

ATTACHMENT H

**Control Technology Plan
for Bunge OPD West's
Emporia, Kansas
Conventional Soybean Plant**

May, 2006

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1.0 Introduction

This Control Technology Plan (CTP) is Attachment H to a Consent Decree signed by Bunge North America (OPD West), Inc. (Bunge OPD West), the United States, and the State of Kansas, among others. This CTP describes the emission reduction program that Bunge OPD West shall implement at its conventional soybean extraction plant which it owns and operates in Emporia, Kansas (Emporia, Kansas Plant). This CTP contains:

- (a) Identification of all units to be controlled;
- (b) Engineering design criteria for all proposed controls;
- (c) Applicable emission limits for VOC and NOx;
- (d) Monitoring parameters for all control equipment;
- (e) A schedule for installation;
- (f) Identification of units to be emission tested and definition of the test methods that will be used;
and
- (g) A procedure for setting emission limits following start-up of emissions control equipment.

2.0 Program Summary

Bunge OPD West shall implement a program with the goal of achieving a reduction of volatile organic compound (VOC) emissions from the soybean solvent extraction plant and nitrogen oxides (NOx) emissions from the Boiler No. 1 (the Cleaver Brooks Boiler) at the Emporia, Kansas Plant.

The VOC emission reduction component of this program consists of optimization of the existing solvent recovery system at its soybean processing plant. The optimization will aid the Emporia, Kansas Plant in lowering overall VOC emissions. The VOC emission limit will be established pursuant to Section 10.0 of this CTP.

The NOx emission reduction component of this program consists of Bunge OPD West installing one Low NOx Burner on its natural gas Boiler (No. 1) at its Emporia, Kansas Soybean Plant. If the program reasonably meets the design criteria in Section 5.0 of this CTP, Bunge OPD West will operate the Low NOx burner according to the schedule in Section 8.0 of this CTP. The emission reduction benefits from this NOx project will be addressed in the final NOx emission limit for the boiler, which will be established pursuant to Section 7.0 of this CTP.

3.0 Process Flow Diagrams

Diagram 3.1 General Process

The following process block diagram presents a general representation of the solvent extraction process at a typical Bunge OPD West vegetable oil solvent extraction plant.

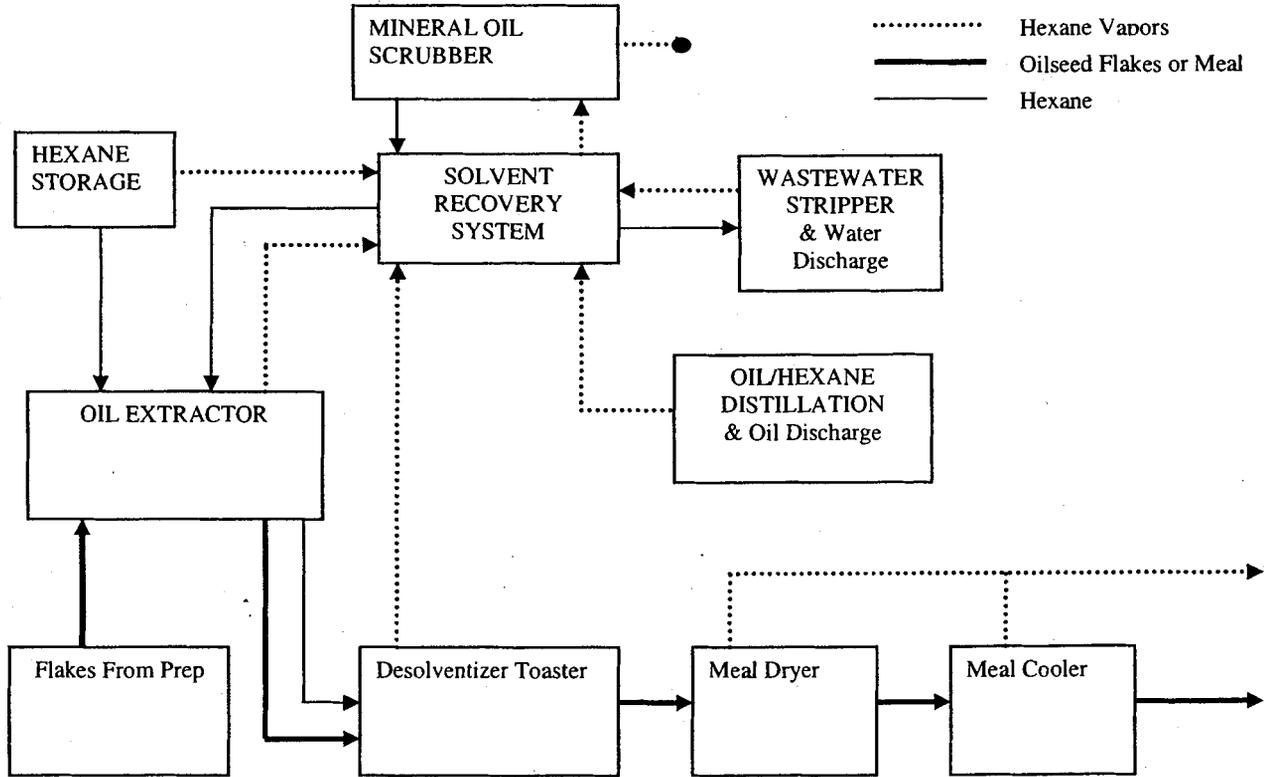
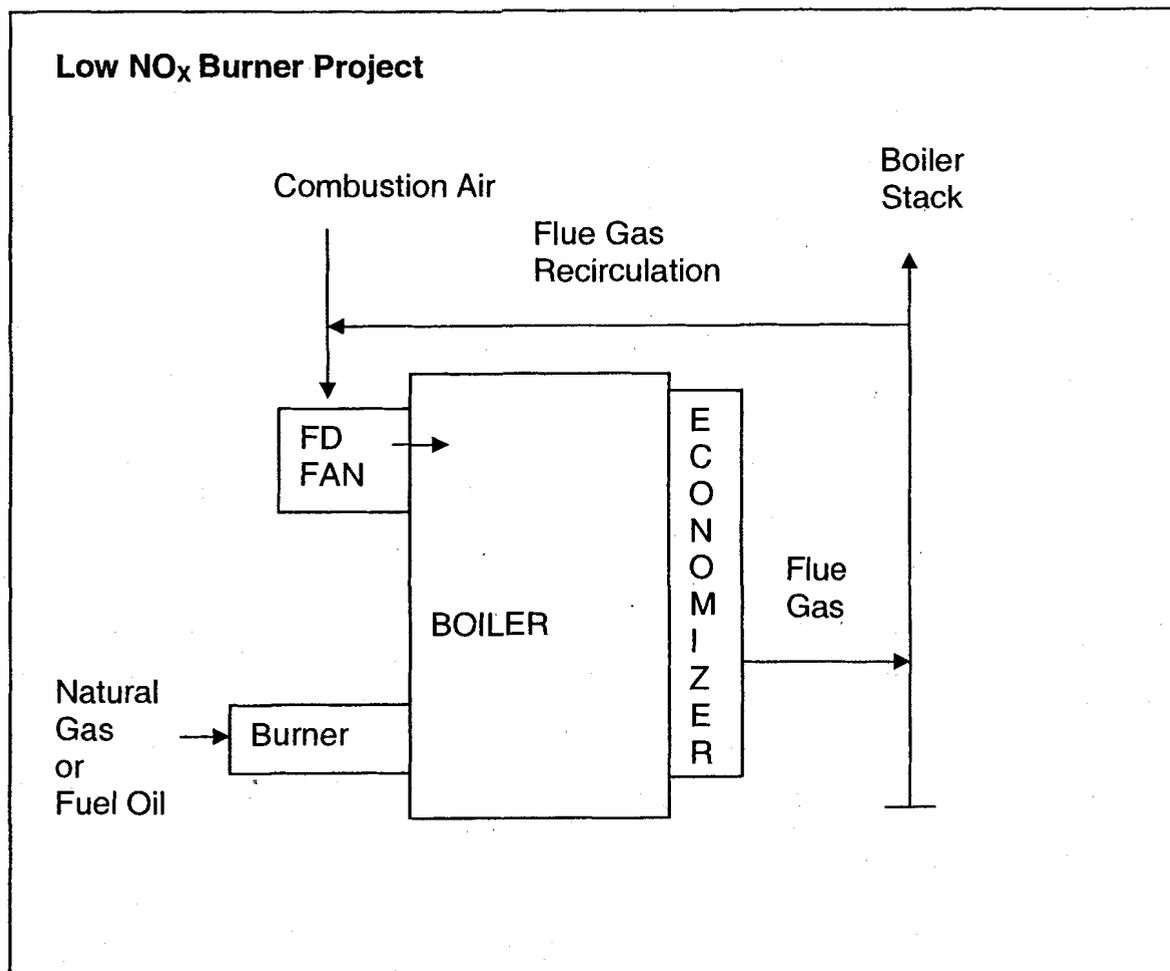


Diagram 3.2. Process Flow Diagram for Boiler and Low-NOx Burner

The following flow diagram presents the affected emission unit and associated control technology.



Install Low NO_x Burner on Boiler to Control Nitrogen Oxides (NO_x)

One Low NO_x Burner will be installed on the Cleaver Brooks Boiler (Boiler No.1) at the Emporia, Kansas Facility to control NO_x emissions associated with burning natural gas. Boiler No. 1 has the capability to burn fuel oil as an alternative fuel. Permitted limits and requirements associated with the use of fuel oil remain in place and are not changed by the installation of the control equipment.

4.0 Emission Units Requiring Pollution Control Equipment

The following emission units and control equipment have been designated as affected units in the Consent Decree and have emission limits requiring either pollution control technology or alternative projects designed to reduce emissions. Changes to the requirements listed in the following table may be considered non-material modifications under Paragraph 5.b. of the Consent Decree for the Emporia, Kansas Plant, provided Bunge OPD West (1) achieves the emission limits specified in this CTP and the Consent Decree and (2) obtains prior written approval of the change(s) from EPA and the Kansas Department of Health and the Environment (KDHE) as provided in Paragraph 5.b. of the Consent Decree.

Emission Unit Description	Control Equipment/Optimization Description
Boiler No. 1 - Natural Gas ⁽¹⁾ (EU-14)	Low NOx Burner (NOx)

⁽¹⁾ Bunge OPD West has two (2) boilers at the Emporia, Kansas facility. Boiler No. 1 serves as the primary boiler for the Emporia, Kansas facility and typically burns natural gas. Boiler No. 2 (EU-13) will serve as a backup to Boiler No. 1. Both Boiler No. 1 and Boiler No. 2 have the capability to burn fuel oil as an alternative fuel. Permitted limits and requirements associated with the use of fuel oil remain in place and are not changed by the installation of the control equipment.

5.0 Engineering Design Criteria for Pollution Control Equipment

Bunge OPD West shall report any deviation from the design criteria listed here in the semi-annual reports required by Paragraph 47 of the Consent Decree and as required under other state and federal rules. Note that the specific design criteria listed here are preliminary and subject to change pending development of additional data. Changes to the requirements listed in the following table may be considered non-material modifications under Paragraph 5.b. of the Consent Decree for the Emporia, Kansas Plant, provided Bunge OPD West (1) achieves the emission limits specified in this CTP and the Consent Decree and (2) obtains prior written approval of the change(s) from EPA and KDHE as provided in Paragraph 5.b. of the Consent Decree.

Emission Unit Description	Control Equipment/Optimization Description	Design Criteria Targets
Boiler No. 1 - Natural Gas ⁽¹⁾ (EU-14)	Low NOx Burner (NOx)	Heat Input: 92.264 MMBtu/hour NOx Emission Rate: ≤ 0.04 lbs/MMBtu ⁽²⁾

⁽¹⁾ Bunge OPD West has two (2) boilers at the Emporia, Kansas facility. Boiler No. 1 serves as the primary boiler for the Emporia, Kansas facility and typically burns natural gas. Boiler No. 2 (EU-13) will serve as a backup to Boiler No. 1. Both Boiler No. 1 and Boiler No. 2 have the capability to burn fuel oil as an alternative fuel. Permitted limits and requirements associated with the use of fuel oil remain in place and are not changed by the installation of the control equipment.

⁽²⁾ The estimated NOx emissions reductions will be approximately 25 tons per year for Boiler No. 1, based on the difference between the current allowable NOx emission limit to the annual maximum NOx emissions after installation of the Low NOx Burner.

NOx Allowable = 40.4 tons/year
Emission Limit

NOx Emissions = 0.04 lbs/MMBtu x 92.26 MMBtu/hr x 24 hrs/day x 7 days/wk x 51 wks/yr x 1ton/2000 lbs after control
 = 15.81 tons/yr

NOx Emissions = 40.4 tons/yr – 15.81 tons/yr = 24.59 tons/year
 Reduction

6.0 Monitoring Parameters for Pollution Control Equipment

Beginning no more than 30 days following startup of the control equipment listed in Section 4.0 of this CTP or thirty days after lodging of the Consent Decree, whichever is later, Bunge OPD West shall monitor the parameters in accordance with the Emporia, Kansas Plant's permits.

7.0 Emission Limits

The table below lists the emissions limits that must be met pursuant to the requirements of this CTP and the Consent Decree. Bunge OPD West shall report any deviation from emission limits in the semi-annual reports required by Paragraph 47 of the Consent Decree and as required under other state and federal rules.

Emission Unit Description	Control Equipment/Optimization Description	Pollutant	Emission Limit(s)
Boiler No. 1 - Natural Gas ⁽¹⁾ (EU-14)	Low NOx Burner	NOx	0.04 lb/MMBTU
Conventional Soybean Extraction System	N/A	VOC	Solvent Loss Ratio ⁽²⁾

⁽¹⁾ Bunge OPD West has two (2) boilers at the Emporia, Kansas facility. Boiler No. 1 serves as the primary boiler for the Emporia, Kansas facility and typically burns natural gas. Boiler No. 2 (EU-13) will serve as a backup to Boiler No. 1. Both Boiler No. 1 and Boiler No. 2 have the capability to burn fuel oil as an alternative fuel. Permitted limits and requirements associated with the use of fuel oil remain in place and are not changed by the installation of the control equipment.

⁽²⁾ See Section 10.0, Proposed and Final Emission Limits.

8.0 Schedules for Emission Reduction Projects

The following schedule implements Paragraph 27 of the Consent Decree:

Emission Reduction Project	Schedule
Installation and Operation of Low NOx burner on Natural Gas-Fired Boiler No. 1 (EU-14)	December 31, 2005

9.0 Pollution Control Equipment Performance Test Schedule and Test Methods

By no later than 180 days after installation of the Low NOx burner required by Sections 4.0 and 5.0 of this CTP, Bunge OPD West shall conduct the following performance testing.

Emission Unit / Pollution Control Device	Pollutant(s) Tested	Test Method
Boiler No. 1 - Natural Gas ⁽¹⁾ (EU-14)	NOx	As applicable, Methods 1, 2, 3A or B, 4, and 7E

⁽¹⁾ Bunge OPD West has two (2) boilers at the Emporia, Kansas facility. Boiler No. 1 serves as the primary boiler for the Emporia, Kansas facility and typically burns natural gas. Boiler No. 2 (EU-13) will serve as a backup to Boiler No. 1. Both Boiler No. 1 and Boiler No. 2 have the capability to burn fuel oil as an alternative fuel. Permitted limits and requirements associated with the use of fuel oil remain in place and are not changed by the installation of the control equipment.

Testing for compliance or demonstration of emission limits shall be conducted in accordance with a protocol approved by KDHE. During source testing, Bunge OPD West shall monitor, at a minimum, the operating parameters specified in Section 6.0 of this CTP.

No later than 60 days after the completion of the source testing, Bunge OPD West shall submit an emissions report to KDHE.

Bunge OPD West shall comply with the emission limit established in Section 7.0 of the CTP no later than 180 days after installation of the Low NOx burner.

10.0 Procedures for Optimization of Control Equipment and Setting Emission Limits

Interim VOC SLR Emissions Limit

In accordance with Attachment A to the Consent Decree, Bunge OPD West shall begin to account for solvent loss and quantity of oilseeds processed to comply with a 0.16 gal/ton VOC solvent loss ratio (SLR) at the Emporia, Kansas Plant. The first compliance determination with this interim limit will be based on the first 12 operating months of data collected after the date on which Bunge OPD West begins to account for solvent loss under this paragraph.

Final VOC SLR Emissions Limit

In accordance with Attachment A to the Consent Decree, Bunge OPD West shall comply with a final VOC SLR limit for the Emporia, Kansas Plant established according to the requirements of the VOC CTP for Defendants' Soybean Extraction Plants and Paragraphs 31 through 36 of the Consent Decree.