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: 112009-003    Project Number: 2009-09-010

Parent Company: Archer Daniels Midland Company
Parent Company Address: 4666 Faries Parkway, Decatur, IL 62526
Installation Name: ADM Grain - New Madrid
Installation Address: 734 New Madrid County Port Rd., Marston, MO 63866
Location Information: New Madrid County, S20 & 29, T22N, R14E

Application for Authority to Construct was made for: Increased throughput. This review was conducted in accordance with Section (6), 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.

NOV - 2 2009

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 devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(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 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 sources(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.
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.”

ADM Grain - New Madrid
New Madrid County, S20 & 29, T22N, R14E

1. Operational Limitation - June 15 through July 5 and August 1 through October 31
   A. ADM Grain – New Madrid shall receive no more than 445,000 bushels of grain per day.
   B. ADM Grain – New Madrid shall dry (EP-02) no more than 161,000 bushels per day.
   C. ADM Grain – New Madrid shall ship no more than 10,000 bushels via trucks from 7:00 AM to 5:00 PM. Shipping via trucks is not permitted outside of 7:00 AM to 5:00 PM.
   D. ADM Grain – New Madrid shall receive no more than 22,250 bushels per day via straight trucks.
   E. ADM Grain - New Madrid shall process no more than 445,000 bushels per day through storage bins (EP-07).
   F. ADM Grain - New Madrid shall ship no more than 445,000 bushels via barge per day.
   G. ADM Grain – New Madrid shall maintain daily records sufficient to demonstrate compliance with Special Conditions 1.A through 1.F. ADM Grain - New Madrid 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.
   H. ADM Grain - New Madrid shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1.G indicate that the source exceeds the limitation of Special Condition Number 1.A through 1.F.

2. Operational Limitation - November 1 through January 31
   A. ADM Grain - New Madrid shall receive no more than 445,000 bushels of grain per day.
   B. ADM Grain - New Madrid shall dry (EP-02) no more than 70,000 bushels from 7:00 AM to 5:00 PM. Drying outside of 7:00 AM to 5:00 PM is not permitted.
   C. ADM Grain – New Madrid shall ship no more than 10,000 bushels via trucks from 7:00 AM to 5:00 PM. Shipping via trucks is not permitted outside of 7:00 AM to 5:00 PM.
SPECIAL CONDITIONS:

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

D. ADM Grain – New Madrid shall receive no more than 22,250 bushels per day via straight trucks.
E. ADM Grain - New Madrid shall process no more than 445,000 bushels per day through storage bins (EP-07).
F. ADM Grain - New Madrid shall ship no more than 445,000 bushels via barge per day.
G. ADM Grain – New Madrid shall maintain daily records sufficient to demonstrate compliance with Special Conditions 2.A through 2.F. ADM Grain - New Madrid 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.
H. ADM Grain - New Madrid shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.G indicate that the source exceeds the limitation of Special Condition Number 2.A through 2.F.

3. Operational Limitation - February 1 through June 14, and July 6 through July 31
A. ADM Grain - New Madrid shall receive no more than 300,000 bushels of grain per day.
B. ADM Grain - New Madrid shall dry (EP-02) no more than 63,000 bushels from 7:00 AM to 4:00 PM. Drying outside of 7:00 AM to 4:00 PM is not permitted.
C. ADM Grain – New Madrid shall ship no more than 10,000 bushels via trucks from 7:00 AM to 5:00 PM. Shipping via trucks is not permitted outside of 7:00 AM to 5:00 PM.
D. ADM Grain – New Madrid shall receive no more than 15,000 bushels per day via straight trucks.
E. ADM Grain - New Madrid shall process no more than 300,000 bushels per day through storage bins (EP-07).
F. ADM Grain - New Madrid shall ship no more than 300,000 bushels via barge per day.
G. ADM Grain – New Madrid shall maintain daily records sufficient to demonstrate compliance with Special Conditions 3.A through 3.F. ADM Grain - New Madrid 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.
H. ADM Grain - New Madrid shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 3.G indicate that the source exceeds the limitation of Special Condition Number 3.A through 3.F.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

4. Construction Requirements  
   A. ADM Grain – New Madrid shall construct an addition to the existing receiving building. The addition shall include at least one retractable door per receiving lane that remains closed while grain is being received. The addition shall effectively create a 3 sided enclosure with a roof during receiving (EP-01).

5. Control Device Requirements - Baghouse  
   A. ADM Grain - New Madrid shall control emissions from grain receiving (EP-01) and barge shipping (EP-04) using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
   B. ADM Grain - New Madrid shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
   C. ADM Grain - New Madrid shall maintain an operating and maintenance log for the baghouses which shall include the following:
      1. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
      2. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

6. Control Device Requirements – Truck Shipping  
   ADM Grain - New Madrid shall install a flexible sleeve at the end of the truck loading spout. This sleeve shall be used whenever grain is loaded into trucks to reduce emissions from truck shipping (EP-03).

7. Control Device Requirements - Internal Handling  
   A. ADM Grain – New Madrid shall not aspirate any of the conveyors or legs considered part of internal handling and their drop/transfer points to the ambient air.
   B. Internal handling is defined as emissions originating from any grain transfer, excluding process emissions from receiving (EP-01), drying (EP-02), truck shipping (EP-03), barge shipping (EP-04), haul roads (EP-06),
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

and bin vents (EP-07).

8. Control Device Requirements – Dust Suppression
   A. ADM Grain – New Madrid shall construct and operate a dust suppression system that applies food grade mineral oil approved for direct contact with grain, on all grain processed through the dryer (EP-02) during the periods of June 15 through July 05, and August 01 through October 31.
   B. The dust suppression system shall be constructed, operated, and maintained in accordance with its manufacturer’s specifications. Oil shall be applied at a rate not less than 100 ppm (0.01% by weight), and to the grain before entering the dryer.
   C. ADM Grain – New Madrid shall maintain daily records sufficient to demonstrate compliance with Special Condition 5.B ADM Grain - New Madrid 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.

9. Haul Roads
   A. ADM Grain – New Madrid shall pave all haul roads with materials such as asphalt, concrete, and/or other material(s).
   B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the installation is receiving grain or shipping grain via truck.
   C. ADM Grain – New Madrid shall periodically water, wash and/or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the installation is receiving grain or shipping grain via truck.

10. Stack Testing
    A. ADM Grain - New Madrid shall conduct initial stack testing on each baghouse (CD-01, CD-02) for the receiving lanes and the baghouse (CD-03) for barge shipping.
    B. Stack test results shall be used to develop device respective control efficiencies for PM$_{10}$.
    C. A completed Proposed Test Plan (form enclosed) shall be submitted to the Air Pollution Control Program at least 30 days prior to the proposed test date of any such performance tests so that a pretest meeting may be arranged, if necessary, and to assure that the test date is acceptable for an observer to be present. The Proposed Test Plan must include specification of test methods to be used and be approved by the director prior to conducting the required emissions testing.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

D. The stack testing shall be performed within ninety (90) days after the issuance of this permit, and performed at the maximum production rate of receiving (EP-01a and EP-01b).

E. Two copies of a written report of the performance test results must be submitted to the director within 90 days of completion of the performance testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required Environmental Protection Agency (EPA) Method for at least one sample run for each air pollutant tested.

F. No later than 30 days after the performance test results are submitted, ADM Grain - New Madrid shall provide the director with a report that establishes the control efficiency of each baghouse tested in Special Condition 10.A. The results shall report the respective control efficiencies in percent to the hundredth decimal place.

G. If the results of the performance testing shows that the control efficiencies are less than those used in the emissions analysis herein, then ADM Grain - New Madrid shall evaluate what effects these lesser control efficiencies would have had on the permit applicability and modeling applicability of this project. ADM Grain - New Madrid shall submit the results of any such evaluation within 30 days of submitting the Performance Test Results report required in Special Condition 10.F. of this permit.

11. Superseding Condition
The conditions of this permit supersede all conditions found in the previously issued construction permits 102008-006, 032005-001, and 092009-003 from the Air Pollution Control Program.
ADM Grain - New Madrid Complete: September 08, 2009
734 New Madrid County Port Rd.
Marston, MO 63866

Parent Company:
Archer Daniels Midland Company
1001 Brush College
Decatur, IL 62526

New Madrid County, S20 & 29, T22N, R14E

REVIEW SUMMARY

- ADM Grain - New Madrid has applied for authority to increase throughput.

- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment, but below the singular and combined de minimis levels. HAP emissions are from the combustion of natural gas for grain drying.

- 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 this installation since the permanent storage capacity of the installation is 1.456 million bushels, which is less than the necessary 2.5 million bushels of grain, and the installation does not mill grain or have soybean oil extraction capabilities.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the equipment.

- Baghouses are being used to control PM and PM$_{10}$ emissions from the receiving pits and barge shipping equipment in this permit. An oil application system is being used to control PM and PM$_{10}$ emissions from the dryer.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM$_{10}$ and PM are at minor source levels.

- This installation is located in New Madrid 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 performed for PM$_{10}$ because of the prevention of significant deterioration requirements for neighboring Noranda Aluminum. Ambient air quality modeling was not performed for PM because no model exists.

• Emissions testing is required for the source.

• No Operating Permit is required for this installation.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Archer Daniels Midland operates a modern, country grain elevator in New Madrid County Missouri, near the city of Marston, referred to herein as ADM. Grain is delivered to the elevator by truck. Grain is dumped into one of four receiving pits, then conveyed to bins, or immediately sent to barge shipping. Particulate emissions from the receiving pits are controlled by building design, baffles, and baghouses. The receiving building is a drive through design with two sides and a roof. One door of each receiving lane remains closed while grain is being dumped. This acts to increase capture efficiency for the receiving pit baghouse system. Baffles inside the receiving pits distribute falling grain and provide a partial lid so that airborne particulate matter does not readily escape. Some stored grain is dried via the natural gas fueled column dryer before shipping. The elevator has the ability to ship grain via truck or barge, however most grain is shipped via barge. All haul roads are paved.

The existing installation is construction permitted as a synthetic de minimis source. It does not have an operating permit. The following permits have been issued to ADM from the Air Pollution Control Program.

Table 1: Construction Permits Issued

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>032005-001</td>
<td>New elevator with a 900,000 bushel storage capacity (expired)</td>
</tr>
<tr>
<td>102008-006</td>
<td>New elevator with a 230,000 bushel storage capacity</td>
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<tr>
<td>092009-003</td>
<td>New receiving pit, replacement dryer, bins</td>
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</table>

PROJECT DESCRIPTION

ADM Grain - New Madrid exceeded receiving limits on September 28, 29, and 30 of 2009. Also ADM operated without a valid permit from October 01, 2009 until the issuance of this permit. ADM proposes to increase receiving, drying, and subsequently shipping throughputs from those in permit 092009-003. Equipment being added for this project include an addition to the receiving structure and an oil application system. One door of each receiving lane will remain closed while grain is being dumped. This acts to
increase capture efficiency for the receiving pit baghouse system. The oil application system will pre-apply food grade mineral oil to all grain processed through the dryer during peak harvest months.

Due to the prevention of significant deterioration requirements (PSD) for PM$_{10}$ from neighboring Noranda Aluminum, the PM$_{10}$ contribution from ADM - New Madrid was required to be less than 30.0 micrograms per meter cubed.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis for grain processes 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” May 2003.

The installation processes corn, wheat, soybeans, and other grains. Without placing limits on the amount of each grain received, calculations were performed at all grain having the density of 60 pounds per bushel.

ADM will have the flexibility to receive grain through a combination of hopper dump and straight trucks. Emission factors are 0.0078 and 0.0590 pounds of PM$_{10}$ per ton of grain, respectively. Hopper dump receiving has a lower emission factor because emissions decrease with decreasing grain free fall height, and the amount of air entrained per unit volume of grain decreases with increasing grain flow rate. Hopper dump trailers typically unload more grain than a straight truck, at a faster rate, and closer to the receiving pit.

The basis of the emission factor for internal handling, 0.034 pounds of PM$_{10}$ per ton of grain, is from traditional elevators. Traditional elevators use a centralized headhouse building where all grain is routed. Most conveyors or legs are exposed and located inside the headhouse. ADM is a modern country elevator, where a headhouse is not used. The legs and conveyors are routed outdoors. The conveyor supplier recommends the conveyors be aspirated, however to achieve the desired control efficiency for internal handling, all conveyors are to be enclosed. Enclosing the conveyors is not expected to contribute to the possibility of explosion, due to their self-cleaning design. A control efficiency of 99.9 percent is applied to the internal handling emission factor, for enclosure without negative pressure. All grain will encounter some form of internal handling, therefore 100 percent capture efficiency is applied.

The oil application system will apply mineral oil at a rate of no less than 100 ppm equivalent to 0.01% oil by weight of grain. Depending on actual grain and oil density, this approximates to 0.75 gallons of oil per 1,000 bushels of grain. Rates of 60 to 200 ppm are described in the June 30, 1997 letter from the National Grain and Feed Association to the EPA, and correspond to the range of 60 to 80 percent control efficiency listed in AP-42 Section 9.9.1, “Grain Elevators and Processes” May 2003. The application rate of 200 ppm was not chosen in this review as it is the maximum allowed by the CFR Title 21 “Food and Drugs” Part 172.878. A control efficiency of
80% was selected for this project, even though the application rate is less than 200 ppm, due to the high amount of grain mixing and subsequent oil transfer between grain kernels in the dryer.

Sixty percent control efficiency is being applied at truck shipping for the use of a flexible sock or sleeve. All grain shipped via truck will encounter this device, therefore 100 percent capture efficiency is applied. Emissions were calculated without the baghouse collection system operating for truck shipping.

Emissions from barge shipping are controlled using a baghouse, assigned 99.5 percent control efficiency, but only 90 percent capture efficiency due to wind effects and spout design.

The emission factors and control efficiencies used in this analysis for natural gas combustion were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, “Natural Gas Combustion” May 2003.

Table 2 provides an emissions summary for this project. Existing Potential Emissions are cited from permit 092009-003. Existing Actual Emissions are cited from the Emissions Inventory Questionnaire, which has not been reported for 2008. Potential Emissions of the Installation are from the equipment operating at their respective maximum hourly design rates, but including any bottlenecks, for 8,760 hours per year. Over that time period, receiving would be bottlenecked to the summation of shipping maximum hourly design rates (MHDR), and internal handling would be bottlenecked to the receiving MHDR. Truck shipping cannot occur if all four lanes are occupied by receiving. Therefore the Potential Emissions of the Installation do not include truck shipping emissions. Due to modeling requirements, reductions in throughputs for non-peak harvest months have lowered the potential to emit, and are listed in the Conditioned Potential Emissions of the Installation.

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<td>N/D</td>
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</table>

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

PERMIT RULE APPLICABILITY
This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM$_{10}$ and PM are at minor source levels.

**APPLICABLE REQUIREMENTS**

ADM Grain - New Madrid 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 June 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 (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.
PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 10, 2009, received March 12, 2009, designating Archer Daniels Midland Company as the owner and operator of the installation.


- Southeast Regional Office Regional Office Site Survey, dated April 7, 2009.

- Southeast Regional Office Notice of Violation, dated October 6, 2009.
Ms. Miranda Gerard  
Environmental Specialist  
ADM Grain - New Madrid  
734 New Madrid County Port Rd.  
Marston, MO 63866  

RE: New Source Review Permit - Project Number: 2009-09-010  

Dear Ms. Gerard:

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 David Little, at the department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:dpll

Enclosures

c: Southeast Regional Office Regional Office  
PAMS File: 2009-09-010  
Permit Number: