

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7 901 NORTH 5TH STREET KANSAS CITY, KANSAS 66101

AUG 2 7 2008

W. Clark Smith Permitting Section Supervisor Air Quality Division Nebraska Department of Environmental Quality P.O. Box 98922 Lincoln, NE 68509-8922

RE: ADM Fremont PSD Construction Permit comments

- Ciark

Dear Mr. Smith:

On July 23, 2008, the Environmental Protection Agency (EPA) Region 7 received notification of the Nebraska Department of Environmental Quality's (NDEQ) intent to approve the Prevention of Significant Deterioration (PSD) construction permit for Archer Daniels Midland - Fremont (ADM) to expand its existing soybean processing plant. The plant is located at 130 North Broad Street, Fremont, Dodge County, Nebraska. We have completed our review of the draft PSD construction permit and have the following comments.

Comment 1.

This project allows for modifications including lengthening the extractor, replacing two of the three components with new parts in the distillation system, replacing two smaller condensers with a new primary condenser, and replacing one of the existing cooling towers with a larger cooling tower. In general, we believe that these modifications should allow ADM to achieve a solvent loss ratio (SLR) below the proposed 0.165 gal/ton in the draft permit or the 0.175 gal/ton limit requested by ADM. We were unable to determine from the permitting record if NDEQ or ADM explored a range of limits related to the new modifications.

While historical data may be useful in assessing the likelihood that a plant can meet a BACT limit, it should not be the only information the state relies on in setting BACT, especially when the process is changing substantially. Instead, we suggest that NDEQ assess the affect of the new equipment over a range of potential BACT emissions limits. We suggest looking at what other similar plants have achieved following similar modifications. Two suggested plants for comparison are the ADM Mankato and proposed Mexico, Missouri projects since they appear to be similar to the project being undertaken at Fremont. We have enclosed data for the Mankato and Mexico plants with this letter.



Upon our review of the data available, we believe the ADM Fremont plant should have an SLR limit of 0.15 gal/ton, comparative to the ADM Mankato plant. Additionally, review of the January 2003 through December 2007 SLR (hexane loss) for the ADM Mankato plant shows it achieved an overall average of 0.116 gal/ton hexane loss. Similar data for the ADM Mexico plant with an average temperature of 66°F (11°F above Mankato's 55°F average), achieved an over all average of 0.120 gal/ton for the same time period. The 12-month rolling average at the Mankato plant never exceeded the 0.145 gal/ton during the period.

Comment 2.

Page 18, Fact Sheet, third paragraph. There appears to be a typographical error that states: "The source is now required to comply with the 0.175 gallons/ton solvent loss ratio . . ."

Comment 3.

See modeling comment memo from Mr. Richard Daye.

As always, we appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Patricia Scott at (913) 551-7312 if you have any questions or comments regarding this letter.

Sincerely, Wall

Mark A. Smith, Chief Air Permitting and Compliance Branch Air and Waste Management Division

Enclosure:

ADM Mankato and ADM Mexico Solvent Loss Ratio data Memo regarding modeling comments from Mr. Richard Daye

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June-2004 2,960,025 8,069 0,091 0,086 73 July-2004 3,103,139 10,401 0,112 0,092 77 August-2004 3,073,714 10,363 0,105 0,098 75 October-2004 3,836,282 12,130 0,105 0,099 57 November-2004 3,638,842 12,221 0,112 0,102 45 December-2004 3,638,842 12,221 0,112 0,103 31 January-2005 3,617,000 10,656 0,098 0,103 22 February-2005 3,784,700 12,196 0,107 0,104 39 April-2005 3,885,039 13,119 0,110 0,105 33 March-2005 3,784,700 12,196 0,107 0,104 39 April-2005 3,885,039 13,119 0,113 0,107 63 June-2005 3,885,039 13,119 0,115 0,108 81 July-2005 3,855,771 11,254 0,097 0,108 83 August-2005 3,766,10 14,937 0,132 0,111 72 October-2005 3,766,951 16,132 0,114 0,116 11 November-2005 3,766,951 16,132 0,114 0,116 11 November-2005 3,756,951 16,132 0,114 0,115 0,108 81 January-2006 3,850,248 13,666 0,118 0,117 33 February-2006 3,850,724 13,921 0,120 0,121 38 April-2006 3,853,724 13,921 0,120 0,121 38 April-2006 3,853,724 13,921 0,120 0,121 38 April-2006 3,875,71 77,681 0,144 0,146 0,120 27 March-2006 3,853,724 13,921 0,120 0,121 38 April-2006 3,756,951 16,632 0,104 0,113 69 June-2006 3,976,975 17,681 0,148 0,137 78 September-2006 4,039,130 17,037 0,141 0,131 69 June-2006 4,039,130 17,037 0,141 0,136 67 September-2006 3,976,975 17,681 0,148 0,137 78 September-2006 4,183,452 15,484 0,123 0,137 78 September-2006 3,513,18,451 15,137 0,121 0,136 67 September-2006 3,513,18,451 15,137 0,121 0,136 67 September-2006 3,513,187 11,790 0,111 0,136 67 Juny-2006 4,039,130 17,037 0,141 0,136 67 Juny-2006 4,039,130 17,037 0,141 0,136 67 Juny-2006 4,039,130 17,037 0,141 0,136 67 Juny-2006 4,183,452 15,484 0,123 0,137 78 September-2006 3,518,74 11,790 0,111 0,136 67 Juny-2006 4,184,57 15,137 0,124 0,136 55	May 2004	2,302,239	6 307	0.110	0.000	66							
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August-2004 3,103,515 10,647 0.114 0.095 73 September-2004 3,279,774 10,363 0.105 0.098 75 October-2004 3,836,282 12,130 0.105 0.099 57 November-2004 3,836,282 12,221 0.112 0.102 45 December-2004 3,897,465 11,992 0.103 21 January-2005 3,617,000 10,656 0.098 0.103 22 February-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,091	luiv-2004	3 103 130	10 401	0.031	0.000	77							
September-2004 3,279,774 10,363 0.105 0.098 75 October-2004 3,836,282 12,130 0.105 0.099 57 November-2004 3,638,842 12,221 0.112 0.102 45 December-2004 3,638,842 12,221 0.112 0.103 31 January-2005 3,617,000 10,656 0.098 0.103 22 February-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,885,039 13,119 0.110 0.104 60 May-2005 3,885,039 13,119 0.110 0.104 60 May-2005 3,865,771 11,254 0.097 0.108 83 August-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,766,951 16,132 0.143 0.114 44 December-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,680,248 13,666 0.118 0.117 33 February-2006 <th>August-2004</th> <th>3 103 515</th> <th>10,401</th> <th>0 112</th> <th>0.002</th> <th>73</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th>	August-2004	3 103 515	10,401	0 112	0.002	73							
October-2004 3,836,282 12,130 0.105 0.099 57 November-2004 3,638,842 12,221 0.112 0.102 45 December-2005 3,617,000 10,656 0.098 0.103 22 February-2005 3,764,700 12,196 0.107 0.104 39 April-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,885,039 13,119 0.110 0.104 60 May-2005 3,885,039 13,119 0.115 0.109 81 June-2005 3,931,045 14,726 0.125 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2006 3,860,248 13,666 0.118 0.117 33 February-2006	Sentember-2004	3 279 774	10,363	0.105	0.098	75							
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December-2004 3,897,465 11,992 0.103 0.103 31 January-2005 3,617,000 10,656 0.098 0.103 22 February-2005 3,298,106 10,913 0.110 0.105 33 March-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,833,300 12,610 0.110 0.104 60 May-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,191,116 11,019 0.115 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,766,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,853,724 13,921 0.120 27 March-2005 3,976,975 17,681 0.148 0.120 27 March-2006 3,976,975	November-2004	3.638.842	12.221	0.112	0.102	45	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -						
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February-2005 3,298,106 10,913 0.110 0.105 33 March-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,833,300 12,610 0.110 0.104 60 May-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,191,116 11,019 0.115 0.108 83 August-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,766,010 14,937 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,914,007 11,237 0.121 0.115 22 January-2006 3,850,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006	January-2005	3,617,000	10,656	0.098	0.103	. 22							
March-2005 3,784,700 12,196 0.107 0.104 39 April-2005 3,833,300 12,610 0.110 0.104 60 May-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,191,116 11,019 0.115 0.109 81 July-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,860,248 13,666 0.118 0.117 33 February-2006 3,853,724 13,921 0.120 27 March-2006 3,853,724 13,921 0.120 27 March-2006 3,976,975 17,681 0.148 0.134 78 Jule-2006 3,976,975 17,681 <	February-2005	3,298,106	10,913	0.110	0.105	33							
April-2005 3,833,300 12,610 0.110 0.104 60 May-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,191,116 11,019 0.115 0.109 81 July-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.114 44 December-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,756,951 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,39	March-2005	3,784,700	12,196	0.107	0.104	-39							
May-2005 3,885,039 13,119 0.113 0.107 63 June-2005 3,191,116 11,019 0.115 0.109 81 July-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3	April-2005	3,833,300	12,610	0.110	0.104	60							
June-2005 3,191,116 11,019 0.115 0.109 81 July-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,853,724 13,921 0.120 27 March-2006 3,853,724 13,921 0.120 21 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484	May-2005	3,885,039	13,119	0.113	0.107	63							
July-2005 3,855,771 11,254 0.097 0.108 83 August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,853,724 13,921 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874	June-2005	3,191,116	11,019	0.115	0.109	. 81	.						
August-2005 3,931,045 14,726 0.125 0.108 78 September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,853,724 13,921 0.120 27 March-2006 3,853,724 13,921 0.120 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 <th>July-2005</th> <th>3,855,771</th> <th>11,254</th> <th>0.097</th> <th>0.108</th> <th>83</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th>	July-2005	3,855,771	11,254	0.097	0.108	83							
September-2005 3,776,610 14,937 0.132 0.111 72 October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 3,531,874 11,790 0.121 0.136 55 October-2006	August-2005	3,931,045	14,726	0.125	0.108	78							
October-2005 3,648,633 11,941 0.109 0.111 61 November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55 October-2006	September-2005	3,776,610	14,937	0.132	0.111	72							
November-2005 3,756,951 16,132 0.143 0.114 44 December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 3,531,874 11,790 0.111 0.136 55	October-2005	3,648,633	11,941	0.109	0.111	61							
December-2005 3,091,407 11,237 0.121 0.115 22 January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 3,531,874 11,790 0.121 0.136 55	November-2005	3,756,951	16,132	0.143	0.114	44							
January-2006 3,860,248 13,666 0.118 0.117 33 February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 3,531,874 11,790 0.121 0.136 55	December-2005	3,091,407	11,237	0.121	0.115	22							
February-2006 3,375,519 14,744 0.146 0.120 27 March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 3,531,874 15,137 0.121 0.136 55	January-2006	3,860,248	13,666	0.118	0.117	33	1			-			
March-2006 3,853,724 13,921 0.120 0.121 38 April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55	February-2006	3,375,519	14,744	0.146	0.120	27							
April-2006 2,711,937 17,046 0.210 0.129 61 May-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55	March-2006	3,853,724	13,921	0.120	0.121	38							
wiay-2006 4,039,130 17,037 0.141 0.131 69 June-2006 3,976,975 17,681 0.148 0.134 78 July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55	April-2006	2,711,937	17,046	0.210	0.129	61							
July-2006 4,229,397 16,407 0.129 0.137 84 August-2006 4,183,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55	Way-2006	4,039,130	17,037	0.141	0.131	09							
August-2006 4,83,452 15,484 0.123 0.137 78 September-2006 3,531,874 11,790 0.111 0.135 67 October-2006 4,164,857 15,137 0.121 0.136 55	June-2006	3,9/0,9/5	17,001	0.140	0.134	/ð 0/							
August-2006 4, 103, 452 15, 464 0. 125 0. 137 76 September-2006 3, 531, 874 11, 790 0. 111 0. 135 67 October-2006 4, 164, 857 15, 137 0. 121 0. 136 55	July-2006	4,229,09/	10,407	0.129	0.137	0 4 70							
October-2006 / 16/ 857 15 137 0 121 0 136 55	Sontombor 2006	4,100,40Z	10,404	0.120	0.137	67							
	October-2000	4 164 857	15 127	0.121	0.100	55	ſ						
November-2006 3.851.693 17.278 0.150 0.137 44	November-2006	3.851.693	17.278	0.150	0.137	44							

December-2006	4,561,595	17,557	0.128	0.137	35
January-2007	4,534,602	15,952	0.117	0.137	24
February-2007	3,963,173	13,837	0.116	0.135	17
March-2007	4,491,445	18,413	0.137	0.136	43
April-2007	3,721,761	21,255	0.190	0.134	54
May-2007	4,657,887	22,151	0.159	0.136	74
June-2007	4,260,744	19,337	0.151	0.136	80
July-2007	4,600,685	20,082	0.146	0.137	83
August-2007	4,526,559	17,472	0.129	0.138	77 -
September-2007	3,718,238	16,999	0.152	0.141	74
October-2007	4,777,680	16,158	0.113	0.141	61
November-2007	4,635,315	19,111	0.137	0.140	41
December-2007	4,197,772	18,435	0.146	0.141	21
			0.116	0.116	55
•					Ave Temp F

Note: Monthly temperature information -http://www.wunderground.com/history/airport/KMKT/2007/12/3/MonthlyHistory.html

Hexane Hexane 12 mo Crush Loss Loss rolling Ave Temp January-2003 1,243,774 Ave Tomp (gpt) F January-2003 1,243,774 Ave Tomp (gpt) F March-2003 1,241,774 3,243 0.0907 39 March-2003 1,221,712 3,437 0.0909 73 June-2003 1,224,712 3,437 0.0909 73 June-2003 1,224,344 4,066 0.113 79 July-2003 1,224,344 4,066 0.113 79 June-2003 1,232,424 3,258 0.108 69 Auguet-2003 1,376,186 5,206 0.120 0.110 44 January-2004 1,376,186 3,480 0.110 0.113 42 March-2004 1,337,282 2,840 0.111 67 1,390,274 June-2004 1,283,314 3,947 0.106 0.114 80 June-2004 </th <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>,</th> <th></th> <th></th> <th></th>							,			
Crush (bushele) Loss (Loss 12 mo (up) Ave Temp (up) January-2003 1,423,274 4,679 0.110 35 Fobruary-2003 1,243,274 4,679 0.110 35 Fobruary-2003 1,243,274 4,679 0.110 35 March-2003 1,347,174 3,411 0.084 66 Apri:2003 1,221,712 3,437 0.089 677 May-2003 1,221,712 3,437 0.089 733 June-2003 1,225,985 3,515 0.122 91 September-2003 1,562,549 0.322 565 Otchober-2003 1,478,186 5,445 0.123 66 December-2003 1,478,186 5,445 0.112 38 February-2004 1,484,4661 1,500 0.110 44 January-2004 1,484,4661 1,500 0.114 76 March-2004 1,387,426 3,399 0.065 0.113 57 May-2004 4,4346										
Hexano Hexano 12 mo (bushes) (gallons) (gpt) (gpt) F January-2003 1,243,274 4,679 0.110 35 February-2003 1,243,274 4,679 0.110 35 March-2003 1,347,174 4,679 0.110 35 March-2003 1,347,174 4,679 0.110 56 April-2003 1,347,174 4,679 0.113 70 June-2003 1,291,712 3,437 0.089 73 June-2003 1,291,712 3,437 0.089 73 June-2003 1,214,243 4,066 0.113 70 Octobor-2003 1,582,549 6,382 0.123 56 December-2003 1,392,742 4,476 0.115 0.110 44 January-2004 1,384 1,500 0.111 67 March-2004 1,304,346 1,500 0.114 76 June-2004 1,283,313 3,947 0.106 0.114 </th <th></th>										
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Crush Loss Loss <thloss< th=""> Loss Loss <th< th=""><th>·</th><th></th><th>0</th><th>Hexane</th><th>Hexane</th><th>12 mo</th><th>A T</th><th>1</th><th></th><th></th></th<></thloss<>	·		0	Hexane	Hexane	12 mo	A T	1		
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July-2004 1,239,331 3,947 0.106 0.116 83 August-2004 1,370,563 4,367 0.106 0.114 80 September-2004 1,487,544 6,735 0.117 67 November-2004 1,487,544 6,735 0.117 67 November-2004 1,471,069 6,382 0.145 0.119 54 December-2004 1,482,915 5,661 0.122 39 February-2005 1,307,214 8,354 0.213 0.130 48 March-2005 1,447,3589 7,820 0.181 0.138 55 April-2005 1,447,451 7,323 0.173 0.151 87 July-2005 1,424,51 7,323 0.173 0.151 87 July-2005 1,424,51 7,323 0.173 0.156 82 October-2005 1,567,169 5,444 0.116 0.158 88 September-2005 1,578,737 4,683 0.030 0.146 38 January-2006 1551099 5070 0.109 0.1		June-2004	1.268.811	5,522	0.145	0.116	80			
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September-2004 1,450,701 6,304 0.145 0.116 80 October-2004 1,487,544 6,735 0.151 0.117 67 November-2004 1,471,069 6,382 0.145 0.119 54 December-2004 1,482,915 5,661 0.127 0.120 45 January-2005 1,481,801 6,789 0.153 0.122 39 February-2005 1,433,589 7,820 0.181 0.138 55 April-2005 1,433,589 7,820 0.182 0.147 68 May-2005 1,412,451 7,323 0.173 0.151 87 June-2005 1,412,451 7,323 0.173 0.154 92 August-2005 1,280,102 6,266 0.163 0.158 88 September-2005 1,567,169 5,444 0.116 0.153 67 November-2005 1,567,8737 4,863 0.103 0.146 38 January-2006 1551999 5070 0.109 0.142 50 February-2006 1		August-2004	1,370,563	4,367	0.106	0.114	80			
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June-2005 1,412,451 7,323 0.173 0.151 87 July-2005 4,50,457 1,934 0.143 0.154 92 August-2005 1,280,102 6,266 0.163 0.158 88 September-2005 1,370,053 4,606 0.112 0.156 82 October-2005 1,567,169 5,444 0.116 0.153 67 November-2005 1,578,737 4,863 0.103 0.148 57 December-2005 1,578,737 4,863 0.103 0.146 38 January-2006 1551099 5070 0.109 0.142 50 February-2006 1359140 3552 0.087 0.132 45 March-2006 1545449 5258 0.113 0.126 57 April-2006 1310272 3632 0.092 0.119 73 May-2006 157763 4055 0.086 0.116 75 July-2006 1537577 4879 0.106 0.104 92 August-2006 1523199 4981		May-2005	1 402 334	5,606	0.102	0.147	76 76			
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January-2006 1551099 5070 0.109 0.142 50 February-2006 1359140 3552 0.087 0.132 45 March-2006 1545449 5258 0.113 0.126 57 April-2006 1310272 3632 0.092 0.119 73 May-2006 1572763 4055 0.086 0.116 75 June-2006 1438307 3307 0.077 0.108 84 July-2006 1537577 4879 0.100 91 September-2006 1249446 2362 0.095 77 October-2006 1547104 4898 0.106 0.095 64 November-2006 1465183 3879 0.088 0.095 57		December-2005	1,578,737	4,863	0.103	0.146	38			
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		November-2006	1465183	3879	0.088	0.095	57			
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December-2006	1410595	3861	0.091	0.094	47
January-2007	1467161	5176	0.118	0.095	39
February-2007	1332158	4470	0.112	0.097	38
March-2007	1200366	3554	0.099	0.095	63
April-2007	1459580	4760	0.109	0.097	63
May-2007	1517532	3809	0.084	0.097	79
June-2007	1464718	5746	0.131	0.101	83
July-2007	1483978	8390	0.188	0.108	87
August-2007	1372254	7165	0.174	0.113	95
September-2007	1105043	4678	0.141	0.120	85
October-2007	1496637	5401	0.120	0.121	72
November-2007	1411826	4403	0.104	0.123	56
December-2007	1501773	5372	0.119	0.125	41
			0.119	0.120	66
· .					Ave Temp

Note: Monthly temperature information -For Mexico Mo. Ave temperature information is from Columbia Missouri



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VII 901 NORTH 5th STREET KANSAS CITY, KANSAS 66101

August 26, 2008

MEMORANDUM

SUBJECT: ADM Fremont, Nebraska – PSD Review

FROM: Richard L. Daye Regional Meteorologist AWMD/APDB

TO: Patricia A Scott Environmental Protection Specialist AWMD/APCO

My review of the modeling for the ADM Fremont PSD application indicates that the modeling is not complete. The purpose of an air quality modeling analysis is to determine whether any air quality NAAQS and/or increment standards will be violated. Emissions from a source(s) are one of the most important parameters in the analysis. All emissions must be considered. A screening technique, 10D, was used to eliminate sources but the technique was not adequately described. The Modeling Assessment section in the EXCEL adm_incr_inventory file indicates that 10D is 10 times the distance that another source is from the source being permitted Such a screening technique has not been approved by Region VII. All increment sources must be modeled. Section 7.2.1.1(a) of 40 CFR Part 51, Appendix W, (Guideline on Air Quality Models), states:

"7.2.1.1 Design Concentrations for SO₂, PM-10, CO, Pb, and NO₂

a. An air quality analysis for SO₂, PM-10, CO, Pb, and NO₂ is required to determine if the source will (1) cause a violation of the NAAQS or (2) cause or contribute to air quality deterioration greater than the specified allowable PSD increment. For the former, background concentration (subsection 8.2) should be added to the estimated impact of the source to determine the design concentration. For the latter, the design concentration includes impact from all increment consuming sources."

An increment modeling file (SO2 Increment Modeling.zip) included Cargill and Ash Grove sources but these were not included in the NAAQS analyses (ADM04.ADO). Any source that consumes increment should also be modeled for NAAQS.

No modeling was done for source E-18, package boiler burning natural gas. Evidently this source operates when source E-18a does not. Emissions from E-18 should be less than those

from E-18a but no source characteristics were given other than it is located at a different location and is shorter. It should have been modeled.

The BPIP analysis indicated that the building with the silos is separate from the building where the package boiler stack (E-18a) is attached. Photographs suggest that the buildings are joined. There is difference in the BPIP analysis. The building configuration should be verified.

SUMMARY: The submitted predicted concentrations are below SO_2 NAAQS and PSD increments. My very limited modeling, that included a different BPIP analysis and a different AERMET analysis, indicates that the ADM facility will not significantly cause or contribute to a SO_2 NAAQS or PSD increment exceedances. It's impact near the Cargill and Ash Grove facilities is less than significance. The concentrations near the Cargill and Ash Grove are unknown because these sources were not included in the NAAQS analysis.

(via email)