



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: OP2016-037
Expiration Date: NOV 02 2021
Installation ID: 133-0016
Project Number: 2015-04-016

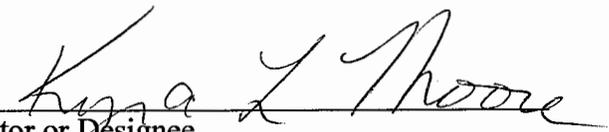
Installation Name and Address
Consolidated Grain & Barge Co.
20314 South Highway 77
East Prairie, MO 63845
Mississippi County

Parent Company's Name and Address
Consolidated Grain & Barge Co.
201 North Missouri Ave
Mound City, IL 62963

Installation Description:

Consolidated Grain and Barge Co. operates a grain elevator near Dorena, Missouri. The installation receives corn, beans, wheat, and milo from trucks. The grain is stored and dried at the installation prior to being loaded onto a barge and shipped on the Mississippi River. The installation is a synthetic minor source of Particulate Matter less than or equal to ten (10) microns in diameter (PM₁₀) located in Mississippi County, an attainment area for all criteria pollutants.


Prepared by:
Jacob Robinett
Operating Permit Unit


Director or Designee
Department of Natural Resources
NOV 02 2016

Effective Date

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I. Installation Equipment Listing

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP01	Grain Receiving - Pit 1
EP02	Elevator Leg 1
EP03	Tunnel Belt N (Tanks 1 & 2)
EP04	Tunnel Belt S (Tanks 3 & 4)
EP06	Long Term Storage Recovery (Tank 5)
EP07A	Meyer Dryer North - Propane Combustion, 19.34 MMBtu/hr
EP07B	Meyer Dryer North – Process
EP08A	Meyer Dryer South- Propane Combustion, 19.34 MMBtu/hr
EP08B	Meyer Dryer South - Process
EP09	River Belt
EP11	Grain Receiving - Pit 2
EP12	Grain Receiving - Leg 2

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Description of Emission Source</u>
EP10 Haul Road

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

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

Emission Limitation:

The permittee shall not cause or allow the emission of particulate matter of a diameter of less than 10 microns (PM₁₀) in excess of 100.0 tons from the entire installation in any consecutive 12 month period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of monthly usage for every emission unit.
2. The monthly emissions of particulate matter of a diameter of less than 10 microns for each emission unit shall be calculated using Attachment F or an equivalent form created by the permittee.
3. The permittee shall calculate their annual emissions of particulate matter of size 10 microns or less by summing the monthly emissions of each emission unit for the last twelve months. The annual emissions will be calculated each month using the most recent twelve months' worth of monthly emission totals.
4. Records may be kept electronically or on paper.
5. All records shall be kept on-site for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification 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.

PERMIT CONDITION 001	
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 0498-019, Issued August 5, 1997	
Emission Unit	Description
EP11	Grain Receiving – Pit 2
EP12	Grain Receiving – Leg 2 Enclosure

Emission Limitation:

The permittee shall not discharge into the atmosphere particulate matter less than ten microns (PM₁₀) in excess of 15 tons in any consecutive 12-month period from EP11 and EP12. [Special Condition #1]

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of emissions of PM₁₀ emitted into the atmosphere from these emission units. The permittee shall record the monthly and running 12-month totals of PM₁₀ emissions from these emission units. The permittee shall use Attachment E or an equivalent form for this purpose. The permittee shall maintain these records on-site for the most recent 60 months and shall immediately make these records available to any Missouri Department of Natural Resources' personnel upon request. [Special Condition #2]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002			
10 CSR 10-6.220 Restriction of Emission of visible Air Contaminants			
Emission Unit	Description	Construction Date	Stack No./Control Device No.
EP02	Elevator Leg 1	1964	EP02, CD1 Enclosure, CD2 Cyclone
EP03	Tunnel Belt N (Tank 1&2)	1964	EP03, CD1 Enclosure, CD2 Cyclone
EP04	Tunnel Belt S (Tank 3&4)	1964	EP04, CD1 Enclosure
EP06	Long Term Storage (Tank 5)	1964	2, CD1 Enclosure, CD2 Cyclone
EP09	River Belt	1964	CD4 Enclosure

Emission Limitations:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 40%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. 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.

Record Keeping:

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

6. Records may be kept electronically or on paper.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification required by Section V of this permit.

PERMIT CONDITION 003			
10 CSR 10-6.220 Restriction of Emission of visible Air Contaminants			
Emission Unit	Description	Construction Date	Stack No./Control Device No.
EP01	Grain Receiving - Pit 1	1997	EP01, CD1 Enclosure, CD2 Cyclone
EP07A and EP07B	Meyer Dryer North	1996	CD3 Screen
EP08A and EP08B	Meyer Dryer South	1981	CD3 Screen
EP11	Grain Receiving - Pit 2	1997	Enclosed
EP12	Grain Receiving - Leg 2	1997	CD4 Enclosure

Emission Limitations:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. 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.

Record Keeping:

1. The permittee shall maintain records of all observation results using Attachments B and C or equivalent forms, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions using Attachment D or an equivalent form generated by the permittee.

3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained on-site for five (5) years.
6. Records may be kept electronically or on paper.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification 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.

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

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

10 CSR 10-6.110 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 2016, 2019, 2022, and 2025 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 10-6.165 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 10-6.170 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 equipment malfunctions contributed to an exceedance.
- 3) 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

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

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”;
 - 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.

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.

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- 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*

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, Compliance and 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. 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, Compliance and 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, Compliance and 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Richard Raithel, Facility Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
 - or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) 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 F
 Plant wide PM₁₀ Compliance Worksheet

Emission Unit No.	Description	(a)	(b)	(c)
		Monthly Usage (tons)	PM ₁₀ Emission Factor (lb/ton)	PM ₁₀ Emission Rate (tons/month)
EP01 and EP11	Grain Receiving		0.05679 ¹	
EP02 and EP12	Elevator Legs		0.02125 ²	
EP03 and EP04	Tunnel Belts		0.22138 ³	
EP06	Long Term Storage		0.66798 ⁴	
EP07B and EP08B	Dryers – Process		0.175 ⁵	
EP09	River Belt – Shipping		0.04812 ⁶	
		(1000 gallons)	(lb/1000 gallons)	(tons/month)
EP07A and EP08A	Dryers – Propane Combustion		0.25 ⁷	
(d) Total Startup, Shutdown, and Malfunction Emissions for this Month in Tons				
(e) Total PM₁₀ Emissions calculated for this Month in Tons				
(f) 12-Month PM₁₀ Emissions Total from Previous Month’s Attachment F, in Tons				
(g) Monthly PM₁₀ Emissions Total (e) from Previous Year’s Attachment F, in Tons				
(i) Current 12-month Total of PM₁₀ Emissions in Tons: [(d) + (e) + (f) - (g)]				

- (a) Monthly Throughput in tons or 1000 gallons(i.e. Monthly usage from EP01 + Monthly usage from EP11);
- (b) Emission factors taken from WebFIRE
 1. Emission Factor taken from SCC 30200551, and includes 3.75% inherent control efficiency due to equipment enclosure.
 2. Emission Factor taken from SCC 30200530, and includes 3.75% inherent control efficiency due to equipment enclosure.
 3. Emission Factor taken from SCC 30200608, and includes 3.75% inherent control efficiency due to equipment enclosure.
 4. Emission Factor taken from SCC 30200607, and includes 3.75% inherent control efficiency due to equipment enclosure.
 5. Emission Factor taken from combining SCC 30200527 and 30200528.
 6. Emission Factor taken from SCC 30200606, and includes 3.75% inherent control efficiency due to equipment enclosure.
 7. Emission Factor taken from SCC 39001099.
- (c) (a) x (b) x 0.0005;
- (d) In the event of a malfunction or upset, the malfunction emissions shall be taken from the report the installation is required to submit to Missouri DNR ACP per 10 CSR 10-6.050(3)(A) after a malfunction has occurred. Total startup and shut down emissions shall be included in this total.
- (e) Summation of (c) + (d) in tons;
- (f) 12-Month PM₁₀ emission total (i) from last month’s Attachment F, in Tons;
- (g) Monthly PM₁₀ Emissions Total (e) from Previous Year’s Attachment F, in Tons;
- (h) Calculate the new 12-month PM₁₀ Emission total. **A 12-month PM₁₀ emissions total (i) of less than 100.0 tons indicates compliance.**

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.

INSTALLATION DESCRIPTION

Consolidated Grain and Barge Co. operates a grain elevator near Dorena, Missouri. The installation receives corn, beans, wheat, and milo from trucks. The grain is stored and dried at the installation prior to being loaded onto a barge and shipped on the Mississippi River. The installation is a synthetic minor source of Particulate Matter less than or equal to ten (10) microns in diameter (PM₁₀) located in Mississippi County, an attainment area for all criteria pollutants. The installation is not a named source; therefore, fugitive emissions do not count towards major source applicability.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	3.24
NO _x	15.86
PM ₁₀	< 100.0
PM _{2.5}	24.80
SO _x	2.88
VOC	0.85

¹Each emission unit was evaluated at 8,760 hours of controlled annual operation unless otherwise noted. PTE from EP10 Haul Road was not included.

²EP11 and EP12 were evaluated at 15 tons/yr of PM₁₀ emissions based upon the emission limitation found in Construction Permit 0498-019 Special Condition No. 1.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM ₁₀)	3.57	5.75	3.91	2.99	1.79
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.45	0.68	0.49	0.36	0.11

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received April 3, 2015;
- 2) 2014 Emissions Inventory Questionnaire, received March 9, 2015; and
- 3) Construction Permit No. 1286-003;
- 4) Construction Permit No. 1096-001;
- 5) Construction Permit No. 0498-019;
- 6) Operating Permit No OP2010-106;
- 7) WebFIRE; and
- 8) 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.

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

This rule is not applicable because the installation uses pipeline grade natural gas per 10 CSR 10-6.260(1)(A)2.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

This rule is not applicable because the installation exclusively uses natural gas per 10 CSR 10-6.261(1)(A).

Change in Emission Factors

In the original Construction Permit 0498-019, the combined emission factor of 0.0926 lb/ton was used to demonstrate compliance with the 15.0 ton limit. The previous operating permit used an emission factor of 0.0891 lb/ton to demonstrate compliance with that limit due to the facility installing an equipment enclosure with 3.75% inherent control efficiency. However there was no reference of where those emission factors were based from. The combined emission factor were reevaluated using emission factors from SCC 30200551 and SCC 30200530 and the 3.75% inherent control efficiency to result in a combined emission factor of 0.08951 lb/ton to determine compliance.

Construction Permit History

The following is a brief history of construction permits for this installation:

Construction Permit No. 1286-003

Issued on December 10, 1986, this permit was issued for the installation of the Meyer Column Grain Dryer EP-08. This permit contains no special conditions.

Construction Permit No. 1096-001

Issued on September 20, 1996, this permit was issued for the installation of the Chicago Column Grain Dryer EP-07. This permit contains no special conditions.

Construction Permit No. 0498-019

Issued on August 5, 1997, this permit was issued for the installation of Grain Receiving – Pit 2 EP11 and Elevator Leg 2 EP12. This permit contains a special condition limiting the PM₁₀ emissions from EP11 and EP12 to 15 tons per consecutive 12-month period. The emission factor used within the tracking sheet was changed from 0.0926 lbs/ton to 0.08951 lbs/ton. The previous emission factor accounted for PM₁₀ emissions from the entire facility with a 50% enclosure inherent control efficiency. The special condition only limits EP11 and EP12, not the entire facility, so the new emission factor only incorporates emissions from the two emission units and includes a 3.75% enclosure inherent control efficiency. Enclosures are capture devices and not control devices, it is current policy to evaluate these units as they have a 3.75% control efficiency for PM.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart DD – *Standards of Performance for Grain Elevators*

The rule is not applicable to the facility. The facility does not meet the definition of grain terminal elevator found in §60.301(c) because their permanent grain storage capacity is 589,000 bushels, which is less than 2.5 million per the definition.

Maximum Achievable Control Technology (MACT) Applicability

None.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

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

The emission units are subject to the limitations of this rule, however since EP02 Elevator Leg 1, EP03 Tunnel Belt N, EP04 Tunnel Belt S, EP06 Long Term Storage, and EP09 River Belt – Shipping were built prior to February 24, 1971, they are subject to the requirements for existing sources as detailed in Permit Condition 002. Since EP01 Grain Receiving – Pit 1, EP07A and EP07B Meyer Dryer North, EP08A and EP08B Meyer Dryer South, EP11 Grain Receiving – Pit 2, and EP12 Elevator Leg 2 were constructed after February 24, 1971, these emission units are subject to the requirements for new sources as detailed in Permit Condition 003.

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

The regulation is applicable to the installation, but is not to EP01 Grain Receiving – Pit 1, EP09 River Belt, and EP11 Grain Receiving – Pit 2 because 10 CSR 10-6.400(1)(B)3 exempts

emissions units that are a part of the receiving and shipping of whole grain from or into a railroad or truck transportation source at a grain elevator. EP07A Meyer Dryer North – Propane Combustion and EP08A Meyer Dryer South – Propane Combustion burns propane, therefore based on the definition of process weight, it excludes liquids used solely as fuel per 10 CSR 10-6.400(2), EP07A and EP08A are exempt from this regulation.

The following emission units have an uncontrolled potential to emit limit less than their process weight rate of emission, that is calculated using the equation found in 10 CSR 10-6.400(3)(A)1. The regulation does not apply to these following units per 10 CSR 10-6.400(1)(B)16.

For process weight rates greater than 30 tons per hour the following equation is used:

$$E = 0.55 * P^{0.11} - 40$$

E = rate of emission in pounds per hour (PM10 Emission Limit)
 P = process weight rate in tons per hour (MHDR)

Emission Unit	Description	SCC Code	MHDR (ton/hr)	PM ₁₀ Uncontrolled Emission Factor (lb/ton)	Potential Uncontrolled PM ₁₀ Emission Rate (lb/hr)	PM ₁₀ Emission Limit (lb/hr)
EP02	Elevator Leg 1	30200530	504	0.034	17.14	69.05
EP03	Tunnel Belt N	30200608	504	0.23	17.14	69.05
EP04	Tunnel Belt S	30200608	504	0.23	17.14	69.05
EP06	Long Term Storage (Tank5)	30200607	252	0.694	174.88	61.05
EP07B	Meyer Dryer North - Process	30200528	56	0.12	6.72	45.64
EP08B	Meyer Dryer South - Process	30200527	56	0.055	3.08	45.64
EP12	Grain Receiving – Leg 2	30200552	348	0.0078	2.71	64.70

Since the facility receives only whole grains, EP06 Long Term Storage tank is not subject to the regulations of this rule per 10 CSR 10-6.400(1)(B)3.

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).

Response to Public Comments

Missouri Department of Natural Resources received two comments from Bob Cheever, an environment engineer with the Air Permitting and Compliance Branch of U.S. EPA Region 7, through email on June 23, 2016. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: Permit Condition PW001 imposes a voluntary limit on particulate matter less than 10 microns in diameter (PM10) of less than 100 tons per year which allows Consolidated Grain & Barge –Dorena to obtain this Intermediate State Permit to Operate instead of a Part 70 operating permit. Consolidated Grain & Barge uses Attachment F or equivalent to demonstrate compliance with this voluntary limit. However, Attachment F may not account for all PM10 emissions as required such as star-up; shut down, malfunction and the haul roads. In its response to a petition filed against the Hu Honua Bioenergy Facility, the EPA reiterates that for purposes of determining the potential-to-emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emissions for all emission units that are part of the source's physical and operational design (entire installation) must be included in calculating PTE for purposes of determining PM10 limitation compliance, including emission units that have been designated as "without limitations" and any designated "insignificant activities." Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emission of that pollutant from the source must be considered in determining compliance with the limit. EPA recommends MDNR revise PW001 in the Intermediate State Permit to Operate for Consolidated Grain & Barge—Dorena, to ensure the source-wide PM10 emission limits are enforceable. MDNR should clarify in the operating permit that the limits apply at all times to all actual source-wide PM10 and that all actual PM10 emission units must be considered in determining compliance with those limits.

Response to Comment: Wording at the beginning of Section II. Plant Wide Emission Limitations states that plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

Comment #2: Attachment E is the compliance worksheet to verify that EP11 and EP12 do not exceed the 15.0 tons per 12-month total PM10 emission limit. Attachment E indicates an emission factor of 0.0891 lb/ton, as referenced in permit 0498-019. Permit to Construct 0498-019, issued August 5, 1997, uses an emission factor of 0.0926 lb/ton to calculate the PM10 from the emission point installed pursuant to the issuance of this construction permit. Additionally, Construction Permit 0498-019 does not reference the origin of the emission factor which is problematic for determining the practical enforceability of the compliance verification data. EPA recommends MDNR determine which is the correct emission factor and to identify an emission factor reference that can be validated.

9) **Response to Comment:** The emissions were reevaluated using updated emission factors from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*;



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

NOV 02 2016

Richard Raithel
Consolidated Grain & Barge Company
20314 South Highway 77
Dorena, MO 63845

Re: Consolidated Grain & Barge Company, 133-0016
Permit Number: OP2016-037

Dear Mr. Raithel:

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

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

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/jrj

Enclosures



c: PAMS File: 2015-04-016