

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 102007-009 Project Number: 2007-08-126

Parent Company: Bartlett Grain Company, L. P.

Parent Company Address: 4800 Main St., Kansas City, MO 64112

Installation Name: Bartlett Grain Company, L. P.

Installation Address: 506 West Lake Blvd., St. Joseph, MO 64504

Location Information: Buchanan County, S30, T57N, R35W

Application for Authority to Construct was made for:

The addition of a grain loading spout. 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.

OCT 15 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

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

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

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

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

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

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

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Project No.	2007-08-126

SPECIAL CONDITIONS:

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

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

Bartlett Grain Company, L. P.
Buchanan County, S30, T57N, R35W

1. Mineral Oil Suppression System
Bartlett Grain Company, L. P. 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.
2. Haul Roads
Bartlett Grain Company, L. P. shall control emissions from all haul roads on which trucks which receive grain from the side-loading spout (EP-17) travel through one of the following methods:
 - A. Paving
 - 1) Bartlett Grain Company, L. P. shall apply pavement in accordance with industry standards for such pavement to achieve control of fugitive emissions while the plant is operating.
 - 2) Maintenance of the surfaces will be conducted 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
 - 1) Bartlett Grain Company, L. P. 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 documented watering:
 - a. The water application rate shall be 30 gallons per 1000 square feet at least once every four hours.
 - b. A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application
 - c. Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.

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SPECIAL CONDITIONS:

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

- 2) Bartlett Grain Company, L.P. 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.

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

Project Number: 2007-08-126
Installation ID Number: 021-0056
Permit Number:

Bartlett Grain Company, L. P.
506 West Lake Blvd.
St. Joseph, MO 64504

Complete: 8/30/2007

Parent Company:
Bartlett Grain Company, L. P.
4800 Main Street
Kansas City, MO 64112

Buchanan County, S30, T57N, R35W

REVIEW SUMMARY

- Bartlett Grain Company, L. P. has applied for authority to construct a grain loading spout.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- Subpart DD of the New Source Performance Standards (NSPS), *Standards of Performance for Grain Elevators*, applies to this installation since the storage capacity of the installation is greater than 2.5 million bushels of grain.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Mineral oil application is being used to control the particulate matter less than ten microns in aerodynamic diameter (PM₁₀) emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are below de minimis levels.
- This installation is located in Buchanan County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- An amendment to the Intermediate Operating Permit is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Bartlett Grain Company, L. P. is a grain elevator that receives grain by truck and ships grain primarily by railcar. The elevators storage capacity is 3.95 million bushels of grain, which makes the installation subject to subpart DD of the NSPS. The installation, an existing minor source, holds an intermediate operating permit, which limits the installation to minor levels. The installation is located along the Missouri river in St. Joseph, Missouri.

The following construction permits have been issued to Bartlett Grain Company, L. P. from the Air Pollution Control Program.

Permit Number	Description
0898-006	Increase capacity on conveyor belts
062003-003	Shuttle Train Loading

PROJECT DESCRIPTION

Bartlett Grain Company, L. P. has applied for authority to construct a side-draw loading spout to allow loadout from two concrete silo storage bins. This loading spout is rated to transfer 14,000 bushels per hour (406 tons per hour), but the spout is bottlenecked by the truck positioning process to 6,000 bushels per hour (176 tons per hour). Emissions from the loading spout are controlled by a mineral oil application, which has been assigned a 70 percent control efficiency. This efficiency was used in previous construction permits. The installation will control emissions from the haul roads effected by this project by paving, watering or applying a chemical surfactant. If a chemical surfactant is used, applications must be made at intervals that will maintain a ground inventory sufficient to prevent visible emissions that would violate any applicable air pollution regulations.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, sections 9.9.1 Grain Elevators and Processes (May 2003) and 13.2.2 Unpaved Roads (November 2006). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	312	37.19	10.23	N/A
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

*Existing Potential Emissions are the existing potential emissions calculated in permit #062003-003 plus the conditioned potential in that permit.

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 PM₁₀ are below de minimis levels.

APPLICABLE REQUIREMENTS

Bartlett Grain Company, L. P. 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

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

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

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 8/28/2007, received 8/30/2007, designating Bartlett Grain Company, L. P. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Mr. Lawrence Rohn
Corporate Engineer.
Bartlett Grain Company, L. P.
506 West Lake Blvd.
St. Joseph, MO 64504

RE: New Source Review Permit - Project Number: 2007-08-126

Dear Mr. Rohn:

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

Operation in accordance with these conditions, 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.

If you have any questions regarding this permit, please do not hesitate to contact Mike Mittermeyer at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mml

Enclosures

c: Kansas City Regional Office
PAMS File 2007-08-126

Permit Number: