

**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: 012008-007

Project Number: 2007-08-086

Parent Company: Bunge North America, Inc.

Parent Company Address: P.O. Box 28500, St. Louis, MO 63146 -1000

Installation Name: Bunge North America, Inc.

Installation Address: 613 County Hwy. 434, Portageville, MO 63873-0367

Location Information: New Madrid County, S5, T21N, R14E

Application for Authority to Construct was made for:
construction of rice receiving station. This review was conducted in accordance with Section (Section 5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JAN 23 2008

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."

Bunge North America, Inc.
New Madrid County, S5, T21N, R14E

1. Haul Roads
Bunge North America, Inc. shall water haul roads whenever conditions exist which would cause visible fugitive emissions to remain visible in the ambient air beyond the property boundary.
2. Baghouses
Bunge North America, Inc. shall control emissions from the following emission points using baghouses as specified in the permit application: EP1 Other Grain Receiving; and EP2 Internal Operations. 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).
3. Bunge North America, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - A. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - B. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. Overall Maximum Annual Grain Receipt
 - A. The annual grain receipt of the entire facility shall not exceed 20.0 million bushels of grain sent to barges or the local feed mills. Attachment A shall be used for this purpose.
 - B. The annual rice receipt of the entire facility shall not exceed 5.0 million bushels of grain sent to barges or the local feed mills. Attachment A shall be used for this purpose.

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SPECIAL CONDITIONS:

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

5. Overall Grain Loadout by Truck
The annual grain loadout to trucks shall not exceed 1.0 million bushels.
Attachment B shall be used for this purpose.
6. Maximum Annual Dryer Throughput
The annual amount of all grains sent to the grain dryer shall not exceed 5.8 million bushels of grain. Attachment C or equivalent forms shall be used for this purpose.
7. Fuel Combustion
The fuel shall be No. 2 Distillate Fuel Oil and its sulfur content shall not exceed 0.3% sulfur by weight.
8. Hopper Truck Restriction
The trucks used to unload rice shall be of the hopper type only. (Trucks used for other grains are not restricted to hopper type.)

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

Project Number: 2007-08-086
Installation ID Number: 143-0062
Permit Number: 012008-007

Bunge North America, Inc.
613 County Hwy. 434
Portageville, MO 63873-0367

Complete: 8/17/07
Reviewed: 8/17/07

Parent Company:
Bunge North America, Inc.
P.O. Box 28500
St. Louis, MO 63146-1000
New Madrid County, S5, T21N, R14E

REVIEW SUMMARY

- Bunge North America, Inc. has applied for authority to construct a rice receiving station .
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- 40 CFR Subpart DD of the New Source Performance Standards (NSPS) applies to the proposed equipment because the total grain handling storage is 2.8 million bushels per year, which is greater than the applicability limit of 2.5 million bushels per year.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations applies to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment. Baghouses are being used to control the PM₁₀ emissions from existing equipment in this permit.
- 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 below de minimis levels for the proposed equipment.
- 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 not performed since potential emissions of the application are below de minimis levels.
- Emissions testing per EPA Reference Method 9 and the procedures in 60.11 (40 CFR 60.303 and 60.8 Appendix A) are required for this installation.
- Your intermediate operating permit will need to be revised to reflect your new grain processing limitations.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The following permits have been issued to Bunge North America, Inc. from the Air Pollution Control Program.

Permit Number	Description
OP EX199805277	Basic Operating Permit
OP2004-036	Intermediate Operating Permit

PROJECT DESCRIPTION

A rice receiving station is being added to an existing, grandfathered grain receiving facility. Rice will be unloaded from hopper trucks and sent to barge or truck loadout.

EMISSIONS/CONTROLS EVALUATION

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, *External Combustion, Food and Agricultural Industries, and Miscellaneous Sources*. Potential emissions of the application represent the potential of the new equipment, assuming maximum operation of 5.0 million bushels of rice receipt.

Baghouses are used on the existing emission points:
 EP1 Other Grain Receiving
 EP2 Internal Operations

The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	**New Installation Conditioned Potential
PM ₁₀	15.0	37.2	5.5	15.4	0.42
SO _x	40.0	16.11	N/A	N/A	N/A
NO _x	40.0	7.46	N/A	N/A	N/A
VOC	40.0	0.13	N/A	N/A	N/A
CO	100.0	1.86	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

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

*Existing potential emission calculated during the review of this project.

**New installation conditioned potential is per voluntary request.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (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

Bunge North America, 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.

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
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (Section 5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Jeannie Kozak
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 8/15/07, received 8/17/07, designating Bunge North America, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- SERO Regional Office Site Survey, dated 8/24/07.

Mr. Robert Hendricks
Sr. Environmental Specialist
Bunge North America, Inc.
613 County Hwy. 434
Portageville, MO 63873-0367

RE: New Source Review Permit - Project Number: 2007-08-086

Dear Mr. Hendricks:

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. Please note that your operating permit will need to be amended based on your new throughput limitation.

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 Jeannie Kozak at departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (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:jkl

Enclosures

c: Southeast Regional Office
PAMS File 2007-08-086
Permit Number: 012008-007