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Perdue AgriBusiness files responses with DEP for soybean plant

BAINBRIDGE (Lancaster County, Pa.) --- Perdue AgriBusiness today has filed with the state Department of Environmental Protection (DEP) its responses to the technical letter that the agency issued in July 2015 regarding the company's proposed grain elevator and soybean crushing facility in Conoy Township, Lancaster County.

Perdue AgriBusiness has been exhaustive in its research and analysis, submitting several hundred pages of data, to thoroughly address and respond to the questions and concerns that were raised during a public hearing and comment period last year. Perdue filed its initial plan for the project with DEP in August 2012; DEP issued its draft plan approval for the project in February 2015.

The responses cover nearly every aspect of plant construction and operation, from the types of assemblies and valves that will be used, and how they will be installed or connected, to protocols for on-site grain storage and regular facility maintenance and inspections.

The bulk of Perdue's response centers on whether the use of a regenerative thermal oxidizer (RTO) is a safe and reasonable additional emissions control device to use at a soybean processing plant.

After extensive research and analysis, and in consultation with equipment vendors and independent consultants, Perdue concluded that the use of an RTO, while technically feasible, represents a significant safety risk that is not justified by the minimal environmental benefits and substantial added costs required to operate the plant.

The RTO would decrease potential total hexane emissions by just 30 percent while increasing operating costs by almost \$3 million per year, making the plant cost-prohibitive and uneconomical. That amounts to \$42,000 per ton of emissions removed, which is two to three times what U.S. Environmental Protection Agency guidance would consider "cost effective."

Most important, however, is the fact that the RTO, an open-flame control device, would introduce an ignition source that creates a danger for fires or explosions. Specific to the Perdue project, a professional engineer and certified fire protection expert has advised against deploying an RTO at the proposed facility due to the increased risk of fire and explosion hazards.

No other soybean extraction plant in the United States utilizes an RTO.

"We are confident in the highly engineered, technical design of this plant. It will be the cleanest, most efficient soybean extraction facility ever built in the United States," said Gregory Rowe, Vice

President of Grain Operations, Environment, Health & Safety (EH&S) for Perdue AgriBusiness. “As we’ve worked to develop this project over the years, DEP has been consistent and thorough in its approach to ensure that this plant complies with established standards for public health, safety and environmental sustainability.”

With enhanced environmental controls and advanced hexane recovery technology, Perdue’s plant will have the lowest permitted hexane emission rate of any soybean processing facility in the United States with a solvent loss ratio of 0.125 gallons per ton, with no allowance for startup, shutdown or malfunction (SSM) emissions. This strict provision means that Perdue’s facility will have the absolute lowest hexane loss of any soybean processing plant in the United States.

Perdue’s facility also will have a smaller environmental footprint than the typical soybean processing plant, since processing water and steam will be provided by the Lancaster County Solid Waste Management Authority (LCSWMA). Adding an RTO, however, would require Perdue to burn a significant volume of fossil fuels like natural gas or propane, thus adding additional pollutants to the air.

The grain elevator and processing facility represent an investment of more than \$60 million in Pennsylvania agriculture and local communities. That investment will generate more than 150 construction jobs, 35 long-term jobs upon completion and an additional 500 jobs in crop production and transportation.

For more information, and to sign up for updates, visit www.perdueagribusinesspa.com.

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