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: 072014-012
Project Number: 2014-01-035
Installation Number: 207-0073

Parent Company: Lansing Trade Group, LLC
Parent Company Address: 10975 Benson Dr. Suite 400, Overland Park, KS 66210
Installation Name: Lansing Trade Group, LLC
Installation Address: 15100 County Road 785, Essex, MO 63846
Location Information: Stoddard County, S3/S10, T25N, R12E

Application for Authority to Construct was made for:
Grain Handling Facility. This review was conducted in accordance with Section (6), 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.

JUL 29 2014
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 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 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.
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.”

Lansing Trade Group, LLC
Stoddard County, S3/S10, T25N, R12E

1. PM$_{10}$ Emission Limitation
   A. Lansing Trade Group, LLC shall emit less than 15.0 tons of PM$_{10}$ in any consecutive 12-month period from the entire installation (see Table 1).
   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 1.A.

2. NOx Emission Limitation
   A. Lansing Trade Group, LLC shall emit less than 40.0 tons of NOx in any consecutive 12-month period from the entire installation (see Table 1).
   B. Attachment C 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. Haul Road Watering
   A. Lansing Trade Group, LLC shall water haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.
   B. Watering may be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads.

4. Control Device Requirement-Baffles
   A. Lansing Trade Group, LLC shall install and operate one way gravity flow baffles on all receiving pits.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

5. Control Device Requirement-Torit® Powercore® Dust Collector
   A. Lansing Trade Group, LLC shall control emissions from the enclosed conveyors and grain handling equipment using Torit® Powercore® Dust Collector as specified in the permit application.

   B. The Torit® Powercore® Dust Collector shall be operated and maintained in accordance with the manufacturer's specifications. The Torit® Powercore® Dust Collector 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 Torit® Powercore® Dust Collector shall be kept on hand at all times. The cartridge filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

   D. Lansing Trade Group, LLC shall monitor and record the operating pressure drop across the Torit® Powercore® 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.

   E. Lansing Trade Group, LLC shall maintain a copy of the Torit® Powercore® Dust Collector manufacturer's performance warranty on site.

   F. Lansing Trade Group, LLC shall maintain an operating and maintenance log for the Torit® Powercore® Dust Collector which shall include the following:
      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.

6. Control Device Requirement-Rail Shipping Hood
   A. Lansing Trade Group, LLC shall control emissions with the rail shipping hood as specified in the permit application.

   B. The rail shipping hood shall meet the design criteria as stated in the manual; operated and maintained in accordance with the manufacturer's
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

specifications. Any gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.

C. Lansing Trade Group, LLC shall maintain a copy of the rail shipping hood manufacturer's performance warranty on site.

D. Lansing Trade Group, LLC shall maintain an operating and maintenance log for the rail shipping hood which shall include the following:
   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.

7. Operational Limitation
   A. Lansing Trade Group, LLC. shall receive no more than ___ by weight of grain received by truck via straight trucks in any consecutive 12-month period.

   B. Attachment B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 7.A.

8. Record Keeping and Reporting Requirements
   A. Lansing Trade Group, 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. These records shall include MSDS for all materials used.

   B. Lansing Trade Group, 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.
Lansing Trade Group, LLC
15100 County Road 785
Essex, MO 63846

Parent Company:
Lansing Trade Group, LLC
10975 Benson Dr. Suite 400
Overland Park, KS 66210

Stoddard County, S3/S10, T25N, R12E

REVIEW SUMMARY

• Lansing Trade Group, LLC has applied for authority to construct a new grain handling facility.

• Hazardous Air Pollutant (HAP) emissions are expected from the combustion of propane from the column dryer.

• New Source Performance Standards (NSPS) Subpart DD, Standards of Performance for Grain Elevators applies to the installation.

• None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.

• Baffles, Torit® Powercore® Dust Collector, and enclosures are being used to control PM, PM\(_{10}\), and PM\(_{2.5}\) emissions from receiving and internal handling. A hood is used to control PM, PM\(_{10}\), and PM\(_{2.5}\) emissions from rail shipping. Undocumented watering is being used to control PM, PM\(_{10}\), and PM\(_{2.5}\) emissions from haul roads.

• This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are conditioned below de minimis levels. Potential of PM remains at minor source levels.

• This installation is located in Stoddard 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 counted toward major source applicability.
• Ambient air quality modeling was not performed since potential emissions of all pollutants, except PM, in the application are below de minimis. There are no ambient air quality standards for PM; therefore, modeling is not required.

• 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.

PROJECT DESCRIPTION

Lansing Trade Group, LLC will build a new rail loading facility near Grayridge (Essex), Missouri in Stoddard County. The facility will predominately be a truck receiving and rail shipping operation handling approximately _______ of grain a year. The installation will consist of a grain elevator, various size bins, column dryer, and a _______ ground pile for a total storage capacity of _______. NSPS Subpart DD applies to this installation since it is over _______ of storage capacity.

• Trucks will travel on approximately 3,440 feet of gravel road. Undocumented watering will be applied to control dust emissions.
• The facility will have two truck scales; one for inbound and one for outbound.
• The elevator has three receiving pits; two that can each receive _______ and one that can receive _______. All three will have baffles to control dust emissions.
• There will be six storage bins: bins #1 and #2 _______ will be for wet storage for grain prior to being dried by the column dryer, bins #3 and #4 are _______ each, and bins #5 and #6 _______ store miscellaneous grain with truck load out spouts each rated at _______ per hour.
• The facility will have on column dryer capable of drying _______ per hour. It will be a Zimmerman _______ with a burner capacity of _______ using propane for fuel.
• The ground pile holds _______ and is loaded via #3 receiving pit and conveyor rated at _______ per hour. It will be loaded out with a front-end loader directly into a truck.
• The elevator will ship via railcar at a rate of _______ per hour. Minimal amount of grain will be shipped by truck.
• Grain handling (conveyors and legs) will be enclosed and dust emissions will be controlled by a Torit® Powercore® Dust Collector that has filter packs instead of the traditional filter bags as in baghouses with an overall efficiency of 99.5%.
• A hood will collect dust emissions from the loading of railcars with a capture efficiency of 80%, control efficiency of 99.5% and overall efficiency of 79.6%.
Lansing Trade Group, LLC will have the flexibility to receive grain through a combination of hopper truck, straight truck, or rail. Hopper truck receiving has a lower emission factor compared to straight truck receiving because emissions decrease with decreasing grain free fall height, and the amount of air entrained per unit volume of grain decreases with increasing grain flow rate. Hopper dump trucks typically unload grain at a faster rate than a straight truck, and closer to the receiving pit. Rail receiving will share the same leg with one lane of truck receiving. Haul road emissions are inherent to truck receiving, making truck receiving the greater potential to emit. Therefore, emissions from rail receiving were not considering in this review. 75 percent of all grain received by truck will be from hopper trucks. One way gravity flow baffles associated with receiving are being used as control devices.

No permits have been issued to Lansing Trade Group, LLC from the Air Pollution Control Program.

Table 1: Project Emission Units

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Maximum Hourly Design Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-1</td>
<td>Grain Receiving Truck #1 (Hopper)</td>
<td></td>
</tr>
<tr>
<td>EP-1</td>
<td>Grain Receiving Truck #1 (Straight)</td>
<td></td>
</tr>
<tr>
<td>EP-2</td>
<td>Grain Receiving Truck #2 (Hopper)</td>
<td></td>
</tr>
<tr>
<td>EP-2</td>
<td>Grain Receiving Truck #2 (Straight)</td>
<td></td>
</tr>
<tr>
<td>EP-3</td>
<td>Grain Receiving Truck #3 (Hopper)</td>
<td></td>
</tr>
<tr>
<td>EP-3</td>
<td>Grain Receiving Truck #3 (Straight)</td>
<td></td>
</tr>
<tr>
<td>EP-4</td>
<td>Rail Receiving</td>
<td></td>
</tr>
<tr>
<td>EP-5</td>
<td>Headhouse and Grain Handling</td>
<td></td>
</tr>
<tr>
<td>EP-6</td>
<td>Storage Bins</td>
<td></td>
</tr>
<tr>
<td>EP-7A</td>
<td>Grain Drying/Column</td>
<td></td>
</tr>
<tr>
<td>EP-7B</td>
<td>Dryer Combustion</td>
<td></td>
</tr>
<tr>
<td>EP-8</td>
<td>Rail Shipping</td>
<td></td>
</tr>
<tr>
<td>EP-9</td>
<td>Truck Shipping (2 Spouts from Bins #5 &amp; #6)</td>
<td></td>
</tr>
<tr>
<td>EP-10A</td>
<td>Haul Road – Truck Receiving</td>
<td></td>
</tr>
<tr>
<td>EP-10B</td>
<td>Haul Road – Truck Shipping</td>
<td></td>
</tr>
<tr>
<td>EP-11A</td>
<td>Ground Pile Vehicular Activity</td>
<td></td>
</tr>
<tr>
<td>EP-11B</td>
<td>Ground Pile Truck shipping to Pit</td>
<td></td>
</tr>
<tr>
<td>EP-11C</td>
<td>Ground Pile Truck Shipping to Exit</td>
<td></td>
</tr>
<tr>
<td>EP-12</td>
<td>Ground Pile Load in (bin vent)</td>
<td></td>
</tr>
<tr>
<td>EP-13</td>
<td>Ground Pile Load out (loader)</td>
<td></td>
</tr>
<tr>
<td>EP-14</td>
<td>Ground Pile Load to receiving pit</td>
<td></td>
</tr>
</tbody>
</table>

EMISSIONS/CONTROLS EVALUATION

Emissions from haul roads and vehicular activity areas were calculated using the predictive equation from AP-42 Section 13.2.1 *Paved Roads*, January 2011 and Section 13.2.2 "Unpaved Roads," November 2006. A 50% control efficiency for PM and PM$_{10}$ and a 40% control efficiency for PM$_{2.5}$ were applied to the emission calculations for the use of undocumented watering of unpaved haul roads.

The rail receiving pit and the three truck receiving pits is limited to the capacity of Legs #1, #2, and #3. Each of the three legs is rated at [xxx] bu/hr, totaling to [xxx] bu/hr. Therefore only three of the four pits can be operational at one time. The MHDR for the headhouse and grain handling was determined by the conveyor to Bins #3 and #4 of [xxx] bu/hr, [xxx] tons/hr capacity, the conveyor to the column dryer which is bottleneck by the dryer capacity of [xxx] bu/hr, [xxx] tons/hr, and Leg #4 to the ground pile and/or bins #5 and #6 rated at [xxx] bu/hr, [xxx] tons/hr. The MHDR for the total bins is [xxx] bu/hr, [xxx] tons/hr and therefore creating a bottleneck for the grain handling at [xxx] bu/hr, [xxx] tons/hr.

The following table provides an emissions summary for this project. This is a new facility and there are no existing potential emissions. The potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Conditioned potential emissions of the application represent a voluntary limit to avoid refined modeling at the time of permitting. Attachment A contains composite emission factors for tracking emissions from all emission units that are evaluated towards the voluntary limit.

**Table 2: Emissions Summary (tons per year)**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Regulatory De Minimis Levels</th>
<th>Existing Potential Emissions</th>
<th>Existing Actual Emissions (EIQ)</th>
<th>Controlled Potential Emissions of the Application</th>
<th>New Installation, Conditioned Potential</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>N/A</td>
<td>N/A</td>
<td>2,574.49</td>
<td>53.87</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>N/A</td>
<td>N/A</td>
<td>716.84</td>
<td>&lt;15.0</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>10.0</td>
<td>N/A</td>
<td>N/A</td>
<td>107.09</td>
<td>2.24</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>7.75</td>
<td>4.62</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>67.21</td>
<td>&lt;40.0</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>2.65</td>
<td>1.58</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/A</td>
<td>N/A</td>
<td>38.77</td>
<td>23.08</td>
</tr>
<tr>
<td>GHG (CO$_{2}$)</td>
<td>75,000 / 100,000</td>
<td>N/A</td>
<td>N/A</td>
<td>66,035.35</td>
<td>39,302.15</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>0.0 / 100.0 / 250.0</td>
<td>N/A</td>
<td>N/A</td>
<td>64,628.64</td>
<td>38,464.92</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>N/A</td>
<td>N/A</td>
<td>0.88</td>
<td>0.52</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined
PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM\textsubscript{10} and NO\textsubscript{x} pollutants are conditioned below de minimis levels, and the indirectly conditioned PM remains above de minimis level, but below major source levels.

APPLICABLE REQUIREMENTS

Lansing Trade Group, 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

- *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

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400. The storage bin vents’ potential emission rate of 52.5 pounds per hour of PM is less than 87.6 lbs/hr (Process Rate Rule), and therefore complies with this regulation.

- New Source Performance Standards (NSPS) Subpart DD, *Standards of Performance for Grain Elevators*
STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required, I recommend this permit be granted with special conditions.

_______________________________   ________________________________
Kathy Kolb  Date
New Source Review Unit

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 17, 2014, received January 21, 2014, designating Lansing Trade Group, LLC as the owner and operator of the installation.

Attachment A – PM$_{10}$ Compliance Worksheet

Lansing Trade Group, LLC  
Stoddard County, S3/S10, T25N, R12E  
Project Number: 2014-01-035  
Installation ID Number: 207-0073  
Permit Number: ________

This sheet covers the period of ________________.

(month, year)

<table>
<thead>
<tr>
<th>Compliance Tracking Activity</th>
<th>Throughput (bushels) $C_2$</th>
<th>Throughput (tons) $C_3$</th>
<th>Emission Factor (pounds of PM$_{10}$ per ton) $C_4$</th>
<th>Emissions $C_5$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain Shipped by Rail</td>
<td></td>
<td></td>
<td>0.0295</td>
<td></td>
</tr>
<tr>
<td>Grain Received to Ground Pile</td>
<td></td>
<td></td>
<td>0.0039</td>
<td></td>
</tr>
<tr>
<td>Grain Shipped by Truck</td>
<td></td>
<td>0.0143</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain Dried</td>
<td></td>
<td></td>
<td>0.0550</td>
<td></td>
</tr>
</tbody>
</table>

- Monthly PM$_{10}$ Emissions (pounds)
- Monthly PM$_{10}$ Emissions (tons)
- Cumulative PM$_{10}$ Emissions (tons)

$c_2$ Grain shipped by truck, rail; amount stored in the ground pile; and grain dried
$c_3$ Multiply $C_2$ by 60 and divide by 2000 (bushels x 60 / 2000).
$c_5$ Emissions calculated by multiplying the Throughput $C_3$ by the respective Emission Factor $C_4$.
$^6$ Monthly PM$_{10}$ Emissions in pounds calculated by summing the four Emissions.
$^7$ Monthly PM$_{10}$ Emissions in tons calculated by dividing the Monthly PM$_{10}$ Emissions in pounds by 2,000.
$^8$ Cumulative PM$_{10}$ Emissions calculated by summing this month’s PM$_{10}$ Emissions in tons with the previous eleven month’s PM$_{10}$ Emissions in tons. A total of less than 15.0 tons is necessary for compliance.
Attachment B - Truck Receiving Worksheet

Lansing Trade Group, LLC
Stoddard County, S3/S10, T25N, R12E
Project Number: 2014-01-035
Installation ID Number: 207-0073
Permit Number: ______

This sheet covers the month of ___________________.

(month, year)

<table>
<thead>
<tr>
<th>Grain Received by Truck (tons)</th>
<th>Grain Received by Straight Truck (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Cumulative Grain Received by Truck (tons)</td>
<td></td>
</tr>
<tr>
<td>3 Cumulative Grain Received by Straight Truck (tons)</td>
<td></td>
</tr>
<tr>
<td>4 Cumulative Percent Grain Received by Straight Truck</td>
<td></td>
</tr>
</tbody>
</table>

1 The current month’s Grain Received by Truck (Hopper and Straight).
2 The current month’s Grain Received by Straight Truck.
3 Cumulative Grain Received by Truck calculated by summing this month’s Grain Received by Truck with the previous eleven month’s.
4 Cumulative Grain Received by Straight Truck calculated by summing this month’s Grain Received by Straight Truck with the previous eleven month’s.
5 Cumulative Percent Grain Received by Straight Truck calculated by dividing the Cumulative Grain Received by Straight Truck by the Cumulative Grain Received by Truck and multiplying the quotient by 100. A total not exceeding 15.0% is necessary for compliance.
Attachment C – NOx Compliance Worksheet

Lansing Trade Group, LLC
Stoddard County, S3/S10, T25N, R12E
Project Number: 2014-01-035
Installation ID Number: 207-0073
Permit Number: ________

This sheet covers the period from _________ to ____________
(month, year)   (month, year)

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>Column Dryer Fuel Usage (EP-7)</th>
<th>1 Month Total PM$_{10}$ Emissions</th>
<th>1 Month Total PM$_{10}$ Emissions</th>
<th>Previous Month’s 12 Month Total</th>
<th>Previous Year’s 1 month Total</th>
<th>12 month Total PM$_{10}$ Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>C1</td>
<td>C2</td>
<td>C3</td>
<td>C4</td>
<td>C5</td>
<td>C6</td>
</tr>
<tr>
<td></td>
<td>Amount of Propane Used (1,000 gal.)</td>
<td>Composite Emission Factor (lbs./1,000 gallon)</td>
<td>Monthly PM$_{10}$ Emissions (lbs.)</td>
<td>Monthly PM$_{10}$ Emissions (tons)</td>
<td>12 month Rolling Total PM$_{10}$ Emissions (tons)</td>
<td>Monthly PM$_{10}$ Emissions (tons)</td>
</tr>
<tr>
<td>Example</td>
<td>475.0</td>
<td>13.0</td>
<td>6175.0</td>
<td>3.09</td>
<td>36.75</td>
<td>1.20</td>
</tr>
<tr>
<td></td>
<td>13.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>13.0</td>
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<td>13.0</td>
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<tr>
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Instructions:
C2 = the total propane (1,000 gal) used during the month and year indicated in C1
C3 = 13.0 (lbs./gal), the composite emission factor for emission units (EP-7/ Column Dryer)
C4 = C2 × C3
C5 = C4 ÷ 2000
C6 = the 12 month rolling total PM$_{10}$ emissions from the previous month (C8 from previous month)
C7 = the monthly total PM$_{10}$ emissions for the same month from the previous year
C8 = C5 + C6 – C7  Note: A value less than 40.0 tons is necessary for continued compliance.
APPENDIX A

Abbreviations and Acronyms

% .......... percent
°F .......... degrees Fahrenheit
acfm ........ actual cubic feet per minute
BACT ...... Best Available Control Technology
BMPs ...... Best Management Practices
Btu .......... British thermal unit
CAM ....... Compliance Assurance Monitoring
CAS ....... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e ...... carbon dioxide equivalent
COMS ..... Continuous Opacity Monitoring System
CSR ....... Code of State Regulations
dscf ........ dry standard cubic feet
EIQ ........ Emission Inventory Questionnaire
EP .......... Emission Point
EPA ...... Environmental Protection Agency
EU ........ Emission Unit
fps .......... feet per second
ft ........ feet
GACT ...... Generally Available Control Technology
GHG ....... Greenhouse Gas
gpm ........ gallons per minute
gr .......... grains
GWP ...... Global Warming Potential
HAP ...... Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ...... pounds per hour
MACT ...... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ....... 1,000 gallons
MW .......... megawatt
MHDR ...... maximum hourly design rate
MMBtu ...... Million British thermal units
MMCF ...... million cubic feet
MSDS ..... Material Safety Data Sheet
NAAQS ... National Ambient Air Quality Standards
NESHAPs .......... National Emissions Standards for Hazardous Air Pollutants
NOx ....... nitrogen oxides
NSPS ...... New Source Performance Standards
NSR ...... New Source Review
PM .......... particulate matter
PM₂.₅ ...... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm ...... parts per million
PSD ...... Prevention of Significant Deterioration
PTE .......... potential to emit
RACT ...... Reasonable Available Control Technology
RAL ....... Risk Assessment Level
SCC ........ Source Classification Code
scfm ........ standard cubic feet per minute
SIC ........ Standard Industrial Classification
SIP .......... State Implementation Plan
SMAL ...... Screening Model Action Levels
SOₓ ....... sulfur oxides
SO₂ ...... sulfur dioxide
tph ........ tons per hour
tpy .......... tons per year
VMT ...... vehicle miles traveled
VOC ...... Volatile Organic Compound
Mr. Marcus Neal  
Director of Operations  
Lansing Trade Group, LLC  
10975 Benson Dr. Suite 400  
Overland Park, KS 66210  


Dear Mr. Neal:  

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, your new source review permit application and with your 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 Kathy Kolb, 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:kkl  

Enclosures  

Permit Number:  

Celebrating 40 years of taking care of Missouri’s natural resources.  
To learn more about the Missouri Department of Natural Resources visit dnr.mo.gov.