



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

# DEPARTMENT OF NATURAL RESOURCES

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**JAN 22 2016**

Mr. Randy Simmons  
Bartlett Grain Company, L.P.  
506 West Lake Boulevard  
St. Joseph, MO 64504

Re: Replacement Operating Permit Title Page  
Project 2014-03-006, Installation ID 021-0056

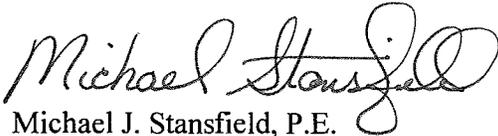
Dear Mr. Simmons:

On January 11, 2016 I sent you the Intermediate State Permit to Operate for the Bartlett Grain Company installation in St. Joseph. Unfortunately, the title page of the application specifies an incorrect expiration date for the operating permit. Please find enclosed a title page that has the correct expiration date of January 11, 2021. Please replace the incorrect title page with the enclosed copy.

If you have any questions regarding this matter, please do not hesitate to contact me 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

c: PAMS File: 2014-03-006

Enclosure



# 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:** OP2015-020  
**Expiration Date:** January 11, 2021  
**Installation ID:** 021-0056  
**Project Number:** 2014-03-006

**Installation Name and Address**

Bartlett Grain Company, L.P.  
1005 Lower Lake Road  
St. Joseph, MO 64504  
Buchanan County

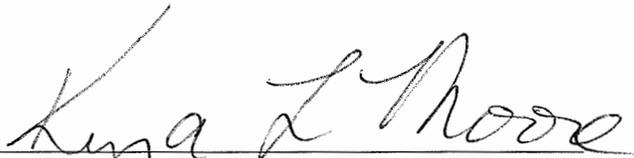
**Parent Company's Name and Address**

Bartlett Grain Company, L.P.  
4900 Main St., Suite 1200  
Kansas City, MO 64112

**Installation Description:**

Bartlett and Company operates a grain cleaning and transfer installation in St. Joseph with a permanent storage capacity of approximately 3 million bushels. The installation has accepted a voluntary limit on PM10 to become a synthetic minor source. It is subject to New Source Performance Standard DD for grain elevators.

  
Prepared by:  
Bern Johnson  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

**JAN 11 2016**

Effective Date

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# I. Installation Description and Equipment Listing

## INSTALLATION DESCRIPTION

Bartlett Grain Company operates a grain cleaning and transfer installation in St. Joseph with a permanent storage capacity of approximately 3.95 million US bushels. Grain is offloaded and transferred into a grain elevator. Incoming grain is accepted from local farms by truck. The grain is weighed, cleaned, and transferred to other storage bins. The grain can then be shipped via rail or truck to customers. Grain is currently shipped primarily by rail.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	18.52	12.89	12.89	12.77	12.12
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	2.82	1.89	1.30	1.07	1.01
Sulfur Oxides (SO <sub>x</sub> )	0.01	0.01	0.01	0.00	0.00
Nitrogen Oxides (NO <sub>x</sub> )	1.48	1.56	1.56	0.5	0.00
Volatile Organic Compounds(VOC)	0.08	0.09	0.09	0.00	0.00
Carbon Monoxide (CO)	1.24	1.31	1.31	0.04	0.00

## 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.

2013 EIQ Emission Point #	Description
EP-01	Grain Receiving Pit
EP-02	Elevator Leg
EP-05	Gallery Belt Tripper
EP-06	Basement Belt Conveyor
EP-08	Loading Spout (truck)
EP-09	Haul Road
EP-10	Garner Bins
EP-11	Storage Bins

EP-13a	Enclosed transfer conveyor (rail load out)
EP-15	Loading Spout (rail)
EP-17	Truck Loading spout
EP-18	Dryer (natural gas)

**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.

2013 EIQ Emission Point #	Description
EP-13b	Enclosed Elevator Leg
EP-14	Enclosed Scale
EP-16	Enclosed Rail Loading

## 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.

<p style="text-align: center;"><b>PERMIT CONDITION PW 1</b> 10 CSR 10-6.065(5)(C)2. Voluntary Limitation</p>
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**Emissions Limitations:**

1. The permittee shall emit less than 100 tons of particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>) in any consecutive 12 month period.

**Monitoring/Recordkeeping:**

1. The permittee shall calculate and record emissions of PM<sub>10</sub> using Attachment E, or an equivalent, to demonstrate compliance with the emission limitation.
2. The permittee shall maintain all records required by this permit for a minimum of five years and shall make them available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

**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 the permittee determines that the installation exceeded the emission limitation listed above.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report 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.

<b>PERMIT CONDITION 1</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit #062003-003A Issued July 12, 2006	
<b>Emission Unit</b>	<b>Description</b>
EP-06	Basement Belt conveyor – installed 1998
EP-13a	Enclosed transfer conveyor – installed June 1998
EP-15	Loading spout (rail) – installed June 1998

**Operational Limitation:**

- 1) The permittee shall control emissions from the listed emission units using baghouses. The baghouses must be in use at all times when the associated piece of equipment is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. These baghouses shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them [Special Condition 2A].
- 2) Appropriate replacement filters for each baghouse shall be kept on hand at all times. These replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance) [Special Condition 2C].

**Monitoring:**

- 1) The permittee shall monitor and record the operating pressure drop across the baghouses at least once in every 24-hour period when the associated equipment is in operation, using Attachment F or equivalent [Special Condition 2B].

**Recordkeeping:**

- 1) The permittee shall maintain an operating and maintenance log (Attachment D or equivalent) for each baghouse which shall include the following [Special Condition 2D]:
  - a. Incidents of malfunction including the dates and duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
  - b. Any maintenance activities conducted on the unit, such as parts replacement, replacement of equipment, etc.; and
  - c. A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.

**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 the permittee determined using the Method 9 test that the emission units exceeded the operational limits listed above.
- 2) Reports of any deviations from monitoring, record keeping 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.

<b>PERMIT CONDITION 2</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit #102007-009, Issued October 15, 2007	
Emission Unit	Description
EP-09	Haul Road
EP-17	Loading spout (truck) – installed October 2003

**Operational Limitation:**

- 1) The permittee shall use a mineral oil suppression system at all times when shipping grain through the side-loading spout (EP-17). The mineral oil suppression system shall be operated and maintained in accordance with the manufacturer's specifications [Special Condition 1].
- 2) The permittee shall control emissions from all haul roads (EP-09) on which trucks which receive grain from the side-loading (EP-17) travel through one of the following methods [Special Condition 2]:
  - a) Paving
    - i) The permittee shall apply pavement in accordance with industry standards for such pavement to achieve control of fugitive emissions while the plant is operating.
    - ii) The permittee will maintain the surfaces as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - b) Documented Watering/Surfactant Spray
    - i) The permittee shall apply water or surfactant spray consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary. The following conditions apply to watering:
      1. The water application rate shall be 30 gallons per 1000 square feet at least once every four hours.
      2. A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application.
      3. Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of the quantity of mineral oil suppressant used. Receipts of mineral oil purchased will be sufficient for this requirement.
- 2) The permittee shall keep the following records on file and available for inspection:

- a. A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.
- b. Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.
- c. Records of watering equipment breakdowns and repairs.

**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 the permittee determined using the Method 9 test that the emission units exceeded the operational limits listed above.
- 2) Reports of any deviations from monitoring, record keeping 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.

<b>PERMIT CONDITION 3</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit #102010-009, Issued October 22, 2010	
Emission Unit	Description
EP-18	Dryer (natural gas) – installed October 2010

**Emissions Limitations:**

1. The permittee shall emit less than 15 tons of particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>) in any consecutive 12 month period.

**Monitoring/Recordkeeping:**

1. The permittee shall calculate and record emissions of PM<sub>10</sub> using Attachment E, or an equivalent, to demonstrate compliance with the emission limitation.
2. The permittee shall maintain all records required by this permit for a minimum of five years and shall make them available to any 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 the permittee determines that the installation exceeded the emission limitation listed above.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

<b>PERMIT CONDITION 4</b>	
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart DD – Standards of Performance for Grain Elevators	
<b>Emission Unit</b>	<b>Description</b>
EP-06	Basement Belt conveyor – installed 1998
EP-13A	Enclosed transfer conveyor – installed June 1998
EP-15	Loading spout (rail) – installed June 1998
EP-17	Loading spout (truck) – installed October 2003

**Emission Limitation:**

- 1) The permittee shall not discharge into the atmosphere any process emission (particulate matter which is collected by a capture system) which:
  - a) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf). [§60.302(b)(1)]
  - b) Exhibits greater than zero percent opacity. [§60.302(b)(2)]
- 2) The permittee shall not discharge into the atmosphere any fugitive emission from:
  - a) Any rail loading station which exhibits greater than 5 percent opacity. [§60.302(c)(1)]
  - b) Any grain handling operation which exhibits greater than zero percent opacity. [§60.302(c)(2)]
  - c) Any truck loading station which exhibits greater than 10 percent opacity. [§60.302(c)(3)]

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation [§60.3032(b)(3)].
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
- 4) If a Method 9 test determines that the zero percent opacity requirement is exceeded, the permittee shall conduct a Method 5 test to determine if the 0.023 g/dscm (ca. 0.01 gr/dscf) limit is exceeded [§60.303(b)(1)].
  - a) The permittee may conduct a Method 17 test in lieu of a Method 5 test if the particulate matter emissions are independent of temperature [§60.303(c)(1)].

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results, noting:

- a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
  - d) The permittee shall maintain records of any equipment malfunctions.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition.
  - 3) Attachments B, C, and D contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

**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 the permittee determined using the Method 9 test that the emission unit(s) exceeded the listed limit.
- 2) Reports of any deviations from monitoring, record keeping 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.

<b>PERMIT CONDITION 5</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Sources Installed Before February 24, 1971		
Emission Unit	Description	Manufacturer
EP01	Receiving Straight Truck, Hopper Truck & Railcar – installed 1970	custom
EP02	Elevator Leg – installed 1930	custom
EP05	Gallery Belt Tripper – installed 1970	custom
EP08	Loadout Spout (Trucks) – installed 1930	custom
EP10	Scale Garner Bins – installed 1930	custom
EP11	Storage Bins – installed 1930	custom

**Emission Limitation:**

- 1) The permittee shall not cause or allow emissions with an opacity greater than 40 percent to be discharged into the atmosphere from any existing or new source with visible emissions.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. Issuance of this permit does not trigger a monitoring schedule reset.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results, noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and

- c) Whether the visible emissions were normal for the process.
- d) The permittee shall maintain records of any equipment malfunctions.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition.
- 3) Attachments B, C, and D contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

**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 the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping 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. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

### **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) 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.
- 3) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for 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 must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 4) 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 10-6.050 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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 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) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) 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 twelve (12)-month period immediately preceding the end of the reporting period.
- 9) 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**

##### **Emission Limitation:**

- 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.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.
    - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

**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 10-6.165 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 10-6.220 Restriction of Emission of Visible Air Contaminants**

#### **Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

#### **Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 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:**

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

### **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

- must 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 must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must 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 must comply with the required practices pursuant to §82.156.
    - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
    - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
    - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must 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.
  - 5) 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)(E)2 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 Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - 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, 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, record keeping, 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 must 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 must 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 must 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 must 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 must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must 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 semiannually (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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must 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 must 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 must 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 must 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 record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. 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 Randy Simmons, Corporate Counsel. 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) MDNR or EPA determines that the permit must 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**

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



**ATTACHMENT E**  
**PM10 - Compliance Worksheet**

This worksheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month/year) (month/year)

Emission Points	Description	<sup>1</sup> Monthly Throughput	<sup>2</sup> Emission Factor	Overall Control Efficiency	<sup>3</sup> Total Monthly Emissions (tons/month)
E01	Rcvg ST		0.059		
E01	Rcvg HT		0.0078		
E01	Rcvg RL		0.0078		
E02	Leg		0.034		
E03	Clnr		0.0405		
E05	Gallery Belt		0.034		
E06	Tunnel belt		0.034		
E07	Leg		0.034		
E08	Truck LO north		0.029		
E09	Haul Rd		1.8987		
E10	Scale Garners		0.0063		
E11	storage bins		0.0063		
E12	barge spout		0.004		
E13A	RI Lo xfr conv		0.034		
E14	Rail scale		0.034		
E15	Rail LO spout		0.0022		
E16	Rail LO Conv		0.034		
E17	SW truck LO spout		0.029		
E18	Dryer (composite ef)		0.055		
E18	Dryer (NG mmcf)		7.6		
<sup>4</sup> Total Monthly Installation PM10 Emissions (tons) =					
<b>Total Monthly Installation PM10 Emissions From Previous 11 months (tons) =</b>					
<sup>5</sup> Total Annual (12-Month) Installation-Wide Individual PM10 Emissions (tons) =					

Notes

- (1) Monthly throughputs are the amount of grain handled (tons). Monthly throughput for haul roads (EP-09) is vehicle miles traveled (VMT) Monthly throughput for the combustion source (EP-18) is the amount of fuel used (mmscf).
- (2) Emission factors from AP-42/WebFIRE.
- (3) Total monthly emissions equal throughput \* emission factor \* (1-control efficiency)
- (4) Total monthly emissions for the entire installation is calculated by summing the individual total monthly emissions.
- (5) Current 12-month installation-wide PM<sub>10</sub> emissions is the sum of current month's emissions plus emissions from the previous eleven months.



# 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.

One emission point has been removed since the last permit was issued. Emission point 12 – Barge loading spout was damaged in a railcar accident and will not be replaced.

## **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 March 3, 2014;
2. Intermediate Operating Permit, OP2009-021, July 13, 2009;
3. Construction Permit #0898-006, Issued July 29, 1998;
4. Operating Permit #021-0056-0001, Issued November 12, 1998;
5. Construction Permit #062003-003, Issued May 21, 2003;
6. Permit Amendment #062003-003A, Issued August 9, 2005;
7. Permit Amendment #062003-003A, Issued July 12, 2006;
8. Construction Permit #102007-009, Issued October 15, 2007;
9. Construction Permit #102010-009, issued October 22, 2010;
10. 2013 Emissions Inventory data from MOEIS;
11. WebFIRE; and
12. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;

## **Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

## **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.

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

Construction Permit #021-0056-001 & #0898-006 – all conditions and requirements of these permits have expired or been superseded by later permits.

Construction Permit #062003-003 – this permit was issued for the addition of several pieces of equipment (EP-6, -13a, -13b, -14, -15, and -16). It included a cyclone and mineral oil suppressant as control measures. Subsequent amendments to this permit (see below) replaced all special conditions of the original.

Permit Amendment #062003-003A (Project 2005-07-015) – this amendment was in response to a request by Bartlett Grain for a reevaluation of their operations under then-current guidelines. The result was that three enclosed emission units were removed from “consideration as emission points”. The three units were EP-13b, -14, and -16. These units were removed from the emission unit list and PTE calculations in the previous operating permit. They have been restored to the Emission Units without Limitation list (page 4) in this document for completeness. They are still excluded from PTE calculation and from Attachment E.

Permit Amendment #062003-003A (Project 2006-05-031) – this amendment modified the control devices for the equipment originally permitted in #062003-003, replacing the cyclone and oil suppressant with baghouses. As a result, the previous special conditions were replaced one regarding the baghouses (see Permit Condition 1).

Construction Permit #102007-009 – this permit was issued for addition of a grain loading spout. It required use of mineral oil suppression for the permitted unit (EP-17).

Construction Permit #102010-009 – this permit was issued for addition of a dryer and associated enclosed conveying equipment. It includes a PM10 emission limit for the permitted unit (EP-18).

### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subpart DD, *Standards of Performance for Grain Elevators* – this subpart applies to grain terminal elevators or any grain storage elevator which commences construction, modification, or reconstruction after August 3, 1978, and has a permanent storage capacity of more than 88,100 cubic meters (ca. 2.5 million U.S. bushels) with some exceptions. The affected emission units are truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations. Much of Bartlett Grain’s installation was constructed well before 1978, so only the four emission units listed in Permit Condition 3 are subject.

### **Maximum Achievable Control Technology (MACT) Applicability**

None

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-

6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	-
HAP	-
NO <sub>x</sub>	36.18
PM <sub>10</sub>	985.65
PM <sub>25</sub>	156.98
SO <sub>x</sub>	0.16
VOC	0.72

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

**Other Regulatory Determinations**

- 1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* – this rule limits the amount of particulate matter that is allowed from an emission unit. There are sixteen specific exemptions in the rule. Most of Bartlett Grain’s emission units fall under one or more of these exemptions (see table below). The definition of process weight rate excludes liquids and gases used solely as fuels.

Emission Unit No.	(1)(B)(3) grain loading/unloading	(1)(B)(7) fugitives	(1)(B)(15) fed enfor >90%	(1)(B)(16) formula
EP-01	x			x
EP-02				x
EP-05				x
EP-06			x	x
EP-08	x			x
EP-09		x	x	x
EP-10				x
EP-11				x
EP-13A			x	x
EP-13B				x
EP-14				x
EP-15	x		x	x
EP-16	x			x
EP-17	x		x	x
EP-18				gas

gas – PM emissions from natural gas are excluded from formula

**Particulate Emissions Calculations**

All units except EP-09 are above 60,000 lbs/hr process weight each. The following equation from 10 CSR 10-6.400(3)(A)1 is used to calculate maximum allowable particulate emissions:

Maximum Allowable PM Emissions  $E = 55.0P^{0.11}-40$

EP-04 is below 60,000 lbs/hr and is calculated with the following equation:

Maximum Allowable PM Emissions  $E = 4.10P^{0.67}$

P = Process weight rate (tons/hr i.e. MHDR)

E = Allowable emission rate limit (lb/hr)

Table 1 – Determination of 10 CSR 10-6.400 PM limit

Emission Unit	MHDR (per hour)	Allowable Emission Rate (lbs/hr)	Emission Factor (lbs/ton)	Pre-Control PTE (lbs/hr)
EP-01	540.00	69.88	0.0746	40.28
EP-02	2,160.00	87.98	0.034	73.44
EP-05	1,080.00	78.59	0.034	36.72
EP-06	1,000.00	77.59	0.0078	7.80
EP-08	540.00	69.88	0.029	15.66
EP-09	4.00	10.38	1.029	4.12
EP-10	1,620.00	84.00	0.0063	10.21
EP-11	1,080.00	78.59	0.0063	6.80
EP-13A	1,000.00	77.59	0.0078	7.80
EP-13B	1,000.00	77.59	0.0078	7.80
EP-14	1,000.00	77.59	0.0078	7.80
EP-15	1,000.00	77.59	0.0078	7.80
EP-16	1,000.00	77.59	0.0078	7.80
EP-17	174.00	57.01	0.029	5.05

These calculations demonstrate that these units are always in compliance with 10 CSR 10-6.400.

**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 APCP a schedule for achieving compliance for that regulation(s).

A draft of the Intermediate Operating Permit for Bartlett Grain Company was placed on public notice on March 6, 2015, by the Missouri Department of Natural Resources (MDNR). Comments were received from Robert Cheever of Region VII of the Environmental Protection Agency. The six comments are addressed in the order in which they appear within the letter(s).

**Comment #: 1**

Section II: Plant Wide Emission Limitations includes Permit Condition PW1 which establishes a voluntary limitation of 100 tons of particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>) in any consecutive 12-month period. Permit Condition PW1 also requires the permittee to calculate and record emissions of PM<sub>10</sub> using Attachment E (or approved equivalent) to demonstrate compliance with the emission limitation. By accepting this voluntary plant-wide limitation, Bartlett Grain – St Joseph is agreeing that all emission units in the installation, with the potential to emit PM<sub>10</sub>, shall be monitored to ensure compliance with the emission limitation. However, Emission Unit EP-13b is not included on Attachment E and EPA believes EP-13b has the same potential to emit PM<sub>10</sub> as several of the other included emission units. Therefore, EPA recommends MDNR include EP-13b with an appropriate referenced emission factor, on Attachment E, for the determination of PM<sub>10</sub> compliance with the plant-wide emission limit.

**Response to Comment:**

In Permit Amendment 062003-003A issued August 9, 2005, the Air Program approved use of a composite emission factor for use in calculating PM<sub>10</sub> emissions. The effect was to remove units EP-13b, -14, and -16 from PTE calculation. The Statement of Basis – Construction Permit Revisions section includes this discussion. The text of the paragraph has been expanded to better explain the removal of these three units from PTE calculation.

**Comment #: 2**

Permit Condition 1 requires the permittee to monitor and record operating pressure drop across the baghouses at least once every 24-hour period when the associated equipment is in operation; and to maintain an operating and maintenance log for each baghouse. MDNR's customary practice is to provide examples of compliance verification records as attachments to operating permits. However, the draft operating permit for Bartlett Grain – St. Joseph does not have attachments associated with Permit Condition 1. Therefore, EPA recommends MDNR provide examples of the compliance demonstration records Bartlett Grain – St. Joseph uses to record baghouse pressure drop; and their operating and maintenance log, as attachments, with appropriate references in Permit Condition 1.

**Response to Comment:**

Attachment F was added to the permit for use in recording baghouse pressure drop.

**Comment #: 3**

Permit Condition 2 requires the permittee to use a mineral oil suppression system at all times when shipping grain through emission unit EP-17. Permit Condition 2 also requires the permittee to control emissions from haul roads. Permit Condition 2 requires detailed record keeping regarding haul road emissions control and no record keeping to verify compliance of the oil suppression system. Additionally, it is MDNR's customary practice to include examples of the permittee's compliance demonstration records as attachments in operating permits. However, the record keeping requirements in the draft Permit Condition 2 does not provide examples and lacks oil suppression system compliance verification. Therefore, EPA recommends MDNR include compliance verification record keeping for the mineral oil suppression system associated with emission unit EP-17; and include examples of all compliance records, used by Bartlett Grain – St. Joseph, for both EP-17 and haul roads as attachments with appropriate references to the attachments.

**Response to Comment:**

A monitoring and recordkeeping requirement for mineral oil suppression was added to Permit Condition 2. The usage record, combined with the manufacturer's operating specifications, allows for compliance verification.

**Comment #: 4**

Permit Condition 4 includes a particulate matter emission limitation from any of four (4) emission units of less than 0.023 g/dscm (0.01 gr/dscf). This emission limitation is an applicable requirement of 40 CFR part 60, Subpart DD in accordance with §60.302(b)(1). §60.302(b)(1) requires the permittee to determine compliance with the particulate matter concentration through the use of Method 5. However, this monitoring requirements is not addressed as an applicable requirement in Permit Condition 4. Thus, EPA recommends MDNR review 40 CFR part 60, Subpart DD and verify all applicable requirements are included in the operating permit.

**Response to Comment:**

Subpart DD does require Method 5 testing for the particulate matter limit, but does not provide a testing schedule. A Method 5 requirement was added to the monitoring section. Permit Condition 4 also limits opacity from the specified emission points. Permit Condition 4 includes a provision for Method 9 testing if there is any indication of visible emissions [see §60.303(b)(3)]. As written, Method 22 is used as a screening tool. If any visible emissions are suspected, then a Method 9 test is performed to determine the actual level of opacity. Because Bartlett Grain's particulate matter emissions are also visible emissions, a Method 5 test is not needed until a Method 9 test determines there are emissions sufficient to indicate a possible exceedance of the particulate matter limit.

**Comment #: 5**

The written notification language regarding Off-Permit Changes in Section V, to be used in operating permits, has just recently been modified to more closely match the wording

in 10 CSR 10-6.065(5)(C)5. Therefore, EPA recommends MDNR insert the newly modified Off-Permit Change wording in the Bartlett Grain – St. Joseph operating permit.

**Response to Comment:**

The text in Section V. Off-Permit Changes now matches the text in the most recent Intermediate Operating Permit template.