11/19/2026

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

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0339010005
Permit Number: P0141369
Permit Type: OAC Chapter 3745-31 Modification
County: Huron

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (Ohio EPA) ***Weekly Review and Public Notices*** website. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: ***https://edocpub.epa.ohio.gov/publicportal/edochome.aspx***. The permit can also be commented on and accessed electronically at: ***https://ohioepa.commentinput.com***. Search by entering the permit # (P0141369) in the "Search Projects" search box and selecting “Review Document” or “Draft Permit.” Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) comments must be sent to the following:

Andrea Moore
Permitting Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA ***Weekly Review and Public Notices*** website. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: ***Weekly Review and Public Notices | Ohio Environmental Protection Agency*** or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: ***HClerk@epa.ohio.gov***

Draft Air Pollution Permit-to-Install OAC Chapter 3745-31 Modification

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

ID#: P0141369
Date of Action: 11/19/2026
Permit Desc: Chapter 31 Modification to replace the DTDC unit and have it all under emission unit P043. P066 (previously the cooler) was separate but will be shutdown as a result of this incorporation.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit P0141369 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

   ☒ Synthetic Minor Determination

   ☐ Netting Determination

2. Source Description:

   Bunge N.A. is a soybean oil processing and refining plant located in Bellevue, Ohio. This source is a major stationary source for multiple criteria and regulated pollutants for the purposes of PSD and Title V. Bunge N.A. is proposing to replace the existing Desolventizer, Toaster, Dryer (DTD) and the Cooler (C)with a new DTDC. The DTD is currently associated with emissions P043 and the C is associated with emissions unit P066. The new DTDC will be permitted under emissions unit P043. The permit will establish federally enforceable restrictions to limit PE, PM10 and PM2.5 emissions from emissions unit P043.

3. Facility Emissions and Attainment Status:

   The facility is a major stationary source of VOC, NOx, PE and PM_{10} emissions for both PSD and Title V. The facility is also a major sources for HAPs.

   Bunge N.A. is located in Huron County which is classified as in attainment for unclassifiable for all criteria pollutants including PM_{10}, $PM_{2.5}$, SO_2, NO_x, CO, ozone, and lead.

4. Source Emissions:

   The facility has requested that the use of the control equipment to be federally enforceable. The emissions from the DTDC associated with P043 will be limited to 22.50 tons of PE, 13.45 tons of PM10 and 5.07 tons of PM2.5 per rolling, 12-month period and is based on the use of cyclones.

5. Conclusion:

   The synthetic minor restrictions in the proposed PTI are sufficient to ensure the facility's emissions will remain below PSD thresholds.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
PE	22.05
PM10	13.45
PM2.5	5.07

Ohio Environmental Protection Agency

DRAFT

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

Facility ID:	0339010005
Permit Number:	P0141369
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/19/2026
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install

for

Bunge N.A.

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Authorization

Facility ID:	0339010005
Facility Description:	soybean oil mill.
Application Number(s):	A0082928, A0082947, A0077932, A0082739
Permit Number:	P0141369
Permit Type:	Permit-To-Install
Permit Fee:	$1,875.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	11/19/2026
Effective Date:	To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

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

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

The above-named entity is hereby granted this Permit-to-Install for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) 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

John Logue
Director

Authorization (continued)

Permit Number: P0141369

Permit Description: Chapter 31 Modification to replace the DTDC unit and have it all under emission unit P043. P066 (previously the cooler) was separate but will be shutdown as a result of this incorporation.

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

Emissions Unit ID:	**P043**
Company Equipment ID:	Conventional Hexane Extraction
Superseded Permit Number:	P0113390
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m3 = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH_4 = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO_2 = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m3 = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH_3 = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO_2 = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO_x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO_2 = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_4 = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m3 = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e), General Requirements

(3) Standard Term and Condition A.6.c), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B. and C. of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the state and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under state law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on

information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located, or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will

be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This permit-to-install is applicable only to the emissions unit(s) identified in the permit-to-install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a permit-to-install.

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a

subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

   a) None.

C. Emissions Unit Terms and Conditions

1. P043, Conventional Hexane Extraction

Operations, Property and/or Equipment Description:

Conventional hexane extraction including: Extractor, DTDC, Evaporation, Vent System.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	5.04 lbs of particulate matter (PE)/hr and 22.05 tons PE per rolling, 12-month period 3.07 lbs of particulate matter less than or equal to 10 microns in size (PM10)/hr and 13.45 tons of PM10 per rolling, 12-month period 1.16 lbs of particulate matter less than or equal to 2.5 microns in size (PM2.5)/hr and 5.07 tons PM2.5 per rolling, 12-month period See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)	0.388 gal of OC (hexane) 'loss' per ton of soybean processed (rolling 6-month average, for emissions units P043 and P051 combined) [See c)(1).] 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined [See c)(1).]
c.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	The BAT requirements for PM10 have been determined to be the rolling, 12-month emission limitation established in OAC rule 3745-31-05(D).

d.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under 3745-31-05(A)(3) do not apply to the emissions of PM2.5 from this air contaminant source because the controlled potential to emit (PTE) for PM2.5 is less than 10 tons per year.
e.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(2)	See b)(2)i.
g.	40 CFR 63.2830 et seq. (MACT - Subpart GGGG)	See 40 CFR 63.2840 [Table 1 (ix)] Hexane loss restrictions [See b)(2)c. through b)(2)h.]
h.	40 CFR 63.1-15 (40 CFR 63.2870 Table 1 of Subpart GGGG)	Table 1 in Section 63.2870 of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGG shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The federally enforceable emission limitations in b)(1)a. are established for the purpose of limiting potential to emit (PTE) and are based on the operational restrictions contained in c)(2).

b. The cyclones controlling the particulate emissions from the Desolventizer, Toaster, Dryer and Cooler (DTDC) shall be in use at all times the DTDC unit is in operation.

c. Hazardous Air Pollutant (HAP) loss requirements:

i. The emission requirements limit the number of gallons of HAP lost per ton of listed oilseeds processed. For each operating month, the permittee must calculate a compliance ratio which compares the actual HAP loss to the allowable HAP loss for the previous 12 operating months as shown in Equation 1 of this section. An operating month, as defined in 40 CFR 63.2872, is any calendar month in which a source processes a listed oilseed, excluding any entire calendar month in which the source operated under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2). Equation 1 of this section follows:

Compliance Ratio = Actual HAP Loss / Allowable HAP Loss

ii. Equation 1 of this section can also be expressed as a function of total solvent loss as shown in Equation 2 of this section. Equation 2 of this section follows:

$$\text{Compliance Ratio} = [(f) \times (\text{Actual Solvent Loss})] \; / \; [0.64 \times (\text{Oilseed}_c \times \text{SLF}_c) + (\text{Oilseed}_s \times \text{SLF}_s)]$$

Where:

f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months, as determined in 40 CFR 63.2854, dimensionless.

0.64 = The average volume fraction of HAP in solvent in the baseline performance data, dimensionless.

Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in 40 CFR 63.2853.

Oilseed (soybean) = Tons of oilseed processed during the previous 12 operating months, as shown in 40 CFR 63.2855 (c = conventional soybean from P043, s = specialty soybean from P051).

SLF = The corresponding solvent loss factor (gal/ton) for conventional oilseed listed in Table 1 (0.2 for conventional, 1.7 for specialty).

[40 CFR 63.2840(a)]

d. When the source has processed listed oilseed for 12 operating months, calculate the compliance ratio by the end of each calendar month following an operating month using Equation 2 of this section. When calculating the compliance ratio, consider the following conditions and exclusions:

i. If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the permittee must categorize the month as an operating month, as defined in 40 CFR 63.2872.

ii. The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.

iii. If the source shuts down and processes no listed oilseed for an entire calendar month, then the permittee must categorize the month as a non-operating month, as defined in 40 CFR 63.2872. Exclude any non-operating months from the compliance ratio determination.

iv. If the source is subject to an initial startup period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.

v. If the source is subject to a malfunction period as defined in 40 CFR 63.2872, exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.

[40 CFR 63.2840(b)]

e. If the compliance ratio is less than or equal to 1.00, the source was in compliance with the HAP emission requirements for the previous operating month.

[40 CFR 63.2840(c)]

f. The permittee shall:

i. Maintain all the necessary records you have used to demonstrate compliance with Subpart GGGG in accordance with 40 CFR 63.2862.

ii. Submit the reports as specified in 40 CFR 63.2850(a)(5).

iii. Submit all notifications and reports and maintain all records required by the MACT General Provisions for performance testing if you add a control device that destroys solvent.

[40 CFR 63.2850(a)(4), (5), and (6)]

g. Existing sources under normal operation: The permittee must meet all of the requirements listed in Table 1 of 40 CFR 63.2850 for sources under normal operation.

[40 CFR 63.2850(b)]

h. Existing or new sources that have been significantly modified: An existing or new source that has been significantly modified must meet the requirements associated with one of two compliance options. Within 15 days of the modified source startup date, you must choose to comply with one of the options listed in b)(2)h.i or b)(2)h.ii as follows:

i. Normal operation. Upon startup of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources under normal operation, and the schedules for demonstrating compliance for an existing or new source that has been significantly modified in Table 2 of that section.

ii. Initial startup period. For up to 3 calendar months after the startup date of a significantly modified existing or new source, the permittee must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of that section for sources operating under an initial startup period, and the schedules for demonstrating compliance for a significantly modified existing or new source operating under an initial startup period in Table 2 of that section. After a maximum of 3 calendar months, a new or existing source must meet all of the requirements listed in Table 1 of that section for sources under normal operation.

[40 CFR 63.2850(d)]

i. The emission limitation specified by OAC rule 3745-17-11(B) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) Hexane consumption /loss, i.e., emission rates from the hexane extraction operations in emissions units P043 and P051 combined shall be determined on a "mass balance" basis. Consumption, i.e. emission rate, shall not exceed the following levels:

a. Total hexane consumption in emissions units P043 and P051 shall not exceed 285,400 gallons (811 tons)/rolling 12-month period; and

b. Total hexane consumption in emissions units P043 and P051 shall not exceed 0.388 gallon/ton crushed soybeans, based on a 6-month rolling, weighted average.

(2) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit potential to emit [See b)(2)a.]:

a. The use of two cyclones controlling the Dryer and one cyclone controlling the Cooler achieving the mass hourly limitations established in b)(1)a. for PE, PM10 and PM2.5.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month, for emission units P043 and P051, combined:

a. The total quantity of soybeans weighed in the preparation process before the hexane extraction operation;

b. The total amount of hexane inventory lost in gallons/month;

c. The 6-month rolling weighted average hexane loss rate (gallons per ton of crushed soybeans, and pounds hexane per pound crushed soybeans);

d. The amount of hexane emitted in tons/month; and

e. The amount of hexane emitted in tons /rolling 12-month.

(Note: It is recognized that data, records, and calculations used for compliance with MACT Subpart GGGG standards may also serve as data, records, and calculations for this section where applicable.)

(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 the stacks 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. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emissions incident; and

e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(2)d. above or continue the check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2862(b)	compliance plan and SSM plan retention on-site
63.2862(c)	records for hexane mass balance calculations
63.346(d)	records for calculation of rolling 12- month averages and the 'compliance ratio'
63.2863	records retention

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. Any exceedances of the 0.388 gal of OC (hexane) 'loss' per ton, from emissions units P043 and P051 combined; and

b. Any exceedance of the 811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined.

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

(2) The permittee shall submit semiannual written reports that identify:

a. All days during which any visible emissions were observed from the stack(s) serving this emissions unit; and

b. Any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Ohio EPA, Northwest District Office (NWDO) by January 31st and July 31st of each year and shall cover the previous six-month period.

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart GGGG, including the following sections:

63.2860(c)	significant modification notifications, as applicable
63.2861(a)	annual compliance certification
63.2861(b)	deviation notification report

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

811 tons of OC (hexane) per rolling 12-month period, from emissions units P043 and P051 combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(1)e.

b. Emission Limitation:

0.388 gal of OC (hexane) 'loss' per ton of soybean processed
[rolling 6-month average]

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in d)(1)c.

c. Emission Limitation:

hexane loss restrictions [See b)(2)c.]

Applicable Compliance Method:

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

d. Emission Limitation:

5.04 lbs PE/hr and 22.05 tons of PE per rolling, 12-month period

3.07 lbs PM10/hr and 13.45 tons of PM10 per rolling, 12-month period

1.16 lbs PM2.5/hr and 5.07 tons of PM2.5 per rolling, 12-month period

Applicable Compliance Method:

The hourly PE, PM10 and PM2.5 emission limitations were established by the following equation:

PM, PM10 and PM2.5 lb/hr emissions = [gr/dscf (dryer cyclone) x dscfm x 60min/hr x lb/7000gr) + (gr/dscf (cooler cyclone) x dscfm x 60 min/hr x lb/7000gr)] x (0.61 of PM for PM10 emissions and 0.377 of PM10 for PM2.5 emissions)

Where:

PM/PM10 ratio (appendix B2.2 category 7 of AP42) =0.610

PM10/PM2.5 ratio (appendix B2.2 category 7 of AP42) = 0.377

The permittee shall demonstrate compliance with the hourly PE, PM10 and PM2.5 emission limitations as well as the gr/dscf emission factors by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

The rolling, 12-month emission limitations were established by multiplying the hourly limitations by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance with the rolling, 12-month emission limitations shall also be demonstrated.

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

(2) The permittee shall conduct emissions testing for this EU per 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, by no later than 180 days after installation of the new DTDC and at such other times as may be required by the Ohio EPA, DAPC.

b. The emission testing shall be conducted to demonstrate compliance with the hourly mass emission rates and verify the hourly emission factors and the gr/dscf emission factors at the dryer cyclones and cooler cyclone.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s):

For PE: Methods 1-5 of 40 CFR, Part 60, Appendix A

For PM10 and PM2.5: Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

d. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the Ohio EPA NWDO. Operational conditions that may need to

be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under worst case conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe worst case operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the NWDO that the proposed operating conditions constitute worst case. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the NWDO. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 NWDO's refusal to accept the results of the emission test(s).

f. Personnel from the NWDO 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the NWDO 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 NWDO.

g) Miscellaneous Requirements

(1) None.