



**Certified Mail**  
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January 23, 2019

Maybelle Sparks  
Division of Water Resources  
Tennessee Department of Environment and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, TN 37243

RE: NPDES Draft Permit  
Archer Daniels Midland Company (ADM)  
2782 Chelsea Avenue  
Memphis, TN 38108  
NPDES Permit No.: TN0000281

*TN Dept. of Env. & Conservation*  
**JAN 28 2019**  
*Division of Water Resources*

Dear Ms. Sparks,

Please find ADM's proposed revisions below regarding the above referenced draft NPDES Permit received by the facility on January 10, 2019.

1. **PgR-1, section II:** The facility requests that the "Application for renewal received" date is changed from May 31, 2013 to May 31, 2018.

II. **PERMIT STATUS**

Issued January 01, 2014  
Expired December 31, 2018  
Application for renewal received May 31, 2013

2. **Facility References:** The facility requests the removal of all references to "dba Southern Cotton Oil". The facility requests that Archer Daniels Midland Company is the only name used to identify the facility, as Southern Cotton Oil is no longer a corporate entity of ADM.

If there are any questions please contact Molly Fitting at 901-454-7357 or at

Sincerely,

A handwritten signature in cursive script, appearing to read "Ala Sarwat".

Ala Sarwat  
Plant Manager