Brandon W. Neuschafer
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March 6, 2006

Mr. Stephen L. Johnson
Administrator
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

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Los Angeles
New York
Phoenix
Shanghai
St. Louis
Washington, DC

And Bryan Cave,
A Multinational Partnership,
London

Dear Mr. Johnson:

Pursuant to 42 U.S.C. § 7661d(b)(2), 40 CFR § 70.8 and 326 Ind. Admin. Code § 2-7-18(d), Bunge North America is providing a copy of the enclosed Petition of Bunge North America Requesting EPA Objection to a New Source Construction and Part 70 Operating Permit for Louis Dreyfus Agricultural Industries LLC in Kosciusko County, Part 70 No.: T085-212-97-00102, which permit was issued by the Indiana Department of Environmental Management on January 24, 2006. This Petition was submitted to Region VII on February 17, 2006.

Please do not hesitate to contact me at (314) 259-2610 if you have any questions. Thank you for your consideration of this matter.

Sincerely,

Brandon W. Neuschafer

BWN

cc: Mr. Ethan Chatfield, US EPA Region V (via email, cover letter only)
Mr. Sam Portanova, US EPA Region V (via email, cover letter only)
Mr. Bradley Johannes, Louis Dreyfus Agricultural

BRYAN CAVE

Steven J. Poplawski
Direct: (314) 259-2610
sjpoplawski@bryancave.com

February 16, 2006

Mr. Thomas V. Skinner
Regional Administrator
United States EPA
Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Mr. Skinner:

Pursuant to 42 U.S.C. § 7661d(b)(2) and 326 Ind. Admin. Code § 2-7-18(d), Bunge North America respectfully submits the enclosed Petition of Bunge North America Requesting EPA Objection to a New Source Construction and Part 70 Operating Permit for Louis Dreyfus Agricultural Industries LLC in Kosciusko County, Part 70 No.: T085-212-97-00102, which permit was issued by the Indiana Department of Environmental Management on January 24, 2006.

Please do not hesitate to contact me at (314) 259-2610 if you have any questions. Thank you for your consideration of this matter.

Respectfully submitted,

Steven J. Poplawski

cc: Mr. Ethan Chatfield, US EPA Region V
Mr. Sam Portanova, US EPA Region V

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PETITION OF BUNGE NORTH AMERICA REQUESTING EPA OBJECTION TO A NEW SOURCE CONSTRUCTION AND PART 70 OPERATING PERMIT LOUIS DREYFUS AGRICULTURAL INDUSTRIES LLC KOSCIUSKO COUNTY, INDIANA PART 70 PERMIT NO. T085-21297-00102

In accordance with 42 U.S.C. §7661d(b)(2) and 326 IAC §2-7-18(d), Bunge North America ("Bunge") hereby submits this petition on the Louis Dreyfus Agricultural Industries LLC ("Dreyfus") Permit No. T085-21297-00102 (the "Permit") as provided in the Notice of Decision issued January 24, 2006. For the reasons stated below, Bunge respectfully requests that the United States Environmental Protection Agency ("USEPA" or "EPA") either (1) object to the Permit or (2) clarify that EPA is in agreement with the approach taken by IDEM in issuing the Permit.

I. INTRODUCTION

A. Procedural History of the Permit

Dreyfus filed an application to build a new soybean oil, soybean meal and biodiesel manufacturing plant in Claypool, Kosciusko County, Indiana (the "Dreyfus Facility"). On November 12, 2005, the Indiana Department of Environmental Management ("IDEM") Office of Air Quality had a notice published in the Times Union, Warsaw, Indiana, regarding Dreyfus' permit application and informing interested persons that they had thirty days to provide comment on the draft of the Permit that IDEM was proposing to issue (the "Draft Permit"). Timely comments were filed by Bunge, Dreyfus, a citizen and USEPA. On January 24, 2006, IDEM issued the Permit including an Addendum to the Technical Support Document of New Source Construction and Part 70 Permit which contains a response to the comments filed (the "Response to Comments").

B. Bunge Has Standing to File This Petition

Under 42 U.S.C. §7661d(b)(2), "any person" may petition USEPA to object to the Permit. Bunge is a leading oilseed processor and a leading U.S. exporter of soybeans and soybean-derived products (meals and oil) with eleven soybean processing facilities throughout the United States including one in Morristown, Indiana and is a "person" who may petition EPA to object to the Permit under 42 U.S.C. §7661d(b)(2). As it did in filing its comments on the Draft Permit with IDEM, Bunge files this petition to ensure that IDEM and USEPA take consistent regulatory positions with regard to the permitting of oilseed processing facilities in order (1) to ensure a level playing field among competitors in the same industry and (2) to provide clear guidance in the air permitting of new and modified soybean processing facilities.

II. THE DREYFUS PERMIT IS OBJECTIONABLE

A. IDEM Failed to Address Bunge's Comment

On December 9, 2005, Bunge filed its comments on the Permit and served a copy on Ms. Pamela Blakley, Section Chief Air Permit Section, USEPA Region V (the "Bunge Comments" attached hereto as Exhibit A). The Bunge Comments objected to the Draft Permit stating:

> Based on its experience in operating soybean processing facilities, Bunge is convinced that the Dreyfus facility cannot restrict its emissions to only 249.8 tpy VOC unless the Dreyfus Facility does not count fugitive VOC emissions. In the TSD [Technical Support Document], IDEM stated and Bunge agrees that "Fugitive emissions from the soybean extraction process are not counted toward a determination of PSD applicability." (TSD at p. 11 of 28). Bunge also appreciates that IDEM has previously taken the same position, excluding fugitive emissions from evaluating PSD applicability, with regard to Bunge's Morristown facility. IDEM's approach is consistent with the PSD regulations which only require consideration of fugitive emissions in making PSD applicability determinations when the source is in one of the specific categories listed in the regulation which do not include soybean processing facilities such as the Bunge Morristown facility and the Dreyfus Facility. See 326 IAC 2-2-1(gg)(6); 40 CFR 52.21(i)(1)(vii).

Bunge Comments at p. 2 (footnote omitted). While the Bunge Comments agreed with IDEM's approach to addressing fugitive emissions in determining PSD applicability, the Bunge Comments then noted that the Draft Permit and the TSD were inconsistent with the position that EPA has taken with regard to the treatment of fugitive emissions in evaluating PSD applicability stating:

> While Bunge agrees with IDEM's approach, Bunge is filing this comment because it is our understanding that in other situations USEPA has disagreed with IDEM's approach and taken the position that VOC emissions which IDEM is treating as fugitive for purposes of evaluating PSD applicability to the Dreyfus facility are not fugitive and, therefore, should be counted in making that applicability determination.

Bunge Comments at 2-3. The discrepancy between IDEM's position and USEPA's position creates two problems that are unacceptable in regulating the soybean processing industry: (1) Dreyfus and any future permittee in Indiana or elsewhere are faced with the possibility that USEPA will disagree with a permit determination like IDEM's and bring an enforcement action and/or (2) USEPA will actually enforce its position on fugitive emissions against future permit applicants and not against Dreyfus and thereby create an uneven playing field where Dreyfus has the benefit of not counting its fugitive emissions but subsequent applicants are required to count fugitive emissions and, as a result, trigger PSD where IDEM found that Dreyfus did not.

In responding to Bunge's objection above, IDEM failed to address the fundamental issue of the problems created for the soybean processing industry by the inconsistency between the position of state agencies like IDEM and the position of USEPA with regard to the treatment of fugitive emissions at soybean processing facilities in the PSD context. Instead, IDEM simply affirmed that its treatment of fugitive emissions was consistent with USEPA Region V guidance documents and assumptions made by USEPA's contractor in promulgating the NESHAP for solvent extraction for vegetable oil production. Response to Comments at pp. 11-12 (attached

hereto as Appendix B). As it did in the Bunge Comments, Bunge agrees with IDEM's interpretation with regard to the treatment of fugitive emissions in determining PSD applicability. However, the Response to Comments fails to address the issue raised by Bunge's objection.

B. EPA Fails to Provide Regulatory Clarity

The Response to Comments summarized EPA's comments on the Draft Permit. At first, the EPA comments seem to address Bunge's objection regarding the disparity between the state and federal approach to fugitive emissions in determining PSD applicability stating:

> Since the primary source [the soybean processing facility] does not fall under one of the 28 listed source categories, fugitive emissions are not counted towards PSD applicability.

Response to Comments at 12 (citing EPA Comment at 1). Thus, in its comments, EPA seems to be saying that because the primary source is a soybean processing facility fugitive emissions are not counted in determining PSD applicability. Therefore, the fact that the facility's potential to emit when fugitive emissions were included was 3944 tpy VOC (and 416 tpy for just hexane alone) did not result in the permit triggering PSD. (see Bunge Comments at 2, citing TSD at 10 of 28.) If Bunge is correctly interpreting EPA's comment 1, then Bunge's petition can be partially addressed by USEPA expressly affirming that its approach to not counting fugitive emissions in addressing PSD applicability is consistent with the approach that IDEM took in its TSD. Given that Bunge is aware of other situations in which EPA has counted such emissions in determining PSD applicability, EPA's failure to provide additional clarification beyond the comment quoted above will still leave the Permit in its currently objectionable condition. Specifically, with regard to other soybean processing facilities, EPA has previously questioned whether any VOC emissions from an oilseed extraction operation can be considered fugitive, because the operation could potentially be enclosed. Either the Permit is inconsistent with

applicable PSD requirements and therefore is objectionable under 42 U.S.C. 7661d(b)(2) or it is a precedent upon which Dreyfus and other soybean processors can rely without fear of EPA overfiling when IDEM's approach (which Bunge believes is correct) is used in determining that PSD is not triggered at other facilities throughout the country.

In addition to the unresolved regulatory uncertainty discussed above, USEPA's comments on the Permit created more uncertainty by stating:

> Not included in the 249.8 tpy of VOC potential emission calculated for this draft permit are an additional 132 tpy of VOC emissions that are considered as bound in product or byproduct. This approach of excluding such emissions from consideration towards PSD applicability is not consistent with the position EPA has taken with regard to emissions at other soybean processing plants (for example: Bunge, ADM, and Cargill).

Response to Comments at 12 (emphasis added). First of all, Bunge appreciates EPA's recognition, embodied in the above comment, that regulators should maintain consistency in making PSD permit applicability determinations within the soybean processing industry. After all, such inconsistency is the basis for this petition and objection to the Permit. However, in filing its comment, EPA has now raised another issue of apparent inconsistency between IDEM's approach to the Permit and EPA's approach to the permitting of similar facilities. EPA could resolve this petition objection by stating that its failure to object to the Permit demonstrates agreement with IDEM's position in the Response to Comments that VOC emissions bound in product and byproduct are not counted because they will not impact the same general area as the plant. Response to Comments at p. 12. Absent such clarification of both this issue and the broader fugitives issue discussed above, either the Permit is inconsistent with applicable PSD requirements and therefore is objectionable under 42 U.S.C. 7661d(b)(2) or it is a precedent upon which Dreyfus and other soybean processors can rely without fear of EPA overfiling when

IDEM's approach (which Bunge believes is correct) is used in determining that PSD is not triggered at other facilities throughout the country.

III. REQUEST FOR RELIEF

Bunge respectfully requests that USEPA deny this Petition as moot by clarifying that it is in agreement with IDEM's approach to PSD applicability taken with regard to the Permit. Such a clarification will address Bunge's dual concerns by both addressing what the rules are for the handling of fugitives in future PSD analysis and creating a level playing field to ensure that other soybean processors will get the same treatment as Dreyfus has in this Permit.

If, however, USEPA, as reflected in the Agency's own comments and Bunge's prior experience, continues to disagree with the approach taken by IDEM with regard to accounting for fugitive emissions determining PSD applicability, then Bunge respectfully requests that USEPA issue an objection to the Permit under 42 U.S.C. §7661d(b)(2). Such an objection will support maintenance of a level playing field among soybean processors, a value recognized by EPA in its own comments on the Permit.

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Partner
Direct: 314-259-2610
sjpoplawski@bryancave.com

December 9, 2005

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VIA E-MAIL AND
VIA FEDERAL EXPRESS

Dr. Tripurari Sinha
IDEM, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

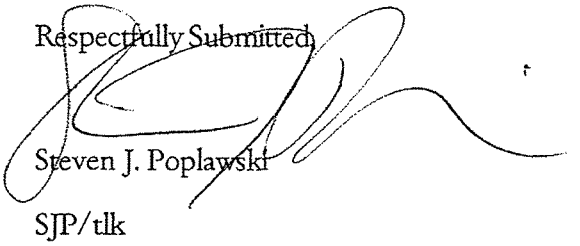
Re: Comments of Bunge North America on Preliminary Findings Regarding a New Source Construction and Part 70 Operating Permit for Louis Dreyfus Agricultural Industries LLC in Kosciusko County Part 70 No.: T085-21297-00102

Dear Dr. Sinha:

Pursuant to the notice of 30-day period for public comment issued by the Indiana Department of Environmental Management ("IDEM") regarding the above-referenced permit, enclosed please find the Comments of Bunge North America on Preliminary Findings Regarding a New Source Construction and Part 70 Operating Permit for Louis Dreyfus Agricultural Industries LLC in Kosciusko County Part 70 No.: T085-21297-00102. Also, please add the undersigned to IDEM's mailing list to receive notice of future action related to the above-referenced permit.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,



Steven J. Poplawski

SJP/tlk
enclosures

cc: Loren Polak, Bunge North America
Pamela Blakely, Section Chief Air Permit Section, USEPA Region V

Steven J. Poplawski
Partner
Direct: 314-259-2610
sjpoplawski@bryancave.com

December 9, 2005

VIA E-MAIL AND
VIA FEDERAL EXPRESS

Ms. Pamela Blakley
USEPA, Region V, AR-18J
Section Chief Air Permit Section
77 West Jackson Blvd.
Chicago, IL 60604

Re: Comments of Bunge North America on Preliminary Findings Regarding a New Source Construction and Part 70 Operating Permit for Louis Dreyfus Agricultural Industries LLC in Kosciusko County Part 70 No.: T085-21297-00102

Dear Ms. Blakley:

Enclosed please find a copy of comments that we filed on behalf of Bunge North America regarding the above-referenced permit. Even though this is a state permit, the comments address a concern regarding USEPA's interpretation of what constitutes "fugitive emissions" at oilseed processing facilities and the impact of that interpretation on whether such sources trigger PSD.

We appreciate EPA's consideration of these comments and look forward to the Agency's response. Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

Steven J. Poplawski

SJP/tlk
enclosures

cc: Loren Polak, Bunge North America
Dr. Tripurari Sinha, IDEM

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COMMENTS OF BUNGE NORTH AMERICA ON PRELIMINARY FINDINGS REGARDING A NEW SOURCE CONSTRUCTION AND PART 70 OPERATING PERMIT FOR LOUIS DREYFUS AGRICULTURAL INDUSTRIES LLC IN KOSCIUSKO COUNTY PART 70 NO.: T085-21297-00102

Bunge North America ("Bunge") hereby submits these comments on the Louis Dreyfus Agricultural Industries LLC ("Dreyfus") Draft Permit No. T085-21297-00102 (the "Draft Permit") in accordance with the public notice regarding the Draft Permit.

INTRODUCTION

Dreyfus has filed an application to build a new soybean oil, soybean meal and biodiesel manufacturing plant in Claypool, Kosciusko County, Indiana (the "Dreyfus Facility"). The Indiana Department of Environmental Management (IDEM) has reviewed Dreyfus' application and issued preliminary findings in the form of a draft permit and several supporting documents that would allow construction and operation of the Dreyfus Facility.

Bunge is a leading oilseed processor and a leading U.S. exporter of soybeans and soybean-derived products (meals and oil) with eleven soybean processing facilities throughout the United States including one in Morristown, Indiana. Bunge files these comments to ensure that IDEM and the United States Environmental Protection Agency (USEPA) take consistent regulatory positions with regard to the permitting of oilseed processing facilities.

A. IDEM Appropriately Defines "Fugitive Emissions" in Finding that the Proposed Project Is Not Major for Purposes of Triggering PSD Review

1. Bunge Concurs With IDEM's Approach to Fugitive Emissions at Soybean Processing Plants

In its Technical Support Document (TSD) for the Draft Permit, IDEM states the volatile organic compound (VOC) emissions for the Dreyfus Facility are limited to 249.8 tons per

year (tpy). (TSD at p. 12 of 28.) Because the VOC emissions are less than 250 tons, IDEM concludes that the PSD requirements do not apply. Id. The Dreyfus Facility can be limited to 249.8 tpy VOC only if fugitive emissions are not included in calculating tpy. The TSD, when it included fugitive emissions, identified the facility's potential to emit as 3944 tpy VOC and 416 tpy for just hexane alone. (TSD at p. 10 of 28.) Based on its experience in operating soybean processing facilites, Bunge is convinced that the Dreyfus facility cannot restrict its emissions to only 249.8 tpy VOC unless the Dreyfus Facility does not count fugitive VOC emissions. In the TSD, IDEM stated and Bunge agrees that "Fugitive emissions from the soybean extraction process are not counted toward a determination of PSD applicability." (TSD at p. 11 of 28). Bunge also appreciates that IDEM has previously taken the same position, excluding fugitive emissions from evaluating PSD applicability, with regard to Bunge's Morristown facility. IDEM's approach is consistent with the PSD regulations which only require consideration of fugitive emissions in making PSD applicability determinations when the source is in one of the specific categories listed in the regulation which do not include soybean processing facilities such as the Bunge Morristown facility and the Dreyfus Facility.[1/] See 326 IAC 2-2-1(gg)(6); 40 CFR 52.21(i)(1)(vii).

2. USEPA Has Previously Disagreed with IDEM's Approach to Fugitive Emissions at Soybean Processing Plants. If USEPA Still Disagrees with IDEM, then It Should Object to the Draft Permit.

While Bunge agrees with IDEM's approach, Bunge is filing this comment because it is our understanding that in other situations USEPA has disagreed with IDEM's approach and taken the position that VOC emissions which IDEM is treating as fugitive for

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1/ Bunge takes no position on IDEM's consideration of fugitive emissions in evaluating whether the biodiesel portion of the facility triggered PSD on its own.

purposes of evaluating PSD applicability to the Dreyfus facility are not fugitive and, therefore, should be counted in making that applicability determination. Accordingly, Bunge is providing a copy of these comments to USEPA. In order for the oilseed processing industry to have clarity and consistency on an issue of critical importance to planning and permitting new or modified facilities, Bunge respectfully requests that IDEM get USEPA's position on the fugitive emission issue prior to final issuance of the Draft Permit. Bunge believes that USEPA should concur in writing with IDEM's position because IDEM's position is consistent with the PSD regulations. However, if USEPA still believes that emissions that IDEM considers fugitive at soybean processing facilities (such as the Dreyfus Facility proposed here) are not fugitive and should be counted in determining whether the Dreyfus Facility has triggered PSD, then USEPA should provide that written guidance and challenge issuance of the Draft Permit. Inaction by USEPA on the Dreyfus Facility Draft Permit will be treated by Bunge as agreement by USEPA that fugitive emissions should not be counted when evaluating PSD applicability at its soybean processing plants.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for
New Source Construction and Part 70 Permit

Source Name:	Louis Dreyfus Agricultural Industries LLC
Source Location:	East of SR 15 between CR 700 S and CR 800 S, Claypool, Indiana 46510
County:	Kosciusko
SIC Code:	2075, 2079 & 2869
Part 70 Application No:	New Source Construction and Part 70 Operation Permit T085-21297-00102
Permit Reviewer:	Dr. Trip Sinha

On November 12, 2005, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Louis Dreyfus Agricultural Industries LLC had applied for a permit relating to the construction and operation of a soybean oil (Salad oil and Refined/Bleached OIL (RB OIL)), soybean meal, and biodiesel manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this construction and operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Written comments were received from a citizen, Louis Dreyfus Agricultural Industries LLC, Bunge North America and U.S. EPA Region 5.

The comments and responses appear below. Any revisions to the permit are shown by the additions being in bold and the deletions being in strikeout.

Steven A. Johnson and Sally A. Johnson

Comment 1: Louis Dreyfus Agricultural Industries LLC held a town meeting in Claypool, Indiana, concerning the proposed plant. At this meeting a question was asked if there would be anything toxic or hazardous. Their response was no. According to the notice published in the local newspaper pertaining to air permits, it states the OAQ regulates the operations of sources that emit relatively large amounts of air pollutants. This is not about odors, but Hexane (C_6H_{14}) oilseed extraction solvent. This is listed by the U. S. EPA as a hazardous air pollutant.

My wife and I visited the soybean plant in Morristown. We talked for a period of time to people living approximately the same distance from that plant as we will be from the plant in Claypool. After talking to these residents for a while, I started getting a scratchy sore throat. From talking to a chemist in your office, I found out that it is an effect of Hexane (Flue like systems, direct exposure affects the nervous system).

With a loss of 15% Hexane, as Louis Dreyfus told us, this size plant would be emitting approximately 8,400 pounds of Hexane per day, seven days a week, 363 days a year, into the environment. The wind blows from the west, southwest most of the time. This pollutant will be going right over the town and small subdivision.

Response 1: The NESHAP 40 CFR 63, Subpart GGGG, requires all existing and new solvent extraction for vegetable oil production processes that are major sources to meet HAP emission standards reflecting the application of the maximum achievable control technology (MACT). This MACT standard allows the source to use no more than 0.2 gallons of hexane per ton of soybean received by the source. This plant is only allowed to use 0.134 gallons of hexane per ton of soybean received, which is 33 percent less than that allowed by NESHAP.

The U.S EPA does not consider n-hexane as a human carcinogen (see 40 CFR 63, Subpart GGGG, Final Rule Summary). However, exposure to hexane can have other health effects. Short term exposure to high levels of hexane may cause irritation of the skin and mucous membranes in humans. Other effects include dizziness, giddiness, confusion, slight nausea, and headache. Long term exposure to hexane in air may be associated with numbness in the hands and feet, muscular weakness, blurred vision, headache, fatigue, possibly paralysis of the arms and legs, dermatitis, jaundice, and coma. IDEM conducted an analysis to determine whether the maximum concentration of n-hexane expected due to emissions from the source would cause either short-term or long-term health effects.

This risk assessment is based on the assumption that the exposure to HAP would be harmful to sensitive subpopulations. That is, the risk assessment was performed assuming that exposed individuals fall into some sort of a sensitive subpopulation category (elderly, children, individuals with compromised immune systems, etc.) and are continuously exposed to the maximum predicted concentration of HAPs for seventy (70) years. This is a health protective assumption to account for those subpopulations mixed within the general population.

There is no reasonable expectation of acute (short term) health effects due to HAPs exposure beyond the property line resulting from the operation of this facility. Maximum modeled 24-hr concentrations for the facility of 940 $\mu g/m^3$ are below the 2100 $\mu g/m^3$ level where acute effects are expected to occur.

There is no reasonable expectation of chronic non-cancer health effects due to HAP exposure resulting from the operation of this facility. The chronic Hazard Quotient (HQ) is less than one (1.0). The HQ is used to determine if it is reasonable to expect adverse health effects to be observed when individuals are exposed to the pollutant over a period of 70 years. A Hazard Quotient below a level of one (1.0) indicates that there is no reasonable expectation of health effects occurring due to HAP exposure. Maximum annual n-hexane concentrations of 59.6 $\mu g/m^3$ are below the 200 $\mu g/m^3$ Minimal Risk Level for n-hexane. This calculates to a Hazard Quotient for the maximum concentration of n-hexane of 0.298, which, being below one (1.0), means that there is no reasonable expectation of adverse health effects from the hexane emissions from the source.

Note that the calculated hazard is not a regulatory limit set by IDEM. There are no federal or state air quality standards for hexane. However, IDEM's analysis provides an indication of the source's impact on human health with respect to n-hexane, which in this case is insignificant.

The information, which you received from Louis Dreyfus meeting, that this proposed plant will emit 8,400 lbs of hexane per day, is not correct. IDEM's calculation shows that it is approximately 2,811 lbs per day.

Calculation:

The amount of hexane used per year = 645 tons per year
(See Addendum to Appendix A, Page 1 of 4)

The amount leaves the area with the products = 132 tons per year
(The 132 tons per year of hexane is not emitted at the plant site, because the products are shipped to different places.)

The amount of hexane emitted from the plant	=	(645 – 132) tons per year
	=	513 tons per year
	=	(513 tons per year)*(2,000 lbs/ton)/(8760 hours/year)
	=	117.12 lbs per hour
	=	(117.12 lbs per hour)* (24 hours/day)
	=	2,811 lbs/day

Out of 2,811 lbs per day emissions, only 64% is n-hexane, which is labeled as hazardous air pollutant.

Therefore, hexane as HAP is emitted in the amount of 1,799 lbs per day.

Comment 2: There are other ways of extracting oil from soybeans. Centripetal process is not as efficient or as fast, but with no hazards to humans, livestock or the environment.

Response 2: IDEM is not aware of any plant in USA using this process. Centripetal process is not used on a large soybean oil extraction plant such as the proposed plant. Therefore, the IDEM has determined that Centripetal process is not an appropriate candidate [best demonstrated technology] for this industry.

Best Available Control Technology (BACT) is an emission limitation, determined on a case-by-case basis, taking into account energy, environmental, and economics impacts and other costs.

BACT has been determined pursuant to 326 IAC 8-1-6 for the oil extraction process and biodiesel process. IDEM has determined that the proposed mineral oil scrubber to control hexane from oil extraction process is the most advanced control equipment available right now in the soybean oil extraction industry. Best available control technology is also employed to control VOC emissions from the leaking equipment such as valves, pumps, flanges etc. The soy oil absorber and water absorber to control VOC emissions from the biodiesel process are the most advanced control equipment available right now in the biodiesel industry.

New Source Performance Standards (NSPS), 40 CFR 60, Subpart VV, a technology based standard, requires the source to control the fugitive emissions from the biodiesel plant.

Comment 3: Please deny Louis Dreyfus's proposed air permit.

Response 3: The applicant has an obligation to submit an application that shows they will comply with all applicable state and federal rules governing air pollution. In turn, IDEM has a legal obligation to issue a permit if such a demonstration has been made by the applicant. IDEM has determined that the applicant can comply with all state and federal rules governing air pollution. As a result, IDEM has no legal authority to deny the permit.

Comment 4: We would like to be included in your mailing list so we may receive a notice of decision.

Response 4: Your name has been added to the list of people receiving the notice of decision for this permit. You will be sent the notice of decision at your address.

Louis Dreyfus Agricultural Industries LLC comment:

Comment 1: The table in Section D.2.2 shows 330 tons/hour for "Load out". Our calculations were based on the following:

Truck Loadout (meal)	330 tons/hr
Truck Loadout (pellets/hulls)	330 tons/hr

Truck Loadout has two bays, so both could occur simultaneously.

Rail Loadout (meal)	330 tons/hr
Rail Loadout (pellets/hulls)	330 tons/hr

Rail Loadout only has one location, so either meal or pellet/hulls will be loaded (although calculations do not limit this, since they are shown as simultaneous).

Please revise the meal loadout calculation to allow the loading rates as shown above.

Response 1: For clarity purposes the table in Condition No. D.2.2 has been revised accordingly. There are no changes in the PM/PM_{10} emissions. The revised condition is as follows:

D.2.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the following processes shall not exceed the limitations specified in the following table:

Remainder of page left blank intentionally.

Process	Process Weight Rate (tons/hr)	PM Emission Limit (lbs/hr)
Truck Load out **(Meal)**	330	64.1
Truck Loadout (Pellets/Hulls)	**330**	**64.1**
Rail Loadout (meal)	**330**	**64.1**
Rail Loadout (Pellets/Hulls)	**330**	**64.1**
Jet Dryer/VSC	192.5	58.5
Hot Dehulling	192.5	58.5
Flaker Aspiration	182.9	57.5
Meal Grinding	148	55.3

Comment 2: Louis Dreyfus has requested that a general condition for Preventive Maintenance Plan be included in Section B of the permit, which will apply to the entire source.

Response 2: Conditions D.1.4, D.2.3, D.3.5, D.4.5, D.5.6 have been removed from the permit, and B.14 (a) in Section B has been revised. The subsequent D section conditions have been renumbered.

~~D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the applicable facilities and associated control devices.~~

~~D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the applicable facilities and associated control devices.~~

~~D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the applicable facilities and associated control devices.~~

~~D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the applicable facilities and associated control devices.~~

~~D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device~~

B.14 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) ~~If required by specific condition(s) in Section D of this permit,~~ ~~t~~The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

(1) Identification of the individual(s), by job title, responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

~~If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Quality~~
~~100 North Senate Avenue~~
~~Indianapolis, Indiana 46204~~

~~The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 3: Louis Dreyfus Agricultural Industries LLC has requested that the controlled fugitive emissions from the biodiesel plant be counted towards the determination of the PSD applicability for the source as New Source Performance Standard (NSPS), 40 CFR 60, Subpart VV applies to the biodiesel plant. The applicant has sent the controlled fugitive emissions calculation as per U. S. EPA Guidance Document "Protocol for Equipment Leak Emission Estimates, EPA 453/R-95-017, November 1995.

Response 3: The calculations have been revised as requested by Louis Dreyfus Agricultural LLC (see Addendum to TSD Appendix A pages 1-4). The permit Conditions D.4.1 and D.4.2, and Source Status table and 326 IAC 2-2 PSD Minor Limit table of the TSD have been revised as follows:

Permit

D.4.1 PSD Minor Limit for VOC [326 IAC 2-2]

(b) The following facilities' VOC emissions rates shall be limited as follows:

Process	Control	VOC (lbs/hour)	Hours of operation limit
Biodiesel manufacturing process Normal operation	Soy oil absorber followed by a water absorber	0.30	
Biodiesel manufacturing process upset operation	Soy oil absorber followed by a water absorber	29.4	24 hrs/yr
Biodiesel storage tanks and loading rack operation	None	1.40	
Glycerine storage tanks	None	0.0008	
Methanol storage tanks	None	0.38	
Methoxide (catalyst) storage tank	None	0.079	
Biodiesel wastewater	None	0.560	
Biodiesel fugitive emissions	LDR as required by 40 CFR 60, Subpart VV	~~3.605~~ **1.01**	

D.4.2 VOC BACT Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Permittee shall limit the volatile organic compound (VOC) emissions from the biodiesel manufacturing process as follows:

Facility	Control	Emission Limit
Biodiesel manufacturing process without methanol unloading	Soy oil absorber followed by a water absorber	Overall VOC control efficiency of 99% and a VOC emission rate of 0.30 lbs/hr
Biodiesel manufacturing process Upset operation	Soy oil absorber followed by a water absorber	Overall VOC control efficiency of 95% and a VOC emission rate of 29.4 lbs/hr

Facility	Control	Emission Limit
Biodiesel manufacturing process with methanol tank unloading	Soy oil absorber followed by a water absorber	Overall VOC control efficiency of 99% and a VOC emission rate of 0.63 lbs/hr
Fugitive emissions	Comply with the provisions of 40 CFR 60, Subpart VV	~~15.79~~ **4.43** tons/year

Technical Support Document

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

This Addendum to Technical Support Document becomes part of the Technical Support Document.

(1) **Source Status**

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	143
PM_{10}	103.6
SO_2	249
VOC	~~249.8~~ **238.4**
CO	85.1
NO_x	66.5

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(2)

326 IAC 2-2 PSD Minor Limit for VOC Emissions

(a) The amount of the purchased soybean oil shall be limited to less than 80 million gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of soybean oil processed to manufacture biodiesel shall be limited to less than 80 million gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The following facilities' VOC emissions rates shall be limited as follows:

Process	Control	VOC (lbs/hour)	Hours of operation limit/yr
Soybean oil extractor system Normal operation	Mineral oil absorber	9.3	
DTDC Dryers and cooler Normal operation	DTDC Cyclones	32.8	
Purchased crude soybean oil	Super Stripper	35 ppmwt.	
Purchased refined bleached (RB Oil) soybean oil.	Analytical Testing of Incoming Oil	35 ppmwt.	
Biodiesel manufacturing process Normal operation	Soy oil absorber followed by a water absorber	0.30	
Biodiesel manufacturing process Upset operation	Soy oil absorber followed by a water absorber	29.4	24 hrs
Biodiesel manufacturing process with methanol tank unloading	Soy oil absorber followed by a water absorber	0.63	
Biodiesel storage tanks and loading rack operation	None	1.40	
Glycerine storage tanks	None	0.0008	
Biodiesel day tanks	Soy oil absorber followed by a water absorber	Included in biodiesel mfg process emissions	
Methanol storage tanks	None	0.38	
Methoxide (catalyst) storage tank	None	0.079	

Process	Control	VOC (lbs/hour)	Hours of operation limit/yr
Biodiesel wastewater	None	0.560	
Biodiesel fugitive emissions	LDR as required by 40 CFR 60, Subpart VV	~~3.605~~ **1.01**	
Boiler	None	1.19	
High pressure steam generator	None	0.045	
Diesel fire pumps	None	0.57	
Fuel oil tank	None	0.002	

Bunge North America ("Bunge") Comment:

Comment 1: Louis Dreyfus has filed an application to build a new soybean oil, soybean meal and biodiesel manufacturing plant in Claypool, Kosciusko County, Indiana (the "Dreyfus Facility"). The Indiana Department of Environmental Management (IDEM) has reviewed Dreyfus' application and issued preliminary findings in the form of a draft permit and several supporting documents that would allow construction and operation of the Dreyfus Facility.

Bunge is a leading oilseed processor and a leading U.S. exporter of soybeans and soybean-derived products (meals and oil) with eleven soybean processing facilities throughout the United States including one in Morristown, Indiana. Bunge files these comments to ensure that IDEM and the United States Environmental Protection Agency (USEPA) take consistent regulatory positions with regard to the permitting of oilseed processing facilities.

A. IDEM Appropriately Defines "Fugitive Emissions" in Finding that the Proposed Project Is Not Major for Purposes of Triggering PSD Review

1. **Bunge Concurs with IDEM's Approach to Fugitive Emissions at Soybean Processing Plants**

In its Technical Support Document (TSD) for the Draft Permit, IDEM states the volatile organic compound (VOC) emissions for the Dreyfus Facility are limited to 249.8 tons per year (tpy). (TSD at p. 12 of 28.) Because the VOC emissions are less than 250 tons, IDEM concludes *that* the PSD requirements do not apply. The Dreyfus Facility can be limited to 249.8 tpy VOC only if fugitive emissions are not included in calculating tpy. The TSD, when it included fugitive emissions, identified the facility's potential to emit as 3944 tpy VOC and 416 tpy for just hexane

alone. (TSD at p. 10 of 28.) Based on its experience in operating soybean processing facilities, Bunge is convinced that the Dreyfus facility cannot restrict its emissions to only 249.8 tpy VOC unless the Dreyfus Facility does not count fugitive VOC emissions. In the TSD, IDEM stated and Bunge agrees that "Fugitive emissions from the soybean extraction process are not counted toward a determination of PSD applicability." (TSD at p. 11 of 28). Bunge also appreciates that IDEM has previously taken the same position, excluding fugitive emissions from evaluating PSD applicability, with regard to Bunge's Morristown facility. IDEM's approach is consistent with the PSD regulations which only require consideration of fugitive emissions in making PSD applicability determinations when the source is in one of the specific categories listed in the regulation which do not include soybean processing facilities such as the Bunge Morristown facility and the Dreyfus Facility.1' See 326 IAC 2-2-1(gg6); 40 CFR 52 1(i)(1)(vii).

2. While Bunge agrees with IDEM's approach, Bunge is filing this comment because it is our understanding that in other situations USEPA has disagreed with IDEM's approach and taken the position that VOC emissions which IDEM is treating as fugitive for purposes of evaluating PSD applicability to the Dreyfus facility are not fugitive and, therefore, should be counted in making that applicability determination. Accordingly, Bunge is providing a copy of these comments to USEPA. In order for the oilseed processing industry to have clarity and consistency on an issue of critical importance to planning and permitting new or modified facilities, Bunge respectfully requests that IDEM get USEPA's position on the fugitive emission issue prior to final issuance of the Draft Permit. Bunge believes that USEPA should concur in writing with IDEM's position because IDEM's position is consistent with the PSD regulations. However, if USEPA still believes that emissions that IDEM considers fugitive at soybean processing facilities (such as the Dreyfus Facility proposed here) are not fugitive and should be counted in determining whether the Dreyfus Facility has triggered PSD, then USEPA should provide that written guidance and challenge issuance of the Draft Permit. Inaction by USEPA on the Dreyfus Facility Draft Permit will be treated by Bunge as agreement by USEPA that fugitive emissions should not be counted when evaluating PSD applicability at its soybean processing plants.

Bunge takes no position on IDEM's consideration of fugitive emissions in evaluating whether the biodiesel portion of the facility triggered PSD on its own.

Response 1: IDEM's position is consistent with the PSD regulations. IDEM 's characterization of fugitives is consistent with the U. S. EPA Region V guidance documents of October 15, 2002 and March 6, 2003, addressed to Minnesota Pollution Control Agency and Indiana Department of Environmental Management, respectively. IDEM's characterization of fugitive emissions is also consistent with the assumptions made by Alpha Gamma Technologies, Inc., a U. S. EPA contractor

in developing the National Emission Standards for Hazardous Air Pollutants for solvent extraction for vegetable oil production (Memorandum dated May 29, 1998: Vegetable Oil NESHAP Project File).

EPA Region 5 comments

Comment 1: According to the draft permit, this new greenfield source will have potential emissions after controls of 249.8 tpy of VOC, which is below the PSD threshold of 250 tpy. Since the primary source does not fall under one of the 28 listed source categories, fugitive emissions are not counted towards PSD applicability. (This fugitive emission exclusion has not been extended to the biodiesel plant, which does fall under one of the 28 listed source categories and is "nested" within this non-listed source).

Not included in the 249.8 tpy of VOC potential emissions calculated for this draft permit are an additional 132 tpy of VOC emissions that are considered as bound in product or byproduct. This approach of excluding such emissions from consideration towards PSD applicability is not consistent with the position EPA has taken with regard to emissions at other soybean processing plants (for example: Bunge, ADM, and Cargill).

In addition to these comments, EPA requests additional time to complete a more thorough analysis of this permit.

Response 1: The VOC emissions have been revised to 238.4 tons per year from 249.8 tons per year, because the controlled fugitive emissions from the biodiesel plant should have been calculated instead of the uncontrolled fugitive emissions. The VOC emissions for PSD purposes are 11.6 tons per year less than the PSD threshold of 250 tons per year.

132 tons per year of VOC emissions, which are considered as bound in product or byproduct is not included in determining the source total VOC emissions. A guidance letter from U. S. EPA Region 5 dated October 15, 2002, addressed to Minnesota Pollution Control Agency, states that VOCs which are determined to be emitted off site may be excluded from a facility's emissions. The VOCs bound in products will be termed as a source of secondary emissions, because VOC will be emitted at some other point as it is shipped to other places for trading or consumption. The potential emissions from these products, secondary emissions, will not impact the same general area as the proposed plant; therefore, the fugitive emissions are not included in facility's emissions (NSR Manual at A.16; see also 54 Fed. Reg. 27,286, 27,289 (June 28, 1989); *see 40 CFR 51.166(b) (18 and see also page 48 of In RE Knauf Fiberglass, GMBH, PSD Appeal Nos. 98-3 thro' 98-20 Feb 4, 1999)*). IDEM is not aware of any other guidance from U. S. EPA. regarding these fugitive emissions. IDEM has been consistent in excluding fugitive VOC emissions from the facility's emissions for determining VOC emissions for PSD purposes in all its soybean oil extraction permits issued to date.

Comment 2: The draft permit relies on a 0.28 lb/ton of beans emission factor to calculate fugitive emissions due to equipment failure, routine maintenance, and leaks to be 236.1 tons per year. Since we did not see a justification for the selection of this emission factor in the draft permit, this calculation is a concern to EPA as the

permit allows only 0.2 tons per year margin of error for VOC emission without exceeding the PSD threshold.

Response 2: The "general" loss factor for equipment failure, routine maintenance and general leaks does not have a documented source. By definition, this factor is estimated by taking total solvent usage minus other sources of emissions, which can be quantified.

The Vegetable Oil NESHAP Project File prepared by Alpha – Gamma Technologies, Inc. identifies the following estimates for fugitive VOC emissions for the oil extraction plant:

(1) Fugitive hexane emissions from crude vegetable oils may represent 5 to 15 percent of the total facility HAP emissions.

(2) Fugitive hexane emissions from crude meal may represent 10 to 40 percent of the total facility HAP emissions.

(3) Fugitive hexane emissions from wastewater may represent 1 to 5 percent of the total facility HAP emissions.

(4) Fugitive hexane emissions from equipment leaks may represent 1 to 25 percent of the total facility HAP emissions.

(5) Operational start-ups and shutdowns may represent 10 to 20 percent of the total facility HAP emissions

(6) Operational upset conditions may represent 1 to 20 percent of the total facility HAP emissions

The applicant determined the general loss factor for equipment failure, routine maintenance and general leaks based on practical experience within the soybean crush/extraction industry and the type/size of extractor proposed. This general loss factor is for estimating purposes only. That number can be higher or lower. The Permittee has to meet the overall solvent loss ratio of 0.134 gallons per ton of soybean received. This overall solvent loss ratio is approximately 40% less than the NESHAP limit of 0.2 gallons per ton of soybean received for new soybean plants. This overall solvent loss ratio gives the Permittee the flexibility to reduce the VOC emissions from all parts of the plant.

Comment 3: Condition D.3.4 allows Louis Dreyfus to emit more during the first year (i.e. a SLR of 0.20). It seems this allowance however will cause them to trip the PSD VOC emission threshold?

Response 3: During facility start-ups and shutdowns, liquid solvent is drained from the process equipment and ambient air is blown through the equipment to purge all solvent vapors. All oil extraction plants experience operational start-ups and shutdowns from time to time. In the first year, the oil extraction plants experience more start-ups and shutdowns resulting in more fugitive VOC losses. The first year is the learning curve for the plant personnel. Since these start-ups and shutdowns are fugitive emissions, these emissions will not cause this source to equal or exceed the PSD threshold. However, Louis Dreyfus has agreed to only take an extra 11

tons of hexane use in the first year, resulting in a solvent loss ratio of 0.136 gallons of hexane per ton of soybean received or a total of 643.7 tons per year of hexane use for the first year. The BACT analysis has been revised as follows:

For consistency and clarity all references to soybean is as received. The Office of Air Quality has revised the BACT and permit Condition D.3.4 for this plant as follows:

Technical Support Document (TSD)

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

This Addendum to Technical Support Document becomes part of the Technical Support Document.

Best Available Control Technology (BACT) Analysis

The Office of Air Quality has determined from the analysis that BACT for this plant is as follows:

(a) BACT for the soybean oil extractor, meal dryers, and meal cooler shall be as follows:

Facility	Control	VOC (Hexane) Emission Limit
Oil extractor	Mineral oil absorber	0.048 pounds per ton of soybean received and 9.3 lbs/hr
Meal dryers and cooler (vent to the same stack)	None	0.03 gals/ton of soybean received and 32.8 lbs of hexane/hr
Plant wide	First year	~~0.20~~ **0.136** gals/tons of soybean received
	After first year	0.134 gals/ton of soybean received

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(b) The overall solvent loss ratio of 0.134 gallons per ton of soybean ~~crushed~~ **received** from the whole plant is also part of the BACT.

First year solvent loss ratio is established as ~~0.2~~ **0.136** gals/ton of soybean received.

This is a new plant and this is established to allow time to learn the operations of the plant.

Maximum annual soybean received	1,686,300 tons/yr

Permit

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT Requirements):

(a) The Permittee shall limit the volatile organic compound (VOC) emissions from the soybean oil extraction process as follows:

Facility	Control	Emission Limit
Oil extractor process	Mineral oil absorber system	0.048 pounds of VOC per ton of soybean received and 9.3 lbs/hr
Meal dryers and meal cooler	None	0.03 gals of VOC/ton of soybean and 32.8 lbs/hr
Overall solvent loss ratio	1st twelve months operation	~~0.20~~ **0.136** gal VOC/ton soybean ~~processed~~ **received**
Overall solvent loss ratio	After 1st twelve months	0.134 gal VOC/ton soybean ~~processed~~ **received**
Maximum annual soybean ~~processed~~ **received**		1,686,300 tons/yr

Upon further review, the OAQ has decided to make the following revisions to the permit.

Permit

The following section of the Boiler MACT, 40 CFR 63, Subpart DDDDD, which was left in inadvertently, has been deleted.

(a) There are no small gaseous fuel units in D.5 section.

~~§63.7506 (c) The affected boilers listed in paragraphs (c) (4) of this section are not subject to the initial notification requirements in §63.9(b) and are not subject to any requirements in this subpart or in subpart A of this part (*i.e.*, they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in subpart A of this part.~~

~~(4) New small gaseous fuel units.~~

(b) There is no continuous opacity monitoring system required for the main boiler.

§ 63.7555 (b) For each CEMS, you must keep records according to paragraphs (b)(1) through (5) of this section.

(1) Records described in §63.10(b)(2) (vi) through (xi).

~~(2) Monitoring data for continuous opacity monitoring system during a performance evaluation as required in §63.6(h)(7)(i) and (ii).~~

Table 10 § 63.8(c)(4)(i)	~~Continuous Monitoring System (CMS) Requirements.~~	~~Continuous opacity monitoring system must have a minimum of one cycle of sampling and analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period.~~	~~Yes.~~
§ 63.8(g)(1)-(4)	~~Data Reduction~~	~~Continuous opacity monitoring system 6-minute averages calculated over at least 36 evenly spaced data points; and continuous emissions monitoring system 1-hour averages computed over at least 4 equally spaced data points.~~	~~Yes.~~

Technical Support Document

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

This Addendum to Technical Support Document becomes part of the Technical Support Document.

The DTDC meal dryers and cooler are also subject to 40 CFR 64 for PM and PM_{10}.

CAM Requirements (40 CFR 64)

The DTDC dryers and cooler are pollutant-specific emissions units as defined in 40 CFR 64.1 for PM/PM_{10}:

(a) each with the potential to emit before controls equal to or greater than the major source threshold for PM/PM_{10},

(b) are subject to an emission limitation or standard for PM/PM_{10}, and

(c) uses control devices as defined in 40CFR Part 64.1 to comply with the emission limitations.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the DTDC dryers and cooler.

The pollutant-specific emission units are not "large units" as described in 40 CFR 64.5. Therefore, the Permittee shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

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