



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2012-008
Expiration Date: FEB 06 2017
Installation ID: 033-0013
Project Number: 2008-04-017

Installation Name and Address

AGRIServices of Brunswick, LLC. - West
Highway 24 West
Brunswick, MO 65236
Carroll County

Parent Company's Name and Address

AGRIServices of Brunswick, LLC.
P.O. Box 38
Brunswick, MO 65236

Installation Description:

AGRIServices of Brunswick, LLC, formerly Brunswick River Terminal, Inc., operates a grain and fertilizer processing plant four miles west of Brunswick, Missouri, on Highway 24 (Carroll County, S18, T53N, R20W). The installation's process operations include: grain and fertilizer storage and handling and corn storage. The installation is a synthetic minor source of Particulate Matter \leq Ten microns in diameter (PM₁₀).

FEB 07 2012

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

AGRIServices of Brunswick, LLC, formerly Brunswick River Terminal, Inc., operates a grain and fertilizer processing plant four miles west of Brunswick, Missouri, on Highway 24 (Carroll County, S18, T53N, R20W). The installation’s process operations include: grain and fertilizer storage and handling and corn storage. The installation is a synthetic minor source of Particulate Matter ≤ Ten microns in diameter (PM₁₀).

Reported Air Pollutant Emissions, tons per year¹		
Year	Particulate Matter ≤ Ten Microns (PM₁₀)	Particulate Matter ≤ 2.5 Microns (PM_{2.5})
2010	13.33	1.18
2009	13.33	1.18
2008	12.57	0.99
2007	13.39	1.15
2006	14.47	0.89

¹The installation does emit SO_x, NO_x, and CO; however, annual emissions were below the reporting threshold of one ton listed within 10 CSR 10-6.110 Table 1.

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit	Description of Emission Unit	2009 EIQ Reference #
EU0001	Grain Receiving Truck Dump	EP#1
EU0002	Grain Loadout Truck	EP#2
EU0003	Grain Rail Loadout – Elevator	EP#3
EU0004	Grain Dryer – Combustion Emissions	EP#4A
EU0005	Corn Screen Cleaner/Flat Storage Loadout	EP#5
EU0006	Corn Whopper Flat Storage Loadout	EP#6
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)	EP#7
EU0008	Grain Loadout Barge	EP#8
EU0009	Grain Barge Conveyor – Loadout	EP#9
EU0010	Barge Unloading – Fertilizer Hopper	EP#10
EU0011	Barge Receiving – Fertilizer Conveyor	EP#11
EU0012	Fertilizer Receiving Rail & Truck	EP#12
EU0013	Fertilizer Receiving Conveyor	EP#13
EU0014	Fertilizer Loadout Hopper #1	EP#14
EU0015	Fertilizer Truck Spout #1	EP#15
EU0016	Fertilizer Loadout Hopper #2	EP#16
EU0017	Fertilizer Truck Spout #2	EP#17
EU0018	Grain Dryer – Process Emissions	EP#4B
EU0019	Haul Road	EP#19
EU0020	Fertilizer Receiving (Retail)	EP#20
EU0021	Fertilizer Weight Hopper (Retail)	EP#21
EU0022	Fertilizer Mixing & Blending	EP#22
EU0023	Dry Fertilizer Loadout (Retail)	EP#23
EU0024	Temporary Storage Pile	EP#24
EU0025	Grain Receiving from Straight Trucks - Temporary Storage	EP#1A
EU0026	Grain Truck Loadout - Temporary Storage	EP#2A
EU0027	Bin Loading Vents	EP#25

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source	2009 EIQ Reference #
(2) 10,000 gallon Diesel Storage Tanks (Breathing & Working Losses)	EP#18A and EP#18B

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.065(2) (C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall not cause or allow the entire installation to exceed 500,000 tons throughput of dry fertilizer during any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of receipts of dry fertilizer.
2. The monthly total of dry fertilizer shall be recorded and a 12-month rolling total calculated. Attachment A or an equivalent form created by the permittee shall be used to show compliance.
3. Records may be kept in either written or electronic form.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly installation fertilizer throughput of 500,000 tons should be exceeded the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the exceedance.
2. Reports of any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 052007-012, Issued May 29, 2007

Emission Limitation:

Special Condition 2.A: The permittee shall emit less than 40 tons of NO_x in any consecutive 12 month period from the entire installation.

Monitoring/Recordkeeping:

1. The permittee shall retain Attachment C which documents that the NO_x emission limit will never be exceeded while the only NO_x emission source at the installation, EP#4A, combusts exclusively propane.
2. Records may be kept in either written or electronic form.
3. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

Reports of any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

(EU0001 and EU0002) – Grain Trucks		
Emission Unit	Description	2009 EIQ Reference #
EU0001	Grain Receiving Truck Dump	EP#1
EU0002	Grain Loadout Truck	EP#2

PERMIT CONDITION (EU0001 and EU0002)-001
 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and

- b) All emission units from which visible emissions occurred.
- 2. The permittee shall maintain records of any equipment malfunctions.
- 3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition.
- 4. Records may be kept in either written or electronic form.
- 5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6. All records shall be maintained for five years.

Reporting:

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0019 and EU0024 through EU0026 – Temporary Storage and Haul Road		
Emission Unit	Description	2009 EIQ Reference #
EU0019	Haul Road	EP#19
EU0024	Temporary Storage Pile	EP#24
EU0025	Grain Receiving from Straight Trucks - Temporary Storage	EP#1A
EU0026	Grain Truck Loadout - Temporary Storage	EP#2A

PERMIT CONDITION (EU0019 and EU0024 through EU0026) - 001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 082002-008, Issued August 7, 2002

Operational Limitation:

Special Condition 2: The permittee shall control the emission of PM₁₀ from EP#19 Haul Road consistently and correctly using the application of a water spray. This periodic watering shall be applied whenever conditions exist that would allow visible fugitive emissions from EP#19 Haul Road to enter the ambient air beyond the property boundaries.

Emission Limitation:

Special Condition 1.A: The permittee shall not discharge into the atmosphere from the temporary storage structure (EP#1A Grain Receiving from Straight Trucks – Temporary Storage, EP#2A Grain Truck Loadout – Temporary Storage, EP#19 Haul Road, and EP#24 Temporary Storage Pile) PM₁₀ in excess of 15 tons in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1. Special Condition 1.B: The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of PM₁₀ emissions from the temporary storage structure (EP#1A Grain Receiving from Straight Trucks – Temporary Storage, EP#2A Grain Truck Loadout – Temporary Storage, EP#19 Haul Road, and EP#24 Temporary Storage Loading Pile). The permittee

shall use Attachment B or an equivalent form approved by the Air Pollution Control Program to demonstrate compliance. These records shall be maintained onsite with the emission units for five years and shall be made available for inspection to the Department of Natural Resources' personnel upon request.

2. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 1.C: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source has exceeded the limitation.
2. Reports of any deviations from the operational limitation, emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

<p style="text-align: center;">PERMIT CONDITION (EU0024 through EU0026)-002 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>
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Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0003 – Grain Rail Loadout - Elevator		
Emission Unit	Description	2009 EIQ Reference #
EU0003	Grain Rail Loadout - Elevator	EP#3

<p>PERMIT CONDITION EU0003-001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>
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Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then

- b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
- 2. The permittee shall maintain records of any equipment malfunctions.
- 3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
- 4. Records may be kept in either written or electronic form.
- 5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6. All records shall be maintained for five years.

Reporting:

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

(EU0004 and EU0018) – Grain Dryer			
Emission Unit	Description	Manufacturer	2009 EIQ Reference #
EU0004	Grain Dryer – Combustion Emissions	Zimmerman	EP#4A
EU0018	Grain Dryer – Process Emissions		EP#4B

PERMIT CONDITION (EU0004 and EU0018) - 001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 052007-012, Issued May 29, 2007

Emission Limitation:

Special Condition 1.A: The permittee shall emit less than 15 tons of particulate matter less than ten microns in diameter (PM₁₀) in any consecutive 12 month period from the grain dryer (EP#4A Grain Dryer – Combustion Emissions and EP#4B Grain Dryer – Process Emissions).

Monitoring/Recordkeeping:

1. Special Condition 1.B: The permittee shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the grain dryer (EP#4A Grain Dryer – Combustion Emissions and EP#4B Grain Dryer – Process Emissions). Attachment D or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. The permittee 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.
2. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 1.C: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source has exceeded the limitation.
2. Reports of any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

<p style="text-align: center;">PERMIT CONDITION (EU0004 and EU0018)-002 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>
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Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0005 – Corn Screen Cleaner/Flat Storage Loadout		
Emission Unit	Description	2009 EIQ Reference #
EU0005	Corn Screen Cleaner/Flat Storage Loadout	EP#5

<p>PERMIT CONDITION EU0005-001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then

- b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
- 2. The permittee shall maintain records of any equipment malfunctions.
- 3. The permittee shall maintain records of any USEPA Method 9 opacity test performed in accordance with this permit condition.
- 4. Records may be kept in either written or electronic form.
- 5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6. All records shall be maintained for five years.

Reporting:

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0006 – Corn Whopper Flat Storage Loadout		
Emission Unit	Description	2009 EIQ Reference #
EU0006	Corn Whopper Flat Storage Loadout	EP#6

PERMIT CONDITION EU0006-001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 1086-003, Issued September 24, 1986

Special Condition:

Special Condition 1: The annual throughput of corn in this building shall not exceed 60,000 tons based upon a rolling 12-month total.

Monitoring/Recordkeeping:

1. Special Condition 2: Records shall be maintained on site for a period covering the past five years showing the amount of corn transferred into this building each month using Attachment A or an equivalent form generated by the permittee.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the special condition, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0027 – Bin Loading Vents		
Emission Unit	Description	2009 EIQ Reference #
EU0027	Bin Loading Vents	EP#25

<p align="center">PERMIT CONDITION EU0027-001 10 CSR 10-6.060 Construction Permits Required Construction Permit 1086-002, Issued September 24, 1986</p>
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Special Condition:

Special Condition 1: The maximum amount of grain that may be transferred to this bin annually shall not exceed 45,000 tons based upon a 12-month rolling total.

Monitoring/Recordkeeping:

1. Special Condition 2: Records shall be maintained on site for a period covering the past five years showing the amount of grain transferred into this grain bin each month using Attachment A or an equivalent form generated by the permittee.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the special condition, monitoring/recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

(EU0007 through EU0009) – Grain Barges		
Emission Unit	Description	2009 EIQ Reference #
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)	EP#7
EU0008	Grain Loadout Barge	EP#8
EU0009	Grain Barge Conveyor – Loadout	EP#9

<p>PERMIT CONDITION (EU0007 through EU0009)-001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>
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Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. Records may be kept in either written or electronic form.

5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

(EU0010 through EU0017 and EU0020 through EU0023) – Fertilizer Process		
Emission Unit	Description	2009 EIQ Reference #
EU0010	Barge Unloading – Fertilizer Hopper	EP#10
EU0011	Barge Receiving – Fertilizer Conveyor	EP#11
EU0012	Fertilizer Receiving Rail & Truck	EP#12
EU0013	Fertilizer Receiving Conveyor	EP#13
EU0014	Fertilizer Loadout Hopper #1	EP#14
EU0015	Fertilizer Truck Spout #1	EP#15
EU0016	Fertilizer Loadout Hopper #2	EP#16
EU0017	Fertilizer Truck Spout #2	EP#17
EU0020	Fertilizer Receiving (Retail)	EP#20
EU0021	Fertilizer Weight Hopper (Retail)	EP#21
EU0022	Fertilizer Mixing & Blending	EP#22
EU0023	Dry Fertilizer Loadout (Retail)	EP#23

<p>PERMIT CONDITION (EU0010 through EU0017 and EU0020 through EU0023)-001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If the emission unit should have visible emissions, the source representative would then conduct a Method 9 observation. If no visible emissions are observed using these procedures, then no Method 9 observations would be required.

2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results using Attachments E & F or equivalent forms generated by the permittee, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission unit and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. Reports of any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) Full paper EIQs shall be submitted to the Air Pollution Control Program by no later than April 1st after the end of the reporting year. Full electronic EIQs shall be submitted via MoEIS by no later than May 1st after the end of the reporting year.
- 6) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.

- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) AGRIServices of Brunswick, LLC. - West may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if AGRIServices of Brunswick, LLC. - West fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources shall conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources' Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources' Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects shall first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations shall first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status shall allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance shall bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement shall comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement shall comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances shall comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation shall show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice shall contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation shall be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee shall comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records shall be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances shall be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change shall meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee shall provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. William P. Jackson, General Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution

Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit shall be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment C
 Plantwide Permit Condition PW002 Compliance Demonstration

Emission Unit	Maximum Hourly Design Rate (1000 gallons)	NO_x Emission Factor (lb/1000 gallons)	NO_x Emission Rate (ton/yr)
EU0004 Grain Dryer – Combustion Emissions EP#4A	0.48623	13	27.69
Plantwide Potential Annual NO_x Emissions (ton/yr):			27.69

The NO_x emission factor for EU0004 Grain Dryer – Combustion Emissions EP#4A was taken from AP-42 Table 1.5-1 for Process SCC 10201002.

The permittee is in compliance with the plantwide emissions limit of 40 ton/yr, provided no additional NO_x emission units are installed at the installation and the dryer combusts exclusively propane.

Attachment F
 Method 9 Opacity Emissions Observations

Company						Observer		
Location						Observer Certification Date		
Date						Emission Unit		
Time						Control Device		
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End	Sum	Average				

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

YES
 NO

 Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received April 2, 2008
- 2) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 3) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
- 4) 2010, 2009, 2008, 2007, and 2006 Missouri Emissions Inventory Questionnaires
- 5) Construction Permit 1086-002, Issued September 24, 1986
- 6) Construction Permit 1086-003, Issued September 24, 1986
- 7) Construction Permit 082002-008, Issued August 7, 2002
- 8) Construction Permit 052007-012, Issued May 29, 2007

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, Alternate Emission Limits

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

This rule is not applicable because the installation only combusts propane.

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

This rule is not applicable to the installation and has not been applied within this permit. The following emission units are exempted from this regulation by 10 CSR 10-6.400(1)(B)3 as they receive or ship whole grain from or into a railroad or truck transportation source at a grain elevator:

Emission Unit	Description	2009 EIQ Reference #
EU0001	Grain Receiving Truck Dump	EP#1
EU0002	Grain Loadout Truck	EP#2
EU0003	Grain Rail Loadout – Elevator	EP#3
EU0005	Corn Screen Cleaner/Flat Storage Loadout	EP#5
EU0006	Corn Whopper Flat Storage Loadout	EP#6
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)	EP#7
EU0008	Grain Loadout Barge	EP#8
EU0009	Grain Barge Conveyor – Loadout	EP#9
EU0025	Grain Receiving from Straight Trucks - Temporary Storage	EP#1A
EU0026	Grain Truck Loadout – Temporary Storage	EP#2A

The following emissions units are exempted from this regulation by 10 CSR 10-6.400(1)(B)7 as they are fugitive emission sources:

Emission Unit	Description	2009 EIQ Reference #
EU0010	Barge Unloading – Fertilizer Hopper	EP#10
EU0011	Barge Receiving – Fertilizer Conveyor	EP#11
EU0012	Fertilizer Receiving Rail & Truck	EP#12
EU0013	Fertilizer Receiving Conveyor	EP#13
EU0014	Fertilizer Loadout Hopper #1	EP#14
EU0015	Fertilizer Truck Spout #1	EP#15
EU0016	Fertilizer Loadout Hopper #2	EP#16
EU0017	Fertilizer Truck Spout #2	EP#17
EU0018	Grain Dryer – Process Emissions	EP#4B
EU0019	Haul Road	EP#19
EU0020	Fertilizer Receiving (Retail)	EP#20
EU0021	Fertilizer Weight Hopper (Retail)	EP#21
EU0022	Fertilizer Mixing & Blending	EP#22
EU0023	Dry Fertilizer Loadout (Retail)	EP#23
EU0024	Temporary Storage Pile	EP#24
EU0027	Bin Loading Vents	EP#25

Emission unit EU0004 Grain Dryer – Combustion Emissions EP#4A is exempted from this regulation by 10 CSR 10-6.400(1)(B)6 as the burning of fuel for indirect heating.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

This rule is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations exclusively combusting propane in their indirect heating sources.

Construction Permits

Construction Permit 1086-002, Issued September 24, 1986:

- ◆ This general construction permit is for the installation of a 430,000 bushel grain storage bin (EP#25) with loading and unloading conveyors, a column dryer, and a haul road.
- ◆ Special Conditions 1 and 2 have been included in this permit (see Permit Condition EU0027-001).

Construction Permit 1086-003, Issued September 24, 1986:

- This general construction permit is for the installation of a 1.9 million bushel grain storage building and a 10,000 bushel/hr loading conveyor (EP#6).
- Special Conditions 1 and 2 have been included in this permit (see Permit Condition EU0006-001).

Construction Permit 082002-008, Issued August 7, 2002:

- This de minimis construction permit is for the installation of a 700,000 bushel temporary storage pile (EP#24), receiving (EP#1A), loadout (EP#2A), and additional haul road usage (EP#19).
- Special Conditions 1 and 2 have been included in this permit (see Permit Condition (EU0019 and EU0024 through EU0026) - 001).
- The emission factor for the Attachment B was calculated as follows:

Emission Unit	Description	Emission Factor Source	PM ₁₀ Emission Factor
EP#1A	Grain Receiving from Straight Trucks	FIRE: Process SCC 30200551	0.059 lb/ton
EP#2A	Grain Truck Loadout	FIRE: Process SCC 30200560	0.029 lb/ton
EP#24	Storage Pile	FIRE: Process SCC 30200530	0.034 lb/ton
EP#19	Haul Road	2010 EIQ Haul Road Worksheet	2.07 lb/mile

$$\frac{0.059 \text{ lb}}{\text{ton}} + \frac{0.029 \text{ lb}}{\text{ton}} + \frac{0.034 \text{ lb}}{\text{ton}} + \frac{2.07 \text{ lb}}{\text{mi traveled}} \times \frac{0.3 \text{ mi per truck (roundtrip)}}{25 \text{ tons grain per truck}} \times 0.5 = \frac{0.134 \text{ lb PM}_{10}}{\text{ton of grain}}$$

- Where 0.5 is 50 percent control for undocumented haul road watering.

Construction Permit 052007-012, Issued May 29, 2007:

- This de minimis construction permit is for the installation of a new 44.582 MMBtu/hr (168 ton/hr of grain) dryer (EP#4A and EP#4B).
- Special Condition 1 has been included in this permit (see Permit Condition (EU0004 and EU0018) – 001).
- Special Condition 2.A has been included in this permit (see Permit Condition PW002).
- Special Conditions 2.B and 2.C were not included with this permit. These special conditions required monthly tracking and reporting of NO_x emissions to demonstrate compliance with the 40 ton/yr NO_x limit of Special Condition 2.A; however, potential plantwide emissions of NO_x were calculated to be only 27.69 ton/yr (see Attachment C).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 – Subpart DD is not applicable because the facility has a total permanent grain storage capacity of 2.33 million bushels which is less than the 2.5 million bushel threshold.

40 CFR Part 60 - Subparts T, U, V, W, and X are not applicable because the facility does not produce fertilizer, but buys and sells it. The facility handles Anhydrous ammonia, Ammonium Nitrate, Urea, UAN solution, Diammonium phosphate, Monoammonium phosphate, 10-30-0 suspension, White granular potash, Red granular potash, Soluble potash, 3-9-27 suspension, Sulfate, and Ammonium Thiosulfate. No granular triple superphosphate is stored at this facility.

Maximum Achievable Control Technology (MACT) Applicability

None.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 ton/year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 27,311.96 tons, classifying the installation as a minor source of GHGs. Please note that the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

10 CSR 10-6.065, *Operating Permits*

This installation qualifies for a Part 70 operating permit under Missouri and federal regulations as it is a major source of PM₁₀. The installation has voluntarily accepted a 500,000 ton/year fertilizer throughput limitation in order to become a synthetic minor source of PM₁₀ and qualify for this intermediate operating permit. The installation does not qualify for a basic operating permit as without the voluntary condition (basic operating permits are not federally enforceable and cannot contain voluntary limits) the installation’s potential emissions exceed the major source threshold for PM₁₀. With the voluntary 500,000 ton/year fertilizer limitation the installation’s potential emissions are as follows:

Pollutant	Potential to Emit (ton/yr) ¹
CO	6.81
CO ₂ e	27,311.96
NH ₃	2.30
NO _x	27.69
PM ₁₀	96.24
PM _{2.5}	8.50
SO _x	0.06
VOC	0.84

¹Potential emissions were calculated based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- The grain handling operations were evaluated at 207,428 tons of annual throughput. If this annual amount of grain handling is exceeded this potential to emit is invalid. The permittee will need to submit for a Part 70 operating permit.
- The fertilizer operations were evaluated at 500,000 tons of annual throughput per Permit Condition PW001.
- EU0019, EU0024, EU0025, and EU0026 were given 50 percent PM control due to periodic watering [see Permit Condition (EU0019 and EU0024 through EU0026) – 001].
- EU0004 and EU0018 are limited to a total of 15 ton/yr PM₁₀ by Permit Condition (EU0004 and EU0018) – 001.
- EU0006 is limited to 60,000 tons of annual throughput by Permit Condition EU0006 – 001.
- EU0027 is limited to 45,000 tons of annual throughput by Permit Condition EU0027 – 001.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This regulation is applicable to the installation and has been applied within the permit. This regulation is applicable to the following emission units, but was not applied within this permit as these emission units each have potential particulate emissions below 0.5 lb/hr and are assumed to always be in compliance with this regulation while being properly maintained and operated:

Emission Unit	Description	2009 EIQ Reference #
EU0006	Corn Whopper Flat Storage Loadout	EP#6
EU0027	Bin Loading Vents	EP#25

This regulation is applicable to EU0019 Haul Road EP#19, but was not applied within this permit as all opacity emissions should be covered under the six-minute exception listed within 10 CSR 10-6.220(3)(B).

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000193527623
RETURN RECEIPT REQUESTED

Mr. William P. Jackson
AGRIServices of Brunswick, LLC. - West
P.O. Box 38
Brunswick, MO 65236

Re: AGRIServices of Brunswick, LLC. - West, 033-0013
Permit Number: **OP2012-008**

Dear Mr. Jackson:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you shall file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS/ark

Enclosures

c: Northeast Regional Office
PAMS File: 2008-04-017