



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

November 2, 2020

Josh Groene
Environmental & Project Engineer
General Mills Operations, LLC
2917 Guinotte Avenue
Kansas City, MO 64120

RE: New Source Review Permit – Project Number: 2020-08-018

Dear Josh Groene:

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 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.

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 the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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, United States Post Office



Josh Groene
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Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102,
phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this permit, please contact the Department of Natural Resources' Air Pollution Control Program at 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



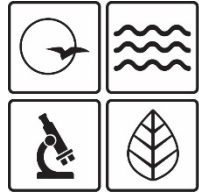
Susan Heckenkamp
New Source Review Unit Chief

SH:rsa

Enclosures

c: Kansas City Regional Office
PAMS File: 2020-08-018

Permit Number: 112020-001



MISSOURI
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: 112020-001 Project Number: 2020-08-018
Installation Number: 095-0019

Parent Company: General Mills, Inc.

Parent Company Address: P.O. Box 1113, Minneapolis, MN 55440

Installation Name: General Mills Operations, LLC

Installation Address: 2917 Guinotte Avenue, Kansas City, MO 64120


Location Information: Jackson County (S34, T50N, R33W)

Application for Authority to Construct was made for:

The installation of a flour unloading line. 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.



Director or Designee
Department of Natural Resources

November 2, 2020
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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of startup of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual startup of this (these) air contaminant source(s).

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

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

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

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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 to 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 (3)(E). "Conditions required by permitting authority."

General Mills Operations, LLC
Jackson County (S34, T50N, R33W)

1. Control Device Requirement – Dust Collector
 - A. General Mills Operations, LLC shall control emissions from the new flour unloading line using a venturi dust collector (EP-104), as specified in the permit application.
 - B. The dust collector shall be operated and maintained in accordance with the manufacturer's specifications.
 - C. The dust collector shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. This gauge or meter shall be located such that Department of Natural Resources' employees may easily observe it.
 - D. Replacement filters for the dust collector shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (e.g. extreme temperature, acidic and alkaline conditions, abrasive particulate, etc.).
 - E. General Mills Operations, LLC shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty, which shall be kept on site.
 - F. General Mills Operations, LLC shall maintain an operating and maintenance log for the dust collector, which shall include the following:
 - 1) Incidents of malfunction with impact on emissions, date and duration of event, probable cause, and corrective actions
 - 2) Maintenance activities with inspection schedule, repair actions, replacements, etc.
2. Record Keeping Requirements
General Mills Operations, 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.

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

Project Number: 2020-08-018
Installation ID Number: 095-0019
Permit Number:112020-001

Installation Address:

General Mills Operations, LLC
2917 Guinotte Avenue
Kansas City, MO 64120
Jackson County (S34, T50N, R33W)

Parent Company:

General Mills, Inc.
P.O. Box 1113
Minneapolis, MN 55440

REVIEW SUMMARY

- General Mills Operations, LLC has applied for authority to install a flour unloading line.
- The application was deemed complete on September 2, 2020.
- HAP emissions are not expected from the proposed equipment.
- None of the NSPS or NESHAPs apply to the installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- A dust collector (EP-104) is being used to control particulates 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 Jackson County, an attainment/unclassifiable area for all other 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.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

General Mills Operations, LLC consists of a 3.6 million bushel capacity terminal elevator for wheat storage and a processing plant for the production of Gold Medal Flour, Bisquick, and other products sold in bulk packages. Grain is received by truck or rail and processed in three mills. The installation is a minor source for construction permits and historically has had a Basic Operating Permit; however, no operating permit is currently required.

The NSR permits listed in Table 1 have previously been issued to General Mills Operations, LLC from the Kansas City Health Department's Air Quality Program. No construction permits have previously been issued to the installation by the Missouri Department of Resources' Air Pollution Control Program.

Table 1: NSR Permit History

Permit Number	Description
659	Superseded by Permit 752
679	Superseded by Permit 752
752	Establishment of facility-wide emission limits
988	Installation of a C Mill grinding process
1019	Installation of a bulk flour loadout
1042	Modification of the A Mill and its cleaning house
1478	Installation of a flour packing line

PROJECT DESCRIPTION

General Mills Operations, LLC is proposing to install a new flour unloading line. The enclosed pneumatic line will be installed alongside the existing pneumatic line, which handles hard wheat flour being unloaded from bulk trucks. The new line will be dedicated to unloading soft wheat flour and will have a maximum design rate of 10.8 tons per hour. The total flour receiving rate will remain the same, and the unloaded soft flour will be transferred to existing silos; therefore, there will be no increase in the overall maximum design rate. A new venturi dust collector (EP-104) will be used to capture flour particles entrained in the air by the unloading/transfer process, and this flour will be returned to the process. EP-104 will also be used to capture particulate from the existing flour unloading line, alongside the existing dust collector; however, the additional control efficiency will not be accounted for in this permit.

To remain consistent with historical emission unit numbering and the current classification of emission units in MoEIS, only the final release point (the dust collector) will be given a designation of EP-104. This will include all emissions from the new soft wheat flour unloading line.

EMISSIONS/CONTROLS EVALUATION

Potential particulate emissions from the new flour unloading line were calculated using the same method historically used at the installation. The maximum air flow rate at the dust collector (1,520 cfm) was multiplied by the grain loading concentration at the filter (0.002 gr/dscf) to get an emission rate of 0.026 lb/hr. The grain loading value was taken from the results of an EPA Method 5 stack test performed on a representative emission point at the installation in 1995. It was conservatively assumed that all particulate emissions are PM_{2.5}.

Table 2 provides an emissions summary for this project. Existing potential emissions were taken from the installation's previous construction permit (Kansas City Health Department's Air Quality Program Permit No. 1478). Existing actual emissions were taken from the installation's most recent EIQ. Potential emissions of the project represent the potential of the new equipment, assuming continuous operation (8,760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2019 EIQ)	Potential Emissions of the Project	Potential Emissions of the Installation
PM	25.0	N/D	N/D	0.11	N/D
PM ₁₀	15.0	<50.0	12.25	0.11	50.11
PM _{2.5}	10.0	N/D	8.57	0.11	N/D
SO _x	40.0	N/A	N/D	N/A	N/A
NO _x	40.0	N/D	0.28	N/A	N/D
VOC	40.0	N/A	N/D	N/A	N/A
CO	100.0	N/D	0.09	N/A	N/D
Total HAPs	25.0	N/A	N/D	N/A	N/A

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

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

General Mills Operations, 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.

GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110 (4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment in this permit is in operation
- *Restriction of Emission of Odors*, 10 CSR 10-6.165
- *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

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 13, 2020, received August 14, 2020, designating General Mills, Inc. as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EIQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	