



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 here in.

Intermediate Operating Permit Number: OP2017-097
Expiration Date: DEC 14 2022
Installation ID: 201-8001
Project Number: 2013-05-046

Installation Name and Address

Consolidated Grain & Barge Co.
2133 East State Highway AB
Scott City, MO 63780
Scott County

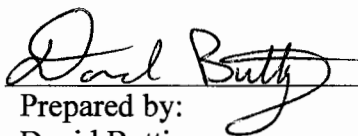
Parent Company's Name and Address

Consolidated Grain & Barge Co.
201 Missouri Avenue
Mound City, Il 62963-0167

Installation Description:

The installation is a barge loading grain terminal. Activities include grain receiving, transfer, drying, storage, and loading operations.

The installation has a PTE greater than the major source threshold for Particulate Matter with a diameter of ten micrometers or less (PM₁₀); however, the installation has accepted a voluntary facility wide limitation on PM₁₀ emissions in order to obtain this intermediate operating permit.


Prepared by:
David Buttig
Operating Permits

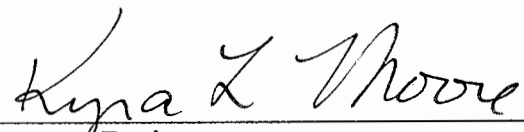

Director of Designee
Department of Natural Resources
DEC 14 2017
Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW001	4
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)	4
PERMIT CONDITION PW002	4
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 1	5
10 CSR 10-6.060, Construction Permit Required	5
Construction Permit 112012-002, Issued November 02, 2012	5
PERMIT CONDITION 2	6
10 CSR 10-6.060, Construction Permit Required	6
Construction Permit 082008-011, Issued August 18, 2008.....	6
PERMIT CONDITION 3	7
10 CSR 10-6.060, Construction Permit Required	7
Construction Permit 0797-027, Issued July 15, 1997	7
PERMIT CONDITION 4	8
10 CSR 10-6.060, Construction Permit Required	8
Construction Permit 0797-027, Issued July 15, 1997	8
IV. CORE PERMIT REQUIREMENTS	9
V. GENERAL PERMIT REQUIREMENTS.....	16
VI. ATTACHMENTS	20
ATTACHMENT A	21
Visible Emission Observations	21
ATTACHMENT B	22
Method 9 Opacity Emissions Observations	22
ATTACHMENT C	23
Inspection/Maintenance/Repair/Malfunction Log	23
ATTACHMENT D	24
PM ₁₀ Emission Calculations for Permit Condition 1	24
ATTACHMENT E.....	25
PM ₁₀ Emission Calculations for Permit Condition 2	25
ATTACHMENT F.....	26
PM ₁₀ Emission Calculations for Permit Condition 3	26
ATTACHMENT G	27
PM ₁₀ Emission Calculations for Permit Condition PW001	27
ATTACHMENT H	28
Fugitive Emissions Observations.....	28

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>
EP-01	Grain Receiving Dump Pit #1
EP-02	Grain Receiving Dump Pit #2
EP-03	Railcar and Barge Loading
EP-05	Natural gas Fired Grain Dryer: 28.42 MMBtu/hr
EP-07	Conveyance Leg from Second Receiving Pit
EP-13	Grain Receiving
EP-14	Grain Handling
EP-15	Grain Shipping
EP-16	Storage Bin 2-100,000 bushel bins 2-75,000 bushel bins
N/A	Temporary Storage Ring/Pile
N/A	Receiving Leg
N/A	Reclaim Conveyor
N/A	Wet Leg
N/A	Dry Leg
N/A	Truck Load-out
N/A	Rail Pit

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.

Description of Emission Source

None

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 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitations:

The permittee shall emit less than 100 tons of particulate matter with a diameter of ten micrometers or less (PM₁₀) in any consecutive twelve-month period.

Monitoring/Recordkeeping:

- 1) Attachment G, or an equivalent, such as electronic forms, approved by the Air Pollution Control Program shall be used to track monthly and 12-month rolling totals for PM₁₀. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 2) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION PW002

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

Emission Limitations:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any new source (Installed after February 24, 1971) any visible emissions with an opacity greater than 20 percent (20%).
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes, air contaminants with an opacity up to sixty percent (60%).

Monitoring/Recordkeeping/Reporting:

As detailed in Core Permit Requirements.

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 1	
10 CSR 10-6.060, Construction Permit Required Construction Permit 112012-002, Issued November 02, 2012	
Emission Unit	Description
EP-07	Conveyance leg from grain receiving pit #2 (EP-02)

Emission Limitations:

The permittee shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the conveyance leg (EP-07) routed from the second receiving pit (EP-02) to the storage conveyor. [Special Condition 1A]

Monitoring/Recordkeeping:

- 1) Attachment D or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used by the permittee to track monthly and 12-month rolling totals for PM₁₀. This form demonstrates compliance with Special Condition 1A. [Special Condition 1B]
- 2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 2A]

Reporting Requirements:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit. [Special Condition 2B]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 2 10 CSR 10-6.060, Construction Permit Required Construction Permit 082008-011, Issued August 18, 2008	
Emission Unit	Description
EP-13	Grain Receiving
EP-14	Grain Handling
EP-15	Grain Shipping
EP-16	Storage Bin
N/A	Temporary Storage Pile/Ring

Emission Limitations:

The permittee shall emit less than fifteen (15) tons of particulate matter less than ten micrometers in diameter (PM₁₀) in any consecutive twelve-month period from the temporary storage pile and associated equipment (EP-13, EP-14, EP-15, and EP-16). [Special Condition 1A]

Monitoring/Recordkeeping:

- 1) Attachment E or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to track monthly and 12-month rolling totals for PM₁₀. This form demonstrates compliance with Special Condition 1A.
- 2) The permittee shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the temporary storage pile. Attachment E or an equivalent form shall be used for this purpose. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 1B]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition 1B indicate that the source exceeds the limitations of Special Condition 1A. [Special Condition 1C]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 3	
10 CSR 10-6.060, Construction Permit Required Construction Permit 0797-027, Issued July 15, 1997	
Emission Unit	Description
EP-01	Grain Receiving Dump Pit #1
EP-02	Grain Receiving Dump Pit #2
EP-03	Railcar and Barge Loading
EP-05	Natural gas Fired Grain Dryer: 28.42 MMBtu/hr
N/A	Receiving Leg
N/A	Reclaim Conveyor
N/A	Wet Leg
N/A	Dry Leg
N/A	Truck Load-out
N/A	Rail Pit

Emission Limitations:

The permittee shall emit less than fifteen (15) tons of particulate matter less than ten micrometers in diameter (PM₁₀) in any consecutive twelve-month period from the listed equipment. [Special Condition 1]

Monitoring/Recordkeeping:

- 1) The permittee shall record the monthly and running 12-month totals of PM₁₀ emissions from the proposed equipment. The permittee shall use Attachment F, or an equivalent form for this purpose.
- 2) The permittee shall maintain records on-site for the most recent 60-months of all records required by this permit and shall immediately make such records available to any Missouri Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month, if the 12-month cumulative total shows that the sources exceeded the limitation of 15.0 tons of PM₁₀ during any consecutive 12-month period.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 4	
10 CSR 10-6.060, Construction Permit Required Construction Permit 0797-027, Issued July 15, 1997	
Emission Unit	Description
EP-01	Grain Receiving Dump Pit #1: Controlled by baghouse
EP-02	Grain Receiving Dump Pit #2: Controlled by baghouse

Operational Limitations:

- 1) The baghouse must be in use when grain is being received at Grain Dump Pit #1 and/or Grain Dump Pit #2. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications.
- 2) Replacement bags for each baghouse shall be kept on hand at all times.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an operating and maintenance log for the baghouse which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 2) The permittee shall maintain the pressure drop in the normal operating range. The normal range shall be determined by manufacturer's specifications, performance testing, or operational history.
- 3) The permittee shall document the pressure drop for units with gauges or visible emissions for units without gauges at least once every seven days of unit operation. If the pressure drop falls out of the normal operating range or visible emissions are observed, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal or to eliminate visible emissions.
- 4) The permittee shall perform the following inspection and maintenance on the baghouse semiannually unless process requirements, manufacturer's recommendations, or operating history necessitates a different approach.
 - a) Check and document the cleaning sequence of the filter houses.
 - b) Thoroughly inspect bags and filters for leaks and wear.
 - c) Inspect all components that are not subject to wear or plugging, including structural components, housings, ducts and hoods.
- 5) If leaks or abnormal conditions are detected, appropriate remediation measures shall be implemented within 8 hours of discovery.

Reporting:

- 1) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall submit a 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) 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.
- 3) The permittee shall submit a full EIQ for the 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.

- 4) 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.

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 is a State Only permit requirement.

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 H, 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 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 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 visible emissions observations 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.
- 4) The renewal of an operating permit does not require the installation to revert to weekly monitoring; instead, it should continue with the monitoring regime it is under at the time of issuance of the renewal permit.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment A (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 using Attachment C, or its equivalent; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed using Attachment B, or its equivalent.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance of any of the emission limitations.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

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 at an installation:

- 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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.
- 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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)12 Responsible Official

The application utilized in the preparation of this permit was signed by David Coomer, Site Manager. On December 07, 2017, the Air Pollution Control Program was informed that Mr. Kurt Hasty, Group Manager, is now the responsible official for Consolidated Grain & Barge. 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 (MoDNR) 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) MoDNR 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 A
Visible Emission Observations

Date	Time	Emission Source	Visible Emissions		Excess Emissions		
			No	Yes ¹	Cause	Corrective Action	Initial

¹If there are visible emissions, the permittee shall complete the excess emissions columns.

Attachment B

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 D
 PM₁₀ Emission Calculations for Permit Condition 1

This sheet covers the period from _____ to _____. (Copy as needed)
 (Month, year) (Month, year)

^a Month, Year	^b Grain Stored (tons)	^c Emission Factor	^d Monthly Emissions (tons)	^e Monthly Emissions from Previous Year (tons)	^f Previous 12 Month Emission Total (tons)	^g Rolling 12 Month Emission Total (tons)
EX: 09/2012	100,000	0.034	1.7	1.0	10.2	10.9
EX: 10/2012	10,000	0.034	0.17	0.5	10.9	10.57
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
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		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				
		0.034				

A rolling 12-month total less than 15.0 tons implies compliance with Special Condition 1.

^a Enter Date
^b Enter the amount of grain received at EP-02 and stored by using EP-07
^c Emission Factor [AP-41 9.9.1 (3-02-005-30)]
^d Calculate using the following equation: (b)*(c)/2000 = (d)
^e Record the monthly emissions from this month last year.
^f Enter the 12 month rolling total from the previous month’s 12 month total (g)
^g Calculate using the following equation: (f)-(e)+(d) = (g)

Attachment E
 PM₁₀ Emission Calculations for Permit Condition 2

Month	Grain Received (tons)	Composite Emission Factor (ton PM ₁₀ /ton Grain) [AP-42]	¹ Monthly Emissions (tons PM ₁₀)	² 12-Month Rolling Total Emissions (tons PM ₁₀)
Example	100,000	6.415 x 10 ⁻⁵	6.415	12.565
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		
		6.415 x 10 ⁻⁵		

¹ Multiply the tons of grain received in the current month by the emission factor
² Add the current monthly emissions to the sum of the previous 11 monthly emissions. A rolling 12-month total of less than 15.0 tons is necessary for compliance.

Composite Emission Factor Calculation

EP-#	Description	MHDR	EF	(lb/hr)	(ton/yr)
13	Receiving, straight truck	450	0.059	26.55	116.289
14	Grain handling	450	0.034	15.3	67.014
15	Shipping, truck	450	0.029	13.05	57.159
16	Storage Bin	450	0.0063	2.835	12.4173
Totals:				57.735	252.8793

$$\frac{57.735 \text{ lbs PM}_{10}}{\text{hr}} \times \frac{\text{hr}}{450 \text{ tons grain}} \times \frac{\text{ton PM}_{10}}{2000 \text{ lb PM}_{10}} = 6.415 \times 10^{-5} \frac{\text{tons PM}_{10}}{\text{ton grain}}$$

Attachment F
PM₁₀ Emission Calculations for Permit Condition 3

Month	Grain Received (tons)	¹ Emission Factor (ton PM ₁₀ /ton Grain)	² Monthly Emissions (tons PM ₁₀)	³ 12-Month Rolling Total Emissions (tons PM ₁₀)
Example	100,000	2.53 x 10 ⁻⁵	2.53	10.62
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
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		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		
		2.53 x 10 ⁻⁵		

¹ Composite emission factor for equipment associated with Construction Permit 0797-027. Emission factors used in the calculation are from [AP-42 9.9.1.].

² Multiply the tons of grain received in the current month by the emission factor

³ Add the current monthly emissions to the sum of the previous 11 monthly emissions. A total of less than 15 tons is necessary for compliance.

Attachment G
PM₁₀ Emission Calculations for Permit Condition PW001

This Attachment may be used to demonstrate compliance with Permit Condition PW-001

This sheet covers the period from _____ (Month) _____ (Year).

Emission Unit	Throughput (tons)	Emission Factor (lb PM ₁₀ /ton Grain)	¹ PM ₁₀ Emissions (tons)
Combustion Emission Unit	Throughput (MMft ³)	Emission Factor (lb PM ₁₀ /MMft ³)	PM ₁₀ Emissions (tons)
Grain Dryer		7.6	
² Total PM ₁₀ Emissions for Current Month, in tons			
³ 12-Month Rolling Total of PM ₁₀ Emissions, in tons			

¹ PM₁₀ emissions= Throughput x Emission Factor x 0.0005 (ton/lb).
² Total PM₁₀ Emissions = sum of all PM₁₀ emissions for the month.
³ Add the current monthly emissions to the sum of the previous 11 monthly emissions.
 *A total of less than 100 tons is necessary for 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

The installation is a barge loading grain terminal. Activities include grain receiving, transfer, drying, storage, and loading operations.

Consolidated Grain & Barge is considered a Country Grain Elevator by definition:

“Country grain elevator” is defined as a grain elevator that receives more than fifty percent (50%) of its grain from producers in the immediate vicinity during the harvest season.” [10 CSR 10-6.065(1)(C)17]

The installation has accepted a voluntary limitation on particulate matter (PM₁₀) emissions in order to obtain this intermediate operating permit. Consolidated Grain & Barge is not a named source and therefore fugitive emissions do not count towards major source applicability.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	2.54
HAP	0.053
NO _x	12.13
PM ₁₀	<100
PM _{2.5}	30.21
SO _x	0.073
VOC	0.643

- Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.
- PM₁₀ emissions are limited by Permit Conditions PW001, 1, 2, and 3.
- Required control devices have been included in the PTE totals.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Micrometers (PM ₁₀)	2.16	2.16	2.16	2.42	1.58
Particulate Matter ≤ 2.5 Micrometers (PM _{2.5})	0.34	0.34	0.34	0.48	0.12
Nitrogen Oxides (NO _x)	0.10	0.10	0.10	1.50	1.5

Pollutants	2016	2015	2014	2013	2012
Volatile Organic Compounds(VOC)	--	--	--	0.07	0.07
Carbon Monoxide (CO)	0.02	0.02	0.02	0.31	0.31

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 May 25, 2013;
- 2) 2016 Emissions Inventory Questionnaire, received March 13, 2017;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit 0797-027, Issued July 25, 1997;
- 5) Construction Permit 082008-061, Issued August 18, 2008; and
- 6) Construction Permit 112012-002, Issued November 05, 2012.

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.

None

Construction Permit Review

Construction Permit #0797-027

The permit was issued July 25, 1997, to authorize the installation of a terminal grain elevator. This permit approves the construction and installation of receiving through two (2) truck pits and one (1) rail pit, exporting through truck load-out, rail load-out, and barge load-out, internal operations consisting of a reclaim conveyor, a wet leg, a dry leg, and a grain dryer. The special conditions of this construction permit appear in the Operating Permit as Permit Condition 3 and Permit Condition 4.

Construction Permit #082008-011

The permit was issued August 18, 2008, to authorize construction of a temporary grain storage pile. The pile will consist of a new grain receiving pit, a new grain leg and conveyor, and a portable unloading conveyor. The pile will be covered by a tarp, which will be removed from a small area of the pile during unloading. The pile has a storage capacity of one million bushels, and the grain receiving equipment can receive 15,000 bushels per hour (450 tons of grain per hour). No air pollution control devices are being

used in conjunction with this equipment. The special conditions of this construction permit appear in the Operating Permit as Permit Condition 2.

Construction Permit #112012-002

This permit was issued November 05, 2012, to authorize the construction of a new conveyance system (EP-07) from the second receiving pit (EP-02) to the storage conveyor. The new conveyance system allows the received material to be conveyed to the dryer/storage bin conveyance system, in addition to being shipped by barge. This addition does not debottleneck any process. The purpose of the project is to allow the facility to have the ability to unload two different materials at the same time without shipping one of the products by barge. The special conditions of this construction permit appear in the Operating Permit as Permit Condition 1.

New Source Performance Standards (NSPS) Applicability

Part 60 Subpart DD, *Standards of Performance for Grain Elevators* does not meet the definition of a Grain Terminal Elevator or Grain Storage Elevator according to this rule. This was confirmed in an e-mail from Kim Austin of Consolidated Grain and Barge on October 01, 2014.

Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

Grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).

Maximum Achievable Control Technology (MACT) Applicability

None

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program 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.

Other Regulatory Determinations

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

This regulation does not apply to the grain dryer because the dryer combusts natural gas.

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

This regulation does not apply to the grain dryer because the dryer combusts natural gas.

10 CSR 10-6.261, *Control of Emission of Sulfur Dioxide Emissions*

This regulation does not apply to the grain dryer because the dryer combusts natural gas.

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

The following emission units are not subject to this regulation because the potential emissions are less than the emission limit established by the rule, as shown below:

EP##	MHDR (ton/hr)	Uncontrolled Emission factor (lb PM/ton)	E (lb PM)/hr	PTE (lb PM/hr)
05	120	0.22	53.13	26.4
07	1200	0.061	79.97	73.2
14	450	0.061	67.70	27.45
16	450	0.025	67.70	11.25
Temporary Storage Ring	450	0.025	67.70	11.25
Receiving Leg	450	0.061	67.70	27.45
Reclaim Conveyor	900	0.061	76.23	54.9
Wet Leg	224	0.061	59.74	13.66
Dry Leg	224	0.061	59.74	13.66

EP-01, EP-02, EP-03, EP-13, EP-15, Truck Load-out, and Rail pit are not subject to this rule by 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 either in the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

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

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

Appendix A

Emission Unit		Uncontrolled Emission Factor (lb PM₁₀/ton grain)	Controlled Emission Factor (lb PM₁₀/ton grain)
EP-01	Grain Receiving Dump Pit #1		
	Straight Truck	0.059	3.01E-02
	Hopper Truck	0.0078	3.98E-03
EP-02	Grain Receiving Dump Pit #2		
	Straight Truck	0.059	3.01E-02
	Hopper Truck	0.0078	3.98E-03
EP-03	Railcar and Barge Loading		
	Railcar	0.0022	--
	Barge	0.004	--
EP-05	Grain Dryer	0.055	--
EP-07	Conveyance Leg from Second Receiving Pit	0.034	--
EP-13	Grain Receiving		
	Straight Truck	0.059	--
	Hopper Truck	0.0078	--
EP-14	Grain Handling	0.034	--
EP-15	Grain Shipping	0.029	--
EP-16	Storage Bin	0.0063	--
N/A	Temporary Storage Ring/Pile	0.0063	--
N/A	Receiving Leg	0.034	--
N/A	Reclaim Conveyor	0.034	--
N/A	Wet Leg	0.034	--
N/A	Dry Leg	0.034	--
N/A	Truck Load-out	0.029	--
N/A	Rail Pit	0.0078	--

Response to Public Comments

A draft of the Consolidated Grain & Barge Co. Intermediate Operating Permit was placed on public notice on September 04, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on September 25, 2014 from Mark Smith, Air Permitting and Compliance Branch Chief of the Environmental Protection Agency Region 7. The eight (8) comments is presented below as submitted, with the response to the comment by the Air Pollution Control Program (APCP) directly following.

EPA Comment #1:

The draft Intermediate State Permit to Operate on public notice for Consolidated Grain and Barge – Scott City (CGB-Scott City) includes the applicable requirements of two (2) Permits to Construct. Permit to Construct #082008-011 was issued August 18, 2008 authorizing a temporary grain storage pile and associated equipment with the emission unit numbers EP-13, EP-14, EP-15 and EP-16. Permit to Construct #112012-002, issued November 2, 2012 authorized the installation of a new conveyance system; emission unit EP-07, routed from the second receiving pit to the storage conveyor. Both of these permit to construct include a table of permit history and both tables include Permit to Construct #0797 027 which has the description "New Grain Elevator."

Permit to Construct #0797-027 was issued July 15, 1997 authorizing the installation of a terminal grain elevator and included thirteen (13) emission points/activities. These emission points/activities include Truck Pit #1, Truck Pit #2, Receiving Leg, Reclaim Conveyor, Wet Leg, Dry Leg, GSI Column, Grain Dryer/Natural Gas, Truck Load-out, Rail Load-out, Rail Pit, Barge Load-out, and Haul Roads. Permit to Construct #0797-027 also included four (4) special conditions applicable to the proposed equipment associated with the new terminal grain elevator.

The draft Intermediate State Permit to Operate for CGB-Scott City currently on public notice however, does not include the special conditions from Permit to Construct #0797-027 and does not include all of the equipment (emission points/activities) associated with the terminal grain elevator. Additionally, there is no indication in either Permit to Construct #082008-011 or Permit to Construct #112012-002, that any of the equipment authorized by Permit to Construct #0797- 027 were to be abandoned and / or removed. Additionally, there is no discussion in the draft operating permit Statement of Basis regarding original equipment no longer in service or on-site.

The Missouri Department of Natural Resources Air Pollution Control Regulations at 10 CSR 10-6.065(5)(C)1 require operating permits, issued pursuant to the Intermediate State Operating Permits, to contain all requirements applicable to the installation at the time of issuance. Therefore, it appears that the special conditions associated with Permit to Construct #0797-027 shall be included in the operating permit. It appears therefore, that the draft Intermediate State Permit to Operate I for CGB-Scott City does not contain all requirements applicable to the installation and EPA recommends MDNR include all the applicable requirements of Permit to Construct #0797-027 in the Intermediate State Permit to Operate.

Missouri Air Pollution Control Program Response to EPA Comment #1:

All emission units and special conditions associated with construction permit 0797-027 have been added to the operating permit.

EPA Comment #2:

Section I: Installation Description and Equipment Listing provides a list of emission units with limitations and a list of emission units without limitations. Permit to Construct #0797-027 includes emission limitations from the "proposed equipment." As detailed in comment 1) above, the proposed equipment includes Truck Pit #1, Truck Pit #2, Receiving Leg, Reclaim Conveyor, Wet Leg, Dry Leg, GSI Column, Grain Dryer/Natural Gas, Truck Load-out, Rail Load-out, Rail Pit, Barge Load-out, and Haul Roads. The lists included in the draft Intermediate State Permit to Operate on public notice do not include the Receiving Leg, Reclaim Conveyor, Wet Leg, Dry Leg, GSI Column, Truck Load-out, Rail Pit, and Haul Roads. Additionally, the draft operating permit on public notice lists Railcar and Barge loading and Grain Dryer as emission units without limitations.

EPA recommends MDNR review the lists of equipment at this installation and include all equipment authorized for installation under all permits to construct. Additionally, EPA recommends MDNR re-confirm that Rail Load-out, Barge Load-out and Grain Dryer/Natural Gas in fact are not subject to the limitations described in Permit to Construct #0797-027.

Missouri Air Pollution Control Program Response to EPA Comment #2:

All emission units and special conditions associated with construction permit 0797-027 have been added to the operating permit.

EPA Comment #3:

Section I: Installation Description and Equipment Listing describes the CGB-Scott City installation as a "barge loading grain terminal." The installation description also indicates that CGB-Scott City is considered a "Country Grain Elevator" and include the definition; which says:

"Country Grain elevator" means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded and which meets the following criteria:

1. Receives more than 50 percent of its grain from farmers in the immediate vicinity during harvest season;
2. Is not located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant.

This definition, however, does not show up in either the Missouri regulations or the federal regulations for grain elevators.

Permit to Construct #0797-027 for CGB-Scott City, issued July 15; 1997, defines the installation as a "terminal grain elevator" with four (4) processes: grain receiving, grain drying, internal operations and grain shipping. Permit to Construct #0797-027 also says the facility is regulated under the New Source Performance Standards (NSPS) Subpart DD. Interestingly, both Permit to Construct #082008-011 and Permit to Construct #112012-002 state that the installation is not subject to NSPS Subpart DD. §60.301, promulgated August 3, 1978 and amended October 17, 2000, defines a "grain terminal elevator as:

"Any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots."

This indicates that the original facility was to have a storage capacity greater than 2.5 million bushels. However, the current listed storage capacity is significantly less and therefore §60.301 would define the installation as a "grain elevator" which means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded. The term "Country Grain Elevator" does not appear in §60.301. However, 10 CSR 10-6.065(1)(C)17 does define a "Country Grain Elevator" as :

"A grain elevator that receives more than fifty percent (50%) of its grain from producers in the immediate vicinity during the harvest season."

MDNR's original installation description in 1997 of the CGB-Scott City facility and the current definition of "country grain elevator" are not what is currently included in the draft operating permit installation description. Therefore EPA recommends MDNR review the installation description and consider whether or not CGB-Scott City is most appropriately defined as a "grain elevator per §60.301. Additionally, EPA recommends that MDNR review the NSPS Subpart DD applicability as determined in 1997, and provide a discussion in the Statement of Basis as to how a "terminal grain elevator" in 1997 became a "grain elevator."

Missouri Air Pollution Control Program Response to EPA Comment #3:

The definition used in the previous draft of the operating permit was taken from an EPA Region VII approved document used for determining the permitting requirements of country grain elevators, country grain terminal elevators, grain terminal elevators, and feed mill equipment in the state of Iowa. This definition has been removed from the operating permit and the following definition has been included in its place:

"*Country grain elevator*" is defined as a grain elevator that receives more than fifty percent (50%) of its grain from producers in the immediate vicinity during the harvest season.

In discussion with Kim Austin of Consolidated Grain and Barge, she has confirmed via e-mail correspondence that the facility has a permanent storage capacity of less than 2.5 million bushels and meets the requirement to receive more than 50% of grain from the local vicinity, and is therefore considered a country grain elevator for permitting purposes.

With this confirmation of permanent grain storage capacity less than 2.5 million bushels, Consolidated Grain and Barge does not meet the requirements to be applicable to NSPS Subpart DD. In order to be applicable to this rule, the facility must either be considered a "Grain Terminal Elevator" or a "Grain Storage Elevator". The definitions of each are:

Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

Grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).

Consolidated Grain and Barge does not meet either of these definitions and is therefore not subject to NSPS Subpart DD.

EPA Comment #4:

Permit Condition PW001 incorporates voluntary limits such that CGB-Scott City is to be considered a synthetic minor source. The reference included in the PW001 banner are not the same references included in the voluntary limitation discussion in the Statement of Basis. Additionally Permit Condition PW001 in the draft operating permit on public notice establishes an emission limitation for particulate matter (PM). However, the installation description indicates the installation has accepted a voluntary limitation on particulate matter emissions with a diameter of 10 micrometers or less (PM₁₀). EPA recommends MDNR resolve these two (2) apparent inconsistencies.

Missouri Air Pollution Control Program Response to EPA Comment #4:

The reference used in the statement of basis has been used for the banner of Permit Condition PW001. The emission limitation has been corrected to limit the emissions of PM₁₀.

EPA Comment #5:

The monitoring requirements in Permit Condition PW001 says "the permittee shall monitor PM emissions." EPA guidance suggests that operating permit conditions must be practically enforceable. EPA's guidance also indicates that practical enforceability answers "who," "what," "where," "when," "how," and "how often." The monitoring requirement in PW001 in this draft operating permit fails to meet the practical enforceability test and EPA recommends MDNR modify the monitoring requirement to include the "where," "when," "how," and "how often" the permittee shall monitor PM (PM₁₀) emissions.

Missouri Air Pollution Control Program Response to EPA Comment #5:

The permit condition has been modified. Monitoring has been included in recordkeeping since the permittee is only required to track total PM₁₀ emissions from the facility on a 12-month rolling total.

EPA Comment #6:

The emission limitations in Permit Condition PW002 are included in the draft operating permit as applicable requirements of 10 CSR 10-6.220: Restriction of Emission of Visible Air Contaminants. Emission limitation #1 identifies the responsible party for ensuring compliance with this limitation as the "owner or other person." Emission limitation #2 specifies "a person" as the responsible party. These two (2) requirements are being placed in an operating permit being issued to CGB-Scott City and EPA recommends MDNR use "permittee" to reflect the responsibility for compliance with Permit Condition PW002.

Missouri Air Pollution Control Program Response to EPA Comment #6:

The suggested wording change has been accepted and changed with in Permit Condition PW002 of the operating permit.

EPA Comment #7:

Emission limitations in Permit Condition 1 are included in the draft operating permit as applicable requirements of 10 CSR 10-6.400; Restriction of Emission of Particulate Matter from Industrial Processes. Emission limitation #1 limits the PM from grain receiving pit dump pit #1 (EP01) to less than 69.88 pounds per hour. Emission limitation #2 limits PM from grain receiving drop pit #2 (EP02) to less than 69.47 pounds per hour. However, Permit to Construct 0797-027, issued July 15, 1997, restricted CGB-Scott City to less than 15.0 tons of PM₁₀ in any consecutive 12-month period for the proposed equipment which included Truck Pit #1 and Truck Pit #2 along with eleven (11) other emission points/activities. Additionally, there is no explanation in the Statement of Basis describing an underlying condition which would allow CGB-Scott City to go from 15.0 tons per consecutive 12-month period plant wide maximum PM₁₀ emissions to greater than 69 pounds per hour PM each for just 2 of the 13 emission points. EPA recommends MDNR provide the necessary added explanation in the Statement of Basis detailing how 69+ pound per hour PM meets the 15.0 tons per 12-month consecutive period emission limitation.

Missouri Air Pollution Control Program Response to EPA Comment #7:

Permit Condition 1 has been removed from the operating permit. EP-01 and EP-02 are exempt from 10 CSR 10-6.400 by 10 CSR 10-6.400(1)(B)3.

EPA Comment #8:

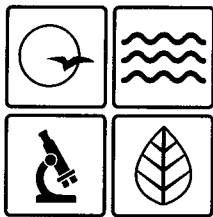
The cover page of the draft Intermediate State Permit to Operate shows the parent company's address as 201 Missouri Avenue; Mound City, IL 62963-0167. However, Consolidated Grain and Barge internet website says they are headquartered just outside New Orleans, LA. In fact, CGB headquarters are physically located at 1127 Hwy 190; East Service Road; Covington, LA 70432 and their mailing address is PO Box 249, Mandeville, LA 70470-0249. EPA suggests MDNR update the Consolidated Grain and Barge company address to reflect the Louisiana location.

Missouri Air Pollution Control Program Response to EPA Comment #8:

It has been confirmed in e-mail correspondence with Kim Austin of Consolidated Grain and Barge the following address is to be used for the Parent Company:

Consolidated Grain & Barge Co.
201 Missouri Avenue
Mound City, IL 62963-0167

No change has been made to the operating permit.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

DEC 14 2017

Mr. Kurt Hasty
Consolidated Grain & Barge Co.
201 Missouri Ave.
Mound City, IL 62963

Re: Consolidated Grain & Barge Co., 201-8001
Permit Number: OP2017-097

Dear Mr. Hasty

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.

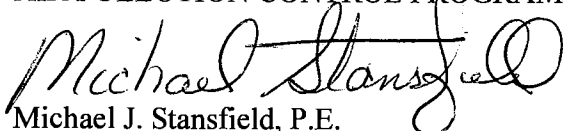
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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:dbj

Enclosures

c: PAMS File: 2013-05-046

