and soybean oil fuel usage for emissions units B009, B010 and B011 shall not exceed 595,000 gallons as a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the No. 2 fuel oil and soybean oil usage levels for the combined emissions units B009, B010 and B011 as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Oil Usage</u>
1	65,000
1-2	130,000

**Cargil  
PTI A**

Emissions Unit ID: B011

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

1-3	190,000
1-4	250,000
1-5	300,000
1-6	350,000
1-7	395,000
1-8	440,000
1-9	480,000
1-10	520,000
1-11	560,000
1-12	595,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel oil usage figures.

3. The quality of the No. 2 fuel oil and soybean oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to meet the sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input.

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

1. For each day during which the permittee burns a fuel other than natural gas, No. 2 fuel oil, or soybean oil the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
  - a. the total amount of combined No. 2 fuel oil and soybean oil employed by emissions units B009, B010 and B011;
  - b. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of No. 2 fuel oil and soybean oil usage figures for B009, B010 and B011;
  - c. the total combined SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;
  - d. beginning after the first 12 calendar months of operation, the combined rolling, 12-month summation of SO<sub>2</sub> emissions from emissions unit B009, B010 and B011;

also, during the first 12 calendar months of operation, the permittee shall record the cumulative No. 2 fuel oil and soybean oil usage and SO<sub>2</sub> emissions from emissions unit B009, B010 and B011, combined, for each calendar month;

- e. the PE and the rolling, 12-month summation of PE from this emissions unit;
  - f. the NO<sub>x</sub> emissions and the rolling, 12-month summation of NO<sub>x</sub> emissions from this emissions unit;
  - g. the CO emissions and the rolling, 12-month summation of CO emissions from this emissions unit;
  - h. the PM-10 emissions and the rolling, 12-month summation of PM-10 emissions from this emissions unit; and
  - i. the VOC emissions and the rolling, 12-month summation of VOC emissions from this emissions unit.
3. For each shipment of oil received or in-house soybean oil employed for burning in emissions units B009, B010 and B011, the permittee shall maintain records of the total quantity of oil, the permittee's or oil supplier's analyses for sulfur content, heat content and the calculated SO<sub>2</sub> emission rate [the SO<sub>2</sub> emission rate shall be calculated as specified in OAC 3745-18-04(F)]. The records shall also include certification from the fuel oil supplier that the oil meets the definition of distillate oil [see 40 CFR 60.49b(r)].

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

4. For each day that this emissions unit burns No. 2 fuel oil or soybean oil, the permittee shall conduct, or have conducted, an one hour visible particulate emissions test in accordance with the following requirements:
- a. The visible particulate emissions test shall be conducted to demonstrate compliance with the visible particulate limitation outlined in this permit;
  - b. The following test method(s) shall be employed to demonstrate compliance with the visible particulate limitation: Method 9 as outlined in 40 CFR Part 60, Appendix A; and
  - c. The visible particulate emissions test shall be conducted by a certified visible emissions evaluator who has met the specifications of Method 9 outlined in 40 CFR Part 60, Appendix A.

A comprehensive written report on the results of the visible particulate emissions test shall be signed by the person or persons responsible for the test and retained for a period of five years

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from the date the record was created. This report shall contain the following information:

- a. A copy of the visible emissions evaluation form; and
  - b. A copy of the visible emissions evaluator certification.
5. Pursuant to 40 CFR Part 60 Subpart Dc, the permittee shall record and maintain records of the amount of natural gas, No. 2 fuel oil and soybean oil combusted during each day in this emissions unit.

**IV. Reporting Requirements**

1. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

and

Ohio Environmental Protection Agency  
Southwest District Office  
Supervisor, DAPC  
401 E. Fifth Street  
Dayton, Ohio 45402-2911

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas, number two fuel oil or soybean oil was burned in this emissions unit.

Emissions Unit ID: B011

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month combined emissions limitation for SO<sub>2</sub> and the combined fuel oil usage limitation for emissions units B009, B010 and B011. In addition, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative SO<sub>2</sub> emissions and fuel oil usage levels combined for emissions units B009, B010 and B011.
4. The permittee shall submit quarterly deviation (excursion) reports that identify (a) all days during which No. 2 fuel oil or soybean oil were employed by this emissions unit and any visible particulate emissions were observed that exceeded the allowable limitations from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.
5. The permittee shall submit deviation (excursion) reports that identify each day during which records were not maintained on the amount of fuel combusted in the emissions unit. These reports shall be submitted within 30 days after the deviation occurs.
6. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.71 tons;
  - b. the rolling, 12-month summation for NO<sub>x</sub> emissions of 13.03 tons;
  - c. the rolling, 12-month summation for CO emissions of 13.78 tons;
  - d. the rolling, 12-month summation for PM-10 emissions of 0.71 tons; and
  - e. the rolling, 12-month summation for VOC emissions of 1.49 tons.
7. All quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;

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- b. the emissions testing shall be conducted to demonstrate compliance with the allowable NO<sub>x</sub> and CO limitations;
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Method 7 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office; and,
- d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

**2. Emissions Limitations:**

NO<sub>x</sub> emissions shall not exceed 0.035 lb/mmBtu nor 2.98 lbs/hr when burning natural gas  
NO<sub>x</sub> emissions shall not exceed 14.0 lbs/1000 gallons nor 8.50 lbs/hr when burning No. 2 fuel oil  
or soybean oil.

Applicable Compliance Method:

Compliance with the NO<sub>x</sub> emission limitations shall be based upon the compliance test as required in Section A.V.1. of this permit.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: B011

## 3. Emissions Limitations:

CO emissions shall not exceed 0.037 lb/mmBtu nor 3.15 lbs/hr when burning natural gas  
CO emissions shall not exceed 5.0 lbs/1000 gallons nor 3.04 lbs/hr when burning No. 2 fuel oil or soybean oil

Applicable Compliance Method:

Compliance with the CO emission limitations shall be based upon the compliance test as required in Section A.V.1. of this permit.

## 4. Emissions Limitations:

When employing natural gas as fuel:

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu nor 0.05 lb/hr

PE emissions shall not exceed 0.0019 lb/mmBtu nor 0.61 lb/hr

PM-10 emissions shall not exceed 0.0019 lb/mmBtu nor 0.61 lb/hr.

VOC emissions shall not exceed 0.004 lb/mmBtu nor 0.34 lb/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum natural gas usage from the burners (85,000 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 1.9 lbs PE or PM10/mm cu. ft.; and 0.6 lb SO<sub>2</sub>/mm cu. ft. The VOC emissions limitation was established by multiplying the maximum heat input capacity of the boiler, 85 mmBtu/hr, by the manufacturer's emission factor of 0.004 lb/mmBtu.

## 5. Emissions Limitations:

When employing No. 2 fuel oil or soybean oil as fuel:

SO<sub>2</sub> emissions shall not exceed 78.5 lbs/1000 gallons nor 43.10 lb/hr

PE emissions shall not exceed 2.0 lbs/1000 gallons nor 1.21 lb/hr

PM-10 emissions shall not exceed 1.0 lb/1000 gallons nor 0.61 lb/hr.

VOC emissions shall not exceed 0.2 lb/1000 gallons nor 0.12 lb/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 6, 25A, and 201. The pound per hour emission limitations above were established by multiplying the maximum fuel oil usage from the burners (1321 gal/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.3-1., 1.3-3., and 1.3-6., revised 9/98: 2.0 lbs PE/1000 gal, 1.0 lb PM10/1000 gal.; 0.2 lb VOC/1000 gal.; and 157(0.5 % sulfur content, by weight) lbs SO<sub>2</sub>/1000 gal.

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Compliance with the SO<sub>2</sub> emission limitation shall also be determined through the record keeping requirement established in Section A.III.3. of this permit.

## 6. Emissions Limitations:

1.53 tons PE per rolling, 12-month summation;  
28.36 tons NO<sub>x</sub> per rolling, 12-month summation;  
29.98 tons CO per rolling, 12-month summation;  
3.24 tons VOC per rolling, 12-month summation; and  
1.53 tons PM-10 per rolling, 12-month summation

## Applicable Compliance Method:

The rolling, 12-month emissions limitations were determined by multiplying the hourly allowable emissions limitation for each pollutant for natural gas combustion, see Sections A.V.2., 3. and 4. of this permit, by 8,760 (hours per year) and dividing the result by 2,000 (pounds per ton). Compliance with the rolling, 12-month emission limitations shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

Annual emissions from combustion of No. 2 fuel oil and soybean oil are less than annual emissions from the combustion of natural gas due to the annual fuel oil usage limitation in term A.II.2. of this permit.

## 5. Emissions Limitation:

23.35 tons SO<sub>2</sub> per rolling, 12-month summation combined for emissions unit B009, B010 and B011 (See term A.I.2.c)

## Applicable Compliance Method:

Compliance shall be demonstrated by the operational restrictions in terms A.II.2. and 3, and the record keeping requirements in term A.III.3.

## 6. Emissions Limitation:

Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average

## Applicable Compliance Method:

Compliance shall be demonstrated through compliance term A.III.4.

72

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: B011

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: B011

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

none

**Cargil  
PTI A**

Emissions Unit ID: P006

**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>
P006 - Grain Dryer No. 1 (Terms in this permit supersede those identified in PTI 05-7365 issued on 11/1/95)	OAC rule 3745-31-05(A)(3)
	40 CFR Part 60, Subpart DD
	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rules 3745-31-10 thru 20

**Cargil**

**PTI A**

Emissions Unit ID: P006

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

Applicable Emissions  
Limitations/Control  
Measures

monthly average.

Particulate emissions (PE) shall not exceed 11.52 pounds per hour, as a monthly average.

The PM-10 emissions for emissions units P006 and P034, combined, shall not exceed 23.92 tons of PM-10 per rolling, 12-month summation.

The PE for emissions units P006 and P034, combined, shall not exceed 95.67 tons per rolling, 12-month summations.

Visible emissions shall not exceed 0% opacity.

Compliance with this rule shall also include compliance with OAC rule 3745-17-08(B), 3745-31-10 thru 20, 3745-31-05(D), and 40 CFR, Part 60 Subpart DD.

See Section A.I.2.a.

The visible emission limitation specified by this rule is less stringent than the limitation specified by OAC rule 3745-31-05(A)(3).

See Section A.I.2.b.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 2.88 pounds per hour, as a

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

- 2.a** The permittee shall maintain dryer plate perforations less than or equal to 0.094 inch (2.4 mm) in diameter for this emissions unit.
- 2.b** Compliance with the visible emission limitation specified in 40 CFR, Part 60, Subpart DD shall satisfy the requirements of OAC rule 3745-17-08(B).

**II. Operational Restrictions**

The maximum amount of soybean processed through emissions units P006 and P034, combined, shall not exceed 1,642,500 tons based upon a rolling, 12-month summation of throughput records.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Soybean Throughput (tons)</u>
1	136,875
1-2	273,750
1-3	410,625
1-4	547,500
1-5	684,375
1-6	821,250
1-7	958,125
1-8	1,095,000
1-9	1,231,875
1-10	1,368,750
1-11	1,505,625
1-12	1,642,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible

Emissions Unit ID: P006

emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the amount of soybean material processed, in tons;
  - b. the amount of soybean material processed for emissions units P006 and P034, combined;
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of soybean material processed, in tons, for emissions unit P006 and P034, combined;  
  
also, during the first 12 calendar month of operation, the permittee shall record the cumulative soybean throughput, in tons, for emissions unit P006 and P034, combined, for each calendar month;
  - d. the hours of operation for this emissions unit;
  - e. the average hourly amount of soybean material processed, in tons, as determined by (a)/(c);
  - f. the average hourly particulate emission rate, in pounds, as determined by (e)x(0.1165 lb/ton\*);
  - g. the monthly particulate emission rate, in tons, for emissions units P006 and P034, combined, as determined by (b)x(0.1165 lb/ton\*);
  - h. the rolling, 12-month summation of particulate emissions for emissions units P006 and P034, i.e, summation of (g) for the previous 12 months;
  - i. the average hourly PM10 emission rate, in pounds, as determined by (f)x(0.25\*\*);
  - j. the monthly PM10 emission rate, in tons, for emissions unit P006 and P034, combined, as determined by (g)x(0.25); and
  - k. the rolling, 12-month summation of PM10 emissions, in tons, for emissions units P006 and P034, combined, i.e., summation of (j) for the previous 12 months.

\* The particulate emission factor is based upon manufacturer data with a 89.1% control efficiency

**Issued: To be entered upon final issuance**  
for the enclosure/settling chamber.

\*\* AP-42, Volume I, Fifth Edition, Table 9.9.1-1, 5/98, indicates that PM10 is 25% of filterable particulate emissions.

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

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month limitation of, and for first 12 months of operation following the issuance of this permit, the soybean throughput limitations; and
  - b. the average hourly PE and PM/10 emissions limitations;
  - c. the rolling, 12-month PE and PM-10 emissions limitations.

These reports are due by the dates specified in Part I - General Terms and Conditions 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. Emissions Limitation:

PE shall not exceed 11.52 pounds per hour, as a monthly average.

PM-10 emissions shall not exceed 2.88 pounds per hour, as a monthly average.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirement specified in section A.III.2. No testing is specifically required to demonstrate compliance with these emissions limitation, but, if appropriate may be required pursuant to OAC rule 3745-15-04(A).

2. Emission Limitation:

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: P006

Visible emissions shall not exceed 0% opacity.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**Cargil**

**PTI A**

Emissions Unit ID: P006

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

3. Emission Limitation:

The PE for emissions units P006 and P034, combined, shall not exceed 95.67 tons per rolling, 12-month summations.

The PM-10 emissions for emissions unit P006 and P034, combined, shall not exceed 23.92 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirement specified in section A.III.2.

**VI. Miscellaneous Requirements**

None

Cargil

PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P008

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - Secondary Dehulling includes grain conveying and soybean dehulling (modifying existing Secondary Dehulling)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.21 lbs/hr nor 0.87 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.
		Visible PE from the stack shall not exceed 5% opacity, as a 6-minute average.
		No visible emissions of fugitive dust (see Section A.I.2.a).
	OAC rule 3745-17-07(A)	Compliance with this rule shall also include compliance with OAC rule 3745-31-10 thru 20.
	OAC rule 3745-17-11(B)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-10 thru 20	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Cargil****PTI A**

Emissions Unit ID: P008

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

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.10 pounds per hour nor 0.43 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.

**2. Additional Terms and Conditions**

- 2.a** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P008

- b. the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for emissions units P008 and P009, combined:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Director (the Ohio EPA, Southwest District Office) that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above in section A.II. These reports are due by the dates specified in Part I - General Terms and Conditions A.1.c.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.87 tons for emissions units P008 and P009, combined; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.43 tons for emissions units P008 and P009, combined.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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

Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be

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

determined in accordance with the following methods:

## 1. Emissions Limitation:

PE shall not exceed 0.21 lbs/hr nor 0.87 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.

## Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by emissions testing performed in accordance with section A.V.4. Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirement in Part III - Section A.III.3. of this permit.

Compliance with these emission limitations may also be demonstrated by multiplying the production capacity for emissions units P008 and P009 (maximum capacity is 94.0 tons/hr and 782,925 tons/yr) by the controlled emission factor as determined by the most recent compliance demonstration. As of the issuance date of this permit, the most recent compliance demonstration, on February 22, 1996, demonstrated a controlled emission factor of 0.0022 lb PE/ton.

## 2. Emissions Limitation:

PM-10 emissions shall not exceed 0.10 pounds per hour nor 0.43 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.

## Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by emissions testing performed in accordance with section A.V.4. Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirement in Part III - Section A.III.3. of this permit.

Compliance with these emission limitations may also be demonstrated by multiplying the production capacity for emissions units P008 and P009 (maximum capacity is 94.0 tons/hr and 782,925 tons/yr) by the controlled emission factor as determined by the most recent compliance demonstration. As of the issuance date of this permit, the most recent compliance demonstration, on February 22, 1996, demonstrated a controlled emission factor of 0.0022 lb PE/ton. PM-10 emissions may be determined by multiplying the results of the PE by 50% (AP-42, Volume I, Fifth Edition, Table 9.9.1-1, 5/98, indicates that PM10 is less than 50% of filterable PE).

## 3. Visible Emissions Limitation:

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P008

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. The permittee shall conduct, or have conducted, emission testing simultaneously for emissions units P008 and P009 in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions and PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PE Method 5 of 40 CFR Part 60, Appendix A; and for PM-10 Method 201 of 40 CFR Part 51, Appendix M.
  - d. The test shall be conducted while the emissions units P008 and P009 are operating simultaneously and at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. Visible Emissions Limitation:

87

**Cargil**

**PTI A**

Emissions Unit ID: P008

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

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

None

Cargil

PTI A

Emissions Unit ID: P008

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

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>
P009 - Primary Dehulling (Terms in this permit supersede those identified in PTI 05-7365 issued on 11/1/95.)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.21 lbs/hr nor 0.87 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.
		Visible PE from the stack shall not exceed 5% opacity, as a 6-minute average.
		No visible emissions of fugitive dust.(see Section A.I.2.a).
	OAC rule 3745-17-07(A)	Compliance with this rule shall also includes compliance with OAC rule 3745-31-10 thru 20.
	OAC rule 3745-17-11(B)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-10 thru 20	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.10 pounds per hour nor 0.43 tons as a rolling, 12-month summation for emissions units P008 and

**Cargil****PTI A**

Emissions Unit ID: P009

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

P009, combined. |

**2. Additional Terms and Conditions**

- 2.a** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit and any visible emissions of fugitive dust. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit,

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P009

then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for emissions units P008 and P009, combined:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Director (the Ohio EPA, Southwest District Office) that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above in section A.II. These reports are due by the dates specified in Part I - General Terms and Conditions A.1.c.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.87 tons for emissions units P008 and P009, combined; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.43 tons for emissions units P008 and P009, combined.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE shall not exceed 0.21 lbs/hr nor 0.87 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.

Applicable Compliance Method:

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

Compliance with the hourly emission limitation shall be demonstrated by emissions testing performed in accordance with section A.V.4. Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirement in Part III - Section A.III.3. of this permit.

Compliance with these emission limitations may also be demonstrated by multiplying the production capacity for emissions units P008 and P009 (maximum capacity is 94.0 tons/hr and 782,925 tons/yr) by the controlled emission factor as determined by the most recent compliance demonstration. As of the issuance date of this permit, the most recent compliance demonstration, on February 22, 1996, demonstrated a controlled emission factor of 0.0022 lb PE/ton.

**2. Emissions Limitation:**

PM-10 emissions shall not exceed 0.10 pounds per hour nor 0.43 tons as a rolling, 12-month summation for emissions units P008 and P009, combined.

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be demonstrated by emissions testing performed in accordance with section A.V.4. Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirement in Part III - Section A.III.3. of this permit.

Compliance with these emission limitations may also be demonstrated by multiplying the production capacity for emissions units P008 and P009 (maximum capacity is 94.0 tons/hr and 782,925 tons/yr) by the controlled emission factor as determined by the most recent compliance demonstration. As of the issuance date of this permit, the most recent compliance demonstration, on February 22, 1996, demonstrated a controlled emission factor of 0.0022 lb PE/ton. PM-10 emissions may be determined by multiplying the results of the PE by 50% (AP-42, Volume I, Fifth Edition, Table 9.9.1-1, 5/98, indicates that PM10 is less than 50% of filterable PE).

**3. Visible Emissions Limitation:**

5% opacity, as a 6-minute average

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P009

4. The permittee shall conduct, or have conducted, emission testing simultaneously for emissions units P008 and P009 in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PE Method 5 of 40 CFR Part 60, Appendix A; and for PM-10 Method 201 of 40 CFR Part 51, Appendix M.
  - d. The test shall be conducted while the emissions units P008 and P009 are operating simultaneously and at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**Cargil  
PTI A**

Emissions Unit ID: P009

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

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P011

**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>
P011 - Hull Grinding (Terms in this permit supersede those identified in PTI 05-7365 issued on 11/1/95.)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-11(B)
	OAC rule 3745-31-10 thru 20

**Cargill****PTI Application: 05-12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P011

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.35 pounds per hour nor 1.54 tons as a rolling, 12-month summation.

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.a).

Compliance with this rule shall also include compliance with OAC rule 3745-31-10 thru 20.

The visible emissions limitations specified by these rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.18 pounds per hour nor 0.77 tons as a rolling, 12-month summation.

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

- 2.a** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

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

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports for this emissions unit which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 1.54 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.77 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

Particulate emissions (PE) shall not exceed 0.35 lbs/hr nor 1.54 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by emissions testing performed in

Emissions Unit ID: P011

accordance with section A.V.4.

Compliance with these emissions limitations may also be demonstrated by multiplying the maximum production capacity for this emissions unit (10 tons/hr) by the controlled emission factor as determined during the most recent compliance demonstration. The most recent compliance demonstration, on February 21, 1996, demonstrated a controlled emission factor of 0.0314 lb PE/ton.

Compliance with the rolling, 12-month limitation for PE shall be determined by multiplying the hourly PE limitation of 0.35 lbs/hr by the maximum hours per 12-months of 8,760 hours, and dividing the result by 2000 lbs/ton. Therefore, if compliance is demonstrated with the hourly PE limitation, then compliance is demonstrated for the rolling, 12-month PE limitation.

2. Emissions Limitation:

PM-10 emissions shall not exceed 0.18 pounds per hour nor 0.77 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the hourly PM-10 emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.4.

Compliance with the annual PM-10 limitation shall be determined by multiplying the hourly PM-10 limitation of 0.18 lbs/hr by the maximum hours per 12-months of 8,760 hours, and dividing the result by 2000 lbs/ton. Therefore, if compliance is demonstrated with the hourly PM-10 emissions limitation, then compliance is demonstrated for the rolling, 12-month PM-10 emissions limitation.

3. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. 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 90 days of start-up.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and PM-10 emissions.

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

- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PE Method 5 of 40 CFR Part 60, Appendix A; and for PM-10 Method 201 of 40 CFR Part 51, Appendix M.
- d. The test shall be conducted while emissions unit P011 is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P018

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - 4,500 tons per day soybean oil extraction, which includes the desolventizers and the mineral oil system (Terms in this permit supersede those identified in PTI 05-7365 issued on 11/1/95.)	OAC rule 3745-31-05(A)(3)	Oilseed solvent loss factor shall not exceed 0.146 gallons per ton of soybean processed per month when using the <u>conventional desolventizer toaster (DT)</u> (see Section A.I.2.b).
		Oilseed solvent loss factor shall not exceed 0.215 gallons per ton of soybean processed per month when using the <u>flash desolventizing system (FDS)</u> (see Section A.I.2.b).
		Compliance with this rule also includes compliance with OAC rules 3745-21-07(G), 3745-31-10 thur 20, and 40 CFR, Part 63, Subpart GGGG.
	OAC rule 3745-21-07(G)	See Section A.I.2.c
	40 CFR Part 63, Subpart GGGG	The compliance ratio limitation for hazardous air pollutants (HAP) specified by this rule is less stringent than the limitation as specified by OAC rule 3745-31-10 thru 20.
	OAC rules 3745-31-10 thru 20	The compliance ratio for solvent loss shall

**Cargil****PTI A**

Emissions Unit ID: P018

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

not exceed 1.0.

Volatile organic compound (VOC) emissions shall not exceed 792.0 tons as rolling, 12-month summation (see Section A.I.2.d).

## 2. Additional Terms and Conditions

- 2.a** The soybean oil extraction system employs solvent to remove oil from soybean flakes. Solvent emissions occur throughout the oil extraction process, flake desolventizing, solvent recovery, and flake handling. For this reason, the OC emissions limitations for this emissions unit include solvent losses from emissions units P015, P016, P018, P030, P032, P033, P037, P045 and P046.
- 2.b** If the compliance ratio for solvent loss is demonstrated to be equal to or less than 1.0, then compliance shall be demonstrated for the oilseed solvent loss factors. Therefore, there are no record keeping and reporting requirements directly related to the oilseed solvent loss factors.
- 2.c** The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).
- 2.d** All OC emissions are assumed to be VOC. Therefore, VOC emissions are equivalent to OC emissions.

## II. Operational Restrictions

1. Pursuant to 40 CFR § 63.2851(a), develop and implement a plan for demonstrating compliance that provides the detailed procedures you will follow to monitor and record data necessary for demonstrating compliance with the 40 CFR Part 63, Subpart GGGG. This plan must be developed prior to startup, and it must include the items in § 63.2851(a)(1) thru (7) as follows:
- The name and address of the owner or operator;
  - The physical address of the vegetable oil production process;
  - 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;
  - When each measurement will be made;
  - Examples of each calculation that will be used to determine compliance;
  - Example logs of how data will be recorded; and

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P018

- g. A plan to ensure that the data continue to meet compliance demonstration needs.
2. Pursuant to 40 CFR § 63.2852, develop a written startup, shutdown, and malfunction (SSM) plan and implement the plan , when applicable. This plan must be developed prior to startup.

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

1. At the end of each operating month, the permittee shall calculate and maintain records of the compliance ratio for solvent loss, comparing the actual solvent loss to the allowable solvent loss, as calculated in the following equations.

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

- a. The following equation shall be used to determine each monthly compliance ratio:

$$CR = (\text{Actual Solvent Loss}) \div \sum [(\text{Oilseed}_{sf}) \times (\text{SLF}_{sf}) + (\text{Oilseed}_{cm}) \times (\text{SLF}_{cm})]$$

Where:

CR = Compliance ratio for solvent loss

Actual Solvent Loss = gallons of actual solvent loss during the operating month, as determined in Section A.III.2.g.

$\text{Oilseed}_{sf}$  = tons of soybean processed by the FDS during the operating month for the specialty white flake, as determined in Section A.III.3.h.

$\text{Oilseed}_{cm}$  = tons of soybean processed by the DT during the operating month for the conventional soybean meal, as determined in Section A.III.3.j.

$\text{SLF}_{sf}$  = the allowable solvent loss factor (gal/ton) for soybean processing by the FDS for the specialty white flake; 0.215 gallons/ton.

$\text{SLF}_{cm}$  = the allowable solvent loss factor (gal/ton) for soybean processing by the DT for the conventional soybean meal; 0.146 gallons/ton.

- b. After the source has processed listed oilseed for 12 operating months, calculate and maintain records of the compliance ratio at the end of each calendar month for the previous 12 operating months per the following equation:

$$CR = (\text{Actual Solvent Loss}) \div \sum_{i=1}^{12} [(\text{Oilseed}_{sf}) \times (\text{SLF}_{sf}) + (\text{Oilseed}_{cm}) \times (\text{SLF}_{cm})]$$

Where:

CR = Compliance ratio for solvent loss

Actual Solvent Loss = gallons of actual solvent loss during the previous 12 operating months, as determined in Section A.III.2.h.

$\text{Oilseed}_{sf}$  = tons of soybean processed by the FDS during the previous 12 operating

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

months for the specialty white flake, as determined in Section A.III.3.i.

$Oilseed_{cm}$  = tons of soybean processed by the DT during the previous 12 operating months for the conventional soybean meal, as determined in Section A.III.3.k.

$SLF_{sf}$  = the allowable solvent loss factor (gal/ton) for soybean processing by the FDS for the specialty white flake; 0.215 gallons/ton.

$SLF_{cm}$  = the allowable solvent loss factor (gal/ton) for soybean processing by the DT for the conventional soybean meal; 0.146 gallons/ton.

2. At the end of each calendar month, the permittee shall determine the actual solvent loss, in gallons, for the previous operating month. The actual 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 rolling, 12-month summation of actual solvent loss, in gallons, by summing the monthly actual solvent loss for the previous 12 operating months. 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 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 in the inventory on the first and last day of each normal operating period);
  - d. Gallons of extraction solvent received, purchased, and recovered during the operating period;
  - e. Solvent inventory adjustments with reasonable justification for the adjustment;
  - f. The total solvent loss for each calendar month, regardless of the operating status of the facility's emissions units covered by this standard;
  - g. The actual solvent loss, in gallons, for each operating month, calculated as follows:

$$\text{actual solvent loss (gal)} = SOLV_B - SOLV_E + SOLV_R +/- SOLV_A$$

$SOLV_B$  = gallons of solvent in the inventory at the beginning of the operating month

Emissions Unit ID: P018

$SOLV_E$  = gallons of solvent in the inventory at the end of the operating month

$SOLV_R$  = gallons of solvent received between the beginning and ending inventory dates of the operating month

$SOLV_A$  = gallons of solvent added or removed from the extraction solvent inventory during the operating month

- h. After 12 operating months, the rolling, 12-month summation of actual solvent loss, in gallons, for the previous 12 operating months.
3. At the end of each calendar month, the permittee shall determine the quantity of oilseed processed, in tons, for the previous operating month. The quantity of oilseed processed determination shall be made separately for the conventional soybean meal and the specialty white flake, each. The quantity of oilseed processed shall be determined on an *as received basis*. The *as received basis* refers to the oilseed chemical and physical characteristics as initially received by the facility and prior to any oilseed handling and processing. After 12 or more operating months have been documented, the permittee shall also determine the rolling, 12-month summation of the quantity of oilseed processed, in tons, by summing the monthly quantity of oilseed processed figures for the previous 12 operating months for the conventional soybean meal and specialty white flake, each. To determine the quantity of oilseed processed, the permittee shall follow the procedures in the plan for demonstrating compliance. The permittee shall maintain monthly records of the following:
- 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 inventory for each oilseed, (tons of oilseed in the inventory on the first and last day of each normal operating period);
  - d. Tons of each oilseed received;
  - e. Oilseed inventory adjustments with reasonable justification for the adjustment;
  - f. The total quantity of each oilseed type processed during normal operating periods recorded within a calendar month, calculated as follows:

Monthly Quantity

of Each Oilseed =  $SEED_B - SEED_E + SEED_R \pm SEED_A$   
 Processed (tons)

Where:

$SEED_B$  = tons of oilseed in the inventory at the beginning of normal operating month

$SEED_E$  = tons of oilseed in the inventory at the end of normal operating month

$SEED_R$  = tons of oilseed received during the operating month

$SEED_A$  = tons of oilseed added or removed from the oilseed inventory during the operating month

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

- g. The rolling, 12-month summation of quantity of oilseed processed, in tons, for the previous 12 operating months.
  - h. The total quantity of each oilseed type processed for the FDS to produce the speciality white flake, in tons.
  - i. The rolling, 12-month summation of quantity of oilseed processed for the FDS to produce the speciality white flake, in tons, for the previous 12 operating months.
  - j. The total quantity of each oilseed type processed for the DT to produce the conventional soybean meal, in tons.
  - k. The rolling, 12-month summation of quantity of oilseed processed for the DT to produce the conventional soybean meal, in tons, for the previous 12 operating months.
4. The permittee shall maintain monthly records of the following information:
- a. The OC/VOC emissions, i.e., calculated by multiplying the actual solvent loss, (2.g.), by the OC/VOC content of the extraction solvent; and
  - b. The rolling, 12-month summation of OC/VOC emissions, i.e., calculated by multiplying the rolling, 12-month summation of (4.a.)
5. The permittee shall collect and record each month the company identification for each liquid organic material 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).

**IV. Reporting Requirements**

1. Pursuant to 40 CFR § 63.2860, submit an initial notification, to the Ohio EPA Southwest District Office, within the schedule listed in 40 CFR § 63.9. This notification shall include the information required by the General Provisions of 40 CFR Part 63 with the following exceptions:
- a. The application for approval of construction does not require the specific HAP emission data required in § 63.5(d)(1)(ii)(H) and (iii), (d)(2) and (d)(3)(ii). The application for approval of construction would include, instead, a brief description of the source including the types of listed oilseeds processed, nominal operating capacity and type of desolventizers to be used.
  - b. The notification of actual startup date, delivered or postmarked within 15 calendar days

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P018

after the actual startup date, must also include whether you have elected to operate under an initial startup period subject to § 63.2850(c)(2) and provide and estimate and justification for the anticipated duration of the initial startup period.

2. Pursuant to 40 CFR § 63.2860, 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 § 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 § 63.2851) and SSM plan (as described in § 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.
3. Pursuant to 40 CFR § 63.2861(a), 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;

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- c. Each listed oilseed type processed during the 12 calendar months period covered by the report;
  - d. Each HAP identified under § 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. Pursuant to 40 CFR § 63.2861(b), submit deviation notification reports, 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. Pursuant to 40 CFR § 63.2861(c), if you choose to operate your source under an initial startup period subject to § 63.2850(c)(2) or (d)(2) or a malfunction period subject to § 63.2850(e)(2), 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

**Cargill****PTI Application: 05 12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P018

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 period; and
  - c. An estimate of the solvent loss during the initial startup or malfunction period with supporting documentation.
6. Pursuant to 40 CFR § 63.2861(d), 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 quarterly deviation (excursion) reports which identify all exceedances of the following:
- a. The rolling, 12-month OC/VOC emissions limitation;
  - b. 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.

## **V. Testing Requirements**

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

1. Emissions Limitations:

Oilseed solvent loss factor shall not exceed 0.146 gallons per ton of soybean processed per month

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

when using the conventional desolventizer toaster (DT).

Oilseed solvent loss factor shall not exceed 0.215 gallons per ton of soybean processed per month when using the flake desolventizing system (FDS).

Applicable Compliance Method -

Compliance shall be demonstrated through the record keeping requirements in Section A.III.1. of the special terms and conditions for emissions unit P018.

2. Emissions Limitation:

OC/VOC emissions shall not exceed 792.0 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping in Section A.III.5. of the special terms and conditions for emissions unit P018.

4. Emissions Limitation:

The compliance ratio for solvent loss shall not exceed 1.0.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements in Section A.III.1. of the special terms and conditions for emissions unit P018.

**VI. Miscellaneous Requirements**

none

**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>
P018 - 4,500 tons per day soybean oil extraction, which includes the desolventizers and the mineral oil system (Terms in this permit supersede identified in PTI 05-7365 issued on 11/1/95.)		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

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

1. The permit to install for this emissions unit (P018) was evaluated based on the actual materials (typically coatings and cleanup 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 U.S. EPA Industrial Source Complex (ISC) model version 00101. The predicted 1-hour maximum ground-level concentration from the use of the ISC 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

TLV (mg/m3): 176.237

Maximum Hourly Emission Rate (lbs/hr): 284

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Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 4,082

MAGLC (ug/m3): 4,190

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.

2. 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:"
  - 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.

116

**Cargil**

**PTI A**

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

Emissions Unit ID: P018

**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none

**Cargil  
PTI A**

Emissions Unit ID: P030

**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>	
P030 - Dryer/Cooler with six decks controlled by wet scrubber, material handling controlled by individual cyclones (Terms in this permit supersede those identified in PTI 05-6134 issued on 8/22/93.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
		OAC rule 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P030

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

Applicable Emissions  
Limitations/Control  
Measures

31-05(A)(3).

See Section A.I.2.c.

Particulate emissions (PE) shall not exceed 0.002 grains per dry standard cubic foot, 1.54 pounds per hour, nor 6.76 tons as a rolling, 12-month summation (see Section A.I.2.a..)

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.002 grains per dry standard cubic foot, 1.54 pounds per hour, nor 6.76 tons as a rolling, 12-month summation (see Section A.I.2.a..)

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.d.)

See Section A.I.2.b.

Compliance with this rule shall also includes compliance with OAC rule 3745-21-07(G), 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** The organic compound (OC) emission limitation is tons 2,312.64 tons as a rolling, 12-month summation. This limitation is combined for emissions units P015, P016, P018, P030, P032, P033, P037, P045, and P046. The monitoring, record keeping and reporting requirements for the OC emissions limitations are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with the rolling, 12-month OC emission limitations are demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.c** The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5). The monitoring, record keeping and reporting requirements for this material usage limitation are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with this material usage limitation is demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.d** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

1. The scrubber water supply pressure shall be continuously maintained at a value of not less than manufacturer's recommendation in pounds per square inch (gauge) at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water supply pressure shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than not less than manufacturer's recommendation in gallons per minute at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water flow rate shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The water supply pressure, in psig, on a daily basis.
  - b. The water flow rate, in gpm, on a daily basis.
  - c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. the cause of the visible emissions;
    - c. the total duration of any visible emission incident; and
    - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

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

- a. The water supply pressure.
- b. The scrubber water flow rate.

These reports are due by the dates specified in Part I - General Terms and Conditions.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 6.76 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 6.76 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 shall not exceed 0.002 grains per dry standard cubic foot, 1.54 pounds per hour, nor 6.76 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the gr/dscf and the lbs/hr limitations shall be demonstrated by emissions testing performed in accordance with section A.V.3. The rolling, 12-month PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: P030

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

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## Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 22.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

124

**Cargil  
PTI A**

Emissions Unit ID: P030

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

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

125

**Cargil**

**PTI A**

Emissions Unit ID: P030

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

**Cargil**

**PTI A**

Emissions Unit ID: P030

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

**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>
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**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**

none

Cargill

PTI Application: 05-12192

Issued

Facility ID: 0575010160

Emissions Unit ID: P034

**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>
P034 - Grain Dryer No. 2 (Terms in this permit supersede those identified in PTI 05-9010 issued on December 3, 1997.)	OAC rule 3745-31-05(A)(3)
	0 CFR Part 60, Subpart DD
	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rules 3745-31-10 thru 20

**Cargil**

**PTI A**

Emissions Unit ID: P034

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

Applicable Emissions  
Limitations/Control  
Measures

3.27 pounds per hour.

Particulate emissions (PE) shall not exceed 13.08 pounds per hour, as a monthly average.

The PM-10 emissions for emissions units P006 and P034, combined, shall not exceed 23.92 tons of PM-10 as a rolling, 12-month summation.

The PE for emissions units P006 and P034, combined, shall not exceed 95.67 tons as a rolling, 12-month summations.

Visible emissions shall not exceed 0% opacity

Compliance with this rule shall also include compliance with OAC rule 3745-17-08(B), 3745-31-10 thru 20, 3745-31-05(D), and 40 CFR, Part 60 Subpart DD.

See Section A.I.2.a of this permit.

The visible emission limitation specified by this rule is less stringent than the limitation specified by OAC rule 3745-31-05(A)(3).

See Section A.I.2.b.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed

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- 2.a** The permittee shall maintain dryer plate perforations less than or equal to 0.094 inch (2.4 mm) in diameter for this emissions unit.
- 2.b** Compliance with the visible emission limitation specified in 40 CFR, Part 60, Subpart DD shall satisfy the requirements of OAC rule 3745-17-08(B).

**II. Operational Restrictions**

The maximum amount of soybean processed through emissions units P006 and P034, combined, shall not exceed 1,642,500 tons based upon a rolling, 12-month summation of throughput records.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Soybean Throughput (tons)</u>
1	136,875
1-2	273,750
1-3	410,625
1-4	547,500
1-5	684,375
1-6	821,250
1-7	958,125
1-8	1,095,000
1-9	1,231,875
1-10	1,368,750
1-11	1,505,625
1-12	1,642,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible

130

**Cargil**

**PTI A**

Emissions Unit ID: P034

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

emissions are observed, the permittee shall also note the following in the operations log:

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

- a. the color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the amount of soybean material processed, in tons;
  - b. the amount of soybean material processed for emissions units P006 and P034, combined;
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of soybean material processed, in tons, for emissions unit P006 and P034, combined;  
  
also, during the first 12 calendar month of operation, the permittee shall record the cumulative soybean throughput, in tons, for emissions unit P006 and P034, combined, for each calendar month;
  - d. the hours of operation for this emissions unit;
  - e. the average hourly amount of soybean material processed, in tons, as determined by (a)/(c);
  - f. the average hourly particulate emission rate, in pounds, as determined by (e)x(0.1165 lb/ton\*);
  - g. the monthly particulate emission rate, in tons, for emissions units P006 and P034, combined, as determined by (b)x(0.1165 lb/ton\*);
  - h. the rolling, 12-month summation of particulate emissions for emissions units P006 and P034, i.e, summation of (g) for the previous 12 months;
  - i. the average hourly PM10 emission rate, in pounds, as determined by (f)x(0.25\*\*);
  - j. the monthly PM10 emission rate, in tons, for emissions unit P006 and P034, combined, as determined by (g)x(0.25); and

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P034

- k. the rolling, 12-month summation of PM<sub>10</sub> emissions, in tons, for emissions units P006 and P034, combined, i.e., summation of (j) for the previous 12 months.

\* The particulate emission factor is based upon manufacturer data with a 89.1% control efficiency for the enclosure/settling chamber.

\*\* AP-42, Volume I, Fifth Edition, Table 9.9.1-1, 5/98, indicates that PM<sub>10</sub> is 25% of filterable particulate emissions.

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

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month limitation of, and for first 12 months of operation following the issuance of this permit, the soybean throughput limitations; and
  - b. the average hourly PE and PM<sub>10</sub> emissions limitations;
  - c. the rolling, 12-month PE and PM-10 emissions limitations.

These reports are due by the dates specified in Part I - General Terms and Conditions 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. Emissions Limitation:

PE shall not exceed 13.08 pounds per hour, as a monthly average.

PM-10 emissions shall not exceed 3.27 pounds per hour, as a monthly average.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirement specified in section A.III.2. No testing is specifically required to demonstrate compliance with these emissions limitation, but, if appropriate may be required pursuant to OAC rule 3745-15-04(A).

133

**Cargil**

**PTI A**

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

Emissions Unit ID: P034

2. Emission Limitation:

Visible emissions shall not exceed 0% opacity.

**Cargil  
PTI A**

Emissions Unit ID: P034

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. Emission Limitation:

The PE for emissions units P006 and P034, combined, shall not exceed 95.67 tons as a rolling, 12-month summations.

The PM-10 emissions for emissions unit P006 and P034, combined, shall not exceed 23.92 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirement specified in section A.III.2.

**VI. Miscellaneous Requirements**

None

**Cargil  
PTI A**

Emissions Unit ID: P034

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

**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>
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**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**

none

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: P037

**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>	OAC rule 3745-31-10 thru 20
P037 - Meal screening and grinding, four grinders, controlled by baghouse	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-21-07(G)(2)	

**Cargil**

**PTI A**

Emissions Unit ID: P037

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

Applicable Emissions  
Limitations/Control  
Measures

See Section A.I.2.c

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.64 pounds per hour, nor 2.82 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.64 pounds per hour, nor 2.82 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust (See Section A.I.2.d.)

See Section A.I.2.b.

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** The organic compound (OC) emission limitation is tons 2,312.64 tons as a rolling, 12-month summation. This limitation is combined for emissions units P015, P016, P018, P030, P032, P033, P037, P045, and P046. The monitoring, record keeping and reporting requirements for the OC emissions limitations are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with the rolling, 12-month OC emission limitations are demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.c** The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5). The monitoring, record keeping and reporting requirements for this material usage limitation are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with this material usage limitation is demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.d** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

Emissions Unit ID: P037

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.82 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.82 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the

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General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.64 pounds per hour, nor 2.82 tons per year

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P037

- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office, shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office, within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## **VI. Miscellaneous Requirements**

none

**Cargil  
PTI A**

Emissions Unit ID: P037

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

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P038

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - New elevator aspiration system controlled by baghouse	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).
		Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.
		No visible emissions of fugitive dust. (See Section A.I.2.b).
		Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.
	OAC rule 3745-17-07(A)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P038

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).

## **2. Additional Terms and Conditions**

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

## **II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the location and color of the emissions;
- b. the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P038

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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons per year

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA,

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Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

**Cargil**

**PTI A**

Emissions Unit ID: P038

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

**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>
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**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**

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>
P039 - New grain cleaning system to include drag conveyor controlled by baghouse	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per hour, nor 1.69 tons as a rolling, 12-month summation (see Section A.I.2.a.).
		Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.
		No visible emissions of fugitive dust. (See Section A.I.2.b)
		Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.
	OAC rule 3745-17-07(A)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-10 thru 20	Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per

**Cargil****PTI A**

Emissions Unit ID: P039

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

hour, nor 1.69 tons as a rolling, 12-month summation (see Section A.I.2.a.).

**2. Additional Terms and Conditions**

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.  
  
If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P039

- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 1.69 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 1.69 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per hour, nor 1.69 tons per year

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Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s),

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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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

## 4. Visible Emissions Limitation:

No visible emissions of fugitive dust

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: P039

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P040

**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>	OAC rules 3745-31-10 thru 20
P040 - New cracking system to include drag conveyor system, two grain legs, a surge tank, four soybean crackers and Ohio EPA, Southwest District Office discharge drag conveyor all controlled by baghouse	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P040

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Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per hour, nor 1.69 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive emissions. (See Section A.I.2.b)

Compliance with this rule shall include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per hour, nor 1.69 tons as a rolling, 12-month summation (see Section A.I.2.a.).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the location and cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P040

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 1.69 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 1.69 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.39 pounds per hour, nor 1.69 tons per year

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

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compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P040

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P040

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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>
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**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**

none

Cargil  
PTI A

Emissions Unit ID: P041

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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>	
P041 - New primary dehulling controlled by baghouse	OAC rule 3745-31-05(A)(3)	OAC rules 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P041

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined (see Section A.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b)

Compliance with this rule shall include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined (see Section A.2.a.).

## 2. Additional Terms and Conditions

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

## II. Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
  - the cause of the visible emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:

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- a. the PE and the rolling, 12-month PE; and
- b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P041

compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

**Cargil**

**PTI A**

Emissions Unit ID: P041

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

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P041

Issued: To be entered upon final issuance

**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>
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**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**

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>
P042 - New secondary dehulling system controlled by baghouse	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined (see Section A.I.2.a.).</p> <p>Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.</p> <p>No visible emissions of fugitive dust. (See Section A.I.2.b)</p> <p>Compliance with this rule shall include compliance with OAC rules 3745-31-10 thru 20.</p>
	OAC rule 3745-17-07(A)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rules 3745-31-10 thru 20	Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per

**Cargil****PTI A**

Emissions Unit ID: P042

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

dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined (see Section A.I.2.a.).

**2. Additional Terms and Conditions**

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

**Cargill****PTI Application: 05-12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P042

- a. the location and color of the emissions;
- b. the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

**Cargill****PTI Application: 05-12182****Issued****Facility ID: 0575010160**

Emissions Unit ID: P042

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P041 and P042, combined.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s),

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P042

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## **VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P042

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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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P043

**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>	
P043 - New conditioner to include conveyors controlled by wet scrubber	OAC rule 3745-31-05(A)(3)	OAC rules 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P043

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.002 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044 (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.002 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044, combined (see Section A.I.2.a.).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

1. The scrubber water supply pressure shall be continuously maintained at a value of not less than manufacturer's recommendation in pounds per square inch (gauge) at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water supply pressure shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than not less than manufacturer's recommendation in gallons per minute at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water flow rate shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.

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

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The water supply pressure, in psig, on a daily basis.
- b. The water flow rate, in gpm, on a daily basis.
- c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

**Cargill****PTI Application: 05-12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P043

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The water supply pressure.
  - b. The scrubber water flow rate.

These reports are due by the dates specified in Part I - General Terms and Conditions.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and

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

- b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.002 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044, combined.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P043

mass emission rate for PE/PM-10 emissions.

- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## **VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P043

Issued: To be entered upon final issuance

**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>
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**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**

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>
P044 - New flaker system to include conveyors and five flakers and flattening rollers, controlled by wet scrubber	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.002 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044, combined (see Section A.2.a.).</p> <p>Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.</p> <p>No visible emissions of fugitive dust. (See Section A.I.2.b).</p> <p>Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.</p>
	OAC rule 3745-17-07(A)	The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	<p>The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.002 grains per</p>

**Cargil****PTI A**

Emissions Unit ID: P044

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

dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044, combined (see Section A.2.a.).

**2. Additional Terms and Conditions**

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

- 1. The scrubber water supply pressure shall be continuously maintained at a value of not less than manufacturer's recommendation in pounds per square inch (gauge) at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water supply pressure shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.
- 2. The scrubber water flow rate shall be continuously maintained at a value of not less than not less than manufacturer's recommendation in gallons per minute at all times while the emissions unit is in operation. Once a compliance demonstration has been completed, the scrubber water flow rate shall then be maintained at a value of not less than the most recent emissions test that demonstrated that the emissions unit was in compliance.

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

- 1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The water supply pressure, in psig, on a daily basis.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P044

- b. The water flow rate, in gpm, on a daily basis.
- c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The water supply pressure.
  - b. The scrubber water flow rate.

These reports are due by the dates specified in Part I - General Terms and Conditions.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any

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

corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.002 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation for emissions units P043 and P044, combined.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference

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

Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: P044

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

**Cargil**

**PTI A**

Emissions Unit ID: P044

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

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P045

**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>	
P045 - White flake cooler collector No. 1 to include associated handling and storage controlled by baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
		OAC rules 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P045

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Applicable Emissions  
Limitations/Control  
Measures

See Section A.2.d

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

See Section A.I.2.c

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

## 2. Additional Terms and Conditions

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.
- 2.c** The organic compound (OC) emission limitation is tons 2,312.64 tons as a rolling, 12-month summation. This limitation is combined for emissions units P015, P016, P018, P030, P032, P033, P037, P045, and P046. The monitoring, record keeping and reporting requirements for the OC emissions limitations are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with the rolling, 12-month OC emission limitations are demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.d** The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5). The monitoring, record keeping and reporting requirements for this material usage limitation are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with this material usage limitation is demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.

## II. Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted

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

in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P045

**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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall

**Cargil**  
**PTI A**

Emissions Unit ID: P045

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

describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: P045

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P046

**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>	
P046 - White flake cooler collector No. 2 to include associated handling and storage controlled by baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
		OAC rules 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P046

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

Applicable Emissions  
Limitations/Control  
Measures

See Section A.2.d

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

See Section A.I.2.c

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.
- 2.c** The organic compound (OC) emission limitation is tons 2,312.64 tons as a rolling, 12-month summation. This limitation is combined for emissions units P015, P016, P018, P030, P032, P033, P037, P045, and P046. The monitoring, record keeping and reporting requirements for the OC emissions limitations are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with the rolling, 12-month OC emission limitations are demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.
- 2.d** The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5). The monitoring, record keeping and reporting requirements for this material usage limitation are contained in Part III - Terms and Conditions for emissions unit P018. Therefore, if compliance with this material usage limitation is demonstrated for emissions unit P018, then compliance is demonstrated for this emissions unit.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for

Emissions Unit ID: P046

this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 2.25 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 2.25 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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

## 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. Emissions Limitation:

PE/PM-10 shall not exceed 0.003 grains per dry standard cubic foot, 0.51 pounds per hour, nor 2.25 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P046

capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## **VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P046

Issued: To be entered upon final issuance

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P047

**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>	OAC rules 3745-31-10 thru 20
P047 - White flake conveying No. 1 to include separation cyclone controlled by baghouse, pneumatic conveying system and storage	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P047

Applicable Emissions  
Limitations/Control  
Measures

pounds per hour, nor 0.56 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.13 pounds per hour, nor 0.56 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.13

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

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

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.56 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.56 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.13 pounds per hour, nor 0.56 tons as a rolling, 12-month summation

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P047

**Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

**2. Visible Emissions Limitation:**

5% opacity, as a 6-minute average

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:**

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P047

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P047

Issued: To be entered upon final issuance

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P048

**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>	OAC rules 3745-31-10 thru 20
P048 - White flake conveying No. 2 to include separation cyclone controlled by baghouse, pneumatic conveying system and storage	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P048

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.13 pounds per hour, nor 0.56 tons as a rolling, 12-month summation (see Section A.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.13 pounds per hour, nor 0.56 tons as a rolling, 12-month summation (see Section A.2.a.).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P048

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.56 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.56 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.13 pounds per hour, nor 0.56 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

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compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P048

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

**Cargil  
PTI A**

Emissions Unit ID: P048

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

**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>
P048 - White flake conveying No. 2 to include separation cyclone controlled by baghouse, pneumatic conveying system and storage		

**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**

217

**Cargil**

**PTI A**

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

Emissions Unit ID: P048

none

**Cargil  
PTI A**

Emissions Unit ID: P049

**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>	OAC rules 3745-31-10 thru 20
P049 - Isolate plant flake receiving to include flake handling and separation cyclone controlled by a baghouse	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargill****PTI Application: 05-12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P049

Applicable Emissions  
Limitations/Control  
Measures

pounds per hour, nor 0.45 tons as a rolling, 12-month summation (see Section A.2.a.).

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.10 pounds per hour, nor 0.45 tons as a rolling, 12-month summation (see Section A.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.10

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

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

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.45 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.45 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

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

1. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.10 pounds per hour and 0.45 tons as a rolling, 12-month summation

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P049

**Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

**2. Visible Emissions Limitation:**

5% opacity, as a 6-minute average

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:**

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions units P041 and P042 are operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargil**  
**PTI A**

Emissions Unit ID: P049

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil  
PTI A

Emissions Unit ID: P049

Issued: To be entered upon final issuance

**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>
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**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**

none

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: P050

**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>	OAC rules 3745-21-08(B) and 3745-23-06(B)
P050 - Isolate plant soy protein spray dryer, natural gas-fired, direct heat transfer, includes separation cyclone, controlled by baghouse	OAC rule 3745-31-05(A)(3)	
		OAC rules 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil****PTI A**

Emissions Unit ID: P050

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Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 4.68 pound per hour, nor 20.50 tons as a rolling, 12-month summation (see Section A.2.a).

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu, 0.07 pound per hour, nor 0.30 tons as a rolling, 12-month summation.

Visible PE from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-21-08(B), 3745-23-06(A), 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The permittee has satisfied the latest available control techniques and operating practices required by committing to comply with the best available technology requirements pursuant to OAC rule 3745-31-05(A)(3).

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 0.065 lb/mmBtu, 7.41 pounds per hour, nor 32.46 tons as a rolling, 12-month summation.

Carbon monoxide (CO) emissions shall not exceed 0.084 lb/mmBtu, 9.58 pounds per hour, nor 41.94 tons as a rolling, 12-month summation.

Volatile organic compound (VOC) emissions shall not exceed 0.0055 lb/mmBtu, 0.63 pound per hour, nor 2.75 tons as a rolling, 12-month summation.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 4.68 pounds per hour, nor 20.50 tons as a rolling, 12-month summation.

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. For each day that the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P050

- b. the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

- 4. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE;
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions;
  - c. the NO<sub>x</sub> emissions and the rolling, 12-month NO<sub>x</sub> emissions;
  - d. the CO emissions and the rolling, 12-month CO emissions;
  - e. the SO<sub>2</sub> emissions and the rolling, 12-month SO<sub>2</sub> emissions; and
  - f. the VOC emissions and the rolling, 12-month VOC emissions.

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

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
- 3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 4. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 20.50 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 20.50 tons; and

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

- c. the rolling, 12-month summation for NO<sub>x</sub> of 32.46 tons; and
- d. the rolling, 12-month summation for CO of 41.94 tons; and
- e. the rolling, 12-month summation for SO<sub>2</sub> of 0.30 tons; and
- f. the rolling, 12-month summation for VOC of 2.75 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 4.68 pounds per hour, nor 20.50 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.5. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

4. Emissions Limitations:

NO<sub>x</sub> emissions shall not exceed 0.065 lb/mmBtu, 7.41 lbs/hr, nor 32.46 tons as a rolling, 12-month summation

CO emissions shall not exceed 0.084 lb/mmBtu, 9.58 lbs/hr, nor 41.94 tons as a rolling, 12-month summation

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu, 0.07 lb/hr, nor 0.30 tons as a rolling, 12-month summation

VOC emissions shall not exceed 0.0055 lb/mmBtu, 0.63 lb/hr, nor 2.75 tons as a rolling, 12-month summation

Applicable Compliance Method:

For NO<sub>x</sub> and CO emissions, compliance shall be determined through the compliance test as required in term A.V.5. For SO<sub>2</sub> and VOC emissions, if required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4, 6 and 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (114,000 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 84.0 lbs CO/mm cu. ft., 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO<sub>2</sub>/mm cu. ft. The emission limitation for NO<sub>x</sub> was established by multiplying the maximum heat input capacity of the dryer, 114 mmBtu/hr, by the manufacturer's emission factor of 0.065 lb/mmBtu.

Compliance with the rolling, 12-month emissions limitations shall be demonstrated by multiplying the hourly allowable emissions limitation for each pollutant by the 12-month maximum operation rate of 8,760 hours, and dividing the result by 2,000 (pounds per ton).

5. 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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;

b. the emissions testing shall be conducted to demonstrate compliance with the allowable PE/PM-10, NO<sub>x</sub> and CO limitations;

c. the following test methods shall be employed to demonstrate compliance with the

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allowable mass emission rates: for PE Method 1-4, 5, for NO<sub>x</sub> Method 7E, and for CO Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office; and,

- d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

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, Southwest District Office. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submission of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

232

**Cargill**

**PTI Application: 05 12192**

**Issued**

**Facility ID: 0575010160**

Emissions Unit ID: P050

**VI. Miscellaneous Requirements**

none

**Cargil**

**PTI A**

Emissions Unit ID: P050

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

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P051

**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>	OAC rules 3745-31-10 thru 20
P051 - Isolate product conveying to include separation cyclone controlled by baghouse, handling and storage	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P051

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons as a rolling, 12-month summation (see Section A.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons as a rolling, 12-month summation (see Section A.2.a.).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P051

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.18 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.18 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons per year

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

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compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P051

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office..

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P051

Issued: To be entered upon final issuance

**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>
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**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**

none

Cargil  
PTI A

Emissions Unit ID: P052

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>	OAC rules 3745-31-10 thru 20
P052 - Isolate packaging controlled by a baghouse and to include handling	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P052

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.12 pounds per hour, nor 0.51 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.12 pounds per hour, nor 0.51 tons as a rolling, 12-month summation (see Section A.I.2.a.).

## 2. Additional Terms and Conditions

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

## II. Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the location and color of the emissions;
  - the cause of the visible emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:

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

- a. the PE and the rolling, 12-month PE; and
- b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.51 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.51 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

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

1. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.12 pounds per hour, nor 0.51 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P052

compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

**Cargil**

**PTI A**

Emissions Unit ID: P052

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

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P052

Issued: To be entered upon final issuance

**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>
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**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**

none

**Cargil  
PTI A**

Emissions Unit ID: P053

**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>	OAC rule 3745-17-11(B)(1)
P053 - Spent flake dryer to include natural gas-fired, direct heat transfer, rotary dryer and separation cyclone controlled by baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-08(B) and 3745-23-06(B)
		OAC rule 3745-31-10 thru 20
	OAC rule 3745-17-07(A)	

**Cargill****PTI Application: 05 12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P053

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 1.98 pounds per hour, nor 8.68 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu, 0.04 pound per hour nor 0.16 ton as a rolling, 12-month summation.

Visible PE from the stack shall not exceed 5 percent opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible particulate emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The permittee has satisfied the latest available control techniques and operating practices required by committing to comply with the best available technology requirements pursuant to OAC rule 3745-31-05(A)(3)

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 0.095 lb/mmBtu, 5.70 pounds per hour, nor 24.97 tons as a rolling, 12-month summation.

Carbon monoxide (CO) emissions shall not exceed 0.084 lb/mmBtu, 5.04 pounds per hour, nor 22.08 tons as a rolling, 12-month summation.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 1.98 pounds per hour, nor 8.68 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Volatile organic compound (VOC) emissions shall not exceed 0.0055 lb/mmBtu, 0.33 pound per hour, nor 1.45 ton as a rolling, 12-month summation.

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and

**Cargill****PTI Application: 05-12102****Issued****Facility ID: 0575010160**

Emissions Unit ID: P053

d. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE;
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions; and
  - c. the NO<sub>x</sub> emissions and the rolling, 12-month NO<sub>x</sub> emissions;
  - d. the CO emissions and the rolling, 12-month CO emissions;
  - e. the SO<sub>2</sub> emissions and the rolling, 12-month SO<sub>2</sub> emissions; and
  - f. the VOC emissions and the rolling, 12-month VOC emissions.

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 8.68 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 8.68 tons; and
  - c. the rolling, 12-month summation for NO<sub>x</sub> of 24.97 tons; and
  - d. the rolling, 12-month summation for CO of 22.08 tons; and
  - e. the rolling, 12-month summation for SO<sub>2</sub> of 0.16 tons; and
  - f. the rolling, 12-month summation for VOC of 1.45 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**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. Emissions Limitation:

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

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 1.98 pounds per hour, nor 8.68 tons as a rolling, 12-month summation

## Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

## Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. the emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions, NO<sub>x</sub> and CO.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PE Method 5, for NO<sub>x</sub> Method 7E, and for CO Method 10 of 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P053

describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 0.095 lb/mmBtu, 5.70 lbs/hr, nor 24.97 tons as a rolling, 12-month summation.

CO emissions shall not exceed 0.084 lb/mmBtu, 5.04 lbs/hr, nor 22.08 tons as a rolling, 12-month summation.

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu, 0.04 lb/hr, nor 0.16 ton as a rolling, 12-month summation.

VOC emissions shall not exceed 0.0055 lb/mmBtu, 0.33 lb/hr, nor 1.45 ton as a rolling, 12-month summation.

Applicable Compliance Method:

For NO<sub>x</sub> and CO emissions, compliance shall be determined through the compliance test as required in term A.V.3. For SO<sub>2</sub> and VOC emissions, if required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4, 6 and 25A. The emission limitations above were established by multiplying the maximum natural gas usage from the burners (60,000 cu.ft/hr) by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," AP-42, Tables 1.4-1, and 1.4-2., revised 7/98: 84.0 lbs CO/mm cu. ft., 5.5 lbs VOC/mm cu. ft.; and 0.6 lb SO<sub>2</sub>/mm cu. ft. The emission limitation for NO<sub>x</sub> was established by multiplying the maximum heat input capacity of the dryer, 114 mmBtu/hr, by the manufacturer's emission factor of 0.095 lb/mmBtu.

Compliance with the rolling, 12-month emissions limitations shall be demonstrated by multiplying the hourly allowable emissions limitation for each pollutant by the 12-month maximum operation rate of 8,760 hours, and dividing the result by 2,000 (pounds per ton).

5. Visible Emissions Limitation:

No visible emissions of fugitive dust.

255

**Cargil**

**PTI A**

Emissions Unit ID: P053

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargill

PTI Application: 05 12102

Issued

Facility ID: 0575010160

Emissions Unit ID: P053

**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>
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**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**

none

Cargil  
PTI A

Emissions Unit ID: P054

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>	OAC rules 3745-31-10 thru 20
P054 - Spent flake conveying to include separation cyclone controlled by baghouse and pneumatic conveyor	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P054

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

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions (PE) shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons as a rolling, 12-month summation (see Section A.I.2.a.).

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust. (See Section A.I.2.b).

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons as a rolling, 12-month summation (see Section A.I.2.a.).

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

- 2.a** All particulate emissions are assumed to be equal to or less than an aerodynamic diameter of 10 micrometers. Therefore, all of the particulate emissions are considered to be PM-10 or smaller.
- 2.b** Best available technology (BAT) has been determined to be the use of a collection and control system with one hundred percent (100%) capture.

**II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the cause of the visible emissions;
  - c. the total duration of any visible emission incident; and
  - d. any corrective actions taken to eliminate the visible emissions.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P054

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) which identify all exceedances of the following:
  - a. the rolling, 12-month summation for PE of 0.18 tons; and
  - b. the rolling, 12-month summation for PM-10 emissions of 0.18 tons.

These quarterly reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **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. Emissions Limitation:

PE/PM-10 emissions shall not exceed 0.003 grains per dry standard cubic foot, 0.04 pounds per hour, nor 0.18 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. The annual PE/PM-10 mass emissions limitation is based upon

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compliance with the hourly mass emissions limitation and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE/PM-10 mass emissions limitation, then compliance is demonstrated for the annual PE/PM-10 mass emissions limitation.

## 2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

## 3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start-up.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM-10 emissions.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A.
- d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P054

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil

PTI A

Emissions Unit ID: P054

Issued: To be entered upon final issuance

**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>
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**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**

none

Cargil  
PTI A

Emissions Unit ID: P902

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>	OAC rules 3745-31-10 thru 20
P902 - Meal and white flake rail loading controlled by baghouse	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A) and OAC rule 3745-17-07(B)	
	OAC rule 3745-17-08(B)	
	OAC rule 3745-17-11(B)	

**Cargil**

**PTI A**

Emissions Unit ID: P902

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

Applicable Emissions  
Limitations/Control  
Measures

or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.27 pounds per hour (as a monthly average), nor 1.11 tons as a rolling, 12-month summation.

Particulate emissions (PE) shall not exceed 0.54 pounds per hour (as a monthly average), nor 2.22 tons as a rolling, 12-month summation.

Visible PE from the stack shall not exceed 5% opacity, as a 6-minute average.

No visible emissions of fugitive dust.

Compliance with this rule shall also include compliance with OAC rules 3745-17-08(B) and 3745-31-10 thru 20.

The visible emissions limitations specified by these rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).

See Section A.2.a.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate matter less than

## 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) and reasonably available control measures (RACM) have been determined to be the use of a collection and control system that is sufficient for minimizing or eliminating visible particulate emissions of fugitive dust.

## II. Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- indication that visible emissions are from the stack and/or fugitive dust;
  - the location and color of the emissions;
  - the cause of the visible emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

3. The permittee shall maintain monthly records of the following information for this emissions unit:

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- a. the amount of material loaded into railcars, in tons;
- b. the number of hours this emissions unit operated;
- c. the PE emissions calculated as follows:

$$PE = 0.27 \text{ lb/ton}^* \times U \times [\{CE \times (1 - RE)\} + \{0.05^{**} \times (1 - CE)\}]$$

where,

PE = monthly particulate emissions rate, in pounds

U = monthly amount of material loaded into railcars, in tons, i.e., as recorded in (a)

CE = capture efficiency of 95%, based upon conservative engineering assumption

RE = removal efficiency of 99%, based upon manufacturer data

\* The uncontrolled emission factor for grain loadout is 0.022 lb PE/ton of grain, based upon "Compilation of Air Pollutant Emission Factors," AP-42, Table 9.11.1-1, revised 11/95.

\*\* Residual meal remaining on the railcar is likely to be emitted as fugitive emissions. It is a conservative engineering estimate that 5% of the total uncaptured emissions fugitive emissions.

- d. the average hourly PE rate, i.e., the monthly PE rate (c) divided by the monthly hours of operation (b);
- e. the monthly PM-10 emission rate, i.e., the monthly PE rate (c) multiplied by 50%, i.e., pursuant to AP-42, Section 9.9.1, PM-10 emissions will not exceed 50% of PE;
- f. the average hourly PM-10 emission rate, i.e., the monthly PM-10 emission rate (e) divided by the monthly hours of operation for this emissions unit (b);
- g. the rolling, 12-month PE; and
- h. the rolling, 12-month PM-10 emissions.

**IV. Reporting Requirements**

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1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which: (a) identify all days during which any visible particulate emissions were observed from this emissions unit and/or visible particulate emissions of fugitive dust were observed from this emissions unit; and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly PE and average hourly PM-10 emissions exceeded 0.54 pounds and/or 0.27 pounds, respectively. In addition, the permittee shall submit the actual average hourly PE and PM-10 emissions for each month.. These reports are due by the dates specified in Part I - General Terms and Conditions.

**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. Emissions Limitation:

PE shall not exceed 0.54 pounds per hour (as a monthly average), nor 2.22 tons as a rolling, 12-month summation.

PM-10 shall not exceed 0.27 pounds per hour (as a monthly average), nor 1.11 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by emissions testing performed in accordance with section A.V.3. Compliance shall also be demonstrated by the record keeping in Part III. - Section A.III.3. of this permit. The rolling, 12-month PE/PM-10 emissions limitation is based upon the record keeping requirement in Part III - Section A.III.3. of this permit.

2. Visible Emissions Limitation:

Visible emissions from the stack shall not exceed 5% opacity, as a 6-minute average.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P902

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

## **VI. Miscellaneous Requirements**

None

Cargill

PTI Application: 05 12192

Issued

Facility ID: 0575010160

Emissions Unit ID: P902

**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>
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**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**

none



**Cargil**

**PTI A**

Emissions Unit ID: P903

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

Applicable Emissions  
Limitations/Control  
Measures

Visible particulate emissions from fugitive dust shall not exceed 5% opacity, as a 6-minute average.

Particulate emissions (PE) shall not exceed 0.07 pound per hour, nor 0.31 tons as a rolling, 12-month summation.

Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.02 pounds per hour, nor 0.08 tons as a rolling, 12-month summation.

Compliance with this rule shall also include compliance with OAC rules 3745-31-10 thru 20, and 40 CFR Part 60, Subpart DD.

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

The visible emissions limitations specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60, Subpart DD.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

PE from the stack shall not exceed 0.01 grains per dry standard cubic foot.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions****2.a****II. Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of the manufacturer's recommendation in inches of water while the emissions unit is in operation. Once a compliance demonstration has been completed, the pressure drop across the baghouse shall then be maintained at a value within the range, plus or minus 2 inches, of the most recent emissions test that demonstrated compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the 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 the baghouse on a daily basis.

If after six months there is no deviation of the pressure drop requirement across the baghouse for this emissions unit, then the frequency of the checks may change from daily to weekly.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from fugitive dust and from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the emissions egress location, i.e., stack, transfer point between hopper and conveyor, etc.
  - b. the location and color of the emissions;
  - c. the cause of the visible emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

**Cargill****PTI Application: 05-12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P903

3. The permittee shall maintain monthly records of the following for this emissions unit:
  - a. the PE and the rolling, 12-month PE; and
  - b. the PM-10 emissions and the rolling, 12-month PM-10 emissions.

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

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained within the required range. These reports are due by the dates specified in Part I - General Terms and Conditions.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **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. Emissions Limitation:

PE from the stack shall not exceed 0.01 grains per dry standard cubic foot

PE shall not exceed 0.07 pound per hour, nor 0.31 tons as a rolling, 12-month summation

PM-10 shall not exceed 0.02 pounds per hour, nor 0.08 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the grain per dry standard cubic foot and the hourly emissions limitations shall be demonstrated by emissions testing performed in accordance with section A.V.3. The rolling, 12-month PE and PM-10 emissions limitations are based upon compliance with the hourly emissions limitations and a 12-month maximum operation rate of 8,760 hours. Therefore, if compliance is demonstrated with the hourly PE and PM-10 emissions limitations, then compliance is demonstrated for the rolling, 12-month PE and PM-10 emissions limitations.

2. Visible Emissions Limitation:

5% opacity, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40

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

CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

3. The permittee shall conduct, or have conducted, emission testing for this emissions units in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of start-up.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and PM-10 emissions.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PE Method 5 of 40 CFR Part 60, Appendix A; for PM-10 Method 201 of 40 CFR Part 51, Appendix M.
  - d. The test shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test.

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office

**Cargill****PTI Application: 05 12192****Issued****Facility ID: 0575010160**

Emissions Unit ID: P903

within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Visible Emissions Limitation:

No visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60 Appendix A using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

none

Cargil  
PTI A

Emissions Unit ID: P903

Issued: To be entered upon final issuance

**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>
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**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**

none