



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 092015-003 Project Number: 2015-08-009
Installation Number: 195-0040

Parent Company: Ray-Carroll County Grain Growers, Inc.

Parent Company Address: P.O. Box 158, Richmond, MO 64085

Installation Name: Farmers Grain Terminal, LLC

Installation Address: 29261 North Highway 240, Slater, MO 65349

Location Information: Saline County, S10/11, T51N, R20W

Application for Authority to Construct was made for:
Replace an existing grain receiving pit and elevator leg with a new grain receiving pit and elevator leg that has a higher capacity. 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.

[x] Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Prepared by J Luebbert
J Luebbert
New Source Review Unit

Director or Designee
Department of Natural Resources

SEP 08 2015

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 devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of 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."*

Farmers Grain Terminal, LLC  
Saline County, S10/11, T51N, R20W

1. Throughput Limitation
  - A. Farmers Grain Terminal, LLC shall limit the grain received at the entire installation to less than 240,000 bushels per day on any given calendar day.
  - B. Farmers Grain Terminal, LLC shall track the amount of grain received, in accordance with Special Condition 1.A., using Attachment A, or another equivalent form approved by the Air Pollution Control Program.
2. Control Device Requirement-Baghouse
  - A. Farmers Grain Terminal, LLC shall control emissions from the Receiving Pit #2 (EP-02) using a baghouse as specified in the permit application.
  - B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
  - D. Farmers Grain Terminal, LLC shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours when the installation is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
  - E. Farmers Grain Terminal, LLC shall maintain a copy of the baghouse manufacturer's performance warranty on site.
  - F. Farmers Grain Terminal, LLC shall maintain an operating and maintenance log for the baghouse which shall include the following:

**SPECIAL CONDITIONS:**

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

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. Record Keeping and Reporting Requirements
- A. Farmers Grain Terminal, LLC 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.
  - B. Farmers Grain Terminal, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 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.

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

Project Number: 2015-08-009  
Installation ID Number: 195-0040  
Permit Number:

Installation Address:  
Farmers Grain Terminal, LLC  
29261 North Highway 240  
Slater, MO 65349

Parent Company:  
Ray-Carroll County Grain Growers, Inc.  
P.O. Box 158  
Richmond, MO 64085

Saline County, S10/11, T51N, R20W

REVIEW SUMMARY

- Farmers Grain Terminal, LLC has applied for authority to install a new receiving pit and a new elevator leg that will be controlled by a baghouse.
- The application was deemed complete on August 10, 2015.
- HAP emissions are not expected from the proposed equipment.
- 40 CFR Part 60 Subpart DD, *Standards of Performance for Grain Elevators*, applies to this installation because the storage capacity of this installation is greater than 2.5 million bushels.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- A baghouse is being used to control the particulate emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Saline 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 below de minimis levels.

- Emissions testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Farmers Grain Terminal, LLC is an existing grain elevator located in Slater, Missouri. Farmers Grain Terminal, LLC has a capacity greater than 2.5 million bushels. Therefore, 40 CFR Part 60 Subpart DD, *Standards of Performance for Grain Elevators*, applies to this installation. Farmers Grain Terminal, LLC is considered a minor source for construction permitting purposes and a basic state source for operating permitting purposes.

The following New Source Review permits have been issued to Farmers Grain Terminal, LLC from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0699-013	New Grain Elevator
0699-013A	Cyclone Pressure Drop

## PROJECT DESCRIPTION

Farmers Grain Terminal, LLC has proposed the replacement of an existing grain receiving pit (EP-02) and elevator leg. The new grain receiving pit and elevator leg will have a greater MHDR than the existing equipment. Therefore, Farmers Grain Terminal, LLC has accepted a voluntary throughput limit below 240,000 bushels per day to keep the existing receiving bottleneck. There will not be an increase of emissions from this project due to Special Condition 1 of this permit limiting the grain received to the same amount allowed by permit number 0699-013. Farmers Grain Terminal, LLC will control the receiving pit and elevator leg with an existing baghouse.

Farmers Grain Terminal, LLC has applied for a permit that will allow an increase in throughput for the installation, but a compliant air quality analysis model has not been verified at this time. Therefore, Farmers Grain Terminal, LLC has accepted a voluntary daily throughput limit below the production level allowed by permit number 0699-013.

## EMISSIONS/CONTROLS EVALUATION

Potential emissions from this project are not estimated in this evaluation because there will not be an increase due to Special Condition 1 of this permit. Without Special Condition 1 of this permit, the installation would be debottlenecked.

Existing potential emissions were taken from Permit number 0699-013. Existing actual emissions were taken from the installation's 2014 EIQ. An new baghouse will control the new receiving pit and elevator leg.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	*Potential Emissions of the Application
PM	25.0	N/D	N/D	N/A
PM <sub>10</sub>	15.0	165.5	5.14	N/A
PM <sub>2.5</sub>	10.0	N/D	0.59	N/A
SO <sub>x</sub>	40.0	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A
GHG (CO <sub>2</sub> e)	100,000	N/A	N/A	N/A
GHG (mass)	0.0 / 250.0	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A

N/A = Not Applicable; N/D = Not Determined

\*Potential emissions from this project are not estimated in this evaluation because there will not be an increase due to Special Condition 1 of this permit

### PERMIT RULE APPLICABILITY

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

### APPLICABLE REQUIREMENTS

Farmers Grain Terminal, LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170

- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

#### SPECIFIC REQUIREMENTS

- 40 CFR Part 60 Subpart DD, *Standards of Performance for Grain Elevators*, applies to this installation

#### 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*, it is recommended that this permit be granted with special conditions.

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 6, 2015, received August 10, 2015, designating Ray-Carroll County Grain Growers, Inc. as the owner and operator of the installation.



## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>m/s</b> .....	meters per second
<b>°F</b> .....	degrees Fahrenheit	<b>Mgal</b> .....	1,000 gallons
<b>acfm</b> .....	actual cubic feet per minute	<b>MW</b> .....	megawatt
<b>BACT</b> .....	Best Available Control Technology	<b>MHDR</b> .....	maximum hourly design rate
<b>BMPs</b> .....	Best Management Practices	<b>MMBtu</b> ....	Million British thermal units
<b>Btu</b> .....	British thermal unit	<b>MMCF</b> .....	million cubic feet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAS</b> .....	Chemical Abstracts Service	<b>NAAQS</b> ...	National Ambient Air Quality Standards
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NESHAPs</b>	National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> .....	Code of Federal Regulations	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CO</b> .....	carbon monoxide	<b>NSPS</b> .....	New Source Performance Standards
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2e</sub></b> .....	carbon dioxide equivalent	<b>PM</b> .....	particulate matter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....	dry standard cubic feet	<b>ppm</b> .....	parts per million
<b>EQ</b> .....	Emission Inventory Questionnaire	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EP</b> .....	Emission Point	<b>PTE</b> .....	potential to emit
<b>EPA</b> .....	Environmental Protection Agency	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EU</b> .....	Emission Unit	<b>RAL</b> .....	Risk Assessment Level
<b>fps</b> .....	feet per second	<b>SCC</b> .....	Source Classification Code
<b>ft</b> .....	feet	<b>scfm</b> .....	standard cubic feet per minute
<b>GACT</b> .....	Generally Available Control Technology	<b>SDS</b> .....	Safety Data Sheet
<b>GHG</b> .....	Greenhouse Gas	<b>SIC</b> .....	Standard Industrial Classification
<b>gpm</b> .....	gallons per minute	<b>SIP</b> .....	State Implementation Plan
<b>gr</b> .....	grains	<b>SMAL</b> .....	Screening Model Action Levels
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>HAP</b> .....	Hazardous Air Pollutant	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>hr</b> .....	hour	<b>tph</b> .....	tons per hour
<b>hp</b> .....	horsepower	<b>tpy</b> .....	tons per year
<b>lb</b> .....	pound	<b>VMT</b> .....	vehicle miles traveled
<b>lbs/hr</b> .....	pounds per hour	<b>VOC</b> .....	Volatile Organic Compound
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		

Mr. Tim Phillips  
Operations Manager  
Farmers Grain Terminal, LLC  
P.O. Box 158  
Richmond, MO 64085

RE: New Source Review Permit - Project Number: 2015-08-009

Dear Mr. Phillips:

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

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building, Room 640, 301 W. High Street, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

Mr. Tim Phillips  
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If you have any questions regarding this permit, please do not hesitate to contact J Luebbert, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:jld

Enclosures

c: Northeast Regional Office  
PAMS File: 2015-08-009

Permit Number: