



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES
Monsanto Company
407 Goldstein Street
Hollandale, MS
Washington County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: OCT 22 2012

Expires: SEP 30 2017

Permit No. 2800-00012

Agency Interest # 2817

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Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Monsanto Company
 Subject Item Inventory
 Permit Number:2800-00012
 Activity ID No.: PER20120001

Subject Item Inventory:

ID	Designation	Description
AI2817		Cotton Seed Delinting
AREA12	AA-001	Cotton Seed Delinting Process (MP-01)
EQPT1	AB-001	10 MMBTU/hr natural gas-fired burner (FB-01)
EQPT2	AB-002	3.6 MMBTU/hr natural gas-fired burner (FB-02)
CONT1	AC-001	Cyclone, Controls seeds conveyed from warehouse bins to seed delinting process (CY-1)
CONT2	AC-002	Cyclone, Controls dryer drums (CY-2)
CONT3	AC-003	Cyclone, Controls dryer drums (CY-3)
CONT4	AC-004	Cyclone, Controls buffer drums (CY-4)
CONT5	AC-005	Cyclone, Controls buffer drums (CY-5)
CONT6	AC-006	Cyclone, Controls clipper cleaner (CY-6)
CONT7	AC-007	Cyclone, Controls seeds conveyed through delinting process (CY-7)
CONT8	AC-008	Cyclone, Controls seeds conveyed through delinting process (CY-8)
CONT9	AC-009	Cyclone, Controls seeds conveyed through delinting process (CY-9)
CONT10	AC-010	Cyclone, Controls seeds conveyed through delinting process (CY-10)
CONT11	AC-011	Cyclone, Controls destoner (CY-11)
CONT12	AC-012	Cyclone, Controls cull bin (CY-12)
AREA9	AA-002	Chemical Treating Line No. 1 (MP-02), the process area controlled by a central baghouse (BH-1)
AREA13	AA-003	Chemical Treating Line No. 2 (MP-03), the process area controlled by a central baghouse (BH-2)
AREA14	AA-004	Treated Seed Disposal Process including bag emptying and transfer process (MP-04)

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ID	Designation	Description
AREA11	AA-005	Chemical Treating Line No. 3 (MP-05), the process area controlled by a central baghouse (BH-3)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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AI0000002817 Cotton Seed Delinting:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	<p>Particulate Matter:</p> <p>For the entire facility, the permittee shall not cause or allow the emission of particles, or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution. [APC-S-1 3.3]</p>
L-2	Particulate Matter	<p>Particulate Matter:</p> <p>Except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship:</p> $E = 4.1 p^{0.67}$ <p>where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.</p> <p>Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. [APC-S-1 3.6(a)]</p>
L-3	Particulate Matter	<p>Particulate Matter: PM / PM10 / PM2.5:</p> <p>The emissions of PM, PM10, and PM2.5 shall be equal to or less than 99.0 tons per year. [APC-S-2 ILB(10)]</p>

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AI0000002817 (continued):

Limitation Requirements:

Condition No.	Parameter	Condition
L-4	Particulate Matter	<p>Particulate Matter:</p> <p>The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations shall be limited as follows:</p> <p>(1) Emissions from installations of less than 10 MMBTU/hr heat input shall not exceed 0.6 pounds per MMBTU/hr heat input.</p> <p>(2) Emissions from installations equal to or greater than 10 MMBTU/hr heat input but less than 10,000 MMBTU/hr heat input shall not exceed an emission rate as determined by the relationship</p> $E = .8808 * I^{.1667}$ <p>where E is the emission rate in pounds per MMBTU/hr heat input and I is the heat input in millions of BTU per hour. [APC-S-1 3.4(a)1-2]</p>
L-5	Opacity	<p>Opacity:</p> <p>(a) No person shall cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (b) & (c).</p> <p>(b) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.</p> <p>(c) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. [APC-S-1 3.1]</p>

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Limitation Requirements:

Condition No.	Parameter	Condition
L-6	Sulfur Dioxide	Sulfur Dioxide: The maximum permissible discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [APC-S-1 4.1(a)]
L-7		The permittee shall operate the pollution control devices at all times when emissions may be vented to them. Should a pollution control device required by this permit fail to operate properly, the permittee shall cease operation of the emissions equipment venting to the control device as repairs are made and the proper efficiency of the pollution control device is restored. [APC-S-2 II.B(10)]
L-8		The permittee shall limit total seed production throughput for the entire facility to no more than 58,000 tons per year (tpy) as determined for each consecutive 12-month period. [APC-S-2 II.B(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 IX]
R-2	The permittee shall maintain sufficient records to document: a. The total facility PM/PM10/PM2.5 emission rate during each month and each consecutive 12-month period, and b. A description of the method(s) used to determine the PM/PM10/PM2.5 emission rate. [APC-S-2 II.B(11)]

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Record-Keeping Requirements:

Condition No.	Condition
R-3	The permittee shall maintain on site all records, reports, data, and calculations used to determine the PM/PM10/PM2.5 emission rate for a period of five (5) years following the date of such record and be made available for review upon request from Office of Pollution Control personnel. [APC-S-2 II.B(11)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [APC-S-2 II.B(11)]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [APC-S-2 II.B(11)]
S-3	The permittee shall submit annual reports in accordance with Condition S-2 providing: (a) The total facility PM/PM10/PM2.5 emission rate in tons per year during each month and each consecutive 12-month period. (b) A description of the method(s) used to determine the total facility PM/PM10/PM2.5 emission rate. (c) The permittee shall use actual stack test data, if available, and actual production and/or actual operating hours to demonstrate compliance. If stack test data is not available, EPA or industry-approved emission factors may be used. [APC-S-2 II.B(11)]
S-4	For Emission Point AA-001, the permittee shall submit biennial stack testing reports with testing rotated among cyclones AC-001 - AC-012. One cyclone shall be tested biennially until all twelve have been tested at least once. [APC-S-2 II.B(11)]
S-5	For Emission Points AA-002, AA-003, AA-005, the permittee shall submit biennial stack testing reports with testing rotated among baghouses BH-1 through BH-3. [APC-S-2 II.B(11)]

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Submittal/Action Requirements:

Condition No.	Condition
S-6	<p>In accordance with Condition S-4 and S-5:</p> <p>(a)The permittee shall conduct the biennial PM stack testing using EPA Test Methods 1 through 5.</p> <p>(b) The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol.</p> <p>(c) The DEQ shall be notified ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s).</p> <p>(d) The performance test results shall be submitted to MDEQ within forty-five (45) days following the completion of the test. [APC-S-2 II.B(11)]</p>

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	<p>General Condition: The open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance; and permitted open burning at hazardous waste disposal facilities subject to regulation under Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA). [APC-S-1 3.7]</p>
T-2	<p>General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials:</p> <p>(a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and</p> <p>(b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49-17-21]</p>

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Narrative Requirements:

Condition No.	Condition
T-3	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-4	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]
T-5	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-6	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-7	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [APC-S-2 X]
T-8	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-9	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]
T-10	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [APC-S-2 II.B(15)b]

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AI0000002817 (continued):

Narrative Requirements:

Condition No.	Condition
T-11	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
T-12	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]
T-13	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 II.B(7)]
T-14	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-15	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-16	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-17	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]
T-18	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 II.B(15)d]

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AI0000002817 (continued):

Narrative Requirements:

Condition No.	Condition
T-19	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none">(a) routine maintenance, repair, and replacement;(b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]
T-20	<p>General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]</p>
T-21	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

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Monsanto Company
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AI0000002817 (continued):

Narrative Requirements:

Condition No.	Condition
T-22	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-23	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>

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AI0000002817 (continued):

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-26	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 VIII]</p>

GENERAL INFORMATION

Monsanto Company
407 Goldstein Street
Hollandale, MS
Washington County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
2817	Delta and Pine Land Company	Historic Site Name	9/26/1989	8/31/2008
2815100012	Monsanto Ag Products LLC	Air-AIRS AFS	10/12/2000	
MSD033329905	Delta & Pine Land Co.	Hazardous Waste-EPA ID	2/17/1992	
280000012	Delta and Pine Land Company-Hollandale	Air-State Operating	9/26/1989	10/1/1992
280000012	Delta and Pine Land Company	Air-Synthetic Minor Operating	12/6/2002	8/29/2007
280000012	Delta and Pine Land Company, Hollandale	Air-Construction	10/18/2005	6/29/2010
280000012	Delta and Pine Land Company, Hollandale	Air-Synthetic Minor Operating	8/29/2007	9/19/2008
2817	Monsanto Company	Official Site Name	6/15/2010	
280000012	Monsanto Ag Products LLC	Air-Synthetic Minor Operating	9/19/2008	6/29/2010
2817	Monsanto Corporation Delta and Pine Seed Company	Air-Notification	2/22/2010	
2817	Monsanto Ag Products LLC	Historic Site Name	8/31/2008	6/15/2010
280000012	Monsanto Company	Air-Construction	6/29/2010	
280000012	Monsanto Company	Air-Synthetic Minor Operating	6/29/2010	7/31/2012
280000012	Monsanto Company	Air-Synthetic Minor Operating	10/22/2012	9/30/2017

Basin: Yazoo River Basin

Location Description:PG- Plant Entrance (General). Data collected by David Hall on 11/17/2005.