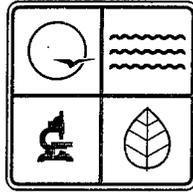


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



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: 122006-018 Project Number: 2006-09-023

Owner: Martinsburg Farmers Elevator Co.

Owner's Address: 102 S. 2nd Street, P O Box 130, Martinsburg, MO 65264

Installation Name: Martinsburg Farmers Elevator Co.

Installation Address: 101 S. Madison, Wellsville, MO 63384.

Location Information: Montgomery County, S34, T50N, R6W

Application for Authority to Construct was made for:

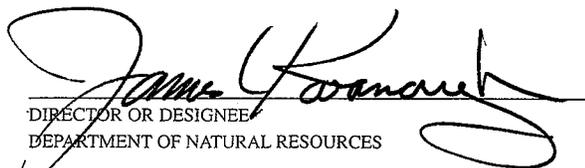
Installation of grain elevator and feed mill. This installation was constructed prior to obtaining a permit from the Missouri Department of Natural Resources, Air Pollution Control Program. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits 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.

DEC 27 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.

Page No.	2
Permit No.	
Project No.	2006-09-023

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."

Martinsburg Farmers Elevator Company
Montgomery County, S34, T50N, R6W

1. Emission Limitation
 - A. Martinsburg Farmers Elevator Company (MFEC) 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 entire installation.
 - B. MFEC shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the entire installation. Attachment A or an equivalent form shall be used for this purpose. MFEC 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. MFEC 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 1.B indicate that the source exceeded the limitation of Special Condition Number 1.A.

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

Project Number: 2006-09-023
Installation ID Number: 139-0045
Permit Number:

Martinsburg Farmers Elevator Co.
101 S. Madison
Wellsville, MO 63384

Complete: September 15, 2006
Reviewed: October 11, 2006

Parent Company:
Martinsburg Farmers Elevator Co.
102 S. 2nd Street
PO Box 130
Martinsburg, MO 65264

Montgomery County, S34, T50N, R6W

REVIEW SUMMARY

- MFEC has applied for authority to construct a grain elevator in Wellsville, Montgomery County, Missouri. This is an existing installation but has not been permitted in the past. The need for this application was identified by Martinsburg Farmers Elevator Co. (MFEC).
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) applies to the proposed equipment. Subpart "DD", *Standards of Performance for Grain Elevators*, does not apply because the permanent storage capacity of this facility is only 204,500 bushels which is less than 2.5 million U.S. bushels of grain as specified in 40 CFR 60.301 (C).
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations applies 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 (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned to de minimis levels.
- This installation is located in Montgomery 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 conditioned below de minimis levels.
- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION/PROJECT DESCRIPTION

MFEC is a de minimis source for PM₁₀ under construction permits due to the 15.0 ton per year limitation established in this permit. This facility is engaged in grain and feed handling operations. According to the applicant approximately 5% of the grain received is milled.

MFEC is located in Wellsville, Montgomery County, Missouri and was constructed in 1976. Additions and modifications have been made to the equipment at this installation since then as shown in Table 1 below.

Table 1. Year and Pieces of Equipment Installed.

Equipment Description	Year and Pieces of Equipment Installed					TOTAL
	1976	1997	2001	2004	2006	
Receiving Pits	2		1		1	4
Elevator Legs	2			1	2	5
Storage Bins	16				9	25
Loadout	1					1
Auger		1			2	3
Rollermill					1	1
Weigh Hopper/Mixer		1				1
Bagging/Loadout		1			1	2

No permits have been issued to MFEC from the Air Pollution Control Program.

MFEC has applied for authority to construct a grain elevator. Table 2 shows the equipment at MFEC and their respective Maximum Hourly Design Rates (MHDR).

Table 2. Installation Equipment and MHDR

Emission Point	Emission Point Description	MHDR (tons/hr)	Source Classification Code (SCC)
EP-1	Receiving Pits (3)	270	3-02-005-52
EP-2	Elevator Legs (3)	270	3-02-005-30
EP-3	Storage Bins	354	3-02-005-40
EP-4	Loadout	270	3-02-005-60
EP-5	Auger (3)	15	3-02-005-30
EP-6	Rollermill	15	3-02-008-19
EP-7	Weigh Hopper/Mixer	8	3-05-102-97
EP-8	Bagging / Loadout	84	3-02-008-03
EP-9	Elevator Legs (2)	140	3-02-005-30
EP-10	Receiving Pits	84	3-02-005-52

No control devices are installed on the equipment at MFEC.

EMISSIONS/CONTROLS EVALUATION

Emission of concern from this installation is PM₁₀. 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 (4/03)*, Missouri Department of Natural Resources, *Agribusiness – Dry Fertilizer Operations* and EPA Factor Information Retrieval System (FIRE) version 6.25. The equipment at this installation have no control devices fitted so all the emission factors are for uncontrolled emissions.

Emission factors used in this analysis are associated with the SCC's listed in Table 1. PM₁₀ emissions from EP-7 were estimated to be similar to those from fertilizer mixing and blending since no emission factors exist for grain weigh hopper/mixer.

Augers (EP-5) and Rollermill (EP-6) each have a MHDR of 15 tons per hour but are bottlenecked to 8 tons per hour by the (Weigh Hopper/Mixer (EP-7).

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Table 2 below provides an emissions summary for this project. As per the applicant's request the installation's conditioned potential for PM₁₀ is less than 15 tons per any 12-month period.

MFEC has not submitted an Emissions Inventory Questionnaire (EIQ) in the past so existing actual emissions could not be determined. There are also no existing potential emissions under construction permits, as the installation has not received any permit from the Air Pollution Control Program.

Table 3. Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	N/D	121.23	<15
SO _x	40.0	N/A	N/D	0.00	N/A
NO _x	40.0	N/A	N/D	0.00	N/A
VOC	40.0	N/A	N/D	0.00	N/A
CO	100.0	N/A	N/D	0.00	N/A
HAPs	10.0/25.0	N/A	N/D	0.00	N/A

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

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 have been conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Martinsburg Farmers Elevator Company 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*

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*

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.

Maurice Chemweno
Environmental Engineer PERMIT DOCUMENTS

Date

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 5, 2006, received September 15, 2006, designating Martinsburg Farmers Elevator Co. as the owner and operator of the installation. Additional information provided via fax on October 12, 2006.
- U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition.
- EPA Factor Information Retrieval System (FIRE) version 6.25.
- Missouri Department of Natural Resources, Agribusiness – Dry Fertilizer Operations.
- St Louis Regional Office Site Survey, dated September 27, 2006.

Attachment A – PM₁₀ Compliance Worksheet

Martinsburg Farmers Elevator Co.
 Montgomery County, S34, T50N, R6W
 Project Number: 2006-09-023
 Installation ID Number: 139-0045
 Permit Number:

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

Copy this sheet as needed

Month	Grain Receiving			Grain Milling			PM ₁₀ Emissions (Tons)	12-Month PM ₁₀ Emissions ² (Tons)
	Grain Received (tons)	Composite Emission Factor ¹ – (lbs/ton)	PM ₁₀ Emission (tons)	Grain Milled (tons)	Composite Emission Factor ¹ (lbs/ton)	PM ₁₀ Emission (tons)		
	<i>A</i>	<i>B</i>	$C = \frac{A \times B}{2000}$	<i>D</i>	<i>E</i>	$F = \frac{D \times E}{2000}$	$G = C + F$	<i>H</i>
		0.0758			0.066			
		0.0758			0.066			
		0.0758			0.066			
		0.0758			0.066			
		0.0758			0.066			
		0.0758			0.066			
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		0.0758			0.066			
		0.0758			0.066			
		0.0758			0.066			

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 G*.

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

Mr. Matt Bishop
General Manager
Martinsburg Farmers Elevator Co.
P O Box 130
Martinsburg, MO 65264

RE: New Source Review Permit - Project Number: 2006-09-023

Dear Mr. Bishop:

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 and 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, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mcl

Enclosures

c: St. Louis Regional Office
PAMS File: 2006-09-023

Permit Number: