PERMIT TO CONSTRUCT

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

Permit Number: 062011-009
Project Number: 2011-01-029
Installation Number: 147-0027

Parent Company: Consumer Oil Company
Parent Company Address: P.O. Box 130, Maryville, MO 64468
Installation Name: Consumer Oil Company
Installation Address: 101 North Depot Street, Maryville, MO 64468
Location Information: Nodaway County, S17, T64N, R35W

Application for Authority to Construct was made for:
The installation of new 55,102 bushel grain bin with an enclosed grain auger and Harvest Time Unloading System. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

☐ Standard Conditions (on reverse) are applicable to this permit.
☐ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUN 21 2011
DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES
EFFECTIVE DATE
STANDARD CONDITIONS:

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

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

You must notify the Departments’ Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

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

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

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

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

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

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

Consumer Oil Company
Nodaway County, S17, T64N, R35W

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued construction permit 032010-012 issued by the Air Pollution Control Program.

2. Emission Limitation
   A. Consumer Oil Company shall emit less than 15.0 tons of particulate matter less than ten microns in diameter (PM$_{10}$) in any consecutive 12-month period from the entire installation. Table 1 below shows the emission points included in the entire installation.

Table 1: Emission Points for the Entire Installation.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Straight Truck Grain Receiving</td>
</tr>
<tr>
<td>EP-02</td>
<td>Internal Handling</td>
</tr>
<tr>
<td>EP-03</td>
<td>Storage Bin Vent</td>
</tr>
<tr>
<td>EP-04</td>
<td>Grain Dryer</td>
</tr>
<tr>
<td>EP-05</td>
<td>Truck Shipping</td>
</tr>
<tr>
<td>EP-06</td>
<td>Fertilizer Receiving</td>
</tr>
<tr>
<td>EP-07</td>
<td>Front End Loader</td>
</tr>
<tr>
<td>EP-08</td>
<td>Weigh Hopper/Mixer</td>
</tr>
<tr>
<td>EP-09</td>
<td>Fertilizer Loadout</td>
</tr>
<tr>
<td>EP-10</td>
<td>Received In Bags</td>
</tr>
<tr>
<td>EP-11</td>
<td>Grain Milling/Cracking</td>
</tr>
<tr>
<td>EP-12</td>
<td>Storage Bin Vent</td>
</tr>
<tr>
<td>EP-13</td>
<td>Handling, Conveying</td>
</tr>
<tr>
<td>EP-14</td>
<td>Weigh Hopper</td>
</tr>
<tr>
<td>EP-15</td>
<td>Treatment</td>
</tr>
<tr>
<td>EP-16</td>
<td>Shipping</td>
</tr>
<tr>
<td>EP-17</td>
<td>Straight Truck Grain Receiving (Bin 1)</td>
</tr>
<tr>
<td>EP-18</td>
<td>Storage Bin Vent (Bin 1)</td>
</tr>
<tr>
<td>EP-19</td>
<td>Truck Shipping (Bin 1)</td>
</tr>
<tr>
<td>EP-20</td>
<td>Straight Truck Grain Receiving (Bin 2)</td>
</tr>
<tr>
<td>EP-21</td>
<td>Storage Bin Vent (Bin 2)</td>
</tr>
<tr>
<td>EP-22</td>
<td>Truck Shipping (Bin 2)</td>
</tr>
<tr>
<td>EP-23</td>
<td>Fertilizer Shipping/Receiving Road</td>
</tr>
<tr>
<td>EP-24a</td>
<td>Grain Elevator Shipping/Receiving 140’ Gravel Road</td>
</tr>
<tr>
<td>EP-24b</td>
<td>Grain Elevator Shipping/Receiving 675’ Paved Road</td>
</tr>
<tr>
<td>EP-25</td>
<td>Seed Shipping/Receiving Road</td>
</tr>
<tr>
<td>EP-26</td>
<td>Grain Bin Shipping/Receiving Road</td>
</tr>
</tbody>
</table>
SPECIAL CONDITIONS:

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

B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.

3. Record Keeping and Reporting Requirements
A. Consumer Oil Company 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. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

B. Consumer Oil Company 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 the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
Consumer Oil Company Complete: January 13, 2011
101 North Depot Street
Maryville, MO 64468

Parent Company:
Consumer Oil Company
P.O. Box 130
Maryville, MO 64468

Nodaway County, S17, T64N, R35W

REVIEW SUMMARY

- Consumer Oil Company has applied for authority to install a new 55,102 bushel grain bin with an enclosed grain auger and Harvest Time Unloading System.

- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.

- New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators does not apply to the installation because the storage capacity at this facility is below 2.5 bushels of grain.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.

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

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM$_{10}$ are conditioned below de minimis levels.

- This installation is located in Nodaway County, an attainment area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
Ambient air quality modeling was not performed since potential emissions of the application are conditioned below de minimis levels.

Emissions testing are not required for the equipment.

No Operating Permit is required for this installation.

Approval of this permit is recommended with special conditions.

**INSTALLATION DESCRIPTION**

Consumers Oil Company is an agriculture cooperative that handles fertilizer, feed, grain, fuels, tires and other farming needs. All equipment at the facility is considered grandfathered except for a grain bin and its respective loading and unloading equipment which was installed March of 2010. Consumers Oil Company applied for an intermediate operating permit in 2002 and eventually that application was replaced by a new application in 2007. During the review of the 2007 application it was determined in January, 2010 that Consumer Oil Company could downgrade to a basic operating permit. A letter was sent to the company but Consumer Oil Company has never submitted a basic operating permit application. This permit limits Particulate Matter less than 10 microns in aerodynamic diameter (PM$_{10}$) emissions from the entire facility to below de minimis and an operating permit will no longer be required. The facility is located in Maryville, Missouri.

The following permits have been issued to Consumer Oil Company from the Air Pollution Control Program.

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>032010-012</td>
<td>New Grain Bin</td>
</tr>
</tbody>
</table>

**PROJECT DESCRIPTION**

Consumers Oil Company is installing a second grain bin that is equipped with a portable auger and Harvest Time Unloading System with power sweep. The Harvest Time Unloading System uses a screw augur at the bottom of the bin that draws grain to the unloading tube at the center of the grain bin. The power sweep function allows the operator to pivot the screw auger in a complete circle around the grain bin. This maximizes the function of the unloading system allowing the auger to reach all points of the grain bin. The grain bin has a 55,102 bushel capacity. The maximum hourly design rate (MHDR) of the auger is 270 tons per hour and the load-out system has a MHDR of 105 tons per hour. There are no control devices being used to control emissions from this equipment. This permit will limit the entire installation to less than 15.0 tons of PM$_{10}$. The potential emissions of all other criteria pollutants will be below the de minimis levels as a result of this limit therefore Consumers Oil Company (147-0027) will no longer need an operating permit.
EMISSIONS/CONTROLS EVALUATION

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

Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{2.5}$</td>
<td>10.0</td>
<td>39.28</td>
<td>0.00</td>
<td>15.68</td>
<td>2.47</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>240.84</td>
<td>0.40</td>
<td>93.52</td>
<td>&lt;15.0</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>20.53</td>
<td>2.86</td>
<td>N/A</td>
<td>20.53</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM$_{10}$ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Consumer Oil Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

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

  The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for a hard copy submittal or May 1 for online submittal for the previous year's emissions.
• Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170

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

• Restriction of Emission of Odors, 10 CSR 10-6.165

STAFF RECOMMENDATION

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

Gerad Fox
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

• The Application for Authority to Construct form, dated January 10, 2011, received January 13, 2011, designating Consumer Oil Company as the owner and operator of the installation.


• Kansas City Regional Office Site Survey, dated February 8, 2011.
Attachment A – Installation Wide PM\textsubscript{10} Compliance Worksheet

Consumer Oil Company  
Nodaway County, S17, T64N, R35W  
Project Number: 2011-01-029  
Installation ID Number: 147-0027  
Permit Number:  

This sheet covers the period from ________ to ________. (Copy sheet as needed.)

(month, year) (month, year)

<table>
<thead>
<tr>
<th>Step Description</th>
<th>(a) Monthly Throughput (tons)</th>
<th>(b) Composite Emission Factor (lb/ton)</th>
<th>(c) Monthly PM\textsubscript{10} Emissions (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Elevator Grain Received</td>
<td>0.1477</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fertilizer Received</td>
<td>0.0770</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Seed Received</td>
<td>0.1223</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain Bin #1 &amp; #2 Grain Received</td>
<td>0.1564</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(d) Total Monthly PM\textsubscript{10} Emissions (lbs)
(e) Total Monthly PM\textsubscript{10} Emissions (tons)
(f) 12-Month PM\textsubscript{10} Emissions (h) from Previous Month’s Attachment A (tons)
(g) Total Monthly PM\textsubscript{10} Emissions (e) from Previous Year’s Attachment A (tons)
(h) Current 12-Month PM\textsubscript{10} Emissions (tons) (h) = [(e) + (f) – (g)]

(a) Record this month’s throughput.
(c) Multiply the Monthly Throughput (a) by the respective Composite Emission Factor (b).
(d) Sum each individual Monthly PM\textsubscript{10} Emissions.
(e) Divide the Total Monthly PM\textsubscript{10} Emissions (d) by 2,000.
(f) Record the 12-Month PM\textsubscript{10} Emissions (h) from the Previous Month’s Attachment A.
(g) Record the Total Monthly PM\textsubscript{10} Emissions (e) from the Previous Year’s Attachment A.
(h) Calculate the Current 12-Month PM\textsubscript{10} Emissions. A total less than 15.0 tons of PM\textsubscript{10} indicates compliance.
Mr. Harold Spire  
General Manager  
Consumer Oil Company  
P.O. Box 130  
Maryville, MO 64468  

RE: New Source Review Permit - Project Number: 2011-01-029

Dear Mr. Spire:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

On January 26, 2010 a letter was sent to Consumer Oil Company in Maryville, Missouri that stated that the facility could change from their intermediate operating permit status to basic operating permit status if desired. After review of this permit it was determined that if a 15.0 ton per year PM$_{10}$ limit was taken by Consumer Oil Company in Maryville, Missouri the need for an operating permit would no longer be necessary. Upon issuance of this permit the potential emissions of all criteria pollutants at this facility are either below or conditioned below the de minimis levels. Furthermore there are no New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) regulations that apply to this facility that requires an operating permit. Therefore an application for a basic operating permit for Consumer Oil Company in Maryville, Missouri is no longer required. Please keep this letter as an official notification that a basic operating permit application is no longer required for this facility.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox, at the Department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief  

KBH:gf1

Enclosures

c: Kansas City Regional Office  
PAMS File: 2011-01-029  
Permit Number: