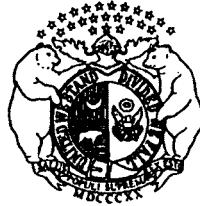


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



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: 022001-017

Project Number: 2001-02-070

Owner: Cargill, Inc.

Owner's Address: 8813 U.S. Hwy 41 South, Riverview, FL 33569

Installation Name: River Bend Ag (formerly Cargill, Inc.)

Installation Address: Riverside Dr. & The Levee, P.O. Box 126, MO 63869

Location Information: New Madrid County, S22, T4, R14E

Application for Authority to Construct was made for:

Addition of two (2) conveyors to their existing fertilizer storage facility at New Madrid, Missouri. 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 (listed as attachments starting on page 2) are applicable to this permit.

FEB 23 2001

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 (2) years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not begun within 2 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. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the 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 sixty (60) days but at least thirty (30) days in advance of this date. Also, you must notify the DNR Regional office responsible for the area within which you are located within fifteen (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 as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within thirty (30) days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, 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 Department of Natural Resources has established a Technical Assistance Program to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or 573-526-6627, or in writing addressed to Technical Assistance Program, P.O. Box 176, Jefferson City, MO 65102.

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 Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, attention Construction Permit Unit.

2001-02-070

Cargill, Inc.

8813 U.S. Hwy 41 South, Riverview, FL 33569

River Bend Ag (formerly Cargill, Inc.)

Riverside Dr. & The Levee, P.O. Box 126, MO 63869

New Madrid County, S22, T4, R14E

Addition of two (2) conveyors to their existing fertilizer storage facility at New Madrid, Missouri. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Page No.	2
Permit No.	
Project No.	2001-02-070

SPECIAL CONDITIONS:

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

River Bend Ag (formerly Cargill, Inc. – New Madrid Fertilizer Division)
New Madrid County, S22, T4, R14E

1. Emission Limitation

- A. River Bend Ag shall emit for this installation less than 15 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12-month period.
- B. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. River Bend Ag 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. River Bend Ag 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 No. 1(B) indicate that the source exceeds the limitation of the Special Condition 1(A).

2. This construction permit when issued shall supersede the construction Permit No. 102000-022.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE

SECTION (5) REVIEW

Project No: 2001-02-070

Installation ID No: 143-0065

Permit No:

River Bend Ag
Riverside Dr. & The Levee
P.O. Box 126, MO 63869

Completed: February 13, 2001

Reviewed: February 20, 2001

Parent Company:
Cargill, Inc.
8813 U.S. Hwy 41 South, Riverview, FL 33569

New Madrid County, S22, T4, R14E

REVIEW SUMMARY

- River Bend Ag has applied for authority to add two (2) conveyors to their existing fertilizer storage facility at New Madrid, Missouri.
- 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.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Installation-wide potential emissions of PM₁₀ are conditioned to below de minimis levels.
- 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 conditioned to below de minimis level.

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

INSTALLATION DESCRIPTION

River Bend Ag (formerly Cargill, Inc. – New Madrid Fertilizer Division) operates a fertilizer storage facility in New Madrid, Missouri. This facility was issued a construction permit on September 20, 2000 (Permit No. 102000-022, Project No. 2000-06-038) for increasing the barge unloading capacity to 450 tons per hour and replacing the existing fertilizer storage building and truck load out stations. The facility was also conditioned to *de minimis* level for PM₁₀ emission in this permit.

PROJECT DESCRIPTION

River Bend Ag proposes to add two (2) conveyors to their existing fertilizer storage facility at New Madrid, Missouri. According to the information in the application, these two (2) conveyors are needed to move the barge out into the river an additional 75 feet to ensure sufficient water depth. If this modification is not made, it is anticipated that the facility will no longer be able to receive fertilizer via barges due to the low river levels resulting in a potential shut down of the facility. The maximum hourly design rate of each conveyor is 450 tons per hour. The facility requested to be under *de minimis* level for the whole installation in their application.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) Factor Information Retrieval System (FIRE) version 6.21. No air pollution control equipment is being used in association with the new equipment. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (i.e., 8760 hours per year.) A composite emission factor for this installation was calculated (based on all installation emission points) and will be used in record keeping forms to ensure that the installation's annual emissions are less than 15 tons per year. With this installation-wide conditioned potential of less than *de minimis* levels, the installation will no longer be required to submit an operating permit application. 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 (1999 EIQ)	Potential Emissions of the Application	Installation Conditioned Potential
PM ₁₀	15.0	<15.0	2.751	78.84	<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

**Existing Potential Emissions of PM₁₀ were conditioned to de minimis level in Permit No.102000-022

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

- I. River Bend Ag (formerly Cargill, Inc. – New Madrid Fertilizer Division)
 - A. General
 1. *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - a) Emission Limitation: \$25.70 per ton of pollutant or the amount established by the Missouri Air Conservation Commission under Missouri Air Law 643.079(1) if changed.
 - b) Record Keeping Requirement: Emission Inventory Questionnaire (EIQ).
 - c) Monitoring Requirement: None
 - d) Reporting Requirement: Submission of EIQ once every five (5) years on April 1 for previous year's emissions and payment of emissions fees every year unless payment schedule for de minimis sources is altered by the APCP.
 - B. Odors
 1. *Restriction of Emission of Odors*, 10 CSR 10-3.090
 - a) Emission Limitation: No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one (1) volume of odorous air is diluted with seven (7) volumes of odor-free air for two (2) separate trials not less than 15 minutes apart within the period of one (1) hour.
 - b) Record Keeping Requirement: None

- c) Monitoring Requirement: None
- d) Reporting Requirement: None

C. Fugitive Particulate Matter

1. *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170

- a) Emission Limitation: No person may cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter to go beyond the premises of origin in quantities that the particulate matter:

- (1) Remains visible in the ambient air beyond the property line of origin;
- (2) Or, may be found on surfaces beyond the property line of origin.

The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the Director.

- b) Record Keeping Requirement: Department of Natural Resources' inspection reports.
- c) Monitoring Requirement: Periodic Department of Natural Resources' inspection/routine surveillance.
- d) Reporting Requirement: None

D. Visible Air Contaminants

1. *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220

- a) Emission Limitation: River Bend Ag shall not discharge into the ambient air from any single existing source of emission whatsoever any air contaminant of an opacity greater than 20%.
- b) Record Keeping Requirement: River Bend Ag shall maintain records of all opacity tests required by this condition for the time periods specified in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.065, *Operating Permits*.
- c) Monitoring Requirement: River Bend Ag shall conduct opacity measurements on these emission units using methods and timelines specified in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.065, *Operating Permits*.
- d) Reporting Requirement: River Bend Ag 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 any exceedence of the opacity limit, established by 10 CSR 10-6.220 and 10 CSR 10-6.065, or any malfunction which could possibly

cause an opacity exceedence.

II. Emission Points EP12 and EP13

A. Particulate Matter

1. *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-3.050
 - a) PM Emission Limitation each point = 67.7 pounds/hr
Calculated Emission Rate for each point = 9.0 pounds/hr
 - b) Record Keeping Requirement: None
 - c) Monitoring Requirement: None
 - d) Reporting Requirement: None

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

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 February 9, 2001, received February 13, 2001 designating Cargill, 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 June 20, 2000.

Attachment A: PM₁₀ Compliance Worksheet

River Bend Ag
New Madrid County, S22, T4, R14E
Project Number: 2001-02-070
Installation ID: 143-0065
Permit Number:

This sheet covers the period from _____ to _____
Month, Year Month, Year

Month	Column 1	Column 2	Column 3	Column 4
	Amount of Fertilizer Off-loaded from Barges (Tons) Note 1	Comp-PM ₁₀ Emission Factor (lbs/ton) Note 2	Monthly PM ₁₀ Emissions (Tons) Note 3	12-Month PM ₁₀ Emissions (Tons/Year) Note 4
		0.1423		
		0.1423		
		0.1423		
		0.1423		
		0.1423		
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		0.1423		
		0.1423		

Note 1: Amount of fertilizer off-loaded from barges during this month.

Note 2: Sum of the emission (lb/hr) / maximum hourly design rate.

Note 3: Column 1 x Column 2 x 0.0005.

Note 4: Sum of last 12-months of Column 3*.

*A 12-Month Total PM₁₀ emissions of not in excess of 15 tons for Column 4 indicates compliance.

Mr. James E. Turner
Territory Manager
River Bend Ag
P.O. Box 126
New Madrid, Missouri 63869

CERTIFIED MAIL: 0008 9701 4315
RETURN RECEIPT REQUESTED

RE: New Source Review Permit Application - Project No. 2001-02-070

Dear Mr. Turner:

Review of your new source review permit application has been completed. In accordance with Missouri State Rule 10 CSR 10-6.060 (10)(A), a review fee of \$50 per hour has been charged. Please note below the amount due. Upon receipt of this amount, your permit will be issued. Payment must be received by the Air Pollution Control Program within 90 days.

If you have any questions or need additional information, please contact me at (573) 751-4817. Thank you in advance for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Fuad Wadud
Environmental Engineer

FW/dg

c: Charles A. Shell/Paula Morgret, Shell Engineering & Associates, Inc.
APCP Accounts Receivable
PATs File

Return this portion of letter and payment to:

Attn: Air Pollution Control Program, Missouri Department of Natural Resources,
205 Jefferson Street, P.O. Box 176, Jefferson City, MO 65102

Make checks payable to the "Department of Natural Resources (APCP/NRPF)"

River Bend Ag, 2001-02-070, Fuad Wadud

Total Hours for Review		Total Amount Due	Date Due
4.75	x \$50 per hour =	\$237.50	

Mr. James E. Turner
Territory Manager
River Bend Ag
P.O. Box 126
New Madrid, Missouri 63869

RE: New Source Review Permit - Project No. 2001-02-070

Dear Mr. Turner:

Enclosed with this letter is your permit to construct. Please 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 special conditions from your new source review 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. As this permit limited the installation to below de minimis levels, no operating permit submittal will be required.

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.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Refaat H. Mefrakis, P.E.
New Source Review Unit Chief

RHM: fwd

Enclosures

c: Charles A. Shell/Paula Morgret, Shell Engineering & Associates, Inc.
Southeast Regional Office
PATs File

Permit No.: