

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.

Permit Number: **082007-009** Project Number: 2007-05-071

Parent Company: MFA Incorporated

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

Installation Name: MFA Agri Service-Bernie

Installation Address: 311 N. Drake, P.O. Box 220, Bernie, MO 63822

Location Information: Stoddard County, S3, T23N, R10E

Application for Authority to Construct was made for:
The installation of a temporary corn storage pile and associated grain receiving, handling, and shipping equipment. 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.

AUG - 9 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 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 Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, Attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

MFA Agri Service-Bernie
Stoddard County, S3, T23N, R10E

1. Emission Limitation
 - A. MFA Agri Service-Bernie 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 temporary storage pile and associated equipment.
 - B. MFA Agri Service-Bernie shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the temporary storage pile and associated equipment. Attachment A or an equivalent form shall be used for this purpose. MFA Agri Service-Bernie shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Department of Natural Resources' personnel upon request.
 - C. MFA Agri Service-Bernie 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.B indicate that the source exceeds the limitation of Special Condition Number 1.A.

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

Project Number: 2007-05-071
Installation ID Number: 207-0015
Permit Number:

MFA Agri Service-Bernie
311 N. Drake
P.O. Box 220
Bernie, MO 63822

Complete: 5/14/2007

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

Stoddard County, S3, T23N, R10E

REVIEW SUMMARY

- MFA Agri Service-Bernie has applied for authority to install a temporary corn storage pile and associated grain receiving, handling, and shipping equipment.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants or currently promulgated Maximum Achievable Control Technology regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of particulate matter less than ten (10) microns in aerodynamic diameter (PM₁₀) are conditioned to de minimis levels.
- This installation is located in Stoddard County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

MFA Agri Service operates a grain processing installation, which is an existing minor source of PM₁₀ and holds a basic operating permit, in Stoddard County. This installation contains an elevator and associated equipment of two dry bulk fertilizer plants and a seed cleaning operation.

The following construction permits have been issued to MFA Agri Service-Bernie from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

Permit Number	Description
0377-006	Fertilizer
0398-005	Grain, fertilizer and seed facility

PROJECT DESCRIPTION

MFA has applied for authority to construct a temporary storage pile for corn. The pile will cover an area approximately 130 feet by 320 feet and will be four feet high. Corn will be loaded into the pile by conveyor and unloaded from the pile with a screw auger at a rate of 280 tons per hour. A tarp held in place by a negative fan system will cover the pile.

Table 2: New Emission Points

Emission Point	Description	Maximum Hourly Design Rate	Emission Factor
EP-14	Haul Road	2.24 lb/VMT	2.080 lb/VMT
TS-1	Grain Receiving	280 ton/hr	0.059 lb/ton
TS-2	Grain Handling	280 ton/hr	0.034 lb/ton
TS-3	Grain Shipping	280 ton/hr	0.029 lb/ton

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, Section 9.9.1, *Grain Elevators and Processes*, May 2003. Potential emissions of the application represent the potential of the new

equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	Project Conditioned Potential
PM ₁₀	15.0	< 15	0.6089	170.01	< 15
SO _x	40.0	0.06	N/D	N/A	N/A
NO _x	40.0	12.89	N/D	N/A	N/A
VOC	40.0	0.26	N/D	N/A	N/A
CO	100.0	3.22	N/D	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 Emissions represent the conditioned emissions from permit 0398-005.

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 particulate matter less than ten (10) microns in aerodynamic diameter (PM₁₀) are conditioned to de minimis levels.

APPLICABLE REQUIREMENTS

MFA Agri Service-Bernie shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170

- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

STAFF RECOMMENDATION

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

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 5/14/2007, received 5/14/2007, designating MFA Incorporated as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated 5/21/2007.

Mr. Alan Mahoney
SER Manager
MFA Agri Service-Bernie
P.O. Box 220
311 N. Drake
Bernie, MO 63822

RE: New Source Review Permit - Project Number: 2007-05-071

Dear Mr. Mahoney:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your 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 contact Michael Mittermeyer or me with the department's Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH: mmk

Enclosure

c: Southeast Regional Office
PAMS File: 2007-05-071

Permit Number: