

RESPONSE TO COMMENTS

ADM GRAIN RIVER SYSTEMS, INC. (ADM GRAIN COMPANY)

PERMIT #0800-AR-13

AFIN: 54-00013

On February 18, 2014, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted on behalf of the Department. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

In Specific Condition 3, SN-07 is shown in the opacity limit table twice. It should be removed from the 20% group.

Response to Comment #1:

This change has been implemented in the permit.

Comment #2:

In Specific Condition 11, there is a sentence that was also in R12 that reads "The spout is not subject to initial testing." I believe this is referring to SN-05A, Gravity Loadout Spout. The sentence should be edited to provide better understanding, or removed.

Response to Comment #2:

The sentence has been changed to specifically refer to SN-05A.

Comment #3:

In Specific Condition 17, a table is shown with the testing status of the sources subject to DD. The row for SN-03A was cut-off, with the source number and one of the test methods missing. In addition, since the approval of R12, there has been further testing that should be added. Below is an updated table.

SN	Tests Required	Test Completed	Tests Remaining
02	Method 5 or 17, Method 9	Method 9 on Dump Method 9 on Baghouse on August 1, 2012 Method 5 on Baghouse on June 26-27, 2013	None
02A	Method 9	Tested July 31, 2012	None

SN	Tests Required	Test Completed	Tests Remaining
03	Method 9	All listed in Permit have been Tested	None
03A	Method 5 or 17, Method 9	Tested June 25, 2013	None
04	Method 5 or 17, Method 9	Tested October 2009	None
05	Method 9	None	Method 9
06	Method 9	Tested June 26, 2013	None
07	Method 9	Tested January 18, 2012	None
07A	Method 9	Tested January 18 & 19, 2012	None
08	Method 5 or 17, Method 9	Tested June 26-27, 2013	None
09	Method 5 or 17, Method 9	Tested October 2009	None

Response to Comment #3:

This change has been implemented in the permit.



ARKANSAS
Department of Environmental Quality

April 18, 2014

Miranda Gerard
Environmental Specialist
ADM Grain River Systems, Inc. (ADM Grain Company)
4666 Faries Parkway
Decatur, IL 62526

Dear Ms. Gerard:

The enclosed Permit No. 0800-AR-13 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 11/12/2013.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0800-AR-13 for the construction, operation and maintenance of an air pollution control system for ADM Grain River Systems, Inc. (ADM Grain Company) to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,

A handwritten signature in black ink that reads "Mike Bates". The signature is written in a cursive style with a large, stylized "M" and "B".

Mike Bates
Chief, Air Division

Enclosure

ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 0800-AR-13

IS ISSUED TO:

ADM Grain River Systems, Inc. (ADM Grain Company)
Highway 20 South
Helena-West Helena, AR 72342
Phillips County
AFIN: 54-00013

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

April 18, 2014
Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: ADM Grain River Systems, Inc. (ADM Grain Company)

AFIN: 54-00013

PERMIT NUMBER: 0800-AR-13

FACILITY ADDRESS: Highway 20 South
Helena-West Helena, AR 72342

MAILING ADDRESS: 4666 Faries Parkway
Decatur, IL 62526

COUNTY: Phillips County

CONTACT NAME: Miranda Gerard

CONTACT POSITION: Environmental Specialist

TELEPHONE NUMBER: 217-412-5631

REVIEWING ENGINEER: Alexander Sudibjo

UTM North South (Y): Zone 15: 3818956.03 m

UTM East West (X): Zone 15: 720167.72 m

Section II: INTRODUCTION

Summary of Permit Activity

ADM Grain Company (ADM), a subsidiary of Archer Daniels Midland Company, located at Highway 20 South, Helena, Arkansas, requested a de minimis modification to increase the facility's maximum grain throughput to 1,800,000 tons per year. The facility's permitted annual emissions are increasing by 10.9 tpy and 0.8 tpy for PM and PM₁₀ respectively.

Process Description

ADM currently operates 4,521,600 bushels of permanent grain storage capacity. ADM is subject 40 CFR Part 60 Subpart DD. The maximum grain throughput at the facility is 1,800,000 tons of grains per consecutive twelve (12) month period.

The following sources are contributing to the emissions from this facility.

- Truck Dumps #1 and #2 (SN-01) are controlled by a baghouse (Air-Con, CAR 101-1292-4953).
- Truck dumps #3 and #4 (SN-02 and SN-02A) are controlled by baffles. SN-02 is also controlled by a baghouse.
- The emissions from the SN-03A and SN-08 are controlled by two (2) baghouses. The control function of the baghouse (Air-Con CAR 101-10, 94-5738) at SN-03A is as follows: The house dust system is on the ground and pulls dust from the boot of the two (2) house legs. The control function of the baghouse (Air-Con CAR 137-10, 94-6068) at SN-08 is as follows: The Annex dust system is on the third floor and pulls dust off of the head of the two(2) house legs, the two(2) drags and head of the three (3) west tripper.
- Bin Vents (SN-04 and SN-09) are controlled by two (2) baghouses. The control function of the baghouse (Air-Con CAR 101-10, 94-6059) at SN-04 is as follows: The east dust system pulls off of the bins on the east side. The control function of the baghouse (Air-Con CAR 101-10, 94-6059) at SN-09 is as follows: The west dust system pulls off of the bins on the west side
- Column Dryer (Natural Gas Fuel) has a maximum grain drying capacity of 180,000 tons per year.

The following table lists the assorted bins storage capacity.

Bin Identification Number	Bins (Unit)	Storage Capacity Bushels/Bin	Total capacity (Bushels)	Note
101 through 112, and 301 through 312, and 501 through 511	35	36,000	1,260,000	Bins in use
201 through 211 and 401 through 411	22	9,600	211,200	Bins in use

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Bin Identification Number	Bins (Unit)	Storage Capacity Bushels/Bin	Total capacity (Bushels)	Note
113 through 136, and 313 through 336 and 512 through 536	73	36,000	2,628,000	Existing bins to be incorporated into use
213 through 234 (excluding bin 224) and, 413 through 434 (excluding bin 424)	44	9,600	422,400	Existing bins to be incorporated into use
Total	174		4,521,000	

The following conveyors are permitted under Internal Handling (SN-03). Except for the river belt conveyor because it was constructed prior to 1978, all the conveyors are subject to NSPS 40 CFR Part 60 Subpart DD which are listed below:

- River belt conveyor-constructed prior to 1978 (Exempt from NSPS DD);
- Two (2) basement conveyors-enclosed conveyor that runs the entire length of the basement (Tested October 20, 2009);
- One (1) conveyor that comes out of the basement-enclosed conveyor that comes from the basement to the east side of the elevator (Tested October 20, 2009);
- Two (2) conveyors both are enclosed conveyors on the third floor, one runs north- south from the south head house, the other runs west to east from leg #3 on the west side (Tested July 31, 2012, conveyors on roof);
- One (1) conveyor on pit #3 conveyor is enclosed and is the truck dump on the west side of the elevator (Tested December 1, 2009);
- Two (2) open conveyors on the galley floor (Tested October 21 & 23, 2009);
- Two (2) enclosed drags on the galley floor (Tested October 21 & 23, 2009);
- Two (2) enclosed drags in the boot pit from truck dumps to the house legs (Tested October 16, 2012, Dump #1 and #2 Boot Pit Transfer Points);
- One (1) enclosed drag from truck dump on the east side of the elevator to the river leg (Tested February 9, 2009);
- One (1) enclosed conveyor on the east side of the elevator, it goes from the conveyor coming out of the basement to the open conveyor (Tested October 20, 2009);
- One (1) open conveyor on the east side of the elevator connects enclosed conveyors to the river leg (Tested July 31, 2012, North incline);
- One (1) open conveyor at the river runs north from river belt to enclosed conveyor (Tested October 15, 2012, River Crossover);
- One (1) enclosed conveyor runs east to the barge spout (Tested October 15, 2012, River High Roller);
- Four (4) LEGS (1 at dump #3 on the west side of the elevator, *2 in south head house, **1 at river belt east side of elevator)- (Dump #3 Lift Leg Tested December 1, 2009)(*Tested October 16, 2012, South Head House Vents, ** Tested October 15, 2012, River Direct Leg).

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In the summer of 2012, the river water levels became too low to ship the grain down river on the barges. So, temporary ground piles (SN-10, 10A, 11, and 11A) will be used to store the grain until the river level rises and the grain can be shipped.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 27, 2013
NSPS 40 CFR Part 60 Subpart DD - <i>Standards of Performance for Grain Elevators</i>

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	138.0	45.1
PM ₁₀	54.3	16.0
SO ₂	0.1	0.2
VOC	0.2	0.9
CO	3.0	13.0
NO _x	3.5	15.4

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Section III: PERMIT HISTORY

The original facility was constructed in the 1960's. The first permit, 800-A, was issued under Arkansas Regulation 19 on October 29, 1986. This permit included a PSD review for installation of a coal fired co-generation system. This unit was never installed or operated.

Permit 800-AR-1 was issued under Arkansas Regulation 19 on March 28, 1988. This permitting action included replacement of a twin cyclone at the truck unloading pit with a new cyclone and pneumatic dust conveying system and installation of an additional cyclone in the soybean preparation area.

Permit 800-AR-2 was issued under Arkansas Regulation 19 on June 19, 1990. This permitting action included rerouting several emission points to one cyclone.

Permit 800-AR-3 was issued under Arkansas Regulation 19 on August 19, 1991. This permitting action included the consolidation of SN-16D and SN-16 E into one source for a new millfeed meat recovery system.

Permit 800-AR-4 was issued under Arkansas Regulation 19 on June 15, 1994. This permitting action included identification of previously existing, but unpermitted, sources and a proposed plant expansion. Additional modifications included replacement of 14 cyclones with baghouses and the addition of a mineral oil absorption system to recover hexane from the soybean oil extraction process. This permit was the first permit issued to Quincy Soybean which included documentation of hexane emissions.

Permit 800-AR-5 was issued under Arkansas Regulation 19 on June 20, 1995. This permitting action included the installation of boiler #3, revisions in the annual throughput rates at the facility, a modification in the control equipment at the truck receiving pit, and a decrease in allowable operation of boilers #1 and #2. Boiler #3 was permitted at 109 MMBTU/hr. This resulted in an emission increase of 38.5 tons per year (tpy) of NO_x, 95.4 tpy CO, and a net emission increase of 4.8 tpy particulate matter (PM/PM₁₀). The boiler was permitted at 109 MMBTU/hr to avoid review under the PSD regulations. Boiler #3 was installed at a capacity of 123 MMBTU/hr.

Title V permit 800-AOP-R0 was issued under Arkansas Regulation 19 on March 4, 1997. This permitting action included the installation of a co-generation system (SN-65) and relaxation of operating restrictions on boiler #3 (SN-64). The above mentioned modification resulted in increases of nitrogen oxides (NO_x) and carbon monoxide (CO) of 104.3 tons per year (tpy) and 154.2 tpy, respectively. These increases exceed the PSD significance levels and are subject to review under the PSD regulations. Emission increases of 15.1 tpy volatile organic compounds (VOC), 14.8 tpy particulate matter (PM), and 0.3 tpy sulfur dioxide (SO₂) associated with these modifications are below the significance levels for each of these pollutants.

Title V permit 800-AOP-R1 was issued on September 15, 1998. This permit modification restricted the capacity of Boiler #3 (SN-64). Therefore, the facility no longer was subject to 40

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CFR Part 60 Subpart Db and Dc. Additionally the permit allowed the facility to unload a barge (SN-58) onto trucks while the conveyor line was in the shipping mode.

Title V permit 800-AOP-R2 was issued on May 13, 1999. This permit modification allowed the facility to remove Schanzer Dryer SN-14 and increase the throughput limit to Amarillo Dryer SN-15. This permit was terminated on January 11, 2001.

Permit 800-AR-6 was issued on May 13, 1999. ADM permitted to increase the existing storage capacity, remove, and construct assorted conveyors at the ADM plant located at Highway 20 South in Helena, Arkansas. The plant was formerly operated as a soybean oil mill. Since 2005, ADM owned and has operated only as a grain elevator. ADM increased the existing facility's grain storage capacity to 3,396,000 bushels by constructing the following equipment: enclosed receiving conveyor, bucket elevator, enclosed fill conveyors, enclosed reclaim conveyors, and truck/rail loudout spout. Due to this storage capacity increase, the facility is subject to 40 CFR 60 Subpart DD. The permitted emissions were 4.1 tpy of PM and 1.4 tpy of PM₁₀.

Permit 800-AR-7 was issued on August 3, 2009. ADM requested an authorization to make the following changes to the above referenced permit:

- To increase the conveying capacity of the Internal Handling (SN-03) by replacing the existing conveyors with a new Gallery Fill Conveyor and a new Reclaim Conveyor in the basement.
- To operate the existing Berico Column Dryer SN-07.

Additionally, ADM submitted another de minimis application and requested to use the existing storage bins that have not been in operation. An assorted storage bins and operation statuses were added to the permit. ADM Grain Company operated 2,471,200 bushels of permanent storage capacity prior to the two bins failing; which caused ADM to lose 1,000,000 bushels storage capacity. This permit allowed the facility to add 3,050,400 bushels of storage capacity, which increased the total storage capacity to 4,521,600 bushels. 40 CFR Part 60 Subpart DD applies to this facility

Also, ADM submitted another de minimis application and requested an authorization to make the following changes to the above referenced permit:

- To increase the conveying capacity of the Internal Handling (SN-03) by installing 110 feet of a new Conveyor on the gallery roof from Leg 3 to east tripper fill conveyor. This conveyor has 20,000 bushels per hour capacity and attached to the dust collector systems.
- Also, installed 180 feet conveyor on the gallery roof from Leg 1 and 2 to east tripper fill conveyor. This conveyor is set at 20,000 bushels per hour as well and also tied to the existing dust systems.

The permitted emission due to this modification increased: 11.1 tones per year (tpy) of PM and 3.7 tpy of PM₁₀, 0.1 tpy of SO₂, 0.9 tpy of VOC, 15.0 tpy of CO, and 13.0 tpy of NO_x.

Permit 800-AR-8 was issued on August 31, 2010. ADM requested an authorization to make the following changes to the above referenced permit:

- Increase facility throughput that specified in the confidential permit application dated October 5, 2009.

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- Install a 10,000 bushel per hour truck load out spout. This spout will attach directly to bin 106 and 107 as part of SN-05.
- Expand process description.
- Add the existing Internal Handling Annex (Baghouses) SN-08 to the permit.
- Add the existing Storage Bins Vents (Baghouse) SN-09 to the permit.
- Include NSPS subpart DD requirements for SN-01, SN-02, SN-02A, SN-04, SN-06, SN-07, SN-08, and SN-09 in the permit.
- Add SN-03A, SN-03B, and SN-04A to the permit.

The above listed changes result in the permitted emission rate increases of 0.7 tons per year (tpy) for PM₁₀ and 1.4 tpy for PM.

Permit 800-AR-9 was issued on December 8, 2011. ADM requested a modification to their permit for the following changes:

- a. To increase grain dryer throughput at Brinco Column Dryer (SN-07) from 90,000 to 180,000 tons per year (tpy).
- b. Install three (3) conveyors for the brinco column dryer at Dryer Conveyors (SN-07A):
 - i. 10,000 bushels per hour (bph) drag conveyor - dryer fill
 - ii. 10,000 bph bucket elevator - dryer fill
 - iii. 10,000 bph bucket elevator - dryer reclaim

The permitted emission due to this modification increased: 12.8 tpy of PM, 6.6 tpy of PM₁₀, 0.1 tpy of SO₂, and 0.4 tpy of NO_x.

Permit 0800-AR-10 was issued on August 9, 2012. ADM requested a de minimis modification to add an existing baghouse which affects SN-06 that was left out of the previous permit and to add temporary ground piles (SN-10 and SN-10A). The total annual permitted emission rate limit changes due to this modification are +1.6 tpy of PM and +1.1 tpy of PM₁₀.

Permit 0800-AR-11 was issued on October 11, 2012. ADM requested an administrative amendment to correct SN-02 and SN-06's emission, opacity, and NSPS DD limits. Also, SN-01 was not subject to NSPS DD. SN-05 was removed from Specific Condition #12. The total annual permitted emission rate limit changes due to this modification were -0.9 tpy of PM and -0.1 tpy of PM₁₀.

Permit 0800-AR-12 was issued on April 3, 2013. This modification added two additional temporary grain storage piles (SN-11 and SN-11A). The piles were 1,000,000 bushels each and had an asphalt base with 4 ft. portable walls. Also, a temporary stacker conveyor and a drive over truck pit that is rated at 15,000 bph were installed. SN-05 was subject to NSPS 40 CFR Part 60 Subpart DD, but SN-05 has a gravity loadout spout (SN-05A) that was not subject to NSPS DD because it was added to an existing grain storage/grain transfer bin. The total annual permitted emission rate limit changes due to this modification were +4.1 tpy of PM and +1.8 tpy of PM₁₀.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19 §19.501 et seq. and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Straight/Hopper Truck Receiving (Dump Pits #1 and 2) (Baghouse)	PM ₁₀	0.5	0.1
02	Truck Receiving (Direct to Barge) (Baffles/Choke Unload) (Baghouse)	PM ₁₀	1.2	0.7
02A	Truck Receiving (Dump Pits #3) (Pit Baffles)	PM ₁₀	0.7	0.3
03	Internal Handling (No Control)	PM ₁₀	0.3	0.8
03A	Internal Handling (Elevator House) (Baghouse)	PM ₁₀	0.3	0.8
04	Storage Bin Vents (East Bins) (Baghouse)	PM ₁₀	0.1	0.1
05	Truck/Rail Shipping (Drop Sock)	PM ₁₀	1.8	0.3
05A	Gravity Loadout Spout for SN-05	PM ₁₀	8.7	1.1
06	Barge Shipping (Dust Suppressor)	PM ₁₀	0.6	0.4
07	Berico Column Dryer (Natural Gas Fuel)	PM ₁₀	1.2	5.2
		SO ₂	0.1	0.2
		VOC	0.2	0.9
		CO	3.0	13.0
		NO _x	3.5	15.4
07A	Dryer Conveyors	PM ₁₀	0.7	3.1
08	Internal Handling Annex (Baghouse)	PM ₁₀	0.3	0.2
09	Storage Bins Vents (Baghouse)	PM ₁₀	0.1	0.1
10	Portable Truck Conveyor - Temporary Ground Pile	PM ₁₀	3.6	0.3
10A	Portable Stacker Conveyor - Temporary Ground Pile	PM ₁₀	15.3	1.1

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SN	Description	Pollutant	lb/hr	tpy
11	Hopper Truck Pit - Temporary Ground Pile	PM ₁₀	3.6	0.3
11A	Portable Stacker Conveyor – Temporary Ground Pile	PM ₁₀	15.3	1.1

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Straight/Hopper Truck Receiving (Dump Pits #1 and 2) (Baghouse)	PM	1.7	0.2
02	Truck Receiving (Direct to Barge) (Baffles/Choke Unload) (Baghouse)	PM	5.3	3.2
02A	Truck Receiving (Dump Pits #3) (Baffles)	PM	3.2	1.1
03	Internal Handling (No Control)	PM	0.5	1.4
03A	Internal Handling (Elevator House) (Baghouse)	PM	0.5	1.4
04	Storage Bin Vents (East Bins) (Baghouse)	PM	0.2	0.2
05	Truck/Rail Shipping (Drop Sock)	PM	5.2	0.7
05A	Gravity Loadout Spout for SN-05	PM	25.8	3.3
06	Barge Shipping (Dust Suppressor)	PM	2.4	1.5
07	Berico Column Dryer (Natural Gas Fuel)	PM	4.6	20.1
07A	Dryer Conveyors	PM	1.3	5.5
08	Internal Handling Annex (Baghouse)	PM	0.5	0.3
09	Storage Bins Vents (Baghouse)	PM	0.2	0.2
10	Portable Truck Conveyor - Temporary Ground Pile	PM	15.8	1.1
10A	Portable Stacker Conveyor – Temporary Ground Pile	PM	27.5	1.9

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SN	Description	Pollutant	lb/hr	tpy
11	Hopper Truck Pit - Temporary Ground Pile	PM	15.8	1.1
11A	Portable Stacker Conveyor - Temporary Ground Pile	PM	27.5	1.9

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
07	5%	§18.501
01, 05A, 10, 10A, 11, 11A	20%	§18.501
03A, 04, 07A, 08, 09	0%	40 CFR 60.302(b)(2)
02, 02A	5%	40 CFR 60.302(c)(1)
03	0%	40 CFR 60.302(c)(2)
05	10%	40 CFR 60.302(c)(3)
06	20%	40 CFR 60.302(c)(4)

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18 §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall not receive more than 1,800,000 tons of grain at the facility per rolling 12 month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #6. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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8. The permittee will not exceed the maximum for the dryers listed below: [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Dryer	Grain Processed (tpy)
07	Berico Column Dryer	180,000

9. The permittee will maintain monthly records of grain processed through SN-07 to demonstrate compliance with Specific Condition #8. These records shall include a rolling twelve month total and each individual month's data. These records shall be kept onsite and shall be made available to the Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall not exceed a throughput of 4 million bushels of grain at SN-10, SN-10A, SN-11, and SN-11A total. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NSPS 40 CFR Part 60 Subpart DD Conditions

11. SN-02, SN-02A, SN-03, SN-03A, SN-04, SN-05, SN-06, SN-07, SN-07A, SN-08, and SN-09 are subject to NSPS 40 CFR Part 60 Subpart DD and shall follow the conditions listed below. Due to a screen perforation less than 0.094 inches, the 0 percent opacity limit does not apply to SN-07. The Gravity Loadout Spout, SN-05A, is not subject to initial testing. [Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart DD]
12. On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:
- a) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - b) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.
- [Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart §60.302(a)(1-2)]
13. On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
- a) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
 - b) Exhibits greater than 0 percent opacity.
- [Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart §60.302(b)(1-2)]
14. On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner

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or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- a) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
 - b) Any grain handling operation which exhibits greater than 0 percent opacity.
 - c) Any truck loading station which exhibits greater than 10 percent opacity.
 - d) Any barge or ship loading station which exhibits greater than 20 percent opacity.
- [Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart §60.302(c)(1-4)]

15. The owner or operator of any barge or ship unloading station shall operate as follows:
- a) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
 - b) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft³ /bu).
 - c) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

[Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart §60.302(d)(1-3)]

16. The owner or operator shall determine compliance with the particulate matter standards in § 60.302 as follows:
- a) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters. Method 17 may be used instead of Method 5.
 - b) Method 2 shall be used to determine the ventilation volumetric flow rate.
 - c) Method 9 and the procedures in § 60.11 shall be used to determine opacity.

[Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart §60.303(b)(1-3),(c)(1)]

17. The following sources have had the following tests completed: [Regulation 19 §19.304 and NSPS 40 CFR Part 60 Subpart DD]

SN	Tests Required	Tests Completed	Tests Remaining
02	Method 5 or 17, Method 9	Method 9 on Dump Method 9 on Baghouse on August 1, 2012 Method 5 on Baghouse on June 26-27, 2013	None
02A	Method 9	Tested July 31, 2012	None
03	Method 9	All Listed in Permit have been Tested	None

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SN	Tests Required	Tests Completed	Tests Remaining
03A	Method 5 or 17, Method 9	Tested June 25, 2013	None
04	Method 5 or 17, Method 9	Tested October 2009	None
05	Method 9	None	Method 9
06	Method 9	Tested June 26, 2013	None
07	Method 9	Tested January 18, 2012	None
07A	Method 9	Tested January 18 & 19, 2012	None
08	Method 5 or 17, Method 9	Tested June 26-27, 2013	None
09	Method 5 or 17, Method 9	Tested October 2009	None

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated April 25, 2008, March 6, 2009, May 25, 2012, and November 19, 2012.

Description	Category
None	

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Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19 §19.704 and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19 §19.410(B) and/or Regulation 18 §18.309(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

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5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19 §19.410(A) and/or Regulation 18 §18.309(A) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19 §19.407(B) and/or Regulation 18 §18.307(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

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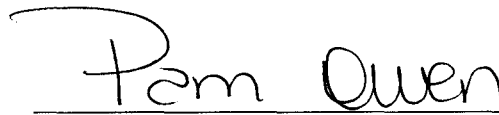
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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
ADM Grain River Systems, Inc. (ADM Grain Company), 4666 Faries Parkway, Decatur, IL,
62526, on this 18th day of April 2014.



Pam Owen, AAIL, Air Division