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: 032013-001  Project Number: 2012-09-072
Installation Number: 019-0024

Parent Company: MFA Incorporated
Parent Company Address: 201 Ray Young Drive, Columbia, MO 65201
Installation Name: MFA Agri Service - Centralia
Installation Address: 202 North Jefferson Street, Centralia, MO 65240
Location Information: Boone County, S10, T51 N, R11 W

Application for Authority to Construct was made for:
Construction of five 3,000 bushel hopper-bottom bins, a portable fill conveyor, reclaim conveyors, a weigh hopper, a seed treater and associated transfer and loadout equipment. 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.

MAR 4 2013

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 these air contaminant sources. The information must be made available within 30 days of actual startup. 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 these air contaminant sources.

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.”

MFA Agri Service - Centralia
Boone County, S10, T51N, R11W

1. Superseding Condition
The conditions of this permit supersede all special conditions found in the previously issued construction permits issued by the Air Pollution Control Program as shown in Table 2.

2. PM$_{10}$ Emission Limitation
A. MFA Agri Service - Centralia shall emit less than 15.0 tons of PM$_{10}$ in any consecutive 12-month period from the entire installation as shown in Table 1.

B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.

Table 1: Emission Points and MHDR

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>MHDR</th>
<th>Units/hour</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-1</td>
<td>Grain Receiving</td>
<td>360.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-2</td>
<td>Grain Handling</td>
<td>360.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-3a</td>
<td>Grain Dryer</td>
<td>42.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-3b</td>
<td>Dryer Natural Gas</td>
<td>20.0</td>
<td>MMBtu</td>
<td>None</td>
</tr>
<tr>
<td>EP-4a</td>
<td>Truck Loadout (grain)</td>
<td>360.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-4b</td>
<td>Rail Loadout (grain)</td>
<td>360.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-5</td>
<td>Feed Receiving</td>
<td>42.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-6</td>
<td>Feed Loadout</td>
<td>42.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-7</td>
<td>Feed Storage Bin</td>
<td>42.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-8</td>
<td>Fertilizer Receiving</td>
<td>60.0</td>
<td>Tons</td>
<td>None</td>
</tr>
<tr>
<td>EP-9</td>
<td>Fertilizer Storage</td>
<td>60.0</td>
<td>Tons</td>
<td>Enclosure</td>
</tr>
<tr>
<td>EP-10</td>
<td>Fertilizer Handling</td>
<td>45.0</td>
<td>Tons</td>
<td>Enclosure</td>
</tr>
<tr>
<td>EP-11(a,b,c,d)</td>
<td>Haul Roads</td>
<td>6.44</td>
<td>VMT</td>
<td>None</td>
</tr>
<tr>
<td>EP-12</td>
<td>Fertilizer Mixer</td>
<td>45.0</td>
<td>Tons</td>
<td>Enclosure</td>
</tr>
</tbody>
</table>
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

<table>
<thead>
<tr>
<th>EP</th>
<th>Description</th>
<th>Tons</th>
<th>Enclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-13</td>
<td>Storage Bin (grain)</td>
<td>360.0</td>
<td>None</td>
</tr>
<tr>
<td>EP-14</td>
<td>Fertilizer Loadout</td>
<td>45.0</td>
<td>None</td>
</tr>
<tr>
<td>EP-S1</td>
<td>Seed Receiving</td>
<td>36.0</td>
<td>None</td>
</tr>
<tr>
<td>EP-S2</td>
<td>Seed Filling</td>
<td>36.0</td>
<td>None</td>
</tr>
<tr>
<td>EP-S3</td>
<td>Seed Conveyor</td>
<td>36.0</td>
<td>None</td>
</tr>
<tr>
<td>EP-S4</td>
<td>Seed Weigh Hopper</td>
<td>36.0</td>
<td>Enclosure</td>
</tr>
<tr>
<td>EP-S5</td>
<td>Seed Treater/Blender</td>
<td>36.0</td>
<td>Enclosure</td>
</tr>
<tr>
<td>EP-S6</td>
<td>Seed Loadout</td>
<td>36.0</td>
<td>Enclosure</td>
</tr>
</tbody>
</table>

3. Seed Treatment Limitation
   A. MFA Agri Service – Centralia shall limit the amount of seed treated with fungicide, herbicide, pesticide, and inoculant to less than 2000.0 tons in any consecutive 12-month period
   
   B. Attachment B, or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 3.A.

4. Use of Alternative Seed Treatment
   A. When using an alternative seed treatment for the installation that is different than the material listed in the Application for Authority to Construct, MFA Agri Service - Centralia shall calculate the potential emissions of all individual HAP in the alternative material, based on the seed treatment limitation of 3.A.
   
   B. Upon request from Missouri Department of Natural Resources' personnel, MFA Agri Service - Centralia shall submit the results of the calculation required by Special Condition 4.A. to the Department of Natural Resources personnel within 30 days.
   
   C. Potential individual HAP emissions for the alternative seed treatment shall be limited below the SMAL for any chemical listed in Attachment C.

5. Operational Requirement
   MFA Agri Service - Centralia shall keep the fungicides, pesticides, inoculants, liquid fertilizers, and herbicides in sealed containers whenever the materials are not in use. MFA Agri Service - Centralia shall provide and maintain suitable, easily read, permanent markings on all of the above containers.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

6. Record Keeping and Reporting Requirements
   A. MFA Agri Service - Centralia shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.

   B. MFA Agri Service - Centralia shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW
Project Number: 2012-09-072
Installation ID Number: 019-0024
Permit Number:

MFA Agri Service - Centralia
202 North Jefferson Street
Centralia, MO 65240

Complete: September 24, 2012

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

Boone County, S10, T51N, R11W

REVIEW SUMMARY

- MFA Agri Service - Centralia has applied for authority to construct five 3,000 bushel hopper-bottom bins, a portable fill conveyor, reclaim conveyors, a weigh hopper, a seed treater and associated transfer and loadout equipment.

- HAP emissions are expected from some of the seed treatment materials that are associated with this project.

- None of the New Source Performance Standards (NSPS) apply to the installation. New Source Performance Standard 40 CFR Part 60 subpart DD: Standards of Performance of Grain Elevators does not apply to this installation because the maximum grain storage capacity is less than 2.5 million bushels.

- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.

- A building enclosure is the only control device being used to limit the particulate emissions from the equipment in this permit.

- 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 VOC are conditioned below de minimis levels. Potential emissions of PM are above the de minimis level but below the major source level.

- This installation is located in Boone County, an attainment area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
• Ambient air quality modeling was not performed because modeling standards do not currently exist for PM.

• Emission 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 DESCRIPTION

MFA Agri-Service – Centralia (herein referred to as MFA) is an existing grain elevator and fertilizer mixing facility located at 202 North Jefferson Street in Centralia, Missouri. MFA is also capable of receiving and storing animal feed. MFA receives dry fertilizer that will be stored until sale. MFA can receive and loadout fertilizer at a rate of 45.0 tons per hour on a yearly basis with the conveyance system serving as the fertilizer facility bottleneck. MFA is capable of receiving and shipping grain at a rate of 360.0 tons per hour. The 20.0 MMBTU/hr grain dryer can dry 42.0 tons of grain per hour, but all grain will not be dried so the grain dryer is not a facility bottleneck. The grain dryer is the only existing equipment with the potential to emit VOCs and HAPs through the combustion of natural gas. The facility does not require an operating permit at this time.

The following New Source Review permits have been issued to MFA Agri Service - Centralia from the Air Pollution Control Program.

Table 2: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1197-009</td>
<td>Addition of 104,000 Bushel Corrugate</td>
</tr>
<tr>
<td>0294-004</td>
<td>3 Ton Molasses Mixer for Fertilizer</td>
</tr>
<tr>
<td>1090-003</td>
<td>Grain Facility</td>
</tr>
<tr>
<td>1076-002</td>
<td>Fertilizer Blending Plant</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

MFA has proposed construction of a bulk seed storage and treatment system for the application of fungicides. This system will consist of five 3,000 bushel hopper-bottom storage bins, a portable fill conveyor, reclaim conveyors, a seed treater/blender, a weigh hopper, and associated transfer and loadout equipment. The seed treater/blender will be the sole emission point from this project with the potential to emit HAPs and VOCs. Potential VOC and HAP emissions were calculated based on the seed treatment limitation found in Special Condition 3.A. of this permit. All VOCs and HAPs contained within the seed treatment are assumed to be emitted to the surrounding atmosphere. The seed treatment will act as a fungicide that will allow storage of the seed. All of the seed equipment associated with this project have MHDRs equal to 36.0 tons per hour. None of the seed equipment is bottlenecked. CruiserMaxx Advanced, Vibrance, Innovate, and Nipsit INSIDE are the proposed seed treatments for this facility.
Seed coating material formulas and contents change from year to year in order to identify and decrease the effect of the most prevalent fungi and insects. Therefore VOC contents of seed treatments are not always located on the MSDS. MFA estimates that the maximum amount of seed treated in any given year is about 1000 tons. Therefore, MFA has requested a voluntary limit of 2000.0 tons of seed treated in any 12-month period as shown in Special Condition 3.A. This demonstrates that MFA Agri Service – Centralia will not exceed the 40.0 ton VOC de minimis level in any consecutive 12-month period.

VOC emissions are calculated based on a mass balance approach. The maximum application rate, VOC content, and specific gravity of all seed treatments submitted with the Application for Authority to Construct are 5 ounces per 100 pounds of seed treated, 25%, and 1.295 respectively. In order to remain conservative, the potential to emit VOC was calculated using an application rate of 10 ounces per 100 pounds of seed treated, VOC content equal to 100%, and a specific gravity equal to 1.35. Using this method, the potential to emit VOC is equal to 17.6 tons. While this method is a conservative overestimation, it demonstrates that actual VOC emissions will not exceed the de minimis level. If the application rate of seed treatment does not exceed 5 ounces per 100 pounds of seed treated, the potential to emit individual HAPs will remain below the de minimis level of 10.0 tons of HAP.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the EPA document AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Section 9.9.1, Grain Elevators & Processes, May 2003. Haul road emissions were calculated using the method recommended in AP-42, Section 13.2.2 Unpaved Roads, November 2006. In order to remain conservative, each haul road PTE was calculated under the assumption that all receiving and shipping operations will be carried out by straight trucks. PTE for haul roads were calculated under the assumption that the unpaved road silt content is 8.5%. The fertilizer processes were evaluated for PM, PM\(_{10}\), and PM\(_{2.5}\) emissions. AP-42 and WebFIRE (Factor Information Retrieval System), EPA’s online emission factor repository, do not contain PM\(_{2.5}\) emission factors for fertilizer handling. Therefore, the PM\(_{2.5}\) emission factor (0.005 pounds per ton of fertilizer) was estimated as being 25% of the PM\(_{10}\) emission factor (0.02 pounds per ton of fertilizer, SCC (3-01-027-09) using the scale factor that was used in AP-42, Table 9.9.1-1. The PM\(_{10}\) emission factor for fertilizer operations was obtained from WebFIRE.

The following table provides an emissions summary for this project. Existing potential emissions were calculated using the same emission factors stated in the previous paragraph. Potential emissions of the entire facility were calculated using emission factors because the previous permit overestimated the potential PM\(_{10}\) emissions. By using current emission factors MFA will be able to achieve a greater rate of production without exceeding the emission limitations stated within this permit. Existing actual emissions were taken from the installation’s 2007 EIQ because it was the last year a full EIQ was completed by the installation. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). New installation conditioned potentials are based on continuous grain dryer
operation and a 15.0 ton facility-wide PM\textsubscript{10} emission limitation. The potential emissions of PM and PM\textsubscript{2.5} are directly limited by the PM\textsubscript{10} limit.

A building enclosure is the only method of limiting particulate matter emissions. A control efficiency of 3.7\% was used in the PTE calculation for the equipment that is in an enclosed building. The equipment that will be enclosed can be found in Table 1.

Table 3: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>665.85</td>
<td>N/D</td>
<td>80.6</td>
<td>35.93</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>15.0</td>
<td>281.85</td>
<td>3.98</td>
<td>29.78</td>
<td>&lt;15.0</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>10.0</td>
<td>42.66</td>
<td>0.635</td>
<td>4.81</td>
<td>2.29</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>1.44</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>12.45</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>0.472</td>
<td>N/D</td>
<td>17.6</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>7.18</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (CO\textsubscript{2}e)</td>
<td>100,000</td>
<td>12,238.3</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>250.0</td>
<td>11,968.3</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>0.162</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</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\textsubscript{10} and VOC are conditioned below de minimis levels. Potential emissions of PM remain above the de minimis level but below the major source level.

APPLICABLE REQUIREMENTS

MFA Agri Service - Centralia 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

- 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 10-6.165*

**SPECIFIC REQUIREMENTS**

• *New Source Performance Regulations, 10 CSR 10-6.070*
  o –*Standards of Performance for Grain Elevators, 40 CFR Part 60, Subpart DD* does not apply to this facility because the total permanent grain storage is less than 2.5 million bushels.
  
  o –*Standards of Performance for the Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facilities, 40 CFR Part 60 Subpart X* does not apply to this facility because the fertilizer stored is considered dry according to the definition within the subpart.

• *MACT Regulations, 10 CSR 10-6.075*
  o *National Emission Standards for Hazardous Air Pollutants from Phosphate Fertilizer Production Plants, 40 CFR Part 63, Subpart BB* does not apply to this facility because it does not process fertilizer. All fertilizer received at this facility is considered dry according to the definition within the subpart.

• *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-6.405*

• *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.

________________________________________________________________________

J Luebbert                                      Date
New Source Review Unit

**PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

• The Application for Authority to Construct form, dated September 21, 2012, received September 24, 2012, designating MFA Incorporated as the owner and operator of the installation.

### Attachment A – PM$_{10}$ Compliance Worksheet

MFA Agri Service - Centralia

Boone County, S10, T51N, R11W
Project Number: 2012-09-072
Installation ID Number: 019-0024
Permit Number: ______

This sheet covers the period from (month/year) to (month/year). (Copy this sheet as needed)

<table>
<thead>
<tr>
<th>Month</th>
<th>Material Received (tons)</th>
<th>PM$_{10}$ Emission Factor (lb/ton)</th>
<th>Monthly PM$_{10}$ Emissions (pounds)</th>
<th>Monthly PM$_{10}$ Emissions (tons)</th>
<th>Previous Month's 12-Month PM$_{10}$ Emissions (tons)</th>
<th>Monthly PM$_{10}$ Emissions from Previous Year (tons)</th>
<th>Current 12-Month PM$_{10}$ Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example 08/2012 Seed</td>
<td>10,000</td>
<td>0.189</td>
<td>1,890.0</td>
<td>1.733</td>
<td>2.0</td>
<td>1.0</td>
<td>2.733</td>
</tr>
<tr>
<td>Grain</td>
<td>5,000</td>
<td>0.159</td>
<td>795.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feed</td>
<td>5,000</td>
<td>0.032</td>
<td>160.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fertilizer</td>
<td>5,000</td>
<td>0.124</td>
<td>620.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **a)** Record the current date. (Month, Year)
- **b)** Record this month’s feed, seed, grain, and fertilizer received.
- **c)** PM$_{10}$ composite emission factor for each process.
- **d)** Calculate using the following equation: $(d) = (b) 	imes (c)$.
- **e)** Calculate using the following equation: $(e) = [(d) for feed received + (d) for seed received + (d) for grain received + (d) for fertilizer received] / 2,000$
- **f)** Record the 12-month PM$_{10}$ emissions $(h)$ from last month.
- **g)** Record the monthly PM$_{10}$ emissions $(e)$ from this month last year.
- **h)** Calculate the new 12-month PM$_{10}$ emissions. $(h) = (e) + (f) - (g)$

A rolling 12-month total less than 15.0 tons of PM$_{10}$ implies compliance with Special Condition 2.A
Attachment B – Seed Treatment Compliance Worksheet

MFA Agri Service - Centralia
Boone County, S10, T51N, R11W
Project Number: 2012-09-072
Installation ID Number: 019-0024
Permit Number: ______

(Copy this sheet as needed)

<table>
<thead>
<tr>
<th>(a)</th>
<th>(b)</th>
<th>(c)</th>
<th>(d)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Seed Treated (tons)</td>
<td>Seed Treated this Month Last Year</td>
<td>12-month Rolling Total</td>
</tr>
<tr>
<td>EX. 01/05/13</td>
<td>500.0</td>
<td>100.0</td>
<td>700.0</td>
</tr>
<tr>
<td>EX. 02/05/13</td>
<td>300.0</td>
<td>200.0</td>
<td>800.0</td>
</tr>
</tbody>
</table>

a) Record the Date
b) Record the amount of seed treated this month
c) Record the amount of seed that was treated in this month last year: (b) from exactly 12 months ago
d) Calculate using the following equation: \((d)_{new} = (d)_{last\ month} + (b) - (c)\)

A 12-month running total less than 2000.0 tons implies compliance with Special Condition 3.A.
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**Legend**

- **A**: Asbestos
- **B**: Cresol/Cresylic Acid (isomers and mixtures)
- **C**: 2,4-D, Salts and Esters
- **D**: Dibenzofurans, Dibenzodioxins
- **E**: 4,6-Dinitro-o-cresol, and Salts
- **F**: Lindane (all isomers)
- **G**: Xylenes (all isomers and mixtures)
- **H**: Antimony Compounds
- **I**: Arsenic Compounds
- **J**: Beryllium Compounds
- **K**: Cadmium Compounds
- **L**: Chromium Compounds
- **M**: Cobalt Compounds
- **N**: Coke Oven Emissions
- **O**: Cyanide Compounds
- **P**: Glycol Ethers
- **Q**: Lead Compounds (except elemental Lead)
- **R**: Manganese Compounds
- **S**: Mercury Compounds
- **T**: Fine Mineral Fibers
- **U**: Nickel Compounds
- **V**: Polymeric Organic Matter
- **W**: Selenium Compounds
- **X**: Polychlorinated Biphenyls (Aroclors)

**Notes**

1. The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million.
APPENDIX A

Abbreviations and Acronyms

% ............ percent
°F ............ degrees Fahrenheit
acfm ........ actual cubic feet per minute
BACT ...... Best Available Control Technology
BMPs ...... Best Management Practices
Btu ........... British thermal unit
CAM ...... Compliance Assurance Monitoring
CAS ......... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR ...... Code of Federal Regulations
CO ........... carbon monoxide
CO₂ ........ carbon dioxide
CO₂e ....... carbon dioxide equivalent
COMS ...... Continuous Opacity Monitoring System
CSR ........ Code of State Regulations
dscf ....... dry standard cubic feet
EIQ .......... Emission Inventory Questionnaire
EP ........... Emission Point
EPA ......... Environmental Protection Agency
EU ........ Emission Unit
fps .......... feet per second
ft ............ feet
GACT ...... Generally Available Control Technology
GHG ...... Greenhouse Gas
gpm .......... gallons per minute
gr ........... grains
GWP ...... Global Warming Potential
HAP ......... Hazardous Air Pollutant
hr ........... hour
hp .......... horsepower
lb .......... pound
lbs/hr ....... pounds per hour
MACT ...... Maximum Achievable Control Technology
μg/m³ ....... micrograms per cubic meter
m/s .......... meters per second
Mgal ...... 1,000 gallons
MW ........ megawatt
MHDR ...... maximum hourly design rate
MMBtu ...... Million British thermal units
MMCF ...... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS .... National Ambient Air Quality Standards
NESHAPs .......... National Emissions Standards for Hazardous Air Pollutants
NOₓ .... nitrogen oxides
NSPS ...... New Source Performance Standards
NSR ...... New Source Review
PM .......... particulate matter
PM₃₂·₅ .... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm .......... parts per million
PSD .......... Prevention of Significant Deterioration
PTE ........ potential to emit
RACT ...... Reasonable Available Control Technology
RAL ......... Risk Assessment Level
SCC ......... Source Classification Code
scfm ......... standard cubic feet per minute
SIC ........ Standard Industrial Classification
SIP ........ State Implementation Plan
SMAL ...... Screening Model Action Levels
SOₓ ........ sulfur oxides
SO₂ ........ sulfur dioxide
tph .......... tons per hour
tpy .......... tons per year
VMT .......... vehicle miles traveled
VOC .......... Volatile Organic Compound
Mr. Alan Mahoney  
Safety, Environmental & Regulatory Manager  
MFA Agri Service - Centralia  
201 Ray Young Drive  
Columbia, MO 65201

RE: New Source Review Permit - Project Number: 2012-09-072

Dear Mr. Mahoney:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 amended 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 J Luebbert, at the Department of Natural Resources’ 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

Susan Heckenkamp  
New Source Review Unit Chief

SH:jll

Enclosures

c: Northeast Regional Office  
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