

STATE OF MISSOURI



PERMIT BOOK

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

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: 122006-004 Project Number: 2006-10-053

Parent Company: MFA Incorporated

Parent Company Address: 201 Ray Young Drive, Columbia, MO 65201

Installation Name: MFA Agri Service - Trenton

Installation Address: 3031 Pleasant Plant, Trenton, MO 64683-1099

Location Information: Grundy County, S8, T61N, R24

Application for Authority to Construct was made for:
Addition of a new bulk seed treatment operation. 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 are applicable to this permit.

DEC - 7 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 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 Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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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 - Trenton
Grundy County, S8, T61N, R24

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 072005-045) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. MFA Agri Service - Trenton 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 bulk seed treatment operations.
 - B. MFA Agri Service - Trenton shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the bulk seed treatment operations. Attachment A or an equivalent form shall be used for this purpose. MFA Agri Service - Trenton 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 - Trenton 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 2.B indicate that the source exceeds the limitation of Special Condition Number 2.A.
3. **Usage of Wetting Agent**
MFA Agri Service - Trenton shall use a wetting agents at all times when loading out seed (EP-12). The wetting agent equipment shall be operated and maintained in accordance with the manufacturer's specifications.

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

Project Number: 2006-10-053
Installation ID Number: 079-0013
Permit Number:

MFA Agri Service - Trenton
3031 Pleasant Plant
Trenton, MO 64683-1099

Complete: October 12, 2006
Reviewed: November 20, 2006

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

Grundy County, S8, T61N, R24

REVIEW SUMMARY

- MFA Agri Service - Trenton has applied for authority to add a new bulk seed treatment operation.
- 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.
- A wetting agent is being used to control the PM₁₀ emissions from loadout of the seed (EP-12).
- 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 this project.
- This installation is located in Grundy 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.
- A revision to the Basic Operating Permit is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

MFA Agri Service-Trenton operates a grandfathered grain, feed, and general farm supply facility in Trenton, Missouri. The current unloading process is rated at 551 tons per hour (19,000 bushels per hour) with a drying system rated at 87 tons per hour (3,000 bushels per hour).

A Basic Operating Permit was completed on March 30, 2006. Although the potential emissions of the installation are over 100 tons per year when operating continuously (8,760 hours per year), the Operating Permit is allowed by EPA to calculate potential emissions for determining source status by using the highest annual amount of grain received during the previous 5 years. The increase in throughput from this project is not expected to increase enough to change the Operating Permit type. Therefore, a revision to the Basic Operating Permit is required as a result of this project.

The following construction permit has been issued to MFA Agri Service - Trenton from the Air Pollution Control Program.

Table 1: Previously Issued Permits

Permit Number	Description
072005-045	Installation of a new grain receiving pit, conveyor, bucket elevator, and associated spouting to existing storage bins. All new equipment is rated at 203 tons per hour (7,000 bushels per hour). In addition, replacement of the grain dryer with a 32 million BTU per hour dryer and repositioning of some existing conveyors to function with new equipment.

PROJECT DESCRIPTION

MFA Agri Service-Trenton has applied for the authority to construct a new bulk seed treatment operation which include three (3) 90-ton hopper bottom storage bins. The emission points associated with this new operation are shown in Table 2.

Table 2: Emission Units in the Bulk Seed Treatment Operation

Emission Point	Emission Unit	Maximum Hourly Design Rate
EP-8	Seed Receiving	36 tons/hr
EP-9	Bin Filling	36 tons/hr
EP-10	Conveyor (Transfer)	30 tons/hr
EP-11	Treater (Transfer)	30 tons/hr
EP-12	Load Out	30 tons/hr
EP-7	Haul Road (Gravel)	0.26 VMT/hr

The application of liquid fungicide solution to the seeds prior to loadout acts as a wetting agent and therefore controls PM₁₀ emission resulting from loadout of the seeds (EP-12).

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, Chapter 9.9.1 *Grain Elevators & Processes* (5/03), and Chapter 13.2.2 *Unpaved Roads* (12/03). A wetting agent controls PM₁₀ emissions from load out of the seed (EP12) at an efficiency of 50%.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The existing potential emissions are taken from Permit No. 072005-045. Existing actual emissions are taken from the 2005 Emission Inventory Questionnaire (EIQ). The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	Application Conditioned Potential
PM ₁₀	15.0	159.98	2.15	15.61	<15.0
SOx	40.0	0.11	0.00	N/A	N/A
NOx	40.0	17.52	0.00	N/A	N/A
VOC	40.0	0.96	0.00	N/A	N/A
CO	100.0	14.71	0.00	N/A	N/A
HAPs	10.0/25.0	0.33	0.00	N/A	N/A

N/A = Not Applicable

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.

APPLICABLE REQUIREMENTS

MFA Agri Service - Trenton 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

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.

- *Operating Permits*, 10 CSR 10-6.065
- *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.

Susan Heckenkamp
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 9, 2006, received October 12, 2006, 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.
- Northeast Regional Office Site Survey, dated October 30, 2006.

Mr. Alan Mahoney, CSHS
Safety, Environmental & Regulatory Manager
MFA Agri Service - Trenton
3031 Pleasant Plant
Trenton, MO 64683-1099

RE: New Source Review Permit - Project Number: 2006-10-053

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 and with your revised 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 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.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:shl

Enclosures

c: Northeast Regional Office
PAMS File 2006-10-053

Permit Number: