



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

DEC 22 2008

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

RE: Archer Daniels Midland Company (Dry Mill) Columbus, Nebraska PSD construction permit revision comments

Dear Mr. Smith:

On November 13, 2008, the United States Environmental Protection Agency (EPA) Region 7 received notification of the Nebraska Department of Environmental Quality's (NDEQ) intent to revise the Prevention of Significant Deterioration (PSD) construction permit for Archer Daniels Midland Company (ADM) that was issued on October 20, 2006. The facility is a Dry Mill plant that produces approximately 400 million gallons of denatured ethanol annually and is located at 3000 East 8th Street, Columbus, Nebraska. We appreciate the opportunity to review the draft permit and provide the following comment.

Draft permit, Page G-1, Section III.(G) Specific Conditions for Emergency Equipment, Paragraph: (3) Operating and Monitoring Requirements and Limitations: (a). The permit allows ADM to construct four (4) 460 HP diesel-fired emergency fire water pump engines. The Fact Sheet states that each engine is limited to 500 operating hours per any period of twelve (12) consecutive calendar months; however, the permit omits listing the emission unit number DM50D. The permit should list all four of the engines to be limited to 500 hours of operation per the stated period of time.

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,

A handwritten signature in cursive script that reads "Mark A. Smith".

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