

PERMIT BOOK

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: **012007 - 017** Project Number: 2006-10-052

Parent Company: MFA Incorporated

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

Installation Name: MFA Agri Service - Guilford

Installation Address: Hwy. M West, Guilford, MO 64457

Location Information: Nodaway County, S21, T62N, R34W

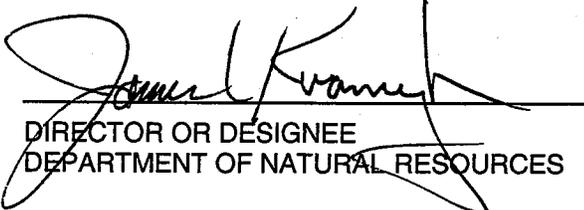
Application for Authority to Construct was made for:
Addition of a new bulk seed treatment operation for soybeans. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

JAN 29 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 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."

MFA Agri Service - Guilford
Nodaway County, S21, T62N, R34W

1. Emission Limitation
 - A. MFA Agri Service - Guilford 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 entire installation.
 - B. MFA Agri Service - Guilford shall maintain an accurate record of PM₁₀ emitted into the atmosphere from from the entire installation. Attachment A or an equivalent form shall be used for this purpose. MFA Agri Service - Guilford 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. MFA Agri Service - Guilford 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 1.B indicate that the source exceeds the limitation of Special Condition Number 1.A.
2. Usage of Wetting Agent

MFA Agri Service - Guilford shall use a wetting agents at all times when loading out seed (EP-15). The wetting agent equipment shall be operated and maintained in accordance with the manufacturer's specifications.

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

Project Number: 2006-10-052
Installation ID Number: 147-0036
Permit Number:

MFA Agri Service - Guilford
Hwy. M West
Guilford, MO 64683-1099

Complete: October 12, 2006
Reviewed: January 10, 2006

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

Nodaway County, S21, T62N, R34W

REVIEW SUMMARY

- MFA Agri Service - Guilford has applied for authority to add a new bulk seed treatment 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.
- A wetting agent is being used to control the PM₁₀ emissions from loadout of the seed (EP-15).
- 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 levels for this project.
- This installation is located in Nodaway 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 the conditioned potential emissions of the application are limited to below de minimis levels.

- Emissions testing is not required for the equipment.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

MFA Agri Service-Guilford operates a grandfathered grain, feed, and general farm supply facility in Guilford, Missouri. This permit consists of the addition of bulk seed treatment operation for soybeans. Cleaned bulk seed (soybeans) will be delivered to the facility and placed in the three hopper bottom storage bins using an enclosed belt conveyor. When orders are received an enclosed belt conveyor will move the bean seed from the storage bins to the treater utilizing two belt conveyers. At the seed treater a liquid fungicide solution is then applied on the seed and then a belt conveyor moves the seed to awaiting trucks. The new equipment is the three hopper bottom storage bins, which will hold approximately 90 tons each. The fill belt conveyor, reclaim belt conveyor under the bins, transfer conveyor to the treater and the loadout conveyor from the treater, All conveyors are enclosed. The new fill conveyor is rated at 36 tons per hour with all other conveyors rated at 30 tons per hour. The installation voluntarily accepted a less than 15 tons PM₁₀ emission limit from the entire installation

PROJECT DESCRIPTION

MFA Agri Service-Guilford has applied for the authority to construct a new bulk seed treatment operation, which includes three (3) 90-ton hopper bottom storage bins. The emission points associated with this new operation are shown in Table 2.

Table 2: Emission Units in the Bulk Seed Treatment Operation

Emission Point	Emission Unit	Maximum Hourly Design Rate
EP-11	Seed Receiving	36 tons/hr
EP-12	Bin Filling	36 tons/hr
EP-13	Conveyor (Transfer)	30 tons/hr
EP-14	Treater (Transfer)	30 tons/hr
EP-15	Load Out	30 tons/hr
EP-07	Haul Road (Gravel)	0.26 VMT/hr

The application of liquid fungicide solution to the seeds prior to loadout acts as a wetting agent and therefore controls PM₁₀ emission resulting from loadout of the seeds (EP-15).

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 9.9.1 *Grain Elevators & Processes* (5/03), and Chapter 13.2.2 *Unpaved Roads* (12/03). A wetting agent controls PM₁₀ emissions from load out of the seed (EP15) at an efficiency of 50%.

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 De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	Application Conditioned Potential
PM ₁₀	15.0	N/A	N/A	16.26	<15.0
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

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 levels.

APPLICABLE REQUIREMENTS

MFA Agri Service - Guilford 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.
- *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.

Samer Al-Shoukhi
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 9, 2006, received October 12, 2006, 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.
- Kansas City Regional Office Site Survey, dated October 30, 2006.

Mr. Alan Mahoney, CSHS
Safety, Environmental & Regulatory Manager
MFA Agri Service - Guilford
Hwy. M West
Guilford, MO 64683-1099

RE: New Source Review Permit - Project Number: 2006-10-052

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 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 me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:sal

Enclosures

c: Kansas City Regional Office
PAMS File 2006-10-052

Permit Number: