MINNESOTA POLLUTION CONTROL AGENCY

520 Lafayette Road North St. Paul, MN 55155-4194

Public Notice of intent to reissue

Permit 01300007-103

Air

General information

Public comment period begins:	April 17, 2025
Public comment period ends:	May 19, 2025
Current permit issued:	April 2, 2020
Current permit expiration date:	May 21, 2020
Name and address of Permittee:	Facility name and location:
Name and address of Permittee: CHS Oilseed Processing	Facility name and location: CHS Mankato
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MPCA contact person:

Kara Leadbetter Industrial Minnesota Pollution Control Agency 520 Lafayette Road North St. Paul, MN 55155-4194 Phone: 651-757-2889 Email: kara.leadbetter@state.mn.us

File manager phone: 651-757-2728 or 844-828-0942

A draft permit and supporting documentation are available for review on the MPCA Public Notices webpage at <u>https://www.pca.state.mn.us/get-engaged/public-comments</u>. Additional materials relating to the issuance of this permit are available for inspection by appointment at any MPCA office (<u>https://www.pca.state.mn.us/about-mpca/contact-us</u>) between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. The MPCA will mail or email a copy of the draft permit upon request. Comments, petitions, and other requests must be received at the MPCA in writing on or before the public comment period end date and U.S. Mail comments must be received by 4:30 p.m.

Description of CHS Mankato

CHS Mankato (CHS) is a soybean oil processing plant located in Mankato, Minnesota. The facility consists of emission units related to soybean receiving, soybean processing, solvent extraction and recovery, meal and flour processing, refining, steam production and storage capacities. The facility receives raw soybeans, extracts crude soybean oil, distills the oil, and de-solventizes the meal and flour. In addition, various types of soybean oils are produced at CHS. Typical processes for oil production include refining, deodorizing, and hydrogenating before the oil is stored, loaded and shipped using rail or truck.

The main pollutants of concern from this facility are particulate matter (PM), particulate matter less than 10 microns in size (PM₁₀), particulate matter less than 2.5 microns in size (PM_{2.5}), volatiles organic compounds (VOC), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxides (NOx), carbon dioxide equivalent (CO2e) and hazardous air pollutants (HAP). Hexane, a HAP, is emitted from the hexane extraction and recovery systems. PM, PM₁₀, PM_{2.5}, SO₂, CO, NOx, CO2e, and VOC emissions are emitted from the boilers. PM, PM₁₀, and PM_{2.5} are emitted from the handling and processing of the beans, the meal and flour system and the refinery. The majority of emission units at CHS exhaust to high-efficiency cyclones and/or fabric filter pollution control devices to limit emissions of PM, PM₁₀, and PM_{2.5}.

This permit action is a Part 70 Reissuance which includes updates to equipment parameters, revision of calculation methodology and other requirements for the VOC Emission Cap; updated Insignificant Activities; updated Compliance Assurance Monitoring (CAM) plan; updated PTE to reflect changes made to types of fuel burned at the facility.

This permit action incorporates a major amendment which authorizes construction of four natural gas-fired non-emergency engines controlled by oxidation catalysts and temperature monitors exhausting to the existing combustion turbine stack, a new boiler equipped with Low-NOx Burners and Flue Gas Recirculation, and a new boiler stack. The boiler will replace existing boiler. Existing boilers will be authorized to exhaust to both the new boiler stack and the existing stacks. The combustion turbine has been decommissioned and removed.

This permit action also incorporates three minor amendments which allow the following updates: a new solvent loss factor; construction of a new High Pressure Steam Generator; and a new fabric filter to replace an existing fabric filter.

The preliminary determination to reissue this Air permit is tentative.

The permit action is for modification and operation of the facility. The permit action is the reissuance of the Part 70 operating permit; therefore, the draft permit has been placed on public notice.

A summary of the Potential to Emit (PTE) in tons per year is as follows:

Pollutant	PM	PM10	PM _{2.5}	SO ₂	NOx	VOCs	CO	CO ₂ e	Single HAP	Total HAP
Total Facility Limited PTE	1,137	1,017	989	3.03	372	1,074	212	380,200	926	929
Limited Emissions Increase from new and modified emission units	3.63	9.93	7.59	0.59	61.76	14.08	103.81	116,597	0	0
PM = Particulate Matter PM ₁₀ = PM, 10 microns and smaller PM _{2.5} = PM, 2.5 microns and smaller SO ₂ = Sulfur Dioxide										

 $NO_x = Nitrogen Oxides$ CO = Carbon Monoxide

VOCs = Volatile Organic Compounds

CO₂e = Carbon Dioxide Equivalents as defined in Minn. R. 7007.0100

HAP = Hazardous Air Pollutant

The Permittee is not required to submit a pollution prevention progress report pursuant to Minn. Stat. § 115D.08.

Procedure for public participation

As stated in Minn. R. chs. 7000 and 7001, there are three formal procedures for public participation in the MPCA's consideration of this matter. Interested persons may:

- 1) Submit written comments on the draft permit.
- Petition the MPCA to hold a public informational meeting.
- 3) Petition the MPCA to hold a contested case hearing.

Submitting written comments

Comments may be submitted:

- 1) Online at https://mpca.commentinput.com/comment/search; or
- 2) By U.S. postal mail to the following address:

Kara Leadbetter Minnesota Pollution Control Agency 520 Lafayette Road North St. Paul, MN 55155-4194

Submitted comments or petitions must state:

- 1) Your interest in the permit application or the draft permit.
- 2) The action you wish the MPCA to take, including specific references to the section of the draft permit you believe should be changed.
- The reasons supporting your position, stated with sufficient specificity as to allow the MPCA to investigate the merits of the 3) position.

Public informational meeting

A public informational meeting is an informal meeting during which interested persons can ask questions concerning the proposed facility. MPCA staff will be present to provide information. If an interested person would like the MPCA to hold a public informational meeting, the person should include all information identified above and in addition include a statement of the reasons the person desires the MPCA to hold a public informational meeting and the issues that the person would like the agency to address at the public informational meeting.

Contested Case Hearing

A contested case hearing is a formal proceeding before an administrative law judge empowered to advise the MPCA regarding issues of fact. As described in Minn. R. 7000.1800, persons who submit petitions for a contested case hearing must also state the issues they propose to address in a contested case hearing, the specific relief requested or resolution of the matter, and the reasons (which may be in the form of proposed findings) supporting an MPCA decision to hold a contested case hearing. Failure to comply with these rules exactly may result in a denial of the request. To the extent known, the petitioner may also submit a list of prospective witnesses to be called at a hearing, a proposed list of publications, references, or studies to be introduced at a hearing

and the approximate time required for the petitioner to present the matter at a hearing. The decision whether to hold a contested case hearing will be made under Minn. R. 7000.1900.