



## 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: 102007-004 Project Number: 2007-06-079

Parent Company: Hassard Elevator Co.

Parent Company Address: 11523 Hwy J, Monroe City, MO 63456

Installation Name: Hassard Elevator Co.

Installation Address: 11523 Hwy J, Monroe City, MO 63456

Location Information: Ralls County, S10, T56N, R7W

Application for Authority to Construct was made for:

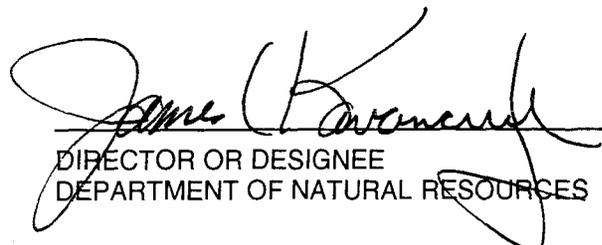
The addition of a continuous flow grain dryer, hopper bottom tank and elevator leg. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

OCT 5 2007

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## 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 this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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.

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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 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.

STATE OF 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: Project Number: 2007-06-079

Parent Company: Hassard Elevator Co.

Parent Company Address: 11523 Hwy J, Monroe City, MO 63456

Installation Name: Hassard Elevator Co.

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DEPARTMENT OF NATURAL RESOURCES

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Page No.	3
Permit No.	
Project No.	2007-06-079

## 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."*

Hassard Elevator Co.  
11523 Hwy J  
Monroe City, MO 63456  
Ralls County, S10, T56N, R7W

1. **Superseding Condition**  
The conditions of this permit supersede special conditions 1, 2 and 3 found in the previously issued construction permit (Permit Number 0599-001) from the Air Pollution Control Program.
2. **Emission Limitation - National Ambient Air Quality Standards (NAAQS)**
  - A. Hassard Elevator Co. shall maintain a daily record of material processed and demonstrate that the daily impact on ambient air quality from the installation does not exceed the daily NAAQS of  $150 \mu\text{g}/\text{m}^3$  for particulate matter less than ten microns in diameter ( $\text{PM}_{10}$ ) at or beyond the property boundary.
  - B. Attachment A or an equivalent form shall be used to record the material processed and the daily impact. Hassard Elevator Co. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
  - C. Hassard Elevator Co. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B indicate that the source exceeds the daily NAAQS of  $150 \mu\text{g}/\text{m}^3$ .
3. **Haul Road Control – Documented Watering**
  - A. Hassard Elevator Co. shall control dust from all haul roads at this site using water or surfactant spray consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary. The following conditions apply to haul road watering:

Page No.	4
Permit No.	
Project No.	2007-06-079

#### SPECIAL CONDITIONS:

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

- 1) The water application rate shall be 30 gallons per 1000 square feet at least once every four (4) hours.
  - 2) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one (1) daily water application.
  - 3) Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.
- B. Hassard Elevator Co. shall keep the following records on file and available for inspection:
- 1) A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.
  - 2) Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.
  - 3) Records of watering equipment breakdowns and repairs.
4. Grain Dryer Restriction – Concurrent Operation  
Hassard Elevator Co. shall not operate grain dryers concurrently.

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

Project Number: 2007-06-079  
Installation ID Number: 173-0030  
Permit Number:

Hassard Elevator Co.  
11523 Hwy J  
Monroe City, MO 63456

Complete: 7/3/2007

Parent Company:  
Hassard Elevator Co.  
11523 Hwy J  
Monroe City, MO 63456

Ralls County, S10, T56N, R7W

REVIEW SUMMARY

- Hassard Elevator Co. has applied for authority to construct a continuous flow grain dryer, hopper bottom tank and elevator leg.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. Specifically Subpart DD does not apply.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or 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 particulate matter less than ten (10) microns in aerodynamic diameter (PM<sub>10</sub>) are below de minimis levels.
- This installation is located in Ralls County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- 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 amendment is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended without special conditions.

### INSTALLATION DESCRIPTION

Hassard Elevator Co. operates a grain elevator in Monroe City. This installation is a minor source of PM<sub>10</sub>.

The following construction permits have been issued to Hassard Elevator Co. from the Air Pollution Control Program.

Table 1: Construction permits issued to 173-0030 Hassard Elevator

Permit Number	Description
1194-018	Grain elevator
0898-002	2 steel grain bins
0599-001	Two 165,000 Bushel grain bins

Hassard Elevator Co. commenced construction of the equipment permitted by this document before the permit was issued.

### PROJECT DESCRIPTION

Hassard Elevator Co. has applied for authority to construct a continuous flow grain dryer fed by a hopper bottom tank and an elevator leg to remove grain from the dryer. This dryer will become the installations main dryer, but the existing dryer will remain in place. The dryers may not be operated at the same time.

### 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, sections 9.9.1 Grain Elevators and Processes and 1.5 Liquefied Petroleum Gas Combustion. The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	**New Project Conditioned Potential
PM <sub>10</sub>	15.0	30.46	3.56	7.96	2.88
SO <sub>x</sub>	40.0	0.04	N/D	0.01	0.00
NO <sub>x</sub>	40.0	5.89	N/D	9.30	3.37
VOC	40.0	0.21	N/D	0.15	0.57
CO	100.0	0.80	N/D	1.57	0.73
HAPs	10.0/25.0	N/A	N/D	N/A	N/A

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

\*Existing Potential Emissions taken from permit 0599-001

\*\*PM<sub>10</sub> Conditioned Potential based on ambient impact analysis. Other pollutants reduced proportionately.

### 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<sub>10</sub> are below de minimis levels.

### APPLICABLE REQUIREMENTS

Hassard Elevator Co. 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  
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 the previous year's emissions.
- *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 10-3.090

## SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

## AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality screening was performed to determine the ambient impact of PM<sub>10</sub>.

Pollutant	Modeled Impact	NAAQS	Time Period
PM <sub>10</sub>	150.00	150.00	24-hour

Hassard Elevator Co. demonstrated compliance with the National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub> using the generic nomograph for permit 0599-001. Because this project is an increase in emissions from one of the emission points (grain drying) screened in the previous permit, a new compliance demonstration is required. Hassard Elevator Co. must limit their production to 1,564 tons of grain received per day to comply with the 24-hour PM<sub>10</sub> standard.

## 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.

\_\_\_\_\_  
Michael Mittermeyer  
Environmental Engineer

\_\_\_\_\_  
Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 6/28/2007, received 7/2/2007, designating Hassard Elevator Co. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated 7/11/2007.



Mr. Donald Benson Jr.  
Plant Manager  
Hassard Elevator Co.  
11523 Hwy J  
Monroe City, MO 63456

RE: New Source Review Permit - Project Number: 2007-06-079

Dear Mr. Benson:

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, 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 have any questions regarding this permit, please do not hesitate to contact Mike Mittermeyer at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

Kendall B. Hale  
New Source Review Unit Chief

KBH:mml

Enclosures

c: Northeast Regional Office  
PAMS File 2007-06-079

Permit Number: