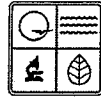


STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

TEMPORARY 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: **08 2007 - 013** Project Number: 2007-06-052

Parent Company: Bunge North America, Inc.

Parent Company Address: 11720 Borman Dr. St Louis, MO 63146-1000

Installation Name: Bunge

Installation Address: LaGrange, MO (see Review Summary for location).

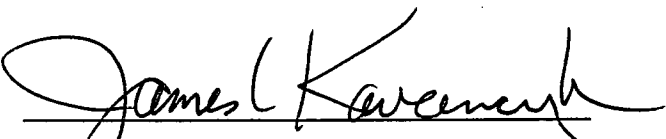
Location Information: Lewis County, S31, T61N, R5W

Application for Authority to Construct was made for:
Addition of a grain storage pile. This review was conducted in accordance with Section (3), 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 are applicable to this permit.

AUG 13 2007

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. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's 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 with 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 to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and 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 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 Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, Attention: Construction Permit Unit.

Page No.	3
Permit No.	
Project No.	2007-06-052

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."

Bunge
Lewis County, S31, T61N, R5W

1. Permit Duration
This Temporary Permit to Construct is valid until August 31, 2008. It is renewable once for an additional year. If the temporary storage facility is required beyond the expiration date of the renewal then Bunge will need to apply for Authority to Construct at least 90 days before the expiration date of the temporary permit.
2. Emission Limitation
 - A. Bunge shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the temporary ground storage pile and associated haul roads.
 - B. Bunge shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the temporary ground storage pile and associated haul roads. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. Bunge 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. Bunge 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 2B indicate that the source exceeds the limitation of Special Condition Number 2A.

TEMPORARY PERMIT
SECTION (3) REVIEW
Project Number: 2007-06-052
Installation ID Number: 111-0006
Temporary Permit Number:

Bunge
LaGrange, MO

Parent Company:
Bunge North America, Inc.
11720 Borman Drive
St. Louis, MO 63146-1000

Lewis County, S31, T61N, R5W

REVIEW SUMMARY

- Bunge has applied for authority to add a temporary grain storage pile. The pile will be located South of Washington St., North of South St., East of Main St. and West of the Burlington Northern rail easement in La Grange, Missouri.
- 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.
- 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.
- This review was conducted in accordance with Section (3) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The ground storage pile has been designated as temporary by Bunge meaning it will operate or emit pollutants for less than 2 years. The PM₁₀ PTE for this project has been conditioned to less than 15 tons in any consecutive 12-month period.
- This installation is located in Lewis 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].

- Emissions testing is not required for the equipment.
- Approval of this temporary permit is recommended with special conditions.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.9.1, *Grain Elevators and Processes* (03/2003) and Section 13.2.2 *Unpaved Roads* (12/2003). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Table 1 and 2 below provide Potential-to-Emit (PTE) and emissions summary for this project.

Table 1. Maximum Hourly Design Rates (MHDR) and Potential-to-Emit (PTE)

Description	MHDR (tons/hr)	Emission Factor (lb/ton)	PM ₁₀ PTE (lb/hr)	PM ₁₀ PTE (tons/yr)
Truck Receiving	420.00	0.0590	24.780	108.54
Grain Handling & Storage	420.00	0.0340	14.280	62.55
Ground Pile	420.00	0.0063	2.646	11.59
Grain Truck Loadout	420.00	0.0290	12.180	53.35
Haul Roads*	420.00	0.0500	21.000	91.98
TOTAL			74.89	328.00

* PTE for Haul Roads is an extrapolation of Bunges estimates

Table 2. Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	1.81	328.00	<15.00
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	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

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (3) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The ground storage pile has been designated as temporary by Bunge, meaning it will operate or emit pollutants for less than 2 years.

APPLICABLE REQUIREMENTS

Bunge 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.

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 (3), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this temporary permit be granted with special conditions.

Maurice Chemweno
Environmental Engineer

Date

Attachment A – PM₁₀ Compliance Worksheet

Temporary Ground Pile

Bunge

Lewis County, S31, T61N, R5W

Project Number: 2007-06-052

Installation ID Number: 111-0006

Temporary Permit Number:

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Copy this sheet as needed

Month	Grain Received (tons)	Composite Emission Factor ¹ – (lbs/ton)	PM ₁₀ Emission (tons)	12-Month PM ₁₀ Emissions ² (Tons)
	<i>A</i>	<i>B</i>	$C = \frac{A \times B}{2000}$	<i>D</i>
		0.1783		
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¹ Composite PM₁₀ emission factor derived by dividing potential emissions (pounds/hr) by maximum hourly design rate (tons/hr)

² Sum of last 12-months of Column D*.

*A 12-Month Total PM₁₀ emissions of less than 15 tons for Column D indicates compliance.

Mr. Robert Henricks, P.E.
Senior Environmental Specialist
Bunge North America, Inc.
P.O. Box 28500
11720 Borman Drive
St. Louis, MO 63146-1000

RE: New Source Review - Temporary Permit - Project Number: 2007-06-052

Dear Mr. Henricks:

Enclosed with this letter is your temporary permit to construct. Please study it carefully. Also, note the special conditions on the accompanying pages.

Operation in accordance with these conditions and with your operating permit 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 contact me at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and consideration.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH: mck

Enclosures

c: Mr. Steve Feeler, Compliance/Enforcement Section
Northeast Regional Office
PAMS File 2007-06-052

Permit Number: