

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **032007 - 010** Project Number: 2006-12-013

Parent Company: Southeast Cooperative Service Company

Parent Company Address: P.O. Box 340, Advance, MO 63730

Installation Name: Southeast Cooperative Service Company - Dexter Facility

Installation Address: Hwy 25 South, Dexter, MO 63841

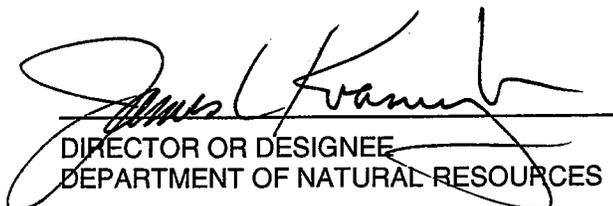
Location Information: Stoddard County, S27, T25N, R10E

Application for Authority to Construct was made for:
A bulk fertilizer and fuel facility. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
 - Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAR 29 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Southeast Cooperative Service Company - Dexter Facility
Stoddard County, S27, T25N, R10E

1. Particulate Matter Emission Limitation
 - A. Southeast Cooperative Service Company - Dexter Facility shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the bulk fertilizer facility, which includes receiving (EP-1,) conveying (EP-2,) mixing (EP-3) and shipping (EP-4).
 - B. Southeast Cooperative Service Company - Dexter Facility shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the bulk fertilizer facility. Attachment A or an equivalent form shall be used for this purpose. Southeast Cooperative Service Company - Dexter Facility shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - C. Southeast Cooperative Service Company - Dexter Facility shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1.B indicate that the source exceeds the limitation of Special Condition Number 1.A.
2. Volatile Organic Compound Emission Limitation
 - A. Southeast Cooperative Service Company - Dexter Facility shall emit less than 40 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the following equipment: diesel storage tanks (EP-5,) the ethanol storage tanks (EP-6,) the unleaded gasoline storage tanks (EP-7) and the kerosene storage tanks (EP-8).
 - B. Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A. Southeast Cooperative Service Company - Dexter Facility shall maintain all records required by this permit for not less

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all fuels used in the fuel tanks.

- C. Southeast Cooperative Service Company - Dexter Facility shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B indicate that the source exceeds the limitation of Special Conditions Number 2.A.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2006-12-013
Installation ID Number: 207-0051
Permit Number:

Southeast Cooperative Service Company - Dexter Facility
Hwy 25 South
Dexter, MO 63841

Parent Company:
Southeast Cooperative Service Company
P.O. Box 340
Advance, MO 63730

Complete: 12/04/2006
Reviewed: 01/23/2007

Stoddard County, S27, T25N, R10E

REVIEW SUMMARY

- Southeast Cooperative Service Company - Dexter Facility has applied for authority to construct a bulk fertilizer and fuel facility.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. Specifically, the applicability requirements of subparts Kb, X and XX are not met.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and PM₁₀ are conditioned below de minimis levels.
- This installation is located in Stoddard County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the

application are below de minimis levels.

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Southeast Cooperative Service Company installation in Dexter is a bulk fertilizer and fuel distributor. The fuel facility, which was built in 1986, is comprised of four (4) diesel, two (2) ethanol, three (3) unleaded gasoline and two (2) kerosene tanks. The bulk fertilizer facility, which was built in 1994, processes fertilizer composed of diammonium phosphate, ammonium sulfate, potash, triple superphosphate and urea. The installation is a *de minimis* source and is not required to obtain an operating permit.

No permits have been issued to Southeast Cooperative Service Company - Dexter Facility from the Air Pollution Control Program. Both the bulk fertilizer and fuel facilities were constructed without obtaining a permit.

PROJECT DESCRIPTION

The bulk fertilizer facility receives the fertilizer components and conveys them to a mixer. From the mixer, fertilizer is loaded out to customers. The maximum hourly design rate for this process is 50 tons of fertilizer per hour.

The fuel facility receives fuel shipments from tanker trucks and distributes that fuel to local farmers and fuel vendors.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 8.3 *Ammonium Nitrate*, July 1993 and the Tanks 4.0 program. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	0.14	17.52	< 15
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	0.30	56.89	< 40
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

*N/A = Not Applicable; N/D = Not Determined

PM₁₀ emissions are associated with the bulk fertilizer facility. VOC emissions are associated with the eleven (11) fuel storage tanks.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Southeast Cooperative Service Company - Dexter Facility shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 11/06/2006, received 12/04/2006, designating Southeast Cooperative Service Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey.

Mr. Mike Galloway
Plant Manager
Southeast Cooperative Service Company - Dexter Facility
Hwy 25 South
Dexter, MO 63841

RE: New Source Review Permit - Project Number: 2006-12-013

Dear Mr. Galloway:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mml

Enclosures

c: Southeast Regional Office
PAMS File 2006-12-013
Permit Number: