

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: **05 2007 - 009** Project Number: 2007-03-068

Parent Company: PCS Phosphate Company, Inc.

Parent Company Address: P.O. Box 3320 Northbrook, IL 60062

Installation Name: PCS Phosphate Company, Inc.

Installation Address: 301 State Line Avenue, Joplin, MO 64802

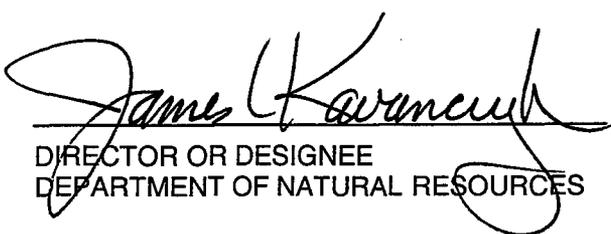
Location Information: Jasper County, S2, T27N, R34W

Application for Authority to Construct was made for:
A Feed Grade Diammonium Phosphate (FGDAP) receiving, storage, and loadout 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.

MAY 21 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 Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



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.

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Location Information: Jasper County, S2, T27N, R34W

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Permit No.	
Project No.	2007-03-068

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."

PCS Phosphate Company, Inc.
Jasper County, S2, T27N, R34W

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Numbers 112004-011, 022005-006, and 092005-021) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. PCS Phosphate Company, Inc. 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 equipment in this permit. The equipment is listed in Attachment A.
 - B. PCS Phosphate Company, Inc. shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the equipment in this permit. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. PCS Phosphate Company, Inc. 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. PCS Phosphate Company, Inc. 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. **Control Device – Baghouse (Fabric Filter)**
 - A. PCS Phosphate Company, Inc. shall control emissions from the Urea Bag Packer (EP-170), Bagging (EP-76), Elevator 4012B (EP-109), and Conveyor 5001B (EP-111a) 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

Page No.	4
Permit No.	
Project No.	2007-03-068

SPECIAL CONDITIONS:

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

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. PCS Phosphate Company, Inc. 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. PCS Phosphate Company, Inc. 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.

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

Project Number: 2007-03-068
Installation ID Number: 097-0005
Permit Number:

PCS Phosphate Company, Inc.
301 State Line Avenue
P.O. Box 225
Joplin, MO 64802

Complete: March 27, 2007
Reviewed: April 24, 2007

Parent Company:
PCS Phosphate Company, Inc.
P.O. Box 3320
Northbrook, IL 60062

Jasper County, S2, T27N, R34W

REVIEW SUMMARY

- PCS Phosphate Company, Inc. has applied for authority to install a Feed Grade Diammonium Phosphate (FGDAP) receiving, storage, and loadout 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.
- No air pollution control equipment is being used in association with the new equipment. However, baghouses are being used to control the particulate matter emissions from the existing units: Urea Bag Packer (EP-170), Bagging (EP-76), Elevator 4012B (EP-109), and Conveyor 5001B (EP-111a).
- 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 level.
- This installation is located in Jasper 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 to de minimis levels.
- Emissions testing is not required for the equipment.
- A revision to your basic operating permit is required within 30 days of the startup of new equipment.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

PCS Phosphates Company Inc., formerly Farmland Joplin Plant, operates an ammonium phosphate fertilizer and feed grade calcium phosphate production plant in Joplin, Missouri. The Air Pollution Control Program received a Part 70 Operating Permit application on May 12, 1997. However, after the renovation and modification of Permit Number 052003-003, the installation's potential to emit (PTE) of criteria air pollutants without fugitive emissions was below 100 tons per year. Therefore, for operating permit purpose, this installation was classified as basic. PCS Phosphate submitted a Basic Operating Permit application on January 21, 2003. The installation also submitted an amendment to their Basic Operating Permit application on January 17, 2006.

The following construction permits have been issued to PCS Phosphate Company, Inc. from the Air Pollution Control Program.

Permit Number	Description
0290-008	Installation of a new bulk truck-loading unit with a limitation of 100,000 tons per year of fertilizer processed.
0695-019	Construction of a facility to apply finely divided clay to fertilizer to reduce clumping and improve handling characteristics.
0290-008A	Amendment to remove NSPS Subpart V from special conditions.
1197-003	Installation of a secondary screen system in the calcium phosphate section and installation of a bulk urea handling system in the ammonium phosphate fertilizer section.
0498-005	Modification of NPK fertilizer shipping process, addition of one (1) belt conveyor to the installation and replacement of the existing 15 MMBtu/hr NPK dryer with a 20 MMBtu/hr dryer.
1298-020	Installation of a limestone mill for grinding limestone with a PM ₁₀ limitation of 15 tons per year for the limestone conveyor and limestone grinder.
032002-021	Increase production of ammonium phosphate fertilizer and feed grade calcium phosphate and add a conveyor belt.
052003-002	Modification of an existing calcium phosphate process. This will include the addition of equipment and modification of existing units. In addition, the ammonium phosphate fertilizer operation will be removed.
112004-011	Addition of two new operations and modification of an existing operation.
022005-006	Modification to Permit Number 112004-011.
092005-021	Installation of a De-Fluorinated Phosphate (DFP) bagging operation.
092005-021A	Amendment to Permit Number 092005-021.

PROJECT DESCRIPTION

PCS Phosphate Company proposes to install a Feed Grade Diammonium Phosphate (FGDAP) receiving, storage, and loadout operation. The FGDAP will be stored in a warehouse and loaded out in bulk trucks. This project utilizes several existing units and three new units. The FGDAP will be received via railcar at EP-147 (existing material receiving). The material will be sent to an existing elevator 2158 (EP-96) through the existing conveyor 2156 (EP-95). A new belt conveyor (EP-173) will be installed that will carry the FGDAP to existing storage handling (EP-24). A new chain paddle conveyor (EP-174) and a new spout (EP-175) will be used for the loadout to truck.

PCS requested to incorporate the emission points associated with the new Feed Grade Diammonium Phosphate (FGDAP) receiving, storage, and loadout operation into PM₁₀ emission limits established in Construction Permit 092005-021. The following is the list of equipment involved in the emission limitation.

Process	Emission Point(s)	*Point Description	Max. Design Rate	Unit
Urea Transloading	EP-150	Urea Rail Car Unloading	50	Tons/hr
	EP-151	Urea Transfer - Enclosed Mobile Belt Conveyor	50	Tons/hr
	EP-152	Urea Drop To Mobile Lifting Conveyor	50	Tons/hr
	EP-153	Urea Transfer – Mobile Lifting Conveyor	50	Tons/hr
	EP-154	Urea Chute	50	Tons/hr
	EP-155	Urea Bulk Truck Loading	50	Tons/hr
	EP-166	Urea Mobile Belt Conveyor Gasoline Engine	0.014	MMBtu/hr
	EP-167	Urea Mobile Lifting Conveyor Gasoline Engine	0.05	MMBtu/hr
	EP-168	Urea Surge Hopper	50	Tons/hr
	EP-169	Urea Bulk Tote Bagger	50	Tons/hr
	EP-170	Urea Bag Packer	50	Tons/hr
De-Fluorinated Phosphate (DFP) Transloading	EP-156	DFP Rail Car Unloading	50	Tons/hr
	EP-157	DFP Transfer - Enclosed Mobile Conveyor	50	Tons/hr
	EP-158	DFP Drop to Fixed Conveyor	50	Tons/hr
	EP-159	DFP Transfer - Fixed Conveyor	50	Tons/hr
	EP-160	DFP Chute	50	Tons/hr
	EP-161	DFP Bulk Truck Loading	50	Tons/hr
De-Fluorinated Phosphate (DFP) bagging Process	EP-76	Bagging	19.5	Tons/hr
	EP-109	Elevator 4012B	21.82	Tons/hr
	EP-111	Conveyor 5001B	19.5	Tons/hr
	EP-111a	Conveyor 5050	19.5	Tons/hr
	EP-150	Urea/DFP Rail Car Unloading	50	Tons/hr
	EP-151	Urea/DFP Transfer – Enclosed Mobile Conveyor	50	Tons/hr
	EP-171	DFP Chute	50	Tons/hr
Potash Receiving System	EP-142	Receiving Pit	200	Tons/hr
	EP-122	Receiving Screw Conveyor	200	Tons/hr
	EP-148	Material Receiving Loader	100	Tons/hr
	EP-124	Shipping Spout	100	Tons/hr
	EP-143	Storage Handling	200	Tons/hr
	EP-162	Potash Receiving Elevator	200	Tons/hr
	EP-163	Conveyor	200	Tons/hr
	EP-164	Conveyor	200	Tons/hr
	EP-165	Potash Shipping Elevator	100	Tons/hr
FGDAP Dedicated Equipment*	EP-173	Belt Conveyor (new)	50	Tons/hr
	EP-174	Chain Paddle Conveyor (new)	100	Tons/hr
	EP-175	Spout (new)	100	Tons/hr
	EP-147	Material Receiving (existing)	23	Tons/hr
	EP-95	Conveyor 2156 (existing)	23	Tons/hr
	EP-96	Conveyor 2158 (existing)	23	Tons/hr
	EP-24	Storage Handling (existing)	23	Tons/hr

*Equipment associated with the new project

EMISSIONS/CONTROLS EVALUATION

The pollutant of concern from the equipment of this application is PM₁₀. The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 8.5.3 *Ammonium Phosphate*. Existing potential emissions were evaluated from Permit Number 092005-021A. Existing actual emissions were taken from the Emissions Inventory Questionnaire (EIQ) submitted by the applicant for 2005. Potential emissions of the application represent the potential of the new and existing equipment associated with FGDAP process and the equipment associated with the emission limit established in Permit Number 092005-021, assuming continuous operation (8760 hours per year). Potential emissions of equipment dedicated for FGDAP process are 41.94 tons of PM₁₀ per year. The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	83.28**	11.47	256.47	< 15.0
Sox	40.0	0.18	N/A	N/A	N/A
Nox	40.0	16.92	0.78	N/A	N/A
VOC	40.0	2.73	0.04	N/A	N/A
CO	100.0	13.04	0.66	N/A	N/A
HAPs	10.0/25.0	5.65	N/A	N/A	N/A

N/A = Not Applicable

**excluding fugitive emissions

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 level.

APPLICABLE REQUIREMENTS

PCS Phosphate Company, Inc. 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

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.

Fuad Wadud
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 16, 2007, received March 21, 2007, designating PCS Phosphate Company, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated April 2, 2007.

Attachment A: Monthly PM₁₀ Tracking Record

PCS Phosphate Company, Inc.
 Jasper County, S2, T27N, R34W
 Project Number: 2007-03-068
 Installation ID Number: 097-0005
 Permit Number:

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

Copy this sheet as needed

Column A	Column B	Column C	Column D	Column E	Column F
Emission Point(s)	Description	Amount Processed (tons)	PM ₁₀ Emission Factor (lb/ton)	Control Efficiency (%)	(a) PM ₁₀ Emissions (tons)
Urea Transloading Process					
EP-150	Urea Rail Car Unloading		0.017 lb/ton urea	3.7	
EP-151	Urea Transfer - Enclosed Mobile Belt Conveyor		0.017 lb/ton urea		
EP-152	Urea Drop To Mobile Lifting Conveyor		0.017 lb/ton urea	3.7	
EP-153	Urea Transfer – Mobile Lifting Conveyor		0.017 lb/ton urea		
EP-154	Urea Chute		0.017 lb/ton urea		
EP-155	Urea Bulk Truck Loading		0.017 lb/ton urea		
EP-168	Urea Surge Hopper		0.017 lb/ton urea		
EP-169	Urea Bulk Tote Bagger		0.16 lb/ton urea		
EP-170	Urea Bag Packer		0.16 lb/ton urea	89.2	
De-Fluorinated Phosphate (DFP) Transloading Process					
EP-156	DFP Rail Car Unloading		0.0264 lb/ton DFP		
EP-157	DFP Transfer – Enclosed Mobile Conveyor		0.0264 lb/ton DFP	3.7	
EP-158	DFP Drop to Fixed Conveyor		0.0264 lb/ton DFP		
EP159	DFP Transfer - Fixed Conveyor		0.0264 lb/ton DFP	3.7	
EP-160	DFP Chute		0.0264 lb/ton DFP		
EP-161	DFP Bulk Truck Loading		0.0264 lb/ton DFP		
De-Fluorinated Phosphate (DFP) Bagging Process					
EP-76	Bagging		0.025 lb/ton DFP	89.1	
EP-109	Elevator 4012B		0.025 lb/ton DFP	89.1	
EP-111	Conveyor 5001B		0.025 lb/ton DFP	89.1	
EP-111a	Conveyor 5050		0.025 lb/ton DFP		
EP-150	Urea/DFP Rail Car Unloading		0.0264 lb/ton DFP		
EP-151	Urea/DFP Transfer – Enclosed Mobile Conveyor		0.0264 lb/ton DFP	3.7	
EP-171	DFP Chute		0.0264 lb/ton DFP	3.7	
Potash Receiving System					
EP-142	Receiving Pit		0.02 lb/ton fertilizer		
EP-122	Receiving Screw Conveyor		0.02 lb/ton fertilizer		
EP-148	Material Receiving Loader		0.02 lb/ton fertilizer		
EP-124	Shipping Spout		0.02 lb/ton fertilizer		
EP-143	Storage Handling		0.02 lb/ton fertilizer	3.7	
EP-162	Potash Receiving Elevator		0.02 lb/ton fertilizer		
EP-163	Conveyor		0.02 lb/ton fertilizer		
EP-164	Conveyor		0.02 lb/ton fertilizer		
EP-165	Potash Shipping Elevator		0.02 lb/ton fertilizer		
Continued next page.					

FGDAP Process					
EP-173	Belt Conveyor (new)		0.028 lb/ton FGDAP		
EP-174	Chain Paddle Conveyor (new)		0.028 lb/ton FGDAP		
EP-175	Spout (new)		0.028 lb/ton FGDAP		
EP-147	Material Receiving (existing)		0.028 lb/ton FGDAP		
EP-95	Conveyor 2156 (existing)		0.028 lb/ton FGDAP		
EP-96	Conveyor 2158 (existing)		0.028 lb/ton FGDAP		
EP-24	Storage Handling (existing)		0.028 lb/ton FGDAP		
(b) Total PM ₁₀ Emissions Calculated for this Month in Tons:					
(c) 12-Month PM ₁₀ Emissions Total From Previous Month's Attachment A, in Tons:					
(d) Monthly PM ₁₀ Emissions Total (b) from Previous year's Attachment A, In Tons:					
(e) Current 12-month Total of PM ₁₀ Emissions in Tons : [(b) + (c) - (d)]					

- (a) [Column F] = [Column C] x [Column D] x [1 - Column E/100] x 0.0005
(b) Summation of [Column F] in Tons;
(c) 12-Month PM₁₀ emissions total (e) from last month's Attachment A, in Tons;
(d) Monthly PM₁₀ emissions total (b) from previous year's Attachment A, in Tons;
(e) Calculate the new 12-month PM₁₀ emissions total.
A 12-Month PM₁₀ emissions total (e) of less than 15.0 tons indicates compliance.

Mr. Paul O. Shoup
Plant Manager
PCS Phosphate Company, Inc.
P.O. Box 225
Joplin, MO 64802

RE: New Source Review Permit - Project Number: 2007-03-068

Dear Mr. Shoup:

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 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 Fuad Wadud at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH: fwl

Enclosures

c: Southwest Regional Office
PAMS File 2007-03-068

Permit Number: