

**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: **012010-009**      Project Number: 2009-07-019

Parent Company:              Bunge North America, Inc.

Parent Company Address: 11720 Borman Dr., St. Louis, MO 63146-1000

Installation Name:            Bunge North America, Inc. - Linda Landing

Installation Number:        143-0062

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

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

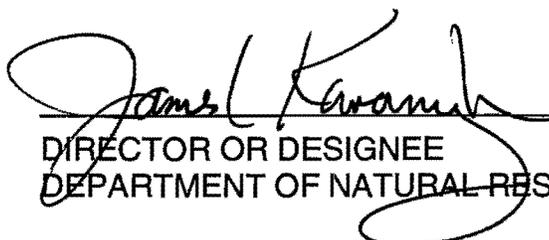
Application for Authority to Construct was made for:  
The re-evaluation of permit 012008-007. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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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 20 2010**

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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 Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). 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 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. - Linda Landing  
New Madrid County, S5, T21N, R14E

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit 012008-007 issued by the Air Pollution Control Program.
2. **Emission Limitation**
  - A. Bunge North America, Inc. - Linda Landing shall emit less than 25.0 tons of particulate matter in any consecutive 12-month period from emission points listed below.
    - 1) Rice Truck Receiving (EP-6a)
    - 2) Rice haul road (EP-6b)
  - 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.
3. **Truck Type Restriction**  
Bunge North America, Inc. - Linda Landing shall receive rice at Rice Truck Receiving (EP-6a) in exclusively hopper bottom type trucks.
4. **Haul Road Watering**  
Bunge North America, Inc. - Linda Landing shall water all haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.
5. **Record Keeping and Reporting Requirements**
  - A. Bunge North America, Inc. - Linda Landing shall maintain all records required by this permit for at least five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
  - B. Bunge North America, Inc. - Linda Landing shall report to the Air Pollution

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**SPECIAL CONDITIONS:**

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

Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 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 (5) REVIEW

Project Number: 2009-07-019  
Installation ID Number: 143-0062  
Permit Number:

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

Complete: July 8, 2009

Parent Company:  
Bunge North America, Inc.  
11720 Borman Dr.  
St. Louis, MO 63146-1000

New Madrid County, S5, T21N, R14E

REVIEW SUMMARY

- Bunge North America, Inc. - Linda Landing has requested the limits in permit 012008-007 be re-evaluated.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- 40 CFR 60 Subpart DD, "Standards of Performance for Grain Elevators" applies to the equipment because it has a storage capacity greater than 2.5 million bushels.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the 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 rice handling 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 PM are conditioned below de minimis levels.
- The installation is located in New Madrid County, an attainment area for all criteria pollutants.
- This installation is 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 counted toward major source applicability.
- 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 new equipment.
- An Intermediate Operating Permit is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Bunge North America operates a grain handling facility in New Madrid County. The installation was constructed before 1983 so no initial construction permit was required. The existing installation is comprised of two grain receiving pits and elevating legs. Both receiving pits are controlled by baghouses. The north pit has a receiving capacity of 15,000 bushels per hour (450 tons per hour) and the south pit has a receiving capacity of 12,000 bushels per hour (360 tons per hour). From the receiving pits, the grain is elevated and stored. A portion of the grain is processed in a column dryer with a grain capacity of 2,000 bushels per hour (60 tons per hour). The dryer's burner is rated at 36 million British thermal unit per hour (MMBtu/hr) and fires #2 fuel oil. Grain is shipped by truck, at a maximum loadout rate of 12,000 (360 tons per hour), and barge, at a maximum loadout rate of 20,000 (600 tons per hour).

The installation is not one of the named source categories in 40 CFR 52.21 (b)(1)(i)(a), but is included in 40 CFR 52.21 (b)(1)(iii)(aa), so the installation is considered a major source if it has the potential to emit 250 tons per year or more of any regulated NSR pollutant, and fugitive emissions are considered. The existing installation has the potential to emit 320.6 tons per year of particulate matter (PM), so the installation is a major source.

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

**Table 1: Permit History**

Permit Number	Description
OP EX199805277	Basic Operating Permit
OP2004-036	Intermediate Operating Permit
012008-007	Rice handling system

## PROJECT DESCRIPTION

In January, 2008 the Air Pollution Control Program issued construction permit 012008-007 for the addition of a rice handling system that would allow Bunge North America, Inc. - Linda Landing to receive rice by hopper bottom truck and convey the rice directly to the barge loading system. The receiving system has a capacity of 20,000 bushels per hour (450 tons per hour). This system consists of a rice dump pit and bulk conveyor

that transfers rice to the existing barge loading equipment. Rice is received in exclusively hopper bottom type truck.

Permit 012008-007 contains installation wide limits on annual grain receipt, annual rice receipt, annual grain shipped by truck and annual grain dried, but does not provide the regulatory justification for imposing those limits.

Bunge has submitted a request to increase the limits in permit 012008-007 to allow them to meet their annual production needs. This permit supersedes the installation wide limits in permit 012008-007 and replaces them with a de minimis limit of PM on the equipment proposed in permit 012008-007.

### 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. AP-42 Section 9.9.1 "Grain Elevators and Processes," May 2003 was used to calculate emissions from grain receiving and grain handling. AP-42 Section 13.2.2 "Unpaved Roads," November 2006 was used to calculate emissions from haul roads. A control efficiency of 50% was applied for the application of water spray on the haul roads.

The existing potential emissions were calculated based on information provided by the applicant and appropriate emission factors and control efficiencies from AP-42. The existing potential emissions is also based on the PM10 limit of 100.0 tons per year found in the installation's intermediate operating permit. The existing actual emissions were recalculated from the throughputs reported in the 2007 EIQ. The potential emissions of the application represent the potential of the rice handling equipment, assuming continuous operation (8760 hours per year). The project conditioned potential is the potential emissions of the rice handling equipment, considering the limitations in this permit. The following table provides an emissions summary for this project.

**Table 2: Emissions Summary (tons per year)**

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	< 100	6.37	119.5	9.7
PM	25.0	320.6	N/D	307.0	< 25.0
SO <sub>x</sub>	40.0	48.7	N/D	N/A	N/A
NO <sub>x</sub>	40.0	22.5	N/D	N/A	N/A
VOC	40.0	0.2	N/D	N/A	N/A
CO	100.0	5.6	N/D	N/A	N/A
HAPs	10.0/25.0	0.05	N/D	N/A	N/A

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

## 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 PM are conditioned below de minimis levels.

## APPLICABLE REQUIREMENTS

Bunge North America, Inc. - Linda Landing 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 June 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
- *New Source Performance Regulations*, 10 CSR 10-6.070 – *New Source Performance Standards (NSPS) for Grain Elevators*, 40 CFR Part 60, Subpart DD

## 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.

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Michael Mittermeyer  
Environmental Engineer

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Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 2, 2009, received July 8, 2009, 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.
- Southeast Regional Office Site Survey, dated July 24, 2009.



Mr. Chris Leonard  
Site Manager  
Bunge North America, Inc. - Linda Landing  
613 County Hwy 434  
Portageville, MO 63873-0367

RE: New Source Review Permit - Project Number: 2009-07-019

Dear Mr. Leonard:

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 Michael Mittermeyer, at the Department's 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

Kendall B. Hale  
New Source Review Unit Chief

KBH:mml

Enclosures

c: Southeast Regional Office  
PAMS File: 2009-07-019

Permit Number: