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: 02 017 - 0 1 0
Project Number: 2016-11-040
Installation Number: 510-1390

Parent Company: Archer Daniels Midland Company
Parent Company Address: 4666 East Faries Parkway, Decatur, IL 62526
Installation Name: American River Transportation Co., LLC
Installation Address: 4528 South Broadway, St. Louis, MO 63111
Location Information: City of St Louis County

Application for Authority to Construct was made for:
Installing one 12.6 million BTU/hr ABCO boiler. 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
Chad Stephenson
New Source Review Unit

Director or Designee
Department of Natural Resources
FEB 2 2 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/
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.”

American River Transportation Co., LLC
City of St Louis County

1. Fuel Requirement-Boiler
   A. American River Transportation Co., LLC shall burn exclusively fuel oil for the boiler (EU-6) with a sulfur content less than or equal to 0.5 % by weight.

   B. American River Transportation Co., LLC shall demonstrate compliance with Special Condition 1.A by obtaining records of the fuel’s sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040 Reference Methods.

   C. American River Transportation Co., LLC shall keep the records required by Special Condition 1.B with the unit and make them available for Department of Natural Resources’ employees upon request.

2. Record Keeping and Reporting Requirements
   A. American River Transportation Co., LLC 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.

   B. American River Transportation Co., LLC shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE

SECTION (5) REVIEW

Project Number: 2016-11-040
Installation ID Number: 510-1390
Permit Number: 022017-010

Installation Address:
American River Transportation Co., LLC
4528 South Broadway
St. Louis, MO 63111

City of St Louis County

REVIEW SUMMARY

• American River Transportation Co., LLC has applied for authority to install one 12.6 million BTU/hr fuel oil fired ABCO boiler.

• The application was deemed complete on November 22, 2016.

• HAP emissions are expected from the proposed equipment. HAPs of concern from this process are from fuel oil combustion.

• 40 CFR 60 Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" applies to the equipment.

• 40 CFR Part 63 Subpart JJJJJJ, "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" applies to the equipment.

• No air pollution control equipment is being used in association with the new equipment.

• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis levels.

• This installation is located in City of St Louis 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 equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

• An Basic Operating Permit application amendment is required for this installation within 30 days of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

American River Transportation Co., LLC is an existing installation that is a river terminal located in St. Louis, Missouri. They operate under a basic operating permit.

The following New Source Review permits have been issued to American River Transportation Co., LLC from the Air Pollution Control Program.

Table 1: Permit History

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<tr>
<th>Permit Number</th>
<th>Description</th>
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<td>02-10-022</td>
<td>Local CP for Boilers</td>
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<td>Amendment to Basic Operating Permit for Source Registration</td>
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<td>11-03-002</td>
<td>Local CP to Update Boiler Fuel</td>
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</table>

PROJECT DESCRIPTION

American River Transportation Co., LLC (ARTCO) has applied for authority to install a fuel oil fired 12.6 million Btu/hr ABCO 3000 AMC boiler. The ABCO boiler was previously used with a different fuel source and is being modified to generate steam heat using fuel oil for tank barge washing and heating certain tanks used for caustic soda storage. The fuel oil will not exceed 0.5 percent sulfur by weight.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.3 Fuel Oil Combustion.

The following table provides an emissions summary for this project. Existing potential emissions were not available. Existing actual emissions were taken from the installation's 2015 EIQ. Potential emissions of the application represent the potential of the modified equipment, assuming continuous operation (8760 hours per year).
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<tr>
<th>Pollutant</th>
<th>Regulatory De Minimis Levels</th>
<th>Existing Potential Emissions</th>
<th>Existing Actual Emissions (2015 EIQ)</th>
<th>Potential Emissions of the Project</th>
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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. Potential emissions of SOx are above insignificant levels.

APPLICABLE REQUIREMENTS

American River Transportation Co., LLC 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
  o Standards of Performance for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc

- MACT Regulations, 10 CSR 10-6.075
  o National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers – Area Sources 40 CFR Part 63, Subpart JJJJJJ

- Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-6.405 applies to the boiler. The boiler will combust fuel oil with less than 1.2% sulfur, therefore it is deemed in compliance.

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 November 14, 2016, received November 18, 2016, designating Archer Daniels Midland Company as the owner and operator of the installation.
APPENDIX A
Abbreviations and Acronyms

% ........... percent
°F ........... degrees Fahrenheit
acfm ...... actual cubic feet per minute
BACT ...... Best Available Control Technology
BMPs ...... Best Management Practices
Btu........ British thermal unit
CAM ...... Compliance Assurance Monitoring
CAS ...... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR ...... Code of Federal Regulations
CO ....... carbon monoxide
CO₂ ........ carbon dioxide
CO₂e ...... carbon dioxide equivalent
COMS ...... Continuous Opacity Monitoring System
CSR ...... Code of State Regulations
dscf ...... dry standard cubic feet
EIQ ...... Emission Inventory Questionnaire
EP ...... Emission Point
EPA ...... Environmental Protection Agency
EU ...... Emission Unit
fps ...... feet per second
ft .......... feet
GACT .... Generally Available Control Technology
GHG ...... Greenhouse Gas
gpm ...... gallons per minute
gr ......... grains
GWP ...... Global Warming Potential
HAP ...... Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ...... pounds per hour
MACT .... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s ...... meters per second
Mgal ...... 1,000 gallons
MW ......... megawatt
MHDR .... maximum hourly design rate
MMBtu ...... Million British thermal units
MMCF ...... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS ...... National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NOₓ .......... nitrogen oxides
NSPS ...... New Source Performance Standards
NSR ...... New Source Review
PM ....... particulate matter
PM₂.₅ ...... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm ...... parts per million
PSD ...... Prevention of Significant Deterioration
PTE ...... potential to emit
RACT ...... Reasonable Available Control Technology
RAL ...... Risk Assessment Level
SCC ...... Source Classification Code
scfm ...... standard cubic feet per minute
SDS ...... Safety Data Sheet
SIC ...... Standard Industrial Classification
SIP ...... State Implementation Plan
SMAL .... Screening Model Action Levels
SOₓ ......... sulfur oxides
SO₂ ...... sulfur dioxide
tph ...... tons per hour
tpy ...... tons per year
VMT ...... vehicle miles traveled
VOC ...... Volatile Organic Compound
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<td>GHG (CO2e)</td>
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Emission factor for Benzo(a)kfluoranthene conservatively applied to each (b) and (k)
PM, PM10, and PM2.5 emission factors cited from AP-42 Table 1.3-1, 1.3-2, 1.3-3 for industrial boiler May 2010.

NSPS/DE: defined as oil fired, no initial notification record keep fuel usage per boiler and sulfur content

MACT 8J: as defined, new every other year tune-up as the CO management practice standard
PM limit of 0.03 lb/MMBtu heat input
AP-42 PM emission factors are in compliance with the limit. They equate to:
Initial performance test, and every 3 years after

2016-11-040
Boilers Fuel Oil
12/25/2016
FEB 22 2017

Mr. Ryan Wilson
Terminal Manager
American River Transportation Co., LLC
P.O. Box 2889
St. Louis, MO 63111

RE: New Source Review Permit - Project Number: 2016-11-040

Dear Mr. Wilson:

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 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 with 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.
If you have any questions regarding this permit, please do not hesitate to contact Chad Stephenson, 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

Susan Heckenkamp
New Source Review Unit Chief

Enclosures

c: St. Louis Regional Office
   PAMS File: 2016-11-040

Permit Number: 022017-010