11/19/2026

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

Tate Tyson
Louis Dreyfus Company Agricultural Products, LLC
11307 County Highway 330
Upper Sandusky, OH 43351

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0388012014
Permit Number: P0141468
Permit Type: Initial Installation
County: Wyandot

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 # (P0141468) 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 Initial Installation

Louis Dreyfus Company Agricultural Products, LLC
11307 County Highway 330
Upper Sandusky, OH 43351

ID#: P0141468
Date of Action: 11/19/2026
Permit Desc: Initial installation for four 4.2 MMBtu/hr natural gas fired water heaters at a soybean oil extraction and refining plant.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit P0141468 in the "Search Projects" search box.

STAFF DETERMINATION FOR THE APPLICATION TO CONSTRUCT UNDER THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS FOR LOUIS DREYFUS COMPANY AGRICULTURAL PRODUCTS, LLC UPPER SANDUSKY, OHIO (WYANDOT COUNTY) PERMIT NUMBER P0141468

Ohio Environmental Protection Agency
Division of Air Pollution Control
Lazarus Government Center
50 W. Town St., Suite 700
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 (NSR) requirements. The federal PSD rules govern emission increases in attainment areas for major stationary sources, which are facilities 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 stationary source is one having at least 100 tons per year potential emissions. A major modification is one resulting in a contemporaneous net increase in emissions which exceeds the significance level of one or more pollutants. Any changes in actual emissions within this five- or ten-year period are considered to be contemporaneous. In addition, Ohio has incorporated the PSD and NSR requirements by rule under Ohio Administrative Code (OAC) 3745-31, and currently has a program that is fully approved by USEPA. For $PM_{2.5}$, Ohio will have to use the requirements established in 40 CFR Part 51, Appendix S until the OAC regulations are modified to include $PM_{2.5}$ emissions.

Both PSD and nonattainment NSR 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 stationary 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 stationary 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 Emission Rate (LAER)
    a) The most stringent emission limitation that is contained in the implementation plan of any state for such class or category of emissions unit, unless the owner or operator of the proposed emissions unit demonstrates that such limitations are not achievable; or,
    b) The most stringent emission limitation that is achieved in practice by such class or category of emissions unit.

This limitation, when applied to a major modification, means lowest achievable emissions rate for the new or modified emissions units within the stationary source. In no event shall the application of this term permit a proposed new or modified emissions unit to emit any air pollutant in excess of the allowable amount under applicable new source standards of performance.

2. Compliance certification

The applicant must certify that all existing major stationary sources owned or operated by the applicant (or any entity controlling, controlled by, or under common control with the applicant) in Ohio as the proposed major stationary source or major modification are in compliance with all applicable emission limitations and standards under the Clean Air Act (or are in compliance with an expeditious schedule which is federally enforceable or contained in a court decree).

Facility/Site Description

Louis Dreyfus Company Agricultural Products, LLC (Louis Dreyfus) is proposing to install a soybean preparation, oil extraction and vegetable oil refining facility in Upper Sandusky, Ohio in Wyandot County.

This area is classified as attainment or unclassifiable for all criteria pollutants: particulate matter 10 microns and less in diameter (PM_{10}), particulate matter 2.5 microns and less in diameter ($PM_{2.5}$), carbon monoxide (CO), nitrogen oxides (NOx), ozone, volatile organic compounds (VOC), sulfur dioxide (SO_2), and lead (Pb).

This facility is a major stationary source of multiple criteria and regulated pollutants for purposes of both PSD and Title V permitting.

Project Description

On October 27, 2023, Louis Dreyfus (previously known as Valencia Project, LLC) was issued a PSD permit for the initial installation of a new soybean oil processing and refining plant. On August 31, 2026, Louis Dreyfus was issued a PSD permit to incorporate engineering design changes. As construction continues, the facility is requesting to replace the Truck Wash Boiler - 10 MMBtu/hr (B004) with 4 identical- 4.2 MMBtu/hr water heaters and to install one 22 BHP natural gas fired emergency generator.

The project changes below will be addressed as an initial installation permitting action:

a) Installation of 4.2 MMBtu Truck Wash Water Heaters #1 and #2 (B005 & B006) which will be used to provide hot water to the both truck bays on site.

b) Installation of 4.2 MMBtu Rail Wash Water Heaters #1 and #2 (B007 & B008) which will be used to provide hot water to the rail car wash bay.

In addition to the above changes, the facility is also proposing to install a 22 BHP diesel-fired emergency generator (P034). This emissions unit is permit exempt, pursuant to OAC rule 3745-31-03(B)(1)(oo).

No changes were requested to the other emissions units on site.

NSR/PSD Applicability:

The emissions units will generate NSR-regulated emissions of PM, PM_{10} , $PM_{2.5}$, CO, NOx, VOC, SO_2 and greenhouse gases (GHGs – expressed as CO_2e). A PSD analysis is required for pollutant emissions exceeding the PSD threshold levels. Nonattainment NSR is not applicable, due to the attainment status of the area. Louis Dreyfus is located in an area designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NOx, VOC (ozone) and SO_2 and lead. Louis Dreyfus is

deemed to be a new major stationary source since the potential to emit (PTE) for VOC is greater than 250 tons per year. The facility has also triggered PSD for PM, PM_{10}, $PM_{2.5}$, and CO_2e since they each have the potential to emit above their respective "significant emissions rates".

The original permit for the project (PTI P0133726, issued final October 27, 2023) and subsequent modification PTI P0139413, issued final August 31, 2026 included BACT requirements for VOC, PM, PM_{10}, $PM_{2.5}$ and CO_2e. Based on the proposed changes, Louis Dreyfus has revised the project emissions in accordance with the U.S. EPA Guidance Memorandum "Project Emissions Accounting Under the New Source Review Preconstruction Permitting Program" dated March 13, 2018. The modifications required Louis Dreyfus to reevaluate BACT requirements for VOC, PM, PM_{10}, $PM_{2.5}$ and CO_2e. Since the project is still under construction, a BACT analysis will be presented for the project wholistically, regardless of whether the emissions units are not included in this permitting action. The proposed changes will not affect the synthetic minor determination established in PTI P0139413, therefore a BACT analysis is not required for SO_2, NOx, and CO.

Because the project has not completed construction, the BACT analysis evaluation will be revisited as if the project is being proposed for the first time. Table I below identifies the facility's overall potential to emit for the project:

Table I

Project Emissions Accounting

Operations, Property, and/or Equipment Description	Emissions Unit ID	Pollutant Potential to Emit (tons/year)							
		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	CO_2e
Roadways	F001	4.60	0.92	0.23					
Boiler #1 & Boiler 2	B001 & B002	0.49	0.49	0.40	0.58	28.79	5.17	38.39	110,665
Deodorizer Boiler	B003	0.02	0.02	0.02	0.03	2.15	0.20	3.61	5,118
4.2 MMBtu/hr Truck Wash Water Heater #1	B005	0.005	0.005	0.004	0.0054	0.45	0.05	0.76	1,077
4.2 MMBtu/hr Truck Wash Water Heater #2	B006	0.005	0.005	0.004	0.0054	0.45	0.05	0.76	1,077
4.2 MMBtu/hr Railcar Wash Water Heater #1	B007	0.005	0.005	0.004	0.0054	0.45	0.05	0.76	1,077
4.2 MMBtu/hr Railcar Wash Water Heater #2	B008	0.005	0.005	0.004	0.0054	0.45	0.05	0.76	1,077
Parts Washer	L001						0.49		
Emergency Diesel Fire Water Pump 1	P001	0.09	0.09	0.09	0.01	3.44	0.09	0.045	686
Emergency Diesel Fire Water Pump 2	P002								
Emergency Diesel Fire Water Pump 3	P003								
Emergency Diesel Fire Water Pump 4	P032								
Cooling Tower-- 755 Bhp diesel fired emergency generator	P033	0.06	0.06	0.06	0.002	1.89	0.10	1.09	194.1
22 Bhp Natural Gas Fired Emergency Generator	P034	0.0028	0.0028	0.0028	0.00003	0.18	0.007	0.022	6.84
Bean Storage Silos	P004	0.90	0.90	0.60					
Vertical Seed Conditioner 1	P005	7.52	7.52	5.02					
Vertical Seed Conditioner 2	P006								

Operations, Property, and/or Equipment Description	Emissions Unit ID	Pollutant Potential to Emit (tons/year)							
		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	CO_2e
Popper Filter 1 Popper Filter 2 Popper Filter 3	P007 P008 P009	3.15	3.15	2.10					
Pelleted Hulls Mills and Cooler	P010	4.69	4.69	2.35					
Meal Storage Tanks	P012	0.56	0.56	0.38			See Note*		
Kaolin Bin	P013	0.11	0.11	0.08					
Bleached Earth Storage	P014	0.11	0.11	0.08					
Filter Aid Storage	P016	0.11	0.11	0.08					
Salt Bin	P017	0.11	0.11	0.08					
Flaker	P018	2.67	2.67	1.78					
Dryer/Cooler	P019	42.54	43.54	4.70			320.8		
Meal and Hull Grinding	P020	3.38	3.38	2.25					
Screening, Destoning and Pod Grinding	P021	2.48	2.48	1.65					
Cascade Dryer, Cracking Roll, Conditioner and Dehulling	P022	4.51	4.51	3.02					
Refinery Cooling Tower	P023	0.16	0.11	0.07					
Extraction Cooling Tower 1	P024	0.22	0.15	0.09					
Extraction Cooling Tower 2	P025	0.22	0.15	0.09					
Soy Oil Refinery and Deodorizer Vent	P026						52.59		
Bleaching Earth Transfer System	P027	0.05	0.05	0.03					
Silica Transfer System	P028	0.05	0.05	0.03					
Filter Aid Transfer System	P029	0.05	0.05	0.03					
Meal Storage Domes 1 & 2	P030 P031	0.11 0.11	0.11 0.11	0.08 0.08					
Solvent Extraction Process	P801						46.34		
Rail Receiving – Whole Bean	P901	3.29	2.35	1.42					
Truck receiving – Whole Bean	P902	7.32	5.91	3.68					
Truck Meal and Hull Loading	P903	0.90	0.75	0.48			See Note*		
Rail Meal and Hull Loading	P904	0.64	0.56	0.36			See Note*		

Operations, Property, and/or Equipment Description	Emissions Unit ID	Pollutant Potential to Emit (tons/year)							
		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	CO_2e
Fugitive Emissions from Hexane Loss	P019 P020 P026 P801						338.1		
Total Project Emission Increases		91.24	85.80	31.42	0.644	38.25	764.09	46.20	120,978.3
PSD Significant Emissions Threshold Levels		25	15	10	40	40	40	100	75,000

*VOC emissions from meal handling, storage, and loadout and included in the Dryer/Cooler and Meal Grinding combined emissions rate of 338.1 tons of VOC

The proposed project triggers PSD review requirements for PM, PM_{10}, $PM_{2.5}$, VOC, and GHG.

Best Available Control Technology Review (BACT)

The requirement to conduct a BACT analysis and determination is set forth in section 165(a)(4) of the Clean Air Act (Act), in federal regulations at 40 CFR Part 52.21.(j) and also in OAC rules 3745-31-15(C) and 3745-31-01(S). The BACT requirement is defined as:

"an emissions limitation (including a visible emissions standard) based on the maximum degree of reduction for each regulated NSR pollutant which would be emitted from any proposed major stationary source or major modification which the director, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such major stationary source or major modification through application of production processes or available methods, systems and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant. In no event shall application of best available control technology result in emissions of any pollutant that would exceed the emissions allowed by any applicable standard under 40 CFR Parts 60, 61, and 63. If the director determines that technological or economic limitations on the application of measurement methodology to a particular emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be approved by the director instead to satisfy the requirement for the application of best available control technology. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice or operation and shall provide for compliance by means which achieve equivalent results.

The BACT process was further formalized in a memorandum by USEPA on December 1, 1987 and in the draft New Source Review Workshop Manual (EPA 1990b) issued on March 15, 1990, by introducing a "top-down" concept for BACT analysis. The top-down process requires that all available control technologies be ranked in descending order of control effectiveness. The BACT process first examines the most stringent - or top - alternative. That alternative is established as BACT unless it is demonstrated that technical considerations, or energy, environmental, or economic impacts justify a conclusion that the most stringent technology is not applicable. If the most stringent technology is eliminated, then the next most stringent alternative is considered, and this process is continued until an acceptable BACT is selected.

The objective of the BACT analysis is to conduct pollutant-specific control technology evaluation per USEPA requirements. The BACT evaluation steps consist of:

Step 1: identify all control technologies;

Step 2: eliminate technically infeasible options;

Step 3: rank remaining control technologies by control effectiveness;

Step 4: evaluate most effective controls and document results; and

Step 5: select the most effective control based on energy, environmental and economic impacts (generally the feasible technology that is also considered to be cost effective).

BACT Analysis: Paved Roadways (F001)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Best available control measures – pave all roadways, speed reduction, good housekeeping practices, and/or watering

BACT Analysis: Bean Storage Silos (P004)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH03a through BH03h [Stack ID: EP-03a through EP-03h]

BACT Analysis: Pelleted Hulls Mills and Cooler (P010)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Cyclone CY14 [Stack ID: EP-14]

BACT Analysis: Meal Storage Tank (P012)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH32 [Stack ID: EP-32]
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Kaolin Bin (P013)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH16 [Stack ID: EP-16]

BACT Analysis: Bleached Earth Storage (P014)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH41 [Stack ID: EP-41]

BACT Analysis: Filter Aid Storage (P016)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH43 [Stack ID: EP-43]

BACT Analysis: Salt Bin (P017)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH54 [Stack ID: EP-54]

BACT Analysis: Flaker (P018)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH17 [Stack ID: EP-17]

BACT Analysis: Dryer/Cooler (P019)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Cyclones CY21a, CY21b, CY21c, CY21d and water wash tower WW21a [Stack IDs: EP-21a and EP-21bcd]
VOC	Compliance with 0.140 gal solvent loss/ton soybean processed per rolling, 12-month period Use of a mineral oil absorber system at P801

BACT Analysis: Meal and Hull Grinding (P020)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH12 [Stack ID: EP-12]
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Screening, Destoning and Pod Grinding (P021)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH15 [Stack ID: EP-15]

BACT Analysis: Cascade Dryer, Cracking Roll, Conditioner and Dehulling (P022)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH13 [Stack ID: EP-13]

BACT Analysis: Soy Oil Refinery and Deodorizer Vent (P026)

Pollutant	BACT Requirements
VOC	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Bleaching Earth Transfer System (P027)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH47 [Stack ID: EP-47]

BACT Analysis: Silica Transfer System (P028)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH48 [Stack ID: EP-48]

BACT Analysis: Filter Aid Transfer System (P029)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH49 [Stack ID: EP-49]

BACT Analysis: Solvent Extraction Process (P801)

Pollutant	BACT Requirements
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Rail Receiving-Whole Bean (P901)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouse BH01 [Stack ID: EP-01]

BACT Analysis: Truck Receiving-Whole Bean (P902)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH02 [Stack ID: EP-02]

BACT Analysis: Truck Meal and Hull Loading (P903)

Pollutant	BACT Requirements
PE PM_{10}	Enclosures vented to Baghouses BH33a and BH33b [Stack ID: EP-33a and EP-33b]

$PM_{2.5}$	
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Rail Meal and Hull Loading (P904)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH34 [Stack ID: EP-34]
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed. Use of a mineral oil absorber system at P801

BACT Analysis: Boiler #1 (B001) and Boiler #2 (B002)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	The use of low-carbon natural gas fuel, good combustion practices, continuous oxygen trim fuel system, compliance with 40 CFR, Part 63, Subpart DDDDD and 40 CFR, Part 60, Subpart Db.
VOC	
GHG	

BACT Analysis: Meal Storage Dome #1 (P030) and Meal Storage Dome #2 (P031)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH72 and BH73 [Stack ID: EP-72 and EP-73]
VOC*	Compliance with 0.140 gal solvent loss/ton soybean processed Use of a mineral oil absorber system at P801

BACT Analysis: Vertical Seed Conditioner #1 (P005) and Vertical Seed Conditioner #2 (P006)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH10a and BH10b [Stack ID: EP-10a and EP-10b]

BACT Analysis: Popper Filter #1 (P007) and Popper Filter #2 (P008) and Popper Filter #3 (P009)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Enclosures vented to Baghouses BH11a, BH11b and BH11c [Stack ID: EP-11]

BACT Analysis: Refinery Cooling Tower (P023), Extraction Cooling Tower #1 (P024), and Extraction Cooling Tower #2 (P025)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	A drift eliminator achieving “drift loss” equal to or less than 0.0005 percent

BACT Analysis: Deodorizer Boiler - 10 mmBtu/hr Natural Gas Fired (B003)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	The use of low-carbon natural gas fuel, good combustion practice, and compliance with 40 CFR, Part 63, Subpart DDDDD.
VOC	
GHG	

In addition to the above BACT requirements, emissions unit B003 is subject to 40 CFR, Part 60, Subpart Dc; OAC rule 3745-17-10; and OAC rule 3745-110-03. The requirements encompassed in these rules are equivalent to the BACT requirements. Therefore, compliance with these rules for this emissions unit are sufficient to demonstrate compliance with the BACT requirements.

BACT Analysis: Truck Wash Water Heater #1 (B005), Truck Wash Water Heater #2 (B006), Rail Wash Water Heater #1 (B007), Rail Wash Water Heater #2 (B008)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	The use of low-carbon natural gas fuel, good combustion practices, and compliance with 40 CFR, Part 63, Subpart DDDDD
VOC	
GHG	

BACT Analysis: Four Emergency Diesel Fire Water Pumps (P001, P002, P003 and P032)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Compliance with 40 CFR, Part 60, Subpart IIII and 40 CFR, Part 63, Subpart ZZZZ
VOC	
GHG	

BACT has been determined to be compliance with the requirements of NSPS Subpart IIII and 40 CFR, Part 63, Subpart ZZZZ. The requirements encompassed in the permit-by-rule are equivalent to the BACT requirements. Therefore, the permits-by-rule issued for these emissions units are sufficient to demonstrate compliance with the BACT requirements

BACT Analysis: Cooling Tower—755 Bhp Diesel Fired Emergency Generator (P033)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Compliance with 40 CFR, Part 60, Subpart IIII and 40 CFR, Part 63, Subpart ZZZZ
VOC	
GHG	

BACT has been determined to be compliance with the requirements of NSPS Subpart IIII and 40 CFR, Part 63, Subpart ZZZZ. The requirements encompassed in the permit-by-rule are equivalent to the BACT requirements. Therefore, the permit-by-rule issued for this emissions unit is sufficient to demonstrate compliance with the BACT requirements

*It should be noted that the facility is also subject to the Maximum Achievable Control Technology requirements under 40 CFR, Part 63, Subpart GGGG, National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production. The requirements of this rule are considered to be an extension of and will be used to demonstrate compliance with the BACT requirements.

BACT Analysis: 22 Bhp Natural Gas Fired Emergency Generator (P032)

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	Compliance with 40 CFR, Part 60, Subpart JJJJ and 40 CFR, Part 63, Subpart ZZZZ
VOC	
GHG	

*It should be noted that the facility is also subject to the Maximum Achievable Control Technology requirements under 40 CFR, Part 63, Subpart GGGG, National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production. The requirements of this rule are considered to be an extension of and will be used to demonstrate compliance with the BACT requirements.

Modeling Summary:

Air Dispersion Modeling

Louis Dreyfus is proposing to install the facility in Upper Sandusky, Ohio (Wyandot County). The area is classified as attainment or unclassifiable for all criteria pollutants. In the original application, Air dispersion modeling was submitted for PM_{10} and $PM_{2.5}$ and additional analyses to account for the secondary formation of $PM_{2.5}$ and ozone. Because the proposed facility-wide emissions are less than the original modeling submitted with PTI # P0133726, revised modeling is not necessary. Results from the modeling submitted with the original PTI application are reiterated below.

A NAAQS and Increment modeling across the full receptor grid was conducted opposed to only conducting a Significant Impact Analysis for this project. Increment modeling was submitted and reviewed for 24-hour and annual PM_{10} and $PM_{2.5}$. Cumulative modeling demonstrated no exceedance of any of the relevant PSD Increment of NAAQS.

The results of the increment and NAAQS modeling analyses using the corrective averaging periods are shown in the tables below:

Pollutant	Averaging Time	MAX Modeled Concentration (including background) (µg/m3)	NAAQS (µg/m3)
$PM_{2.5}$	24-hour	21.36[a]	35
$PM_{2.5}$	Annual	7.91[b]	9
PM_{10}	24-hour	47.54[c]	150

[a]Includes 24-hour average $PM_{2.5}$ background concentration of 16.00 µg/m^3
[b]Includes annual average $PM_{2.5}$ background concentration of 6.60 µg/m^3
[c]Includes 24-hour average PM_{10} background concentration of 27.00 µg/m

Pollutant	Averaging Time	MAX Modeled Concentration (µg/m^3)	PSD Class II Increment (µg/m^3)
$PM_{2.5}$	24-hour	7.22	9
$PM_{2.5}$	Annual	1.43	4
PM_{10}	24-hour	21.99	30
PM_{10}	Annual	3.40	17

Ohio Generally Acceptable Incremental Impacts (GAII) were also reviewed. The modeling did demonstrate exceedances of the Ohio Acceptable Incremental Impact for 24-hour $PM_{2.5}$ and PM_{10}. It is Ohio EPA's policy to limit any single project from consuming more than one-half of the PSD increment, but exceptions to this policy are described in Ohio Engineering Guide #69. Ohio EPA reviewed the magnitude and areal extent of these exceedances of the one-half

increment policy and determined that these exceedances were acceptable. Note that the Ohio Acceptable Incremental Impacts are not health-based standards but are in place to ensure that future growth is not unreasonably restricted by any single project.

Pollutant	Averaging Time	MAX Modeled Concentration ($\mu g/m^3$)	GAII ($\mu g/m^3$)
$PM_{2.5}$	24-hour	7.21	4.5
$PM_{2.5}$	Annual	1.40	2
PM_{10}	24-hour	21.81	15
PM_{10}	Annual	3.01	8.5

Qualitative Assessment of the Potential for Secondary $PM_{2.5}$ Formation

In accordance with U.S. EPA's Tier I December 2, 2019, February 23, 2017, and September 20, 2021 analysis documents and methodologies, a qualitative assessment of impacts of secondary $PM_{2.5}$ formation was performed. Secondary precursor emissions $PM_{2.5}$ formation are not expected to have a significant impact to ambient air quality nor will they result in a violation of the NAAQS for $PM_{2.5}$.

Ozone Formation Analysis

Model Emissions Rates for Precursors (MERPs) was used to demonstrate that the secondarily formed ozone from this project will not result in an exceedance of the 2015 8-hour ozone standard.

Additional Impacts Analysis

Louis Dreyfus 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. Specific details are presented in the permit application.

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 PSD review are satisfied. Therefore, the Ohio EPA staff recommends that a permit to install be issued to Louis Dreyfus for the proposed project.

Permit Strategy Write-Up

1. Check all that apply:

   ☒ Synthetic Minor Determination

   ☐ Netting Determination

2. Source Description:

   Louis Dreyfus Company Agricultural Products, LLC is a proposed soybean oil processing and refining plant located in Upper Sandusky, Ohio. This source is a major stationary source for multiple criteria and regulated pollutants for the purposes of PSD and Title V. This permit will establish federally enforceable restrictions to limit emissions from B005, B006, B007 and B008.

3. Facility Emissions and Attainment Status:

   Louis Dreyfus is a major stationary source of VOC, HAP, PM_{10} and $PM_{2.5}$ emissions for both PSD and Title V. The facility has requested federally enforceable restrictions for B005, B006, B007, and B008 to limit NO_x emissions to 1.80 tons per rolling, 12-month period.

   Louis Dreyfus is located in Wyandot 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:

   This facility is proposing to replace one 10 MMBtu/hr boiler (B004) with four 4.2 MMBtu/hr water heaters (B005, B006, B007, and B008). Project emissions are included in Table I of the above Staff Determination. This permitting action established synthetic minor limits for B005, B006, B007, and B008 for the purposes of avoiding PSD permitting requirements for NO_x. This PTI establishes a 0.049 lb NO_x/MMBtu limitation and a 0.45 ton per rolling, 12-month period limitation for each emissions unit individually.

5. Conclusion:

   The synthetic minor restriction in the proposed PTI is sufficient to ensure the facility's emissions will remain below PSD modeling 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
NO_x	0.45
VOC	0.20
PE	0.02

PM_{10}	0.02
$PM_{2.5}$	0.016
CO_2e	4,308

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control

Permit-to-Install

for

Louis Dreyfus Company Agricultural Products, LLC

Facility ID:	0388012014
Permit Number:	P0141468
Permit Type:	Initial Installation
Issued:	11/19/2026
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install

for

Louis Dreyfus Company Agricultural Products, LLC

Table of Contents

Authorization 22

List of Commonly Used Abbreviations 24

A. Standard Terms and Conditions 25

B. Facility Wide Terms and Conditions 33

C. Emissions Unit Terms and Conditions 35

1. Emissions Unit Group - Water Heaters: B005, B006, B007, B008, ... 36

Authorization

Facility ID:	0388012014
Facility Description:	
Application Number(s):	A0082712, A0082911
Permit Number:	P0141468
Permit Type:	Permit-To-Install
Permit Fee:	$600.00 *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:

Louis Dreyfus Company Agricultural Products, LLC
11307 County Highway 330
Upper Sandusky, OH 43351

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: P0141468

Permit Description: Initial installation for four 4.2 MMBtu/hr natural gas fired water heaters at a soybean oil extraction and refining plant.

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

Group Name:Water Heaters

Emissions Unit ID:	**B005**
Company Equipment ID:	TrkWash1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B006**
Company Equipment ID:	TrkWash2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B007**
Company Equipment ID:	RailcarWash1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B008**
Company Equipment ID:	RailcarWash2
Superseded Permit Number:	
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.

2. The following emissions unit is also being installed as part of this project:

EU ID	EU Description	BACT Requirements
P034	22 Bhp Natural Gas Fired Emergency Generator (Scalehouse Genset)	Compliance with 40 CFR, Part 60, Subpart JJJJ and 40 CFR, Part 63, Subpart ZZZZ

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Water Heaters: B005, B006, B007, B008,

EU ID	Operations, Property and/or Equipment Description
B005	4.2 MMBtu/hr Truck Wash Water Heater #1
B006	4.2 MMBtu/hr Truck Wash Water Heater #2
B007	4.2 MMBtu/hr Railcar Wash Water Heater #1
B008	4.2 MMBtu/hr Railcar Wash Water Heater #2

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 rules 3745-31-10 through 3745-31-20	VOC emissions shall not exceed 0.0054 lb/MMBtu of actual heat input and 0.05 ton per rolling, 12-month period from B005, B006, B007, and B008, individually PE shall not exceed 0.00051 lb/MMBtu of actual heat input and 0.005 ton per rolling, 12-month period from B005, B006, B007, and B008, individually PM_{10} emissions shall not exceed 0.00051 lb/MMBtu of actual heat input and 0.005 ton per rolling, 12-month period from B005, B006, B007, and B008, individually $PM_{2.5}$ emissions shall not exceed 0.00042 lb/MMBtu of actual heat input and 0.004 ton per rolling, 12-month period from B005, B006, B007, and B008, individually

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1,077 tons of CO_2e per rolling, 12-month period from B005, B006, B007, and B008, individually See b)(2)a.
b.	OAC rule 3745-31-05(D)	NOx emissions shall not exceed 0.049 lb/MMBtu of actual heat input and 0.45 tons per rolling, 12-month period from B005, B006, B007, and B008, individually See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) not apply to the CO, NO_x, PE, PM_{10}, $PM_{2.5}$, SO_2, and VOC emissions from these air contaminant sources since the PTE is less than 10 tons per year, taking into account the BACT requirements established OAC rules 3745-31-10 through 3745-31-20 and federally enforceable restrictions established under OAC rule 3745-31-05(D).
d.	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule
e.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/MMBtu of actual heat input
f.	OAC rule 3745-110-03	See b)(2)c.
g.	OAC rule 3745-18-06	See b)(2)d.
h.	40 CFR, Part 63, Subpart DDDDD (40 CFR 63.7480 through 63.7575)	See b)(2)e., b)(2)f., d)(3), and e)(2).
i.	40 CFR 63.1 through 63.15	Table 10 to 40 CFR, Part 63, Subpart DDDDD—Applicability of General Provisions to Subpart DDDDD shows which parts of General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

a. The permittee shall employ BACT for these emissions units. BACT has been determined to be the following:

Pollutant	BACT Requirements
PE PM_{10} $PM_{2.5}$	The use of low-carbon natural gas fuel, good combustion practices, and compliance with 40 CFR, Part 63, Subpart DDDDD
VOC	
GHG	

b. The federally enforceable limitations in b)(1)b. are established for the purpose of avoiding PSD permitting requirements. The federally enforceable limitations are based on the operational restrictions in c)(1).

c. Each boiler has a maximum heat input of less than 20 MMBtu/hr. Therefore, this rule does not apply to these emissions units pursuant to OAC rule 3745-110-03(K).

d. These emissions units are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

e. These emissions units meet the definition of a new boiler, designed to burn a gas 1 fuel (subcategory) with a heat input capacity of less than 5 MMBtu per hour and therefore not subject to the emissions limits in Tables 1 or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boilers are subject to the following requirements:

Initial notification	63.7510(g)
Work Practice Standards	63.7500 (a)(3), (b), (e), (f) and Table 3
General Compliance Requirements	63.7505(a), 63.7515(d), 63.7540(a)(12) and (a)(13), 63.7565 and Table 10

f. The permittee shall perform on a tune-up on these emissions units every 5 years.

c) Operational Restrictions

(1) The permittee shall only burn natural gas in these emissions units.

(2) The maximum annual hours of operation for each emissions unit shall not exceed 4,380 hours, based upon a rolling, 12-month summation of the operating hours

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

Month(s)	Maximum Allowable Cumulative Operating Hours
1	365
1-2	730

Month(s)	Maximum Allowable Cumulative Operating Hours
1-3	1,095
1-4	1,460
1-5	1,825
1-6	2,190
1-7	2,555
1-8	2,920
1-9	3,285
1-10	3,650
1-11	4,015
1-12	4,380

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. The operating hours;

b. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative hours of operation for each calendar month.

c. Beginning after the first 12 calendar months of operation or the first 12 calendar months following issuance of this permit, the rolling, 12 month summation of the operating hours; and

d. The rolling, 12-month emissions of NO_x, PE, PM_{10}, $PM_{2.5}$ VOC and CO_2e emissions from each emissions unit, in tons;

(2) 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 each emissions unit.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7555(a)	Recordkeeping requirements
63.7560(a),(b), and (c)	Recordkeeping retention
63.7540(a)(12)	Boiler tune-up requirements

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. For the first 12 calendar months of operation, all exceedances of the maximum allowable hours of operation; and

b. After the first 12 months of operation, all exceedances of the rolling, 12-month hours of operation restriction.

c. Identification of each day where a fuel other than natural gas was burned in these emissions units.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of the permit.

(2) The permittee shall comply with the applicable reporting requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Reporting Requirements	63.7545(a), (f), (h), 63.7550(a), (b), (c) and (h)

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. <u>Emissions Limitation</u>

VOC emissions shall not exceed 0.0054 lb/MMBtu of actual heat input and 0.05 ton per rolling, 12-month period from B005, B006, B007, and B008, individually

PE shall not exceed 0.00051 lb/MMBtu of actual heat input and 0.005 ton per rolling, 12-month period from B005, B006, B007, and B008, individually

PM_{10} emissions shall not exceed 0.00051 lb/MMBtu of actual heat input and 0.005 ton per rolling, 12-month period from B005, B006, B007, and B008, individually

$PM_{2.5}$ emissions shall not exceed 0.00042 lb/MMBtu of actual heat input and 0.004 ton per rolling, 12-month period from B005, B006, B007, and B008, individually

1,077 tons of CO_2e per rolling, 12-month period from B005, B006, B007, and B008, individually

<u>Applicable Compliance Method</u>

The VOC emissions limitation was established by dividing the emission factor (lb/MMscf) found in AP-42 Table 1.4-2 by the natural gas heating value of 1,020 Btu/scf.

The PE, PM_{10} and $PM_{2.5}$ US EPA emissions factors for the National Emissions Inventory (NEI) were used instead of the AP-42 factors based on EPA statements that they are more accurate. Sourced from Particulate Matter for NEI summarized by Roy Huntley of US EPA based on data from Ron Myers US EPA, leader of the development of condensable PM test method.

The CO_2e emissions limitation was established using emission factors from 40 CFR Subpart 98 Table C-1, C-2, and A-1.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emissions limitations through emission testing performed in accordance with:

Pollutant	Method
VOC	40 CFR, Part 60, Appendix A, Methods 1 through 4 and Method 25 or 25A, as applicable
PE	40 CFR, Part 60, Appendix A, Methods 1 through 5
PM_{10} and $PM_{2.5}$	40 CFR, Part 60, Appendix A, Methods 1 through 4 and 40 CFR, Part 51, Appendix M, Methods 201/201A and 202
CO_2e	40 CFR, Part 60, Appendix A, Methods 1 through 3A

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

Compliance with the rolling, 12-month emissions limitations were established by multiplying the lb/MMBtu emission limitation by a conversion factor of 1020 btu, and multiplying by the maximum hours of operation of 4,380 hours per year, then dividing by 2000 lbs/ton. Compliance shall be determined in accordance with the recordkeeping specified in d)(1) above.

b. Emissions Limitation

NOx emissions shall not exceed 0.049 lb/MMBtu of actual heat input and 0.45 tons per rolling, 12-month period from B005, B006, B007, and B008, individually

Applicable Compliance Method

Compliance with the NO_x lb/MMBtu emissions limitation was established by dividing the emissions factor (lb/MMscf) found in AP-42 Table 1.4-2 by the natural gas heating value of 1,020 Btu/scf

Compliance with the rolling, 12-month emissions limitation shall be based on the recordkeeping requirements in d)(1).

c. Emissions Limitation

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

Applicable Compliance Method

If required, compliance shall be demonstrated in accordance with visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

d. Emissions Limitation

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

g) Miscellaneous Requirements

(1) None.