

Facility Name: **Cargill's Gainesville Vegetable Oil Mill & Refinery**

City: Gainesville

County: Hall

AIRS #: 04-13-139-00002

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Application #: TV- 9380

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Date Application Received: October 22, 1996, July 14, 2000 (update)

Date Application Deemed  
Administratively Complete: February 27, 1997

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Date of Draft Permit: December 11, 2000

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Permit No: 2075-139-0002-V-01-0

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<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Cargill's Gainesville Vegetable Oil Mill & Refinery** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

**I. Facility Description**

A. Facility Identification

1. Facility Name: Cargill's Gainesville Oil Mill & Refinery
2. Parent/Holding Company Name: Cargill, Incorporated
3. Previous and/or Other Name(s): None
4. Facility Location: 862 West Ridge Road
5. Attainment or Non-attainment Area Location

The facility is located in an Attainment area. However, the facility is located adjacent to the 13 county Metro Atlanta Non-Attainment area for Ozone. It is believed to be in an area that contributes to non-attainment in the 13 county Metro Atlanta area. The facility is located in a county that borders a Ozone non-attainment area.

6. Class I Area Impacts

The facility is located within 100 miles of the Cohutta Class I area.

B. Site Determination

There are no other facilities which could possibly be contiguous, adjacent and under common control of the vegetable oil mill and the edible oil refinery.

C. Existing Permits

**Table 1: List of Current Permits, as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2075-069-10745	5/10/91(original issue date), 11/15/91,9/24/93,11/28/95,9/24/96 (amended dates)		X
2075-069-10745	1/15/93, 10/31/96	X	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
2075-069-10745	1/15/93 amendment and 10/31/96 permit amendment were not listed in the application. The Jan. 93 amendment involved installation and operation of two new

**Table 2: Comments on Specific Permits**

Permit Number	Comments
	baghouses to control fugitive emissions from bean meal storage tanks A and B. The Oct. 96 amendment deleted condition 5 from the permit as it was not needed anymore.

D. Process Description

1. SIC Code(s)

Indicate the Major and Other SIC Code(s), if applicable.

Major - 2075 (Soybean oil mill producing crude/raw soybean oil, hulls and soymeal). The facility processes soybean oilseeds primarily. The edible oil refinery can process different types of vegetable oils and produces refined edible oil from raw/crude vegetable oils. The refinery processes crude vegetable/soy oil from the oil mill and from imported crude vegetable oil from other oil mills.

Other - None

2. Description of Product(s): The vegetable oil extraction plant produces mostly raw/crude soybean oil, hulls and soymeal. The edible oil refinery produces refines crude/raw vegetable oils received from Cargill's oil mill and other oil mills (imported crude vegetable oil). The facility also contains an edible oil packaging plant that packages the refined vegetable oil from the refinery and makes ready to ship vegetable oil packages. The packaging plant does not have any emission units/sources since no refining or processing, other than packaging, takes place at the packaging plant.

3. Overall Facility Process Description

Soybeans are brought to the facility by truck and rails (98% of total receipts). The soybeans are dropped from the truck and railcar bottoms into below grade grates into conveyors that carry the beans to above ground storage tank and silos. The bean unloading/receiving is aspirated (conducted under a slight negative/suction pressure) for PM control and fugitive dust control. The dust is pulled into a baghouse (CB) via a cyclone (CA). The cyclone and baghouse is located atop the unloading area.

The facility has 4 silos and 4 storage tanks to store the wet product. The bottom collection from cyclone (CA) is sent to the storage silos through a cyclone (CC). Emissions from cyclone (CC) are exhausted into a baghouse (CD). Emissions from the conveyor system connecting the silos and storage tanks go to a baghouse (C1). The baghouse (CD) also handles emissions occurring from the transportation of wet and dry beans to and from the storage silos.

The soybeans next go through precleaning operations assisted by Kice aspirators, sifters and destoners to remove pods and other trash. Two cyclones (CE and CF) control emissions from two Kice aspirators (L5A

and L6A); emissions from the cyclones are exhausted through a baghouse (CG). A pod grinder (L87A) receives material from the bottom collection of cyclones (CE, CF and CJ) as well as the bottom collection from the baghouse (CD). A cyclone (CH) separates the pods and dust and directs it to the hull storage tank B (P10B). Emissions from this cyclone are directed to the baghouse (CG).

Wet soybeans are then dried in one of two column dryers; a Carter Day steam heated dryer (L10A) and an Aeroglide hot air heated dryer (L11A) burning natural gas/propane. The drying process uses steam or hot air to reduce the moisture of the wet soybeans to about 10%. The Carter Day dryer has screen vents, which emit particulate matter whereas the Aeroglide dryer is connected to the cyclone (CJ). The dried beans are sent to one of the four dry product storage silos. Emissions from the conveying of drybeans are directed to baghouse (CD).

The dry beans are conveyed from the dry product silo to a classifier (P01A) and a cracking mills (P01B). Emissions from the classifier and the cracking mills are exhausted through a baghouse (CK). The cracked soybeans go to one of the two Kice aspirators (P02A and P02B), which do the primary hull separation. The clean product is sent to a rotary conditioner (P12A). Two cyclones (CL and CM) pick up the hulls and feed it to a secondary sifter classifier (P05A) and a secondary Kice aspirator (P05B) for secondary dehulling operation. The emissions from the cyclones as well as the secondary aspirator are exhausted through a baghouse (CN). Hulls from the baghouse (CN) are sent to two grinders (P08A and P09A). Two cyclones (CAH1 and CAH2) transport the ground hulls to the hull storage tank B (P10B). Emissions from the cyclones go to baghouse (CN). A baghouse (CQ) mounted on top of the hull storage tank controls displaced dust emissions resulting from filling the tank. The facility has another hull storage tank (M02A) located next to the meal storage tanks for shipping out the hulls.

After dehulling, the soybeans pass through a rotary conditioner (P12A). Emissions from the conditioner are directed into a flaking operation. The dehulled soybeans are flaked. PM emissions from the flaking are controlled by a cyclone (CP). The extraction process consists of extracting the soybean oil from the flakes by mixing the flakes with hexane in large automated mixing vessel. The extraction process results in miscella (soybean oil dissolved in Hexane) and soymeal from the defatted soyflakes. The miscella is next distilled to separate soyoil from hexane. Hexane is also recovered from the soyflakes using steam in a desolventizer/toaster unit. 99.9% hexane is removed from the oil and the defatted flakes. The rate of hexane consumption is 400 gal./min. Since 1997 the facility started using an isomer of hexane that has less than 1% n-Hexane (a HAPs). Thus emissions of n-hexane from the extraction plant/oil mill has been drastically reduced to less than 10 tons/year. However, emission of n-Hexane from the entire facility including the edible oil refinery exceed the HAPS major threshold of 10 tons/year making the facility a major source for HAPs emissions subjecting the facility to the newly promulgated Vegetable Oil MACT standards.

The soymeal from the extraction plant next goes to a meal dryer (P17A). PM emission from the dryer is controlled by cyclones (DC01 to DC04). Soymeal is next cooled in a cooler (P15A). PM emissions are controlled by a cyclone (CT). The cooled soy meal is passed through a sifter (P11A) and grinder (P11B) and then stored in one of the three meal storage tanks (M06A to M06C). Baghouse (CU) controls emissions from the meal sifter and grinder. Baghouse mounted on storage tanks control PM emissions from the air displaced during the tank filling.

The truck loadout is enclosed except for the opening on two sides to allow trucks to enter and leave the loadout area. Hard plastic curtains hang from the roof at the open ends and controls release of fugitive dust during the meal and hull loadout operations.

The refining of the crude/raw soy and vegetable oil takes place in a separate building from the extraction plant and consists of bleaching, deodorizing, hydrogenation and blending operations.

Most of the residual hexane is stripped from the oil during the deodorization process. Most of the hexane emissions in the refinery occur in the hot well. Hexane, water and dirt are removed from the refined vegetable oil. The boilers in this area use natural gas for normal operations with distillate oil being the backup fuel. However, both the oil mill and the refinery are located within the facility fence line. A hydrogen reformer (HR01) is located in the refinery complex and is part of the hydrogenation operation in the refinery. The reformer produces hydrogen gas that is used in the hydrogenation process. The reformer also generates steam that is used in the facility in various operations such as drying of the raw soybeans.

The oil mill has a Henry Vogt spreader stoker coal-fired boiler to meet the steam demands of the extraction plant and the refinery. The boiler has a input heat rating of 145 MMBtu/hr and steam production capacity of 120,000 lbs/hr. A six compartment reverse air baghouse controls PM emissions from the baghouse. The baghouse has fiberglass (Nomex) bags. The coal-fired boiler does not have a backup fuel. The coal coming in by rail is unloaded over a grate and is conveyed to storage silos. The ash generated in the boiler is stored in an ash silo located next to the boiler. The York-Shipley Standby boiler B002 is equipped to use soy-emulsion oil as a backup fuel in addition to #2 fuel oil. Natural gas is the primary fuel for this boiler.

4. Overall Process Flow Diagram (optional)

The process flow diagram submitted along with the application spans over six pages and is referred herein for the interested reader.

E. Regulatory Status

1. PSD/NSR:

The coal-fired boiler (Source code B001) was installed in 1980 and is subject to PSD. This boiler has emission limits for PM and SO<sub>2</sub>.

The facility is major for PM, PM-10, SO<sub>2</sub>, CO, VOC and NO<sub>x</sub>.

The facility has taken limits on the amount of imported crude vegetable oil it will process at the refinery and the hexane concentration in the imported crude oil to avoid PSD review for VOCs. The facility has also limited the hexane consumption at its oil extraction unit in the oil mill.

2. Title V Major Source Status by Pollutant

The facility has not requested a Synthetic Minor (SM) status for any pollutant.

**Table 3: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	y	✓		
PM <sub>10</sub>	y	✓		
SO <sub>2</sub>	y	✓		
VOC	y	✓		
NO <sub>x</sub>	y	✓		
CO	y	✓		
TRS	n/a			
H <sub>2</sub> S	n/a			
Individual	y		✓	
Total HAPs	y		✓	

3. MACT Standards: The facility is subject to 40 CFR 63, Subpart GGGG (Solvent Extraction for Vegetable Oil Production) as of April 12, 2001. Cargill's facility is a regulated entity under the finalized regulation. This Vegetable Oil MACT was proposed in May 26, 2000. The public comment period on this MACT closed in July 25, 2000. The oilseed solvent loss factor for determining allowable HAP loss for a conventional soybean process is 0.2 gal/ton of oilseeds processed in the proposed MACT. Based on information submitted in the application, currently the permitted hexane loss factor is 0.17 gal/ton of soybean processed for the Cargill's Oil Mill in Gainesville. Thus, currently permitted HAPS emission levels are below the allowable HAPS level under the proposed MACT. The facility would have no difficulty in meeting the MACT standard for solvent loss for the solvent extraction process. The vegetable oil MACT would be the VOC RACT under Rule (tt). The extraction plant uses an isomer of hexane with less than 1% n-hexane in the extraction solvent. Thus, n-Hexane emission from the extraction plant is around 5 tons/year.

Two years ago Cargill switched to an isomer of hexane that is not a HAP. Thus, they cut down their emission of n-Hexane (a HAP) to less than 10 tons/year. However, emissions of n-hexane from the imported crude vegetable oil at the refinery make this facility a HAPs major facility. The facility is subject to all requirements of the vegetable oil MACT. The compliance ratio for the extraction process does not start until April 12, 2003. The isomer of hexane is not a Hazardous Air Pollutant (HAP) unlike n-Hexane, which is a HAP.

4. Program Applicability

Indicate if the following programs are applicable to the facility (with a “yes” or “no”).

<b>Program Code</b>	<b>Applicable (Yes/No)</b>
Program Code 6 - PSD	Yes
Program Code 8 - Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M - Part 63 NESHAP	No
Program Code V - Title V	Yes

NSPS Subpart DD is not applicable to the grain handling equipment/elevators at the facility since these equipment were installed before 1978 the applicability date for this subpart.

**Regulatory Analysis**

All applicable regulations are federally enforceable, unless indicated otherwise by a “State-Enforceable condition” label.

**II. Facility Wide Requirements**

A. None applicable.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment -

With the exception of oil mill receiving and storage, which is not a process under Rule (e), the entire Cargill’s Oil Mill not including the edible oil refinery is one process under Georgia Rule (e). EPD defines a “process” as a unit operation or combination of unit operations, which cannot be operated independently of each other. Although Cargill’s facility encompasses a combination of unit operations, its vegetable/soy oil processing and extraction plant exclusive of the refinery will be considered as one process operation since their unit operations are not independent of each other.

The facility is subject to State Rules (tt), (yy) which requires all major sources of VOC and NOx at the facility to apply RACT controls and come into full compliance on or before May 1, 2003. Cargill submitted a VOC and NOx RACT plans to the Department for approval in October 2000. The RACT proposals are still under Departmental review. The NOx RACT proposal was annual boiler tune up for optimum performance. The VOC RACT is the vegetable oil MACT that EPA will promulgate in April 2001.

- Emission and Operating Standards - There is no facility wide emission and operating standards for this facility.

C. Compliance Status: In compliance. See section VII.F for details.

- D. **Operational Flexibility:** The facility has requested that it be labeled as a vegetable oil extraction facility and an edible oil refinery even though it mostly processes soybean oil seeds for sake of retaining operational flexibility. The facility has requested operational flexibility for the crude vegetable oil refinery too even though it mostly refines crude/raw soybean oil to improve its operational flexibility. The facility has not identified any alternate operating scenario in its application. The labeling does not subject the facility to any new applicable requirements or regulations.
- E. **Permit Conditions:** None Applicable.

**III. Regulated Equipment Requirements**

A. **Brief Process Description**

The facility operations can be visualized as two independent operations. The first process is the oil extraction process from oil seeds. The second process is the refining of the crude/raw vegetable oil produced by oil mills. These two processes can be viewed as independent processes as the refinery can operate without the oil mill at the site by processing only imported vegetable oil.

The Oil Mill and the Refinery Operations are detailed in Section I D.3. and are not repeated here.

B. **Equipment List for the Process**

<b>Equipment Source Code Description</b>	<b>Pollutant Emitted</b>	<b>Applicable Rule(s)/Regulation(s)</b>	<b>Is Rule or Regulation Federally Enforceable?</b>
B001 Coal-fired Boiler	NOx, SOx, PM, CO	PSD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	yes yes
B002 York Shipley Boiler	NOx, SOx, PM, CO	391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 40 CFR 60, Subpart Dc	yes
HPB2 High Pressure Boiler 2	NOx, SOx, PM, CO	391-3-1-.02(2)(d), 391-3-1-.02(2)(g), 40 CFR 60, Subpart Dc	yes
HPB1 High Pressure Boiler	NOx, SOx, PM, CO	391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	yes
HR01 Hydrogen Reformer	NOx, SOx, PM, CO	391-3-1-.02(2)(d), 391-3-1-.02(2)(g)	yes
L01A, L02A Truck Unloading	PM	391-3-1-.02(2)(n)	yes

Equipment Source Code Description	Pollutant Emitted	Applicable Rule(s)/Regulation(s)	Is Rule or Regulation Federally Enforceable?
L12A, L16A Conveying wet and dry oilseeds to storage silos	PM	391-3-1-.02(2)(n)	yes
L10A, Carter Day Dryer	PM	391-3-1-.02(2)(b) 391-3-1-.02(2)(e), 391-3-1-.02(2)(n)	yes
L11A- Aeroglide Dryer	PM	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(n)	yes
Cracking Mills (P01B, P01C, P03D) & Flakers (P13A)	PM	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(n)	yes
X01A Mineral Oil System (extractor),	HAPS, VOC	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	yes
X02A Desolventizer/Toaster	PM, HAPS, VOC	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)(i)	yes
P17A Meal Dryer/Meal Cooler	VOC, PM	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(n)	yes
P11A Meal Sifters, P11B Meal Grinders	PM	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(n)	yes
M06A, M06B & M06C Meal Tanks	PM	391-3-1-.02(2)(n)	yes
M03A, & M03B Upper garner for hull&meal loadout	PM	391-3-1-.02(2)(n)	yes
M05A, & M05B Post- scale garner for Meal&Hull loadout	PM	391-3-1-.02(2)(n)	yes
M07A, & M07B Meal&Hull loadout	PM	391-3-1-.02(2)(n)	yes
R04A Vegetable oil Refinery	PM, VOC	391-3-1-.02(2)(b), 391-3-1-.02(2)(e),	yes

**C. Equipment & Rule Applicability**

• **Emission and Operating Caps** -

Hexane consumption limit: In order to avoid PSD review for VOCs, the consumption of Hexane by the vegetable/soy oil extraction process in the oil Mill is limited to a total of 518.1 tons per any 12 consecutive month period. Condition 3.2.1 incorporates this requirement.

Imported crude oil processing rate: To avoid a PSD review for VOCs, imported crude/raw vegetable or soy oil processed at the edible oil refinery is limited to 500 million pounds during any consecutive 12 month period. Condition 3.2.2 incorporates this requirement.

Hexane content limit in imported crude oil: The weighted average hexane concentration in the imported crude vegetable/soy oil processed at the refinery, as determined during any 12 consecutive month period, shall not exceed 100 ppm. This condition has been imposed to avoid PSD review for VOCs Condition 3.2.2 incorporates this requirement.

• **Applicable Rules and Regulations**: -

B001 Coal-fired Boiler: Cargill operates the primary coal-fired boiler that provides process steam plant wide and has heat input rating of 145 MMBtu/hr. The boiler can deliver 120,000 lbs/hr of process steam. The boiler is a spreader stoker with flyash reinjection type boiler. Emission from boiler is controlled by a six compartment reverse air baghouse.

The Boiler B001 is subject to the particulate matter limit for fuel burning equipment installed after January 1, 1972 with a heat input capacity between 10 MMBtu/hr and 250 MMBtu/hr.

[Georgia Rule 391-3-1-.02(2)(d)2(ii)]. Georgia Rule (d)2.(ii) limits particulate matter based on the following equation:  $E = 0.5 * (10/R)^{0.5}$  where

E equals the allowable particulate emission rate in lbs per million Btu heat input and

R equals the heat input in million Btu per hour.

The PM emission from this boiler is limited to 0.1 lb/MMBtu and the PM emission rate is limited to 14.5 lb/hr by the PSD permit issued to the facility.

SO<sub>2</sub> emissions are limited from this boiler by limiting the sulfur content of the fuel to no more than 1.5 weight percent, as required by the PSD permit issued to the facility. The 1.5 wt.% limit is slightly more restrictive than the 3 wt% limit under the State Rule 391-3-1-.02(2)(g)2. Condition 3.4.7 reflects the fuel sulfur limit.

Georgia Rule (d)3 limits opacity of stack emissions to less than or equal to 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent. Condition 3.4.1 reflects the requirements for the Coal-fired boiler B001.

York Shipley standby boiler B002 and High Pressure Boilers HPB1 and HPB2

The York Shipley standby Boiler (B002) and the High Pressure Boilers (HPB1 and HPB2) are subject to Rule (d) for PM and Opacity. The allowable PM emission rate is given by

391-3-1-.02(2)(d)2. The high pressure Boiler HPB1 is rated at 8 MMBtu/hr and under Rule (d) the allowable PM rate for HPB1 is 0.5 pounds/million BTU heat input.

For sources B002 and HPB2 the allowable PM rate is given by 391-3-1-.02(2)(d)2(ii) and for the boiler B002 the allowable PM rate is 0.31 lbs/MMBtu, and the allowable PM rate is 0.42 lb/MMBtu for the high pressure steam vaporizer (HPB2). The York Shipley boiler has a input heat rating of 25.2 MMBtu/hr. The high pressure boiler HPB2 is rated at 14 MMBtu/hr. The York-Shipley boiler and the high pressure boiler (Steam vaporizer) HPB2 are subject to the provisions of 40 CFR 60, Subpart Dc. Both boilers shall be fired with fuels that meet specifications of fuel oil number 1 or 2 and shall have a sulfur content equal to or less than 0.5 wt.%. Condition 3.3.1 reflects the fuel sulfur limits for the boilers. These boilers meet the applicability criteria of heat rating and installation date specified in 40 CFR 60.40c(a) (Subpart Dc regulations). Conditions 3.4.2 and 3.4.3 contain the Rule(d) requirements for boilers B002, HPB1, and HPB2.

Rule(b) Opacity limit:

The Carter-Day dryer (L10A), Aeroglide Dryer (L11A), Mineral Oil Solvent extraction system (X01A), Desolventizer/toaster (X02A), the Cracking Mills (P01B, P01C, P03D), the Flakers (P13A), Meal dryer/cooler system (P17A), and the Meal sifter/grinder system (P11A&P11B) are all subject to the 40% opacity rule 391-3-1-.02(2)(b). Condition 3.4.4 reflects this requirement.

Rule(e) PM limit from manufacturing process:

The mineral oil extractor (X01A) and the meal grinders (P11B) were installed and operated before July 1968. However, The cracking mills (P01B, P01C, P03D), Carter-Day dryer (L10A), Aeroglide Dryer (L11A), the Flakers (P13A), Desolventizer/toaster (X02A), meal dryer/cooler (P17A), and the meal sifters (P11A), are subject to Particulate Matter emission limit of Rule (e)(i) since these sources were installed after July 1968 and are considered new equipment as per Rule (e). Since the entire vegetable oil extraction process is considered as one process for the purpose of Rule (e) all of the sources in the extraction process are considered new equipment and are subject to 391-3-1-.02(2)(e)(i). Condition 3.4.5 reflects this requirement.

Condition 3.4.9 limits the emission rate of Particulate matter from the meal dryer/cooler (P17A) to 4.25 lbs/hour. This limit is a PSD avoidance limit and was imposed to avoid a PSD review for PM when the meal dryer/cooler was installed at the facility in September 1996.

Rule(g) Sulfur dioxide emission limit for fuel burning sources at the facility:

This rule applies to all boilers at the site (source codes B001, B002, HPB1 and HPB2), the Aeroglide dryer (source code L11A), and the hydrogen reformer (HR01). Compliance with the sulfur dioxide limit is demonstrated through burning of natural gas with a sulfur content of 2 grains/100 scf and by burning #1 or #2 distillate fuel oil with less than 0.5 wt% sulfur. Conditions 3.2.3, and 3.3.1 reflect this requirement.

Rule(n) Fugitive emissions Opacity limit:

The Carter Day dryer (L10A), Aeroglide dryer (L11A), Cracking mills (P01B, P01C, P03D), Flakers (P13A), Meal dryer/cooler (P17A), Meal sifters (P11A), Meal grinders (P11B), Truck unloading of oilseeds (L01A, L02A), Conveying of wet/dry oilseeds to storage silos (L12A, L16A), Meal storage tanks (M06A-M06C), Upper Garner for meal&hull loadout (M03A, M03B), Post-scale Garner for meal&hull loadout (M05A, M05B), and meal&hull loadout to truck&rail (M07A-M07B) are subject the fugitive dust Rule (n) that limits opacity from fugitive emissions to 20% or less. Condition 3.4.6 reflects this requirement.

D. Compliance Status

Section 11.10 of the permit application indicates that all sources at the facility operate in compliance with all applicable requirements.

E. Operational Flexibility

The only operational flexibility requested in the application is labeling the oil mill as a vegetable oil mill rather than as a soybean oil mill and labeling the refinery as an edible oil refinery rather than as a soybean oil refinery. The facility should be capable of processing other types of oil seeds such as rapeseed, flax, cottonseed etc. However, permittee has not provided any details of alternate operating scenarios. The rules and regulations and emission rates specified for the soybean oil processing should continue to hold under the alternate operating scenarios.

F. Permit Conditions

There are no unusual permit conditions that need to be addressed in this section.

**IV. Testing Requirements** (with Associated Record Keeping and Reporting)

A. General Testing Requirements

None of the applicable regulations require performance testing, therefore testing was not required for any of the emissions units. However, the permit does contain a condition that the Division can require that a performance test be conducted any time to determine compliance with emissions limits contained in Section 3.4.

This permit does not contain any exception to general testing requirements. Condition 4.1.2 requires Permittee to provide the Division a notice and a test plan 30 days before the source test date, to afford the Division the opportunity to review the source test plan and to witness and or audit the test if it so desires. Condition 4.1.1 requires the permittee to submit the source test results to the Division within 30 days of the test date. Test methods for determining emissions are listed in Condition 4.1.3.

**B. Specific Testing Requirements**

None applicable.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)**

**A. General Monitoring Requirements**

Condition 5.1.1 requires that all monitors be operated continuously except during breakdown and repairs. Any repairs or maintenance work should be completed in an expeditious manner so downtime is minimized. All data should be recorded during any calibration activity to document that the calibration was performed and completed properly.

**B. Specific Monitoring Requirements**

The coal-fired boiler (source code B001) is subject to PM emission limit and fuel sulfur content limit as explained in Section III. C. The PM emissions from this boiler are controlled by a six-compartment reverse air baghouse. The baghouse pressure drop is monitored to ensure its efficient operation. The opacity of emissions from the baghouse is monitored using a transmissometer. Each shipment of coal received for charging to the boiler is checked to ensure that it complies with the sulfur content limit (1.5%) in the PSD permit. The supplier's analysis of coal for sulfur content is checked in each shipment to ensure that it complies with sulfur content limit in the permit. Condition 5.2.4 requires daily visible emission checks of the baghouse. Condition 5.2.3 requires opacity of emissions from the baghouse CAD1 controlling emissions from the coal-fired boiler using a continuous opacity monitoring system (COMS). Condition 5.2.5 requires development and implementation of a preventive maintenance program for the baghouse listed in condition 5.2.4 to assure compliance with provisions of condition 8.17.1. Condition 6.2.7b stipulates monitoring the sulfur content in each shipment of coal received for firing in the boiler B001.

The boilers (Emission Units HPB1, B002 and HPB2) are all subject to Georgia Rule 391-3-1-.02(2)(d) for Particulate Matter and Opacity and Rule (g) for sulfur dioxide. In addition Boilers B002 and HPB2 are subject to the Federal NSPS 40 CFR 60, Subpart Dc. Primary fuel for each boiler is natural gas with #2 fuel oil and soy emulsion oil (for boiler B002 only) serving as backup fuel. Since these fuels are very clean burning fuels and boilers firing these fuels require little maintenance to ensure proper operation, the likelihood of the emissions limitations for Particulate Matter and Opacity being exceeded is highly unlikely. Hence, no monitoring of the PM and opacity of these boilers is stipulated in the permit conditions. Emissions from the coal-fired boiler B001 are controlled by baghouse CAD1. A Continuous Opacity Monitoring System (COMS) has been installed on the baghouse exhaust and the permit requires that all applicable performance specifications be met for the COMS. Any six-minute opacity period greater than 20 percent from the boiler controlled by the baghouse CAD1 is required to be reported as an exceedance.

Natural gas, soy emulsion oil and distillate fuel oil have low amounts of sulfur and for this reason, the boilers should be well in compliance with the Rule (g) fuel sulfur limit of 2.5 percent. No monitoring is required for compliance with the rule when the boilers are fired with natural gas or soy emulsion oil.

The fuel oil supplier certification of the fuel oil sulfur content is the required monitoring to ensure that the fuel oil fired in the boilers complies with the specification for # 2 fuel oil.

The Hydrogen Reformer (HR01) burns natural gas or propane. Natural gas and propane are clean fuels hence the Reformer is expected to comply with the PM, opacity and Sulfur-dioxide emission limits without any problem. Hence, no monitoring is required for the Reformer for compliance with Rule (d) and Rule (g).

The Carter Day Oilseeds Dryer (L10A) uses steam for drying the oilseeds. Hence, there are no emissions for the steam assisted drying process itself. The opacity and PM emissions from the drying process are expected to be low. Hence, no monitoring of the emissions from L10A is proposed to ensure compliance with Rule (b) and Rule (e). The Aeroglide dryer (L11A) is fired with pipeline quality natural gas a clean burning fuel with very low sulfur content. The sulfur content of the gas is expected to be less than 2 grains/100 scf. Hence, no monitoring of the Aeroglide dryer emissions is required for ensuring compliance with Rule (g).

The extraction unit (X01A) extracts vegetable oil from the soy flakes using a solvent extraction process. The Desolventizer/toaster unit (X02A) removes residual hexane from the soymeal. The emission from these sources is easily expected to comply with Rule (b) for opacity and with Rule (e) for PM emissions. No monitoring of emissions from these units is required due to the low opacity and PM emissions from these sources.

As described in Section II.B. of the application review, Rule (e) applies to all units/processes in the oil extraction plant except for receiving and storage operations. Emissions from the cyclones venting to atmosphere are subject to Rule (b). PM emission rates from the cyclones venting to atmosphere are subject to Rule (e). Proper operation and maintenance of the cyclones will assure that emissions are below applicable limitations. Weekly visual inspections of the cyclones are required to ensure proper operation and maintenance. Reportable excursions are specified.

Condition 5.2.1 specifies weekly operation and maintenance checks for the Meal Dryer/Cooler Cyclones DC01, DC02, DC03, and DC04, the Aeroglide dryer screen cleaning Cyclone (CJ01) and the flaker Cyclone (CP01). Specific checks include but are not limited to checking cyclone exterior for holes, hopper checks for bridging and plugging, and screw conveyor checks to ensure proper removal of dust removal.

Many of the emission units at the facility are controlled by baghouses. Proper operation and maintenance of baghouses will assure compliance with the applicable particulate matter emission limitations under Rule (e) for new and existing sources. Visible emissions from the baghouse are a good indicator of its performance. Therefore, a daily check of visible emissions is required for each baghouse that vents to the atmosphere. Any determination of visible emissions requires corrective action to be taken. For each of the baghouses except CAD1, which controls emissions from the coal-fired boiler B001, any two consecutive occurrences of visible emissions must be reported. In addition to the daily visible emissions checks, a preventive maintenance program for the baghouse is required to be developed consisting of a weekly measurement of pressure drop across each baghouse and certain maintenance checks. The preventive maintenance plan is subject to review by the Division.

The Meal Dryer/Cooler (P17A) is subject to a PSD avoidance limit (in addition to being a part of the larger Rule (e) process) of 4.25 lb/hour of particulate matter. PM from the Meal Dryer/Cooler is controlled by a series of four cyclones (DC01, DC02, DC03, and DC 04). As described above for cyclone monitoring to verify compliance with Rule (e), proper operation and maintenance of the cyclones will reasonably assure compliance with the PSD avoidance limit. Daily visual inspections of the cyclone emissions and the cyclones are required and reportable excursions are specified in Condition 5.2.1

The refinery operations are subject to Rule (e) for PM emissions. This regulation directly affects operation of the clay storage silo operations. Monitoring of these operations are required to ensure that no more than 10,000 tons of clay are stored and loaded in the silos each year.

#### Associated Record Keeping and Reporting

Records of all data collected in accordance with the required monitoring protocols discussed in Section 5.2 shall be maintained by Permittee and shall be submitted semi-annually.

## VI. Other Record Keeping and Reporting Requirements

### A. General Record Keeping and Reporting Requirements

Section 6.1 of the Permit contains general requirements for the maintenance of all records for a period of five years unless otherwise specified by an applicable requirement following the date of entry and the prompt reporting of all information pertaining to deviations from applicable requirements. The submission of written reports (semiannually) of any failure to meet an applicable emission and/or any failure to comply with or complete any work practice or standard contained in this permit is also required. Condition 6.1.7 requires the Permittee to report any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of monitoring.

### B. Specific Record Keeping and Reporting Requirements

#### 1. Individual Equipment:

- i) Conditions 6.2.4 and 6.2.6 require the Permittee to monitor and record the sulfur content of the fuel fired in the Coal-fired boiler (B001), York-Shibley standby boiler (B002), and high pressure boilers HPB1 and HPB2. Permittee is required to retain the records for at least five years unless otherwise specified by an applicable requirement. Monitoring is required in the form of vendor fuel certification of the sulfur content of the fuel fired in the boilers. Condition 6.2.7 requires permittee to submit vendor certification for the fuel oil/ coal burned in the boilers HPB1, HPB2, B002 and B001.
- ii) Condition 6.2.1 requires permittee to record consumption of hexane at the oil extraction unit each month and calculate total hexane consumed in the last 12 consecutive months every month in the reporting period.
- iii) Condition 6.2.2 requires permittee to record the amount of crude/raw vegetable oil received for processing from outside oil mills (imported oil) at the refinery each month and total imported crude oil processed in the last 12 consecutive months for each month in the reporting period.
- iv) Condition 6.2.3 requires permittee to calculate weighted average concentration of hexane in the imported crude oil each month and the weighted average concentration of hexane in the imported crude oil for the last twelve consecutive months, for each month in the reporting period.
- v) Condition 6.2.5 requires permittee maintain monthly records of fuel consumption in boilers B002 (the York-Shibley standby boiler) and the high pressure boiler HPB2. This recordkeeping requirement ensures compliance with the NSPS Subpart Dc requirement that apply to these two boilers.
- vi) A requirement is included (Condition 6.2.8) to maintain a record of all actions taken to suppress fugitive dust from paved or unpaved roads, storage piles, grain handling equipment or any other source of fugitive dust to show compliance with Georgia Rule 391-3-1-.02(2)(n).

- vii) Condition 6.2.10 requires permittee to develop and maintain a written plan for handling and disposal of PM captured by the air pollution control equipment for the soybean processing unit and for the coal-fired power plant. The plan shall focus on minimizing fugitive dust during disposal of fine particulate matter.
- viii) Condition 6.2.11 requires permittee to calculate Compliance Ratio (CR) as specified in the Vegetable oil MACT 40 CFR 63.2840.
- ix) Condition 6.2.12 requires permittee to submit an initial notification by August 12, 2001 and a notification of the compliance status within 60 days after the initial 12 operating months during which compliance ratio is determined each month as specified in 40 CFR 63.2860.
- x) Condition 6.2.13 requires submission of various reports specified in the vegetable oil MACT.

## **VII. Specific Requirements**

### **A. Operational Flexibility**

Operational flexibility does not need to be incorporated into the Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Permit Application. The only operational flexibility requested is in labeling of the oil mill and the refinery as a vegetable oil mill and an edible oil refinery.

### **B. Alternative Requirements**

There are no alternative requirements that need to be incorporated into this Title V Permit.

### **C. Insignificant Activities**

See section 4.10 of the Title V permit application or attachment A of the permit for details of insignificant sources and activities. There are no unusual issues pertaining to the insignificant sources at the site.

### **D. Temporary Sources**

Cargill has not requested to operate any temporary sources at the site.

### **E. Short-Term Activities**

None applicable.

### **F. Compliance Schedule/Progress Reports**

No non-compliance issues were listed in section 11.10 of Title V application. All sources at the facility are currently in compliance with all applicable Air Quality Regulations. Therefore, no compliance schedule or progress reports are included in the permit. This conclusion is reinforced by the latest inspection report on this facility and by the compliance certification included along with the permit application.

G. Emissions Trading

The facility is not currently involved in any emissions trading program.

H. Acid Rain Requirements

The facility is not subject to acid rain requirement regulations (Title IV). No Title IV conditions are included in this permit.

I. Prevention of Accidental Releases

The facility is not subject to prevention of accidental release regulations.

J. Stratospheric Ozone Protection Requirements

The facility has indicated that they may be subject to Title VI Stratospheric Ozone Protection Requirements. These requirements do not appear to be applicable to the facility's activities at this present time. The facility does not appear to handle any refrigeration or CFC compounds at this time that make it subject to the Stratospheric Ozone Protection Requirements.

K. Pollution Prevention

No pollution prevention requirements have been incorporated in this Title V permit.

L. Specific Conditions

This section is included in the permit just in case there are applicable requirements, which need to be included in the Title V Permit, that do not fit in any other section of the permit. No such conditions were identified for this facility, and therefore, this section is not applicable.

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

## Addendum to Narrative

The draft Title V Permit was public noticed in the "The Times" Gainesville, GA newspaper on May 30, 2001. The public comment period on the draft permit ended on June 29, 2001. Comments on the Title V draft permit were received from the facility (Cargill Foods) on May 15, 2001 and from the Georgia Center for Law in the Public Interest (GCLPI) on behalf of the Newtown Florist Club of Gainesville, GA on June 28, 2001. GCLPI's comments also requested a public hearing on the draft permit. EPD held a public meeting and hearing on Cargill's Title V Draft Permit in Gainesville on December 6, 2001. Additional comments were accepted at the public meeting. EPD has responded to all comments in the addendum.

Note: All Condition numbers in Comments refer to Draft Permit Condition numbers. Condition numbers in the Response refer to Condition numbers in the final permit. Whenever the final Condition number is different from the Draft Permit Condition, the Draft Permit Condition number is included in brackets. The changed condition numbers affect Section 5 and 6 of the Permit.

### A. Comments from Cargill Foods

**Comment:** Condition 1.3 - Overall Facility Process Description: Cargill commented that the actual operations are somewhat different than those in the draft permit. Third paragraph second sentence: replace Kice Aspirators with Cleaners.

**Response:** The term Kice Aspirators was replaced with Cleaners in the final permit.

**Comment:** In the first sentence on Page 2 remove the word " a classifier (P01A)" since it is not in process.

**Response:** The word " a classifier (P01A) " was removed from the first sentence on page 2.

**Comment:** Second paragraph page 2: In line 9 add "over " before 99.9% hexane.

**Response:** The word "over " was added before 99.9% hexane.

**Comment:** In the second paragraph on Page 2 Cargill requested deletion of the sentence " The rate of hexane consumption is 400 gal/min." stating that the sentence is not critical to description.

**Response:** EPD agrees with Cargill that the sentence requested for strikeout is not critical to the process description. The sentence was deleted from the description.

**Comment:** Cargill requested addition of the term "cooler" after dryer at two places in the first sentence of the third paragraph on page 2.

**Response:** The term "/cooler" was added to dryer as requested in two places in the first sentence

**Comment:** Cargill requested deletion of the second sentence of the third paragraph on page 2. Cargill stated that the cooler (P15A) was replaced with a Dryer/Cooler unit in 1996.

**Response:** The second sentence of the third paragraph on page 2 was deleted.

**Comment:** Change “controls” to “control” in the second sentence of 4th paragraph on page 2. In the first sentence of the last paragraph on page 2 change “takes place is” with “takes place in”.

**Response:** Added “the” after controls in the second sentence of 4th paragraph on page 2. Replaced “is” with “in” the first sentence of the last paragraph on page 2.

**Comment:** Add “and truck” after rail in the fifth line of 2nd paragraph on page 3. Delete the duplicate sentences starting with “ The emissions from the cyclones and ending with shipping out the hulls.”

**Response:** Added “and truck” after rail in the fifth line of 2nd paragraph on page 3. Deleted the duplicate sentences starting with “ The emissions from the cyclones and ending with shipping out the hulls.” in the second paragraph on page 3.

**Comment:** Add “PSD” to the applicable requirements column for the mineral oil system extractor in section 3.1.

Add “and Rail” to Truck Unloading in the description column on page 5.

**Response:** “PSD” is not an applicable requirement for the mineral oil system extractor. Hence it was not added in section 3.1. Added “and Rail” to Truck Unloading in the description column on page 5.

**Comment:** Delete the extra “i” in “specification” on the last line of Condition 5.2.3.

**Response:** Deleted the extra “i” in “specification” on the last line of Condition 5.2.3.

**Comment:** The majority of the cyclones and baghouses at the Gainesville facility are used for the primary purpose of product transfer. While a secondary benefit from using pneumatic conveying is decreased particulate emissions, Cargill does not consider these pieces of equipment to be control devices. It is apparent that Cargill’s Title V permit application lists these units as controls; however, at the time of the original submittal (1996), Cargill was unclear on how to classify these units. In Georgia, other oilseed and grain handling facilities have shown that similar types of transfer equipment are used solely for the purpose of product recovery (see issued Part 70 Permit No. 2074-093-0027-V-01-0 for Mid-Georgia Processing, Vienna, Georgia, and Permit No. 2074-277-0061-V-01-0 for Chickasha of Georgia, Tifton, Georgia).

**Cargill is requesting that all baghouses and cyclones listed in section 3.1 of the permit (aside from Unit ID Nos. CAD1, CJ01, CD01, and DC01 through DC04) be considered product recovery devices, rather than control devices used to control particulate emissions.** Under this interpretation, the equipment is classified as insignificant based on emission levels, and should be placed in Attachment B of the permit (see section 7.10 of the Title V permit application for potential emission estimates for these units). The exceptions are Units DC01 through DC04 of the Meal dryer/cooler, which is significant due to volatile organic compound (VOC) emissions from solvent. Note also that Unit ID Nos. CAD1 (Coal-fired boiler baghouse), CJ01 (Aeroglide dryer cyclone), and CD01 (Oilseed conveying to silos) are control devices, used for the purpose of minimizing particulate emissions to the atmosphere and

collecting waste materials (e.g., ash, ground pods). These devices should remain as significant sources in the Title V permit.

**Response:** EPD's agrees with Cargill's position that cyclones and baghouses used for product transfer be considered as process equipment if its primary purpose is to collect products that are used in the process and air pollution control is only a secondary purpose of these process equipment. These product collectors are part of the plants physical and operational design and would be present even if there were not pollution control regulations. Conversations with Cargill confirmed that only one cyclone vents to another cyclone. Rest of the product collectors vent to the atmosphere. In the final Permit in the table in Section 3.1, the product collectors are moved to Attachment B, as emissions from the product collectors are insignificant.

**Comment:** Cargill requested changing the frequency of visible emissions from the baghouses from daily to "weekly" in condition 5.2.5.

**Response:** After consulting with the monitoring group (ISMP), the frequency of visible emission checks has not been changed in condition 5.2.4 (Condition 5.2.5 draft permit) of the final permit. This is consistent with the requirements in other Title V permits issued by EPD to vegetable oil mills.

**Comment:** Cargill requested removal of emission units P01C, P03D, and L01A from Attachment B (the insignificant source list, Generic Emission Groups Table) to avoid confusion since these sources are listed in Table 3.1 of the permit.

**Response:** Emission units P01C P03D, and L01A were removed from Table 3.1 of the permit and left in Generic Emission Groups Table in Attachment B (the insignificant sources emissions list).

**Comment:** Cargill requested increase in frequency of baghouse pressure drop readings to daily from weekly in Condition 5.2.6 and decrease in the frequency of visible emission checks from daily to weekly in Condition 5.2.5. Cargill explained that several of the vents requiring daily visible emission checks are located atop buildings and silos that are difficult to reach under normal circumstances. Cargill mentioned that readings from the ground would be difficult to take due to the height of the exhaust points and their close proximity and the requirement to meet the 140 degree sector. Cargill assured that the daily baghouse pressure drop readings are a good surrogate or substitute for the visible emission checks.

**Response:** The Division has decided not to change the frequency of visible emission monitoring of baghouse emissions (Condition 5.2.4 in final permit). The frequency of the baghouse pressure drop monitoring has not been changed in Condition 5.2.5 in the final permit. EPD believes that a reduction in the frequency of visible emission monitoring of the baghouse emission will not provide a reasonable assurance of compliance.

**Comment:** Cargill proposed the following addition to the wording in Condition 5.2.5 (Draft Permit). "Within 12 hours after corrective action is taken, the Permittee shall reinspect the unit to verify that no visible emissions exist. If visible emissions persist, then a Method 9 test will be conducted within 24 hours to determine the opacity, and the opacity will be recorded in the maintenance log. "

**Response:** Condition 5.2.4 (Condition 5.2.5 in draft permit) requires Cargill to correct any problem resulting in visible emissions from the baghouses in the most expedient manner possible and record the incident in the

daily maintenance log. Hence Condition 5.2.4 (Condition 5.2.5 in draft permit) was left unchanged in the final permit.

**Comment:** Remove boiler HPB1 from condition 6.1.7(b)(v) since this boiler is not limited to burning fuel oil with) 0.5 wt.% sulfur.

**Response:** Condition 3.2.3 c. limits fuel oil burned in the High Pressure Boiler HPB1 to # 2 fuel oil, so HPB1 should be listed in Condition 6.1.7(b)(v). Thus, Condition 6.1.7(b)(v) was not changed.

**Comment:** Cargill requested addition of the language “ opacity greater than 40%” to Condition 6.1.7(c)(ii).

**Response:** The Division disagrees with the requested language change and sees no need for the requested change. In addition to satisfying the periodic monitoring requirement for Rule (b), this condition also satisfies the periodic monitoring requirement for Rule (e). No change was made to condition 6.1.7(c)(ii).

**Comment:** Remove boiler “HPB1” from Condition 6.2.4 since this boiler is permitted to burn fuel oil with upto 2.5 wt.% sulfur.

**Response:** Condition 3.2.3 c. limits fuel oil burned in the High Pressure Boiler HPB1 to # 2 fuel oil, so HPB1 should be listed in Condition. No change was made to condition 6.2.4.

**Comment:** Cargill proposed some changes to the wording in Condition 6.2.6 to accurately reflect the sulfur content analysis for the coal sample.

**Response:** EPD wants each shipment of coal fired in the boiler to be sampled for sulfur content. Instead of sampling each shipment Cargill may sample the as-bunkered coal for sulfur content each day the boiler is fired with coal.

**Comment:** Cargill requested that the word “analyses” be used instead of “suppliers certifications” in Condition 6.2.7b since that is how the coal analysis is carried out for the purpose to demonstrating compliance with the coal sulfur limits.

**Response:** The word “suppliers certifications” was replaced with “analyses” as requested by Cargill.

**Comment:** Cargill requested that the word “imported” be added before the word “crude vegetable/soy oil” to accurately reflect the permit limits in condition 6.2.9(c).

**Response:** The term “crude vegetable/soy oil is qualified by adding “imported” as the hexane content limit applies only to imported crude vegetable/soy oil at the refinery.

**Comment:** In Attachment B, in the first row replace N/A with yes to reflect performance of such activities at the site. Cargill requested clearing of the notation N/A in the quantity column for combustion equipment, Items #1 and #3 as these activities do not occur at the facility. Under the Laboratories and testing class update the Quantity for item 1 to 6 from 5. Replace N/A with Yes in the quantity column for Industrial Operations Item 3. In the quantity column for Industrial operations Item # 10 add the quantity less than or equal to 5 to be consistent with Title V application checklist.

**Response:** N/A was replaced with "yes" to indicate cleaning and sweeping of streets in Attachment B in the Mobile source row. The term N/A was cleared in the quantity column for combustion equipment, Items #1 and #3 as requested by Cargill. The quantity for Laboratory and Testing item 1 was updated to 6. The term N/A was replaced with Yes in the quantity column for Industrial Operations Item 3. The quantity < 5 was added to Item 10 in the Industrial Operations column.

**Comments:** Attachment B - Insignificant Activities based on emission levels: Change the quantity for P05A to 2 from 1 and the number of Secondary Aspirators to 4 from 1 to reflect the actual number on site.

**Response:** The requested change in the numbers of shakers for Source P05A and aspirators for Source P05B was made.

**COMMENTS MADE BY Georgia Center for Law in Public Interest (GCPLI) on behalf of Newtown Florist Club**

The following comments were received from the GA Center for Law in Public Interest on behalf of their client Newton Florist Club on June 28, 2001 by the Air Protection Branch. The comments were divided into General Comments related to programmatic issues and Specific comments related to the Draft Permit for the subject facility. The comments and EPD's responses are given below:

**GENERAL COMMENTS:**

1. **Comment:** EPD's Public notice procedures are not adequate. The Commenter claims that EPD did not notice the draft permit by mailing such notice to a mailing list that includes people that have requested to be on a mailing list. EPD did not have such a mailing list when the draft permit was released.

**General Response:** The draft Title V permit was public noticed in the Gainesville Times on May 29, 2001. For this draft permit EPD carried out its standard procedure for public participation that it has used for draft Title Permits for the past few years. EPD has recently reviewed its Title V public participation process and has determined that it conforms to the Part 70 requirements. EPD has incorporated some of the changes suggested by the commenter in order to improve the public participation process.

**Comment:** The commenter states that it is not sufficient for EPD to put the end date of EPA's review period as 45 days after the public comment period commences. The commenter suggested that EPD add two more entries on its web page. First, EPD should create a timely entry indicating whether or not EPA has objected to the permit with a Yes, No or not decided. Second EPD should create an entry indicating the precise date that EPA's review period ends. The commenter claims that in order to comply with IA and 40 CFR 70.7(h)(2), EPD must continue to update this information on day 46 and thereafter depending on whether EPA's review period has truly expired.

**Response:** The end date of EPA's review period has been added to the web page.

A **comment** was made regarding the requirement of 40 CFR 70.7(h)(2) that the public notice, "will explain where the public can review all relevant supporting documents." The commenter writes that, while "EPD's public notice states that all relevant information is available at the Air Protection Branch in Suite 120," this "may not be accurate." This is because information "may be located in an EPD regional office" and "information relevant to accidental releases under Clean Air § 112(r) may be located at other agencies."

**Response:** As stated in the public notice, all information used in the development of the draft Title V permit (the "relevant supporting documents") is located at the Air Protection Branch.

A **comment** was made with regard to a statement in the Public Notice that "this permit will be enforceable by the Georgia EPD and the U.S. Environmental Protection Agency." The commenter described this as "inaccurate" because 42 U.S.C. 7604(a) makes it clear that the permit will be enforceable by any person. The commenter writes that the word "person" includes "an individual, corporation, partnership, association, state, municipality, and a political subdivision of a state." The commenter writes that EPD should clear up this "misstatement for at least two reasons." Firstly, "it is inherently important for the government to always provide the public with accurate information regarding implementation of air pollution laws." Secondly "EPD has recognized that public involvement in the Operating Permit program has been limited." The writer concludes that "In order to involve the public in the Operating Permit program, an important first step is to convince the public that this program is a legitimate means by which the public can participate to achieve the goal of attaining clean air. If the public is aware of their right to enforce a permit, they are more likely to put effort into ensuring that the permit is adequately protective of the environment."

**Response:** The commenter correctly noted that the permit, when issued, is enforceable by the public. However, EPD believes that the current, standardized public notice is correct as published and fulfills all the requirements for such notices as set forth by the Act and the U.S. EPA. However, EPD has examined the wording of the public notice in light of this comment and has modified it slightly for future public notices in order to properly encourage the participation of all persons.

A **comment** was made objecting to the sentence in the public notice that states "after the comment period has expired, the EPD will consider all comments, make any necessary changes and issue the Title V operating permit." The commenter counters that, "under certain circumstances, EPD is required to refuse to issue a Title V" as per 40 CFR 70.7(a). The commenter complains that our public notice "could be interpreted as an indication of EPD's predisposition to issue Title V permits regardless of whether the permit complies with the law." The commenter concludes, "Therefore, we suggest that EPD include an additional statement that it will make a determination of whether to issue the permit."

**Response:** EPD has determined that the language in the public notice meets the Public Notification requirements of 40 CFR 70.7(h)(2). EPD has not received any information to indicate that a Part 70 operating permit should be denied for this facility.

2. A **comment** was made that THE PERMIT IMPERMISSIBLY LIMITS ENFORCEMENT TO "CITIZENS OF THE UNITED STATES" by the language in Condition 8.2.1.

**Response:** The language of Condition 8.2.1 was derived from 40 CFR 70.6(b)(1), which states that Part 70 permits "are enforceable by the Administrator and citizens under the Act."

However, in order to avoid any confusion the phrase "of the United States" has been removed from Condition 8.2.1 in the final permit.

3. A **comment** was made that THE PERMIT MATERIALS SHOULD BE MADE AVAILABLE IN THE AFFECTED COMMUNITY AS WELL AS AT EPD'S OFFICE.

**Response:** Availability of all permit materials in the affected community is not required by 40 CFR Part 70 or by the Georgia Rules for Air Quality Control. EPD's policy regarding dissemination of permit materials is to post all relevant materials pertaining to Title V permits being proposed, including the Title V application, the permit narrative, the draft permit, and a copy of the public notice, on EPD's Title V web site. These electronic documents can be accessed by any citizen, anytime from anywhere as per their convenience, or at the local county, municipal and college libraries. In addition, these documents are always available at the Air Protection Branch's office in Atlanta.

In cases when electronic copies of the application forms are not available, paper copies of the permit application, permit narrative and draft permit are provided at the Air Protection Branch's main offices in Atlanta for sources located within the Atlanta metropolitan area, or at the local courthouse or EPD regional office (if the regional office is in the same county as the source in question) for sources located outside the Atlanta area.

In cases where historical permit files are requested, EPD allows members of the public to review these materials at the Air Protection Branch's main offices, during office hours (8:30 AM to 4:00 PM, Monday through Friday except State Holidays). EPD's policy on this matter is applied consistently and is fully compliant with the requirements of 40 CFR 70.7(h).

4. A **comment** was made that THE PERMIT MUST REQUIRE THE PERMITTEE TO SUBMIT ALL MONITORING INFORMATION TO EPD. The comment goes on to indicate that this must be done to allow all persons access to that monitoring data.

**Response:** The section of the United States Code cited by the commenter requires that the Permittee submit, no less than every six months, the results of any required monitoring. 40 CFR 70.6(a)(3)(iii) and Georgia Rule 391-3-1-.03(10)(d)1.(i), which incorporates this federal requirement, require the submittal, at least every six months, of reports of any required monitoring. These citations do not require the submittal of copies of all monitoring data recorded by the Permittee; rather, they require submittal of reports on the results of this monitoring. Condition 5.3.1 of the permit, for which these comments were submitted, requires such reports to be submitted semi-annually, by July 30 and January 30, for the preceding calendar semi-annual periods of each year. The permit has therefore not been modified in response to this comment.

5. A **comment** was made that THE PERMIT CANNOT LIMIT CREDIBLE EVIDENCE FROM BEING USED IN AN ENFORCEMENT ACTION.

**Response:** EPD believes that adequate provisions for consideration of credible evidence have been included in Condition 8.17.1, which states, in part, that “Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to EPD which may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.”

Furthermore, the prescribed performance test methods and procedures, which are incorporated in the Georgia Rules for Air Quality Control, contain clear provisions that, by prescribing such procedures, nothing would preclude the additional use of other credible evidence, either for compliance certifications or for establishing whether or not a source is in violation of any emissions limitation or standard. [See Rule 391-3-1.02(3)(a) and the referenced Procedures for Testing and Monitoring Sources of Air Pollutants at Section 1.3(g).] Even without this direct inclusion, the Rules themselves are cited in all permits issued by EPD.

EPD has elected not to include any additional language beyond the Rules cited above because it is our belief that any attempt to clarify the rule or define credible evidence will generally produce an impression of limiting of the scope of the rule. This we do not wish to do. EPD believes that any challenge to the authority of the U.S. EPA, State of Georgia, or any citizen with standing to use any credible evidence would easily be turned away. On the other hand, if limiting language such as that offered in the referenced EPA text were to be used, arguments to use such statements to “whither away” at the general principle could and most probably would be made. For instance, petitioners might suggest that the statement was only meant to apply to stated test methods and not work practice or other parts of the applicable standards, including the general provisions to the rules.

6. This **comment** was entitled THE PERMIT MUST REQUIRE THE PERMITTEE TO REPORT ALL EXCEEDANCES, EXCURSIONS AND EXCESS EMISSIONS.

The commenter wrote, “Condition 6.1.7 limits the exceedances, excursions, and excess emissions” which the Permittee must report and writes that this contravenes 40 CFR § 70.6(a)(3)(i) which “requires that the permit require the permittee to report all exceedances, excesses and excursions.”

**Response:** EPD disagrees. Reporting of “any” deviation is required by 3 conditions (6.1.2, 6.1.3, and 6.1.4) of Title V permits. Condition 6.1.7 merely specifies some particular deviations that we know must be reported and EPD believes that this makes the permit more practically enforceable. These template conditions were developed as part of model kaolin permit (Dry Branch Kaolin). EPA Region 4 specifically reviewed these conditions and agreed with this approach to deviation reporting as being adequate to meet Part 70 requirements. The permit has therefore not been modified in response to this comment.

7. A **comment** was made that THE PERMIT DOES NOT FULLY INCLUDE THE ACCIDENTAL RELEASE REQUIREMENTS.

**Response:** As indicated in the text of the comment, EPD includes the 112(r) requirements in Condition 7.10.1 of Title V permits. EPD has reviewed the language of condition 7.10.1 and has modified it in order to better reflect the requirements of 112(r).

**SPECIFIC COMMENTS:**

8. **Comment:** The Permit should include a compliance schedule. The commenter claims that permittee has repeatedly demonstrated a problem meeting its particulate matter standards. Releases affecting surrounding community have occurred twice in 1997 and 1998 and two more have occurred since that date. EPD should include a compliance schedule in the permit requiring Cargill to fix this problem.

**Response:** A compliance schedule is needed when the facility operates continuously out of compliance with an applicable emission limit or standard and prompt corrective action is required to bring operations into compliance. Cargill's Gainesville facility has not operated in such a mode at the time of this application or at the time of permit issuance. The Division has found Cargill to be proactive in addressing upset or excess emission incidents and taking prompt corrective action to bring operations into compliance with all applicable emission limits in an expedient manner. Compliance schedules are not included in a Title V permit for isolated incidents of excess emissions due to malfunctions or operational upsets. These incidents are addressed in Part 5.0 (Monitoring Requirements) of the permit.

Compliance schedules are not intended to address infrequent incidents of excess emissions. Part 70 states that a compliance plan shall include a narrative description of how the source will achieve compliance for requirements "for which the source is not in compliance at the time of permit issuance." 40 CFR 70.5(c)(8)(C). In preamble to this rule, USEPA further reiterated its intent to not require compliance schedules from facilities in compliance at the time permit issuance. It is unlikely that sources in compliance were intended to be subject to enforceable interim measures. In addition, complying sources have already demonstrated an ability to comply with applicable requirements. EPA believes that it would be burdensome and serve no useful purpose for these sources to submit detailed compliance schedules." 57 Fed. Reg. 32274 (July 21, 1992).

Georgia's Title V program mirrors the federal program by requiring a compliance schedule for only those sources that are not in compliance. Georgia's Title V Permit Instructions state that "if a facility is not in compliance with an applicable standard, they are required by Part 70 to provide a compliance plan." The instructions further clarify that a facility is not subject to a compliance schedule if it has come into compliance. "Past non-compliance could be related to permit requirements and to emission standards. If the facility determines that it was in non-compliance with an emission standard, it could become compliant and certify compliance with the application...." Id. at 8.

The commenter indicates that Cargill's Gainesville facility has not had an unpermitted release of dust since August 1998, over three years ago.

Because, there is no ongoing non-compliance, under federal and state rules the facility may certify compliance and is not required to propose a compliance schedule.

The Division does not agree with the commenters request to include a compliance schedule and has not done so in the Title V permit for the facility.

**Comment:** The Permittee never obtained a construction permit for the high pressure boiler. Therefore the permit should include a compliance schedule for New Source Review.

**Response:** The facility has two high pressure boilers (Source Codes HPB1 and HPB2).

Boiler HPB1 is a 8 MMBtu/hr gas fired boiler installed in 1994. Boiler HPB2 is a 14 MMBtu/hr gas fired boiler installed in 1996.

Cargill submitted a Construction Permit Application no. 6163 in November 1993 for the operation of the vegetable oil mill with the high pressure boiler HPB1. EPD determined on March 9, 1994 that a construction permit was not required for the high pressure boiler HPB1 since the rating of the boiler was less than 10 MMBtu/hr.

Cargill submitted a Construction Permit Application no. 8001 on September 1, 1995 for installation and operation of the high pressure boiler HPB2. In response to Cargill's application the operating permit no. 2075-069-10745 was amended on November 28, 1995 to allow for installation and operation of the boiler HPB2. The commenter does not specify which of the Cargill's boiler was installed without receiving a construction permit. Thus, EPD disagrees with commenter's claim that a construction permit was not obtained for the high pressure boiler. Thus, there is no need for a compliance schedule including a new source review for the facility.

9) **Comment:** The Permit Should Include a NSR. The commenter claims that the coal boiler was built after 1977 and the facility is a major source of criteria pollutants. Hence, the coal boiler must comply with NSR requirements including having the BACT (Best Available Control Technology) and doing air modeling of increment increases and on Class I airsheds.

**Response:** The Henry-Vogt Coal-fired boiler was installed at the facility in 1980. Cargill submitted an application to install and operate the coal-fired boiler on July 25, 1978. The application was reviewed using the New Source Review procedures (PSD) in place at that time and a PSD permit was issued by EPD in 1979 authorizing construction of the coal-fired boiler. EPD's review included a control technology review (BACT), ambient air analysis, and additional impact analysis, concurrent EPA Region IV review and EPD provided for public comment under the NSR regulations. EPD concluded that the coal-fired boiler could be constructed and operated as proposed in compliance with the NSR rules. In response to an Operating Permit Application from Cargill EPD issued an Operating Permit no. 2069-069-7810-O was issued on March 17, 1981 for the operation of the coal-fired boiler. Thus, the coal-fired boiler complied with NSR requirements including BACT.

10) **Comment:** Incomplete Reference to Impact on Class I Areas: The commenter claims that the facility is within 100 miles of the Great Smoky Mountains National Park. This affects the profile of the facility's emissions and should be included in the permit.

**Response:** The facility does not fall within the 100 kilometer radius of the Great Smoky Mountains National Park. The draft permit narrative mistakenly indicated miles instead of kilometers. Regardless, this is for information purposes only and does not involve any applicable requirements under Title V.

11) **Comment:** All Files Pertaining to the Permit was not made available: Permittee claims that their request to view monitoring data held at the Cargill facility, was denied by Cargill. Permittee claims that they requested EPD to view older files that included inspection reports. Permittee claims that when they went to the State Archives to view the files they were told that the files were never sent there by EPD. The commenter claims that EPD's failure to provide them with the relevant documents is a violation of 40 CFR 70.(h)(2).

**Response:** Only all files and monitoring data submitted by Cargill to EPD and EPA is made available to the general public for review. EPD cannot force Cargill to make available to the public all monitoring data held at the Cargill facility. EPD has all monitoring and inspection files related to the facilities operations starting 1991 at EPD's file room in Tradeport. Files from 1974 to 1991 containing monitoring, inspection and correspondence were sent to State archives and appeared to have been filed by year rather than by the facility. It appears that commenter's search for the requested files brought up one file without any relevant information. Just on that basis commenter concluded that the Archives don't have any monitoring or inspection data files for the facility. The Division feels that the commenter was not diligent in its file search at the Archives. EPD is not responsible for incomplete half-hearted searches made by the commenter's representative at the State Archives. None of the documents referenced by the commenter was used in drafting the Title V permit for Cargill and should not have affected the commenter's ability to comment on the draft permit. All documents used by EPD for preparing the draft permit were made available for commenter's review at EPD's Tradeport office. EPD disagrees with commenter's claim of a violation of 40 CFR 70.7(h)(2).

12) **Comment:** The permit cannot allow the permittee to submit monitoring information after the final permit is issued. The commenter points out that Condition 5.2.6 of the Draft Permit requires the permittee to submit a preventive maintenance plan for the baghouses within 60 days of the permit issue date. The commenter claims that this condition is proof that the permit does not contain adequate monitoring for the baghouses as required by 40 CFR 70.6(a)(3). Hence, the public and EPA are not going to have an opportunity to review and comment on this plan. Therefore, EPD should include conditions for monitoring baghouse emissions in a new draft permit that is renoticed for public comment.

**Response:** Condition 5.2.6 of the draft permit does not require the submission of monitoring plan of unknown requirements. This condition requires development and implementation of a Preventive Maintenance Program and specifies that it contain certain minimum elements. If the Permittee develops and implements a Preventive Maintenance Program that includes the specific elements listed in Condition 5.2.6, the Permittee will be in compliance with Condition 5.2.6. EPD has authority, as specified in this condition and other conditions of the draft permit, to review the Preventive Maintenance Plan to ensure that it complies with Condition 5.2.6. No changes are made to the permit regarding the monitoring of baghouse performance.

13) **Comment:** The Permit fails to include the relevant MACT standard: The commenter claims that Cargill is a vegetable oil mill that uses solvent extraction and is a major source of HAPs. Therefore, Cargill's permit should include this MACT standard.

**Response:** EPD agrees with commenter in that Cargill's Gainesville vegetable oil mill uses a solvent extraction process. Based on information submitted with the Title V application the facility is a Major source of HAPs as the facility wide emission of n-hexane (a HAPS) exceeds 10 tons per year. n-hexane is emitted from the soybean and cottonseed oil extraction units and from the refining of crude vegetable oil that is imported from other mills. The imported crude vegetable oil contains n-hexane. Hence, the facility is subject to the newly promulgated vegetable oil MACT 40 CFR 63, Subpart GGGG. EPA concurs with EPD that iso-hexane used at the Cargill Gainesville facility is not a HAPS unlike n-hexane. The facility uses an extraction solvent that contains an isomer of hexane that is not a HAPS. The concentration of n-hexane in the extraction solvent at Cargill is less than 1.0 wt.%.

Despite use of the iso-hexane, emissions of n-hexane (a HAPs) from the facility exceeds 10 tons per year making the facility a HAPs Major source subject to the vegetable oil MACT. Emission of n-hexane from the extraction plants is less than 10 tons/year. Hence Cargill's Final Title V permit includes the newly promulgated MACT standard for n-hexane emissions.

14) **Comment:** The permit does not adequately protect public health. The commenter claims that the permit limits on particulate matter (PM), sulfur oxides (SO<sub>x</sub>), and hexane and hexane isomers do not prevent the facility from producing air pollution that is injurious to human health and that unreasonably interferes with the enjoyment of life and use of the property of members of the Newtown Florist Club. The EPD should lower the PM, SO<sub>x</sub>, hexane and hexane isomer limits to prevent these adverse affects as required by 391-3-1-.02(2)(a)1.

**Response:** EPD disagrees with commenter that the permit does not adequately protect public health. EPD believes based on information on hand that the facility does not unreasonably interfere with the enjoyment of life and use of the property of members of the Newtown Florist Club or any other residents living or working in the immediate vicinity of the plant. EPD has set the PM, SO<sub>x</sub>, hexane and hexane isomer emission limits at levels that comply with all applicable Federal and State Air quality regulatory limits. The State does not have regulatory authority to reduce the emission limits lower than those already set in the draft permit. The commenter has provided no evidence that Cargill operates in violation of 391-3-1-.02(2)(a)1. The Federal 11th Circuit Court of Appeals found that an allegation of hexane release in 1995 from the Gainesville facility was without merit. Absent such evidence, no modification to the Gainesville facilities Draft Permit is justified. There is no basis under Title V for imposing new substantive requirements such as lower emission limits. Thus, EPD disagrees and denies commenter's request to lower the emission limits for the criteria and hazardous pollutant limits that are currently in place in the facilities operating permit.

**RESPONSE TO COMMENTS FROM NEWTOWN FLORIST CLUB SUBMITTED DURING THE PUBLIC HEARING OF THE DRAFT TITLE V PERMIT ON DECEMBER 6, 2001.**

Pursuant to a request from the Newtown Florist Club, a Public Hearing on Cargill's Draft Permit was held in Gainesville on December 6, 2001. Below are the comments and EPD responses for issues that pertain to Cargill's Title V Permit. Written comments were submitted by the Newtown Florist Club at the public hearing.

1. Commenter wants implementation of Title III Section 112(r) to be implemented and enforced in the Title V Permit for the extraction plant.

**Response:** Condition 7.10.1 has been expanded in the final permit in response to the commenters request and contains all the elements requested by the commenter.

2. VOC permit limit be set at the current reported VOC emissions and not 518 TPY.

**Response:** EPD does not have authorization under the Title V program to impose more stringent emission limits without cause. The previous limits have gone through proper review under the appropriate program and State and Federal regulations. EPD does not have the legal authority to unilaterally impose more stringent emission limits than the existing emission limits without just cause. Also hexane (not VOC) emission from the facility is limited to 518 TPY in Cargill's current and Title V Permit. Thus, EPD respectfully denies commenters request.

3. Improved monitoring and compliance for all emissions. VOC- Present system is based on beginning and ending inventories plus shipments of hexane. This system lends to manipulation and inaccuracies. It has been reported by some Cargill employees, that it is not uncommon for the supervisor to manipulate the plant process and re-inventory.

**Response:** VOC - Emissions. The present system of accounting of hexane emissions is based on a material balance of the hexane receipts and usage at the facility. The hexane loss or consumption is calculated from material balance approach. EPD is not aware of a better or more accurate system to account for hexane consumption at the plant. The commenter has not proposed any alternate system that is more accurate and less prone to alleged manipulation by plant personnel. The hexane consumption numbers are reported to EPD's compliance section on a quarterly basis and is reviewed by the Compliance staff carefully for accuracy and completeness. Under Title V, the facility operating reports are accompanied by certification by responsible personnel. Under Title V program the responsible person is supposed submit a compliance certification each year. These tighter controls subject the responsible official and Cargill to prosecution if the inspection reveals manipulation or falsification of any monitoring data.

4. Particulate and dust is prevalent in the neighborhood, yet reported numbers are low.

**Response:** The comments are not specific to emissions from Cargill. There is more than one source of particulate matter and dust in the neighborhood. The statement is general and ambiguous. What the commenter means by reported numbers is not clear to EPD. EPD cannot act on such vague statements.

5. Compliance Records should be maintained and be available to the public.

**Response:** All compliance records and reports submitted by Cargill to EPD and EPA are available to the public. EPD does not have any legal authority to make Cargill release operational and monitoring to the Public that they keep at the facility. Such internal company records are not subject to Georgia Open Records Act (GORA).

Following are the comments and EPD responses to comments by Mr. Robert Ukeiley during the Public Meeting and Hearing on Cargills Draft Title V Permit.

**Comment:** EPD should impose more stringent emission limits in Cargill's Title V Permit. These additional more stringent limits are needed to protect the health on Newtown residents. Emissions from the subject facility interferes with the Newtown residents right to use of their property and enjoyment of life. EPD must take peoples concerns into account.

**Response:** EPD believes that the existing emission limits in Cargills current and Draft Title V Permit meets all applicable State and Federal regulations and ambient air quality standards and limits for various air pollutants and protects the health and welfare of residents living near the plant. Hence, EPD does not have the legal authority to impose additional more stringent emission limits without just cause in Cargills Title V Permit.

**Comments:** Conditions 2.3.1 and 2.3.2 are not enforceable as a practical matter, since the NOx and VOC RACT are not specified in the Draft Permit. The NOx and VOC RACT Standards are vague as well.

**Response:** EPD disagrees with the commenter. Condition 2.3.1 and 2.3.2 states Cargill is subject to the VOC and NOx RACT Rules (tt) and (yy). The compliance date for these regulations is May 1, 2003. Before the deadline EPD should have the VOC and NOx RACT methods identified and in place at Cargill's Gainesville facility. Once that is done, EPD may expand these conditions to include specific RACT methods. Thus, no changes were made to these conditions in the final permit.

**Comment:** All baghouse listed in Condition 5.2.5 in the draft permit should have Continuous Opacity Monitoring System (COMS) for monitoring visible emissions just like the COMS for the coal-fired boiler. This is required due to frequent opacity violations and unreasonable PM emission from the facility.

**Response:** EPD strongly disagrees with the commenter on the need to have all baghouse visible emissions monitored by COMS. The coal-fired boiler is the biggest source of PM emissions at the facility. Whereas, the other process baghouses contribute only a small fraction to total PM emissions at the facility, hence EPD does not see the needs to have the visible emissions from the baghouses listed in Condition 5.2.4 of the final permit (Condition 5.2.5 in Draft Permit) monitored using a COMS. Such monitoring is not cost effective and would not provide any substantial environmental benefits in terms of reduced PM emissions. PM emissions from the process baghouses is very minimal. EPD is requiring daily monitoring of visible emissions from these process baghouses listed in Condition 5.2.5 of the draft permit.

No changes were made to this condition (5.2.4) in the final permit.

**Comment:** Since the facility is subject to the vegetable oil MACT, which is a significant change from the draft permit, Cargill's Title V permit should be republic noticed and the public should be given another opportunity for comment.

**Response:** Cargill's Gainesville facility is subject to the newly promulgated Vegetable Oil MACT, which is a change from the draft permit. However, these requirements are clearly spelled out in the regulation itself and are not effective until April 12, 2004.

Hence, EPD does not plan to conduct another round of public comment period for the facility. This will only serve to delay the prompt issual of Cargill's Title V permit without any added environmental benefit. EPD rejects commenters request for another round of public comment for the draft Title V Permit.

**Comment:** Condition 3.2.1 in the draft permit is not enforceable as a practical matter. Consumption of hexane in the solvent extraction process is not defined. The vegetable oil extraction process is not defined as well. Does the limit in Condition 3.2.1 include n and iso hexanes?.

**Response:** EPD disagrees with the comments. The vegetable oil extraction process is briefly described in Section 1.3 of the permit. The hexane consumption refers to solvent (hexane) loss in the extraction process and refers to hexane emissions from the extraction plant. No change is made to this condition in the final permit. The hexane limit in condition 3.2.1 includes emission of both n and iso hexane. Note that iso hexane is not a HAPS. Emission of n-hexane from the extraction plants is less than 6 tons/year.

**Comment:** 112(r) provisions not clearly listed in the permit.

**Response:** Condition 7.10.1 has been expanded in the final permit in response to the commenters request and contains all the elements requested by the commenter.

**Comment:** Cargill is the first Title V Permit hearing conducted by EPD. EPD's public outreach efforts are inadequate and public participation in future Title V Permits should be increased.

**Response:** The commenter is referred to EPD's General Response for GCLPI's General Comment 1. EPD has made changes to its public notice procedures to enhance and improve public outreach and increase public participation in the Title V Permitting process. Furthermore, the Cargill hearing was not the first public hearing conducted for a draft Title V Permit.

**Comment:** Cargills Permit does not have any odor control conditions.

**Response:** There are currently no State or Federal regulations for odor levels or odor standards. Thus EPD does not have any legal authority or standards to set and limits on odor in the Title V Permit. Thus no new condition of odor control is added to the Final Permit.

**Comment:** Monitoring condition for Condition 3.2.2b in the draft permit does not exist.

**Response:** EPD disagrees with the commenters claim there is no monitoring condition for Condition 3.2.2b. Condition 6.2.3 is the monitoring condition to assure compliance with the hexane content limits in Condition 3.

**Addendum 2:**

A comment was made by Georgia Center for law in Public Interest that The Permit Cannot Limit Credible evidence from being used in an enforcement action.

**Response:** As EPD has explained earlier in this addendum, EPD contends that nothing in the Title V Permit prohibits the use of credible evidence or information in enforcement of the Title V Permit. EPD regulations that are referenced in the Title V Permit contain specific provisions that specify such. However, EPD has decided to voluntarily add a new Condition 8.23.1, which clarifies that nothing in the permit limits the use of credible evidence or information.

**Addendum 3:** This addendum addresses some minor changes to the permit in response to EPA's initial comments on the Proposed Title V Permit for Cargill's Gainesville Oil Mill and Refinery Permit No. 2073-139-0002-V-01-0

### Significant Comments

1. Applicable Requirements – Part 63, Subparts A and GGGG:

EPA Commented that all applicable requirements of GGGG must be included in the TitleV Permit. Cargill is also subject to the requirements of Part 63, Subpart A, General Provisions as identified in 40 CFR 63.2870. Language needs to be added to the permit condition 2.2.1 stating that the permit will be reopened prior to the compliance date to incorporate the specific applicable requirements from Subpart GGGG.

**EPD Response:** Condition 2.2.1 states that Cargill's Gainesville facility is subject to all applicable requirements of 40 CFR 63, Subpart GGGG. A new condition 2.2.2 has been added to the permit that states that the facility is subject to the provisions of 40 CFR 63, Subpart A - General Provisions as identified in 40 CFR63.2870. EPD fully understands EPA's request regarding adding of language pertaining to reopening of the permit to include specific requirements of Subpart GGGG. EPD intends to reopen the permit and incorporate all applicable requirements prior to the compliance date of Subpart GGGG provisions in 2005. However, EPD has not stated its intent explicitly in the language requested by EPA. However, EPD has not stated its intent explicitly in the language requested by EPA. In fact EPD will be reopening the permit prior to the Summer of 2003 to incorporate provisions from the facilities VOC RACT plan and at that time include all specific requirements of the Vegetable oil MACT as well. This was explained to EPA's reviewer who has agreed to EPD's approach.

2. Subsumed Requirements:

EPA stated that whenever an applicable requirement is subsumed by a more stringent BACT limit, for clarification purposes, a notation identifying the subsumed requirement be added to the respective citation of authority for the more stringent limit.

**EPD Response:** EPD in the proposed permit had cited the less stringent regulation citation as the subsumed condition and had included the word subsumed in parenthesis. EPD has accepted EPA's logic and has removed the brackets around the word subsumed. It is EPD's position that the more stringent BACT limit replaces the less stringent State Regulations which become the subsumed requirement. EPD has placed the entire subsumed requirements in brackets to clearly identify the citation for the less stringent requirement. This was done for citation of Conditions 3.3.1, 3.4.1 and 3.4.7.

## General Comments

1. Condition 3.2.1: EPA recommended that the permit contain a clarifying note that the hexane emissions addressed in this condition include both n-hexane and iso-hexane.

**EPD Response:** In Condition 3.2.1 the word hexane was replaced with “both n-hexane and iso-hexane”.

2. Condition 6.2.3: EPA suggested adding the definition of the term “Sum(Vi) in this condition.

**EPD Response:** The definition of the term “Sum(vi)” was added to this condition as suggested by EPA.