

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT SIGNIFICANT MODIFICATION OF THE TITLE V - CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

Cargil, Inc.
115 South Euclid Street
Bloomington, Illinois 61701

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Springfield, Illinois

I. INTRODUCTION

This source has applied for a significant modification Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 113804AAR, Permit #96030019) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

This significant modification for this facility is being made to clarify inconsistencies on how to determine emissions. Also the boiler section was corrected to include construction permit 98060058 and removed retired boilers. All other changes were considered administrative type changes.

II. SOURCE DESCRIPTION INFORMATION

a. Location and Nature of Business

Cargill, Inc. is located at 115 South Euclid Street, Bloomington, McLean County. The Cargill-Bloomington soybean facility produces several products. The main categories of production are white flakes, grits, meal, ground hulls, and special mill run (SMR). The elevator operation involves receiving, storing, cleaning and drying soybeans. The process plant involves preparation for extraction, soybean oil extraction with hexane, white flake production, grit production, meal production, and ground hull production.

b. National Ambient Air Quality Standard Status for this Area

This source is located in an area that is in attainment of the National Ambient Air Quality Standards for all pollutants.

c. Major source status

The proposed permit is based on:

1. This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

d. Significant emission units

Emission Unit	Description	Date Constructed	Emission Control Equipment
001	Truck Unloading	Pre-1973	E802 Truck Dump DC (Pre-1973)
002	Truck Unloading	Pre-1973	E820 Main House DC (Pre-1973)
003	Rail Unloading	Pre-1973	E816 Bean Cleaning DC (May 1989)
004	Bean Storage Bins	Pre-1973	None
005	Headhouse	Pre-1973	E820 Main House DC (Pre-1973)
006	Bean Cleaning/Separating		E816 Bean Cleaning DC (May 1989) 607 Ground Hull DC (1986) E820 Main House DC (Pre-1973)
007	Pod Grinder		E816 Bean Cleaning DC (May 1989) E822 Pods Cyclone (1989)
008	Column Bean Dryer (Berico Dryer)		E820 Main House DC (Pre-1973) E816 Bean Cleaning DC (May 1989)

Emission Unit	Description	Date Constructed	Emission Control Equipment
009	Cracking Mills, Separating, Conveying		603 Secondary Dehulling DC (1990) 608 2nd Floor Dehulling DC (1986)
010	Primary Dehulling, Hull Sifter		603 Secondary Dehulling DC (1990) 605 Twin Dehulling Cyclones (Pre-1973) 608 2nd Floor Dehulling DC (1986)
011	Hull Grinding		609 Ground Hull Cyclone (Pre-1972) 607 Ground Hull DC (1986)
012	SMR System (Sifters and Conveying)		E820 Main House DC (Pre-1973) 613 Fuji Fines DC (2001) 607 Ground Hull DC (1986) 608 2nd Floor Dehulling DC (1986)
013	SMR/Hull Bins		None
014	Bean Conditioning		None
015	Flaking Mills and Expanders		601 Flaking Mill Aspiration Cyclone (Pre-1972)
016	Raw Flake Conveyers		None

Emission Unit	Description	Date Constructed	Emission Control Equipment
017	Extractor, Evaporators/Condensers, Preheaters, Hexane Storage Tanks, Crude Stripper, Various Process Vessels (e.g., flash tanks, equalization tanks)	1995 (Modifications to Extractor)	965 Mineral Oil Absorption Column (1982)
018	Crude Oil Tanks (5)		None
019	Oil Loadout		None
020	Desolventizer Toaster (Meal and Grits)		965 Mineral Oil Absorption Column (1982)
021	Wet Meal Grinders (Meal and Grits)		None
022	Meal Dryer (Meal and Grits)		None
023	Meal Cooler (Meal and Grits)		651 Meal Cooler Cyclone (1986)
024	Meal Grinding and Sifting (Meal Only)		652 Meal Grinding DC (1991)
025	Meal Bins (Meal Only)		652 Meal Grinding DC (1991)
026	PMI Bins (Meal Only)		665 PMI Dust Collector
027	Meal Loadout (Meal Only)		659 Meal Loadout Dust Collector (Pre-1973)
028	Grit Roller Mills (Grits Only)		652 Meal Grinding DC (1991)
029	Grits Dryer (Grits Only)		664 Grits Cooler Collector (1986) 612 Grits Bindeck Cyclone (1997) 652 Meal Grinding DC (1991)

Emission Unit	Description	Date Constructed	Emission Control Equipment
030	Grits Sifter/Aspirator (Grits Only)	1997	E803 Grit Sifter Receiver (1997) E821 Grit Kice Cyclone (1997) 652 Meal Grinding DC (1991) E820 Main House DC (Pre-1973)
031	Grit Bins (Grits Only)		E820 Main House DC (Pre-1973)
032	Grits (Bulk) Loadout (Grits, Beans, Splits, Seeds)		E816 Bean Cleaning DC (May 1989)
033	Flake Stripper/Condenser	2003 (Stripper Replaced)	965 Mineral Oil Absorption Column (1982) 658 Vacuum Chamber DC (2003) 657 FDS Cooler Collector (2003)
034	Flake Bins		655 White Flake Bin DC (1989)
035	Flake Truck/Rail Loadout		655 White Flake Bin DC (1989) 566 White Flake Vacuum Lock (2003)
036	Cleaver Brooks Boiler #1 Rated: 52 mmBtu/hr Primary Fuel: Natural Gas Back Up: Distillate Oil	1971 (Modified 1987)	None
037	Cleaver Brooks Boiler #2 Rated: 25.1 mmBtu/hr Burns Natural Gas Only	1998	None

III. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	859.06
Sulfur Dioxide (SO ₂)	31.88
Particulate Matter (PM)	172.60
Nitrogen Oxides (NO _x)	44.08
Hazardous Air pollutant (HAP), not included in VOM or PM	----
TOTAL	1,107.61

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does not establish any new [T1N] requirements or revised [T1R] requirements.

IV. EMISSIONS CONTROL PROGRAMS INFORMATION

As of the date of issuance of this permit, there are no such emissions control programs applicable to this source.

V. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

VI. OTHER PERTINENT INFORMATION

Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

VII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

VIII. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.