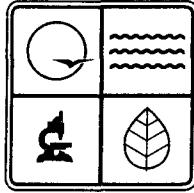


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION

PERMIT BOOK



## PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **012006-011** Project Number: 2005-11-089

Owner: MFA - Incorporated

Owner's Address: 201 Ray Young Drive, Columbia MO 65201

Installation Name: MFA Agri Service - Neosho

Installation Address: 107 S. Hamilton, Neosho MO 64850

Location Information: Newton County, S19, T25, R31

Application for Authority to Construct was made for:

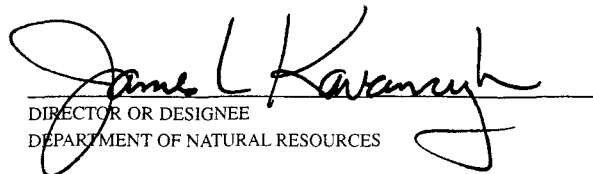
Installation of a new 3-ton horizontal mixer, augers, a bucket elevator, a distributor, and new piping all to be located in the existing warehouse north of the storage bins. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

JAN 23 2006

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

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Permit No.	
Project No.	2005-11-089

#### SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

MFA Agri Service - Neosho  
Newton County, S19, T25, R31

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 052002-016) from the Air Pollution Control Program.
2. **Annual Emission Limitation**
  - A. MFA Agri Service - Neosho shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM<sub>10</sub>) in any consecutive 12 month period from the entire installation. All equipment on this site (145-0014) is included in the 15 tons of particulate matter less than ten (10) microns in diameter (PM<sub>10</sub>) limit.
  - B. MFA Agri Service - Neosho shall maintain an accurate record of PM<sub>10</sub> emitted into the atmosphere from the entire installation. Attachment A or an equivalent form shall be used for this purpose. MFA Agri Service - Neosho shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
  - C. MFA Agri Service - Neosho shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1B indicate that the source exceeds the limitation of Special Condition Number 1A.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2005-11-089  
Installation ID Number: 145-0014  
Permit Number:

MFA Agri Service - Neosho  
107 South Hamilton  
Neosho, MO 64850

Complete: December 01, 2005  
Reviewed: December 12, 2005

Parent Company:  
MFA - Incorporated  
201 Ray Young Drive  
Columbia, MO 65201

Newton County, S19, T25, R31

REVIEW SUMMARY

- MFA Agri Service - Neosho has applied for authority to install a new 3-ton horizontal mixer to be located inside the existing warehouse north of the storage bins. Augers will be installed from the ingredient bins to the mixer and will include a shroud cover to limit emissions. The mixer will discharge to a conveyor to move feed to a new bucket elevator located just south of the building. A distributor and new piping from this new bucket elevator will transfer product to the bulk load out bins or the bagging bins.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. Subpart DD Standards of Performance for Grain Elevators does not apply to the installation since the storage capacity is well below one million bushels.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment. A shroud is being used but no control credit is being taken for the device.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are conditioned to below de minimis levels for the installation.
- This installation is located Newton County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment authorized in this permit.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

MFA Agri Service-Neosho has applied for authority to modify the existing installation located in Neosho, Missouri with county plant number (145-0014) to replace a failing feed blender system which is located outside of the existing warehouse. MFA Agri Service-Neosho is planning to install of a new 3-ton horizontal mixer to be located inside the existing warehouse north of the storage bins. Augers will be installed from the ingredient bins to the mixer and will include a shroud cover to limit emissions. The mixer will discharge to a conveyor to move feed to a new bucket elevator located just south of the building. A distributor and new piping from this new bucket elevator will transfer product to the bulk load out bins or the bagging bins.

The following permits have been issued to MFA Agri Service - Neosho from the Air Pollution Control Program.

**Table 1: Previously Issued Permits**

Permit Number	Description
052002-016	Replace bin conveyor and mill.

### PROJECT DESCRIPTION

Grain receiving is EP-01 and is rated at 56 tons per hour Maximum Hourly Design Rate (MHDR). EP-01 will not be altered by this modification. EP-03 is the new roller mill that is rated at 4 tons per hour MHDR. EP-04 is the bulk load out and the capacity is enhanced by this modification from 25 to 36 tons per hour MHDR. EP-05 is an unpaved haul road that was counted in the previous permit (052002-016); however, trucks back into this installation and the vehicles miles traveled are below the 100 miles minimum required for EIQ reporting. Emission point EP-05 is not considered in this review. EP-06, Storage bin vents, is not changed by this modification and remain at 56 tons per hour MHDR. EP-07 is the new mixer and it is rated at 40 tons per hour MHDR. It will have a shroud to control emissions , but no control value is used or reported. Approximately, 40 tons could be produced per hour with 36 tons going to bulk and 4 tons going to bagging. The new bucket elevator is rated at 112 tons per hour, but it is fed by a batch process from the new mixer. This bottlenecks the operation and limits it

to 40 tons per hour. The former EP-02 internal handling, the old blender is to be removed from service and this emission point is eliminated. The overall plant emissions decrease with this modification.

## EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, 9.91, *Grain Elevators and Processes*, dated 3/03. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

**Table 2: Emissions Summary (tons per year)**

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2002 EIQ)**	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	15***	0.05	8.45	<15
SO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

\*N/A = Not Applicable; N/D = Not Determined

\*\*No actual emissions have been reported for 2003 and 2004.

\*\*\*Existing potential emissions are from permit number 052002-016 which incorrectly listed the emission potential as equal to 15 tons. The emission should have been limited to less than 15 tons.

No control equipment is being used with the proposed equipment. Emission point EP-07 has a shroud to help control emissions; however, no control value is assigned to the shroud.

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM10 are conditioned to below de minimis levels for the installation.

## APPLICABLE REQUIREMENTS

MFA Agri Service - Neosho shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

## GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Timothy Paul Hines  
Environmental Engineer

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Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 11/21/2005, received 11/28/2005, designating MFA - Incorporated as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated 12/07/05.





Mr. Alan Mahoney  
Safety, Environmental and Regulatory Manager  
MFA Agri Service-Neosho  
201 Ray Young Drive  
Columbia, MO 65201

RE: New Source Review Permit - Project Number: 2005-11-089

Dear Mr. Mahoney:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:thl

Enclosures

c: Southwest Regional Office  
PAMS File 2005-11-089

Permit Number: