

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: **05 2017 - 005** Project Number: 2016-10-038
Installation Number: 021-0060

Parent Company: Ag Processing Inc.

Parent Company Address: P.O. Box 2047, Omaha, NE 68103

Installation Name: Ag Processing Inc.

Installation Address: 900 Lower Lake Road, St. Joseph, MO 64502

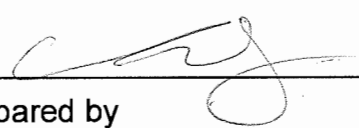
Location Information: Buchanan County, S30, T57N, R35W

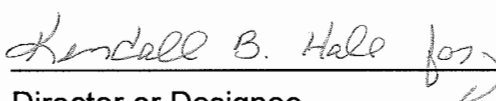
Application for Authority to Construct was made for:

The replacement of an existing soybean receiving leg and south truck receiving pit. 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.


Prepared by
Chia-Wei Young
New Source Review Unit


Director or Designee
Department of Natural Resources

MAY 18 2017

Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of 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 within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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."

Ag Processing Inc.
Buchanan County, S30, T57N, R35W

1. Control Device Requirement-Baghouse
 - A. Ag Processing Inc. shall control emissions from the receiving leg and south truck receiving pit (EP-07) using a baghouse as specified in the permit application.
 - B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. A copy of the manufacturer's specifications shall be retained onsite and shall be used to verify that the baghouse is being operated within the parameters set forth by the manufacturer.
 - C. Monitoring Requirements
 - 1) The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauge or meter shall be located such that the Department of Natural Resources' personnel may easily observe them.
 - 2) Replacement filters for the baghouses shall be kept on hand at all times. The filters shall be made of fibers appropriate for the operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance)
 - 3) Ag Processing Inc. shall monitor and record the pressure drop across each baghouse at least once each day. The operating pressure drop shall be maintained within the range specified by the manufacturer.
 - D. Ag Processing Inc. shall maintain an operating and maintenance log for the baghouse which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. Record Keeping and Reporting Requirements

Ag Processing Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

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

Project Number: 2016-10-038

Installation ID Number: 021-0060

Permit Number: 05 2 0 1 7 - 0 0 5

Installation Address:

Ag Processing Inc.
900 Lower Lake Road
St. Joseph, MO 64502

Parent Company:

Ag Processing Inc.
P.O. Box 2047
St. Joseph, MO 64502

Buchanan County, S30, T57N, R35W

REVIEW SUMMARY

- Ag Processing Inc. has applied for authority to replace an existing soybean receiving leg and to build a replacement south truck receiving pit (EP-07).
- The application was deemed complete on October 25, 2016.
- HAP emissions are not expected from the proposed equipment.
- 40 CFR Part 60, Subpart DD, *Standards of Performance for Grain Elevators*, of the NSPS is applicable to the receiving leg and the south truck receiving pit (EP-07, BH-278)
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment, although 40 CFR Part 63, Subpart GGGG, *National Emission Standards for Hazardous Air Pollutants; Solvent Extraction for Vegetable Oil Production*, is applicable to other equipment at the installation.
- A baghouse is being used to control the particulate emissions as well as recover the product from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Buchanan County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- 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 south receiving pit baghouse (BH-278) as a part of this permit.
- An update to the installation's Part 70 Operating Permit renewal application (Project No. 2016-01-021) is required for this installation within one (1) year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Ag Processing Inc. operates a soybean processing facility in St. Joseph, consisting of a soybean oil extraction plant, a soybean oil refinery plant, and a hydrogen gas plant. The installation is an existing major source for construction permits and a Part 70 source for operating permits.

Ag Processing Inc. submitted a renewal application for its Part 70 Operating Permit, which is still undergoing review by the Missouri Air Pollution Control Program (Project No. 2016-01-021). The installation is required to submit an update to the renewal application within one (1) year of equipment startup.

The following New Source Review permits have been issued to Ag Processing Inc. from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0392-008	Section (5) permit for a soybean oil refinery and a hydrogen gas plant
1192-013	Section (5) permit for modifications to the soybean load-out facility and modifications to the soybean meal storage facility
0893-004	Section (5) permit for the replacement of two existing hull grinders with new grinders
1193-007	Section (5) permit for additional grain handling equipment
1193-016	Section (5) permit for the replacement of an existing flaking mill with a new flaking mill
0294-003	Section (5) permit for new de-hulling equipment and an increase in soybean meal load-out throughput
0794-006	Section (5) permit for new soybean hot dehulling equipment, an additional extractor, an additional de-solventizer toaster/dryer cooler, and change to equipment associated with EP14
0994-001	Section (6) permit for a new feed mill pelleting operation
0896-014	Section (5) permit to add a pneumatic conveyor and high efficiency cyclone
092001-004	Section (8) permit to increase the maximum allowable daily production rate of the refinery plant (3,000,000 pounds of soybean oil refined per day) that was established in 0392-008 to the maximum reported capacity associated with the refinery operations
1192-013A	Amendment to 1192-003
102006-002	Section (6) permit for a biodiesel plant located adjacent to the soybean processing plant. AGP's biodiesel plant is considered a separate installation for permitting purposes

	(see the associated permit review summary for further explanation).
052007-007	Section (8) permit
052007-007A	Amendment to 052007-007 to increase the production capacity of the existing soybean processing plant to 120,000 bushels per day (1,314,000 tons per year)
072015-015	PSD permit to increase oilseed processing limit from 120,000 bushels per day (1,314,000 tons per year) to 135,000 bushels per day (1,478,250 tons per year)

PROJECT DESCRIPTION

Ag Processing Inc. proposes to replace an existing soybean receiving leg and to build a replacement south truck receiving pit (EP-07), which will include a transfer drag and a tunnel system that will house the receiving drag conveyor and related equipment. The existing receiving leg is rated at 12,000 bushels per hour (BPH), or 360 tons per hour. The new receiving leg is rated at 25,000 BPH, or 750 tph. The new receiving leg will allow the installation to receive the same amount of soybeans in a shorter period of time, but the installation does not plan to increase the total amount of oilseeds processed in a year. The oilseed processing limit of 1,478,250 tons per year from Permit No. 072015-015 still applies to the facility and it includes the new south truck receiving pit.

A new baghouse will be used for the new south truck receiving pit and the new receiving leg. The existing baghouse has an air flow rate of 13,800 scfm while the new baghouse will have an air flow rate of 16,500 scfm.

In the issuance of the previous PSD permit, No. 072015-015, which increased the oilseed processing rate from 1,314,000 tons per year to 1,478,250 tons per year, the south receiving pit was not included. Instead, all of the oilseeds were assumed to be received at the west receiving pit (EU0030). At that time, the south receiving pit baghouse had a lower air flow rate (13,800 scfm to 16,500 scfm) and assuming that all are received at the west receiving pit would be the worst-case scenario. The new South Receiving Pit baghouse has the same design air flow rate (16,500 scfm) as the West Receiving Pit. Furthermore, the calculated capture efficiency for the new south receiving pit (29%) is greater than the calculated capture efficiency (27%) of the west receiving pit used for Permit No. 072015-015. Therefore, the change in the south receiving pit does not affect the emissions analysis in Permit No. 072015-015, and the emissions analysis in Permit No. 072015-015 does not need to be revisited.

EMISSIONS/CONTROLS EVALUATION

Particulate emissions from truck receiving do not achieve 100% capture. Fugitive emissions from South Truck Receiving (EP7) were calculated using Equation 1 from AP-42 Section 13.2.4 "Aggregate Handling and Storage Piles" (November 2006). The average wind speed of 9.14 mph as observed in the St. Joseph airport was used in emissions calculations. A moisture content of 4.8% was employed in emissions calculations. Although many agricultural documents demonstrate higher moisture contents for soybeans, Equation 1 is not valid at moisture contents above 4.8%. The capture efficiency for these sources was determined to be the ratio of actual air flow rate

to the baghouse to the induced air flow rate. The air flow rate for the new baghouse is 16,500 scfm. The induced air flow is calculated using the following equation.

$$Q_{ind} = 10 \times A_u \times \sqrt[3]{\left(\frac{R \times S^2}{D}\right)}$$

Where:

Q_{ind} = Volume of Induced Air (scfm)

A_u = Enclosure open area at upstream end (point where air is induced into the system by action of the falling material (ft²) = 49 ft²

R = Material flow rate (tph) = 750 tph

S = Height of material free fall (ft) = 8 ft

D = Average particle diameter (ft) = 0.0295 ft

The calculation procedures as described above have been approved for previous permits issued to the installation.

The stack emissions were calculated using the air flow rate and a grain loading of 0.004 gr/dscf for PM and PM₁₀ and 0.002 gr/dscf for PM_{2.5}. The hourly emissions calculated from this grain loading rate are 0.57 lb/hr of PM and PM₁₀ and 0.28 lb/hr of PM_{2.5}. The facility is not required to perform stack tests to validate these emission rates. If a more conservative emission rate of 0.01 gr/dscf is used instead, particulate emissions from this project will still be less than their respective de minimis levels.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit No. 072015-015 Existing actual emissions were taken from the installation's 2016 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2016 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	Major	N/D	3.28	N/A
PM ₁₀	15.0	Major	28.21	2.86	N/A
PM _{2.5}	10.0	N/D	8.82	1.30	N/A
SOx	40.0	1.76	0.0084	N/A	N/A
NOx	40.0	Major	1.41	N/A	N/A
VOC	40.0	Major	363.53	N/A	N/A
CO	100.0	246.51	1.18	N/A	N/A
GHG (CO ₂ e)	N/A	N/D	N/D	N/A	N/A
GHG (mass)	N/A	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	Major	0.00	N/A	N/A

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

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 all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Ag Processing Inc. 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *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 10-6.165

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *New Source Performance Regulations*, 10 CSR 10-6.070
 - 40 CFR Part 60, Subpart DD, *Standards of Performance for Grain Elevators*

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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 15, 2016, received October 25, 2016, designating Ag Processing Inc. as the owner and operator of the installation.

Other documents relied upon in preparation of this permit.

- E-mail communications between Ag Processing Inc. and the Construction Permit Unit of the Missouri Air Pollution Control Program.
- EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal1,000 gallons
°Fdegrees Fahrenheit	MWmegawatt
acfmactual cubic feet per minute	MHDRmaximum hourly design rate
BACTBest Available Control Technology	MMBtuMillion British thermal units
BMPsBest Management Practices	MMCFmillion cubic feet
BtuBritish thermal unit	MSDSMaterial Safety Data Sheet
CAMCompliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPSNew Source Performance Standards
COcarbon monoxide	NSRNew Source Review
CO₂carbon dioxide	PMparticulate matter
CO_{2e}carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppmparts per million
dscfdry standard cubic feet	PSDPrevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTEpotential to emit
EPEmission Point	RACTReasonable Available Control Technology
EPAEnvironmental Protection Agency	RALRisk Assessment Level
EUEmission Unit	SCCSource Classification Code
fpsfeet per second	scfmstandard cubic feet per minute
ftfeet	SDSSafety Data Sheet
GACTGenerally Available Control Technology	SICStandard Industrial Classification
GHGGreenhouse Gas	SIPState Implementation Plan
gpmgallons per minute	SMALScreening Model Action Levels
grgrains	SO_xsulfur oxides
GWPGlobal Warming Potential	SO₂sulfur dioxide
HAPHazardous Air Pollutant	tphtons per hour
hrhour	tpytons per year
hphorsepower	VMTvehicle miles traveled
lbpound	VOCVolatile Organic Compound
lbs/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	

Air Pollution Control Program

Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CHLOROPRENE	126-99-8	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y
ACETOPHENONE	98-86-2	1		Y	N	CHROMIUM COMPOUNDS		5	L	N	Y
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CHRYSENE	218-01-9	0.01	V	Y	N
ACROLEIN	107-02-8	0.04		Y	N	COBALT COMPOUNDS		0.1	M	N	Y
ACRYLAMIDE	79-06-1	0.02		Y	N	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N
ACRYLIC ACID	79-10-7	0.6		Y	N	CRESOL, [META-]	108-39-4	1	B	Y	N
ACRYLONITRILE	107-13-1	0.3		Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N
ANILINE	62-53-3	1		Y	N	CUMENE	98-82-8	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y
ANTIMONY COMPOUNDS		5	H	N	Y	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	DIAZOMETHANE	334-88-3	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	DIOXINS/FURANS		6E-07	D,V	Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	DIBENZOFURAN	132-64-9	5	V	Y	N
ASBESTOS	1332-21-4	0	A	N	Y	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N
BENZO(A)ANTHRACENE	56-55-3	0.01	V	Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N
BENZENE	71-43-2	2		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y
BENZIDINE	92-87-5	0.0003	V	Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DICHLOROMETHANE	75-09-2	10		N	N
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y
BERYLLIUM SALTS		2E-05	J	N	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
BROMOFORM	75-25-2	10		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
CAPROLACTAM (Delisted)	105-60-2					DIMETHYL PHTHALATE	131-11-3	10		Y	N
CAPTAN	133-06-2	10		Y	Y	DIMETHYL SULFATE	77-78-1	0.1		Y	N
CARBARYL	63-25-2	10	V	Y	Y	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
CARBON DISULFIDE	75-15-0	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
CARBON TETRACHLORIDE	56-23-5	1		Y	N	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
CARBONYL SULFIDE	463-58-1	5		Y	N	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
CATECHOL	120-80-9	5		Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
CHLORAMBEN	133-90-4	1		Y	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
CHLORDANE	57-74-9	0.01		Y	Y	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
CHLORINE	7782-50-5	0.1		N	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
CHLOROACETIC ACID	79-11-8	0.1		Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
CHLOROBENZENE	108-90-7	10		Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	ETHYL ACRYLATE	140-88-5	1		Y	N

Air Pollution Control Program

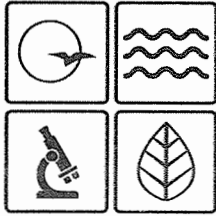
Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
CHLOROFORM	67-66-3	0.9		Y	N	ETHYL BENZENE	100-41-4	10		Y	N
ETHYL CHLORIDE	75-00-3	10		Y	N	NITROBENZENE	98-95-3	1		Y	N
ETHYLENE GLYCOL	107-21-1	10		Y	N	NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2					NITROPHENOL, [4-]	100-02-7	5		Y	N
ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N	NITROPROPANE, [2-]	79-46-9	1		Y	N
ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
ETHYLENE OXIDE	75-21-8	0.1		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
ETHYLENE THIOUREA	96-45-7	0.6		Y	Y	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
FORMALDEHYDE	50-00-0	2		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N
GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N	PARATHION	56-38-2	0.1		Y	Y
GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
HEPTACHLOR	76-44-8	0.02		Y	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
HEXACHLORO BENZENE	118-74-1	0.01		Y	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N
HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N	PHENOL	108-95-2	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N	PHOSGENE	75-44-5	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N	PHOSPHINE	7803-51-2	5		N	N
HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	PTHALIC ANHYDRIDE	85-44-9	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N
HEXAMETHYLENE, -1,6-DIISOCYANATE	822-06-0	0.02		Y	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PROPIONALDEHYDE	123-38-6	5		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PROPYLENE OXIDE	75-56-9	5		Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
HYDROQUINONE	123-31-9	1		Y	N	QUINOLINE	91-22-5	0.006		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	QUINONE	106-51-4	5		Y	N
ISOPHORONE	78-59-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y
LEAD COMPOUNDS		0.01	Q	N	Y	SELENIUM COMPOUNDS		0.1	W	N	Y
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	STYRENE	100-42-5	1		Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N	STYRENE OXIDE	96-09-3	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y
MERCURY COMPOUNDS		0.01	S	N	N	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N
METHANOL	67-56-1	10		Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N
METHOXYCHLOR	72-43-5	10	V	Y	Y	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	TOLUENE	108-88-3	10		Y	N
METHYL CHLORIDE	74-87-3	10		Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N
METHYL ETHYL KETONE (Delisted)	78-93-3					TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N
METHYL HYDRAZINE	60-34-4	0.06		Y	N	TOXAPHENE	8001-35-2	0.01		Y	N
METHYL IODIDE	74-88-4	1		Y	N	TRICHLORO BENZENE, [1,2,4-]	120-82-1	10		Y	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N	TRICHLOROETHYLENE	79-01-6	10		Y	N
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
METHYL CYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TRIETHYLAMINE	121-44-8	10		Y	N
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TRIFLURALIN	1582-09-8	9		Y	Y
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
MINERAL FIBERS		0	T	N	Y	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
NAPHTHALENE	91-20-3	10	V	Y	N	VINYL ACETATE	108-05-4	1		Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	VINYL CHLORIDE	75-01-4	0.2		Y	N
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
NICKEL COMPOUNDS		1	U	N	Y	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N

Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
NICKEL REFINERY DUST		0.08	U	N	Y						
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y						

Legend	
Group ID	
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4, 6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides
Notes	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAY 18 2017

Ms. Allison Willis
Environmental Compliance Manager
Ag Processing Inc.
PO Box 2047
Omaha, NE 68103

RE: New Source Review Permit - Project Number: 2016-10-038

Dear Ms. Willis:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. 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, your new source review permit application and your amended operating permit 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

Ms. Allison Willis
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If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Dendall B. Hale for

Susan Heckenkamp
New Source Review Unit Chief

SH:cj

Enclosures

c: Kansas City Regional Office
PAMS File: 2016-10-038

Permit Number: 05 2017 - 005