



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: 102015-004 Project Number: 2015-09-009
Installation Number: 207-0073

Parent Company: Lansing Trade Group, LLC
Parent Company Address: 10975 Benson Drive 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:
Construction of a 1.37 million bushel Hoop Barn. 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.

Kathy Kolb
Prepared by
Kathy Kolb
New Source Review Unit

Rendell B. Hale
Director or Designee
Department of Natural Resources
OCT 16 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.

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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. Superseding Condition
 - A. The conditions of this permit supersede all of the Special Conditions found in the previously issued construction permit Permit Number 072014-012 issued by the Air Pollution Control Program.

2. PM₁₀ Emission Limitation
 - A. Lansing Trade Group, LLC shall emit less than 15.0 tons of PM₁₀ 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 2.A.

3. NO_x Emission Limitation
 - A. Lansing Trade Group, LLC shall emit less than 40.0 tons of NO_x 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 3.A.

4. Documented Haul Road Watering
 - A. Lansing Trade Group, LLC 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:
 - 1) The water application rate shall be 100 gallons per 1000 square feet at least once every day.
 - 2) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one 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.

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SPECIAL CONDITIONS:

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

- B. Lansing Trade Group, LLC 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, ground is frozen or that there is no haul road traffic/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.
- 5. Control Device Requirement-Baffles
Lansing Trade Group, LLC shall install and operate one way gravity flow baffles on all receiving pits.
- 6. Control Device Requirement-Torit[®] Powercore[®] Dust Collector
 - A. Lansing Trade Group, LLC shall control emissions from the enclosed conveyors and grain handling equipment (EP-5) using Torit[®] Powercore[®] Dust Collector as specified in the previous permit application (Permit # 072014-012).
 - 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.

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SPECIAL CONDITIONS:

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

- 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.
- 7. Control Device Requirement-Rail Shipping Hood
 - A. Lansing Trade Group, LLC shall control emissions from the rail shipping with a 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 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.
- 8. Operational Limitation
 - A. Lansing Trade Group, LLC shall receive no more than 15.0% 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 8.A.

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SPECIAL CONDITIONS:

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

9. 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.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2015-09-009
Installation ID Number: 207-0073
Permit Number:

Installation Address:

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

Parent Company:

Lansing Trade Group, LLC
10975 Benson Drive 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 1.37 million bushel hoop barn.
- The application was deemed complete on September 8, 2015.
- HAP emissions for this project are not expected from the proposed equipment.
- New Source Performance Standards (NSPS) Subpart DD, *Standards of Performance for Grain Elevators* applies to the installation. According to 40 CFR 52.21(b)(1)(iii)(aa), fugitive emissions are counted towards major source status for this facility.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- One way gravity flow baffles on all receiving pits are used to control PM, PM₁₀, and PM_{2.5} emissions. Documented watering for all haul roads at this facility is being established in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ and NO_x pollutants are conditioned below de minimis levels, and the indirectly conditioned PM remains above de minimis level, but below major 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 not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of all

pollutants besides PM for this application are below de minimis levels. There are no modeling requirements for PM.

- Emissions testing is not required for the equipment.
- A submittal of a Basic Operating Permit application was required for this installation within 30 days of the initial equipment startup. As of this construction permit application, a basic operating has not been received by APCP.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Lansing Trade Group, LLC operates a rail loading facility near Grayridge, Missouri. The facility is a truck receiving/rail loading operation handling approximately 20 million bushels of grain a year. The existing facility consists of a grain elevator and one ground pile for a total storage of 2.7 million bushels. A propane fired column dryer with a 10,000 bushels per hour (300 tons/hr) capacity is also part of this facility.

Below in Table 1 is a list of all emission points at the facility including the new equipment associated with this project/hoop barn.

Table 1: Project Emission Units

Emission Unit	Description	Maximum Hourly Design Rate (tons /hour) True/Annual
EP-1	Grain Receiving Truck #1 (Hopper)	765/510
	Grain Receiving Truck #1 (Straight)	135/90
EP-2	Grain Receiving Truck #2 (Hopper)	765/510
	Grain Receiving Truck #2 (Straight)	135/90
EP-3	Grain Receiving Truck #3 (Hopper)	510/510
	Grain Receiving Truck #3 (Straight)	90/90
EP-4	Rail Receiving	900/900
EP-5	Headhouse and Grain Handling	2,700/2,700
EP-6	Storage Bins	2,100/2,100
EP-7A	Grain Drying/Column	300/300
EP-7B	Dryer Combustion	108 mmBtu/hr
EP-8	Rail Shipping	1860/1860
EP-9	Truck Shipping (2 Spouts from Bins #5 & #6)	150/300
EP-10A	Haul Road – Truck Receiving	Varies
EP-10B	Haul Road – Truck Shipping	Varies
EP-11A	Ground Pile Vehicular Activity	Varies
EP-11B	Ground Pile Truck shipping to Pit	Varies
EP-11C	Ground Pile Truck Shipping to Exit	Varies
EP-12	Ground Pile Load in (bin vent)	600/600
EP-13	Ground Pile Load out (loader)	600/600
EP-14	Ground Pile Load to receiving pit	1800/0
EP-15	Hoop Barn Grain Receiving Truck #4 (Hopper))	510/255
EP-15a	Hoop Barn Grain Receiving Truck #4 (Straight)	90/45

EP-16	Hoop Barn Headhouse and Grain Handling	600/300
EP-17	Hoop Barn Storage Bins	600/300
EP-18	Hoop Barn Truck Shipping (1 Spout from Bin #7)	300/300
EP-19a	Haul Road – Truck Receiving Hoop Barn	Varies
EP-19b	Haul Road – Rail Shipping (Hoop Barn to Pit)	Varies
EP-19c	Haul Road – Truck Shipping Hoop Barn	Varies

The following New Source Review permit has been issued to Lansing Trade Group, LLC from the Air Pollution Control Program.

Table 2: Permit History

Permit Number	Description
072014-012	Grain Elevator/Confidential

PROJECT DESCRIPTION

Lansing Trade Group, LLC, for this project, has constructed a 1.37 million bushel hoop barn at this facility. The hoop barn will consist of a truck receiving pit (200 bushel), receiving conveyor, elevating leg, and fill conveyor (all 20,000 bushel per hour/600 tons per hour), as well as a reclaim pit (200 bushel), reclaim conveyor (10,000 bushels per hour/300 tons per hour), and overhead truck load-out bin (3,000 bushel). The reclaim conveyor will be the bottleneck for this project at 300 tons per hour. The hoop barn will contain 12 aeration fans on each side and have one powered exhaust at each end. The truck dump pit will be built along the edge of the existing truck road. No additional truck road will be built, but traffic on the existing road will increase with the addition. The hoop barn system will operate with its own loading and unloading areas and will not be connected to the other storage handling process on site. There will be one way gravity flow baffles on the new receiving pit.

Also at this time, Lansing Trade Group, LLC will construct a drag conveyor system at the facility. The addition will handle grain from the two existing wet grain bins. The capacity of the system is 15,000 bushels per hour/450 per hour of grain. The system is enclosed and controlled by a cartridge filter dust collector already installed in the existing system. The emissions for this drag conveyor system, although part of this project, is already covered in the existing facility's calculations due to the method that the AP-42 emission factor (SCC 3-02-005-30). This emission factor was developed for a traditional grain elevator with multiple drop points. The addition of another drag conveyor system (i.e. another drop point) into the existing grain handling equipment does not result in an additional emissions since the AP-42 factor is inclusive of all drop points associated with internal grain handling. Throughput and grain loadout are not increasing with the addition of this drag conveyor system; it is rerouting the flow.

Lansing Trade Group, LLC proposes to change from undocumented watering of haul roads to documented watering of haul roads. A 90% control efficiency for PM and PM₁₀ and a 40% control efficiency for PM_{2.5} were applied to the updated emission calculations for the use of BMPs.

Due to the proximity in timing of the two projects, this application and that of Permit # 072014-012 has been combined for permit applicability.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.9.1 *Grain Elevators & Processes*, May 2003.

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 90% control efficiency for PM and PM₁₀ and a 40% control efficiency for PM_{2.5} were applied to the emission calculations for the use of BMPs on unpaved roads.

The following table provides an emissions summary for this project. The potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Lansing Trade Group, LLC has requested a facility wide de minimis limit. The New Installation Conditioned Potential emissions of the facility represent the combined emissions of the existing equipment and the new equipment from this project. Attachment A contains composite emission factors for tracking emissions from all emission units that are evaluated towards the voluntary limit.

During the review for this permit, errors in calculation of the composite emission factors from Permit #072014-012 were found and were corrected in this permit.

Existing potential emissions were taken from Permit # 072014-012. Existing actual emissions from the installation are not available because the facility has not be in operation for a full calendar year. Potential emissions of the application represent the potential of the hoop barn and associated grain handling equipment, assuming continuous operation (8760 hours per year) and the new total conditioned emissions for the entire facility.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	^a Existing Conditioned Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	53.87	N/A	363.27	51.46
PM ₁₀	15.0	<15.0	N/A	129.57	<15.0
PM _{2.5}	10.0	2.24	N/A	33.34	3.84
SOx	40.0	4.62	N/A	N/A	4.62
NOx	40.0	<40.0	N/A	N/A	<40.0
VOC	40.0	1.58	N/A	N/A	1.58
CO	100.0	23.08	N/A	N/A	23.08
GHG (CO ₂ e)	75,000 / 100,000	39,302.15	N/A	N/A	39,302.15
GHG (mass)	0.0 / 100.0 / 250.0	38,464.92	N/A	N/A	38,464.92
HAPs	10.0/25.0	0.88	N/A	N/A	0.52

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

^aExisting emissions as stated in Project 2015-01-056/Permit #072014-012

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 PM₁₀ and NOx 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 hoop barn's grain handling and bin vents' potential emission rates of 18.3 and 7.5 pounds per hour respectively of PM is less than 63.0 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*, 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 September 2, 2015, received September 3, 2015, designating Lansing Trade Group, LLC as the owner and operator of the installation.
- Email from Hans McDonald dated September 28, 2015

Attachment A – PM₁₀ Compliance Worksheet

Lansing Trade Group, LLC
 Stoddard County, S3/S10, T25N, R12E
 Project Number: 2015-09-009
 Installation ID Number: 207-0073
 Permit Number: _____

This sheet covers the period of _____.
(month, year)

Compliance Tracking Activity C1	Throughput (bushels) C2	Throughput (tons) C3	Emission Factor (pounds of PM ₁₀ per ton) C4	Emissions C5
Grain Shipped by Rail (from bins)			0.0326	
Grain Shipped by Rail (from storage pile)			0.0592	
Grain Shipped by Truck (from storage pile)			0.0619	
Grain Shipped by Truck (from bins)			0.0676	
Grain Dried			0.0570	
Grain Shipped by Truck from Hoop Barn			0.1229	
Grain Shipped by Rail from Hoop Barn			0.1234	
⁶Monthly PM₁₀ Emissions (pounds)				
⁷Monthly PM₁₀ Emissions (tons)				
⁸Cumulative PM₁₀ Emissions (tons)				

^{C2} Record the total grain shipped by truck, rail; amount stored in the ground pile; grain dried, grain shipped by truck/rail from hoop barn

^{C3} Multiply C2 by 60 and divide by 2000 (bushels x 60 / 2000).

^{C5} Emissions calculated by multiplying the Throughput C3 by the respective Emission Factor C4.

⁶ Monthly PM₁₀ Emissions in pounds calculated by summing the seven Emissions.

⁷ Monthly PM₁₀ Emissions in tons calculated by dividing the Monthly PM₁₀ Emissions in pounds by 2,000.

⁸ Cumulative PM₁₀ Emissions calculated by summing this month's PM₁₀ Emissions in tons with the previous eleven month's PM₁₀ 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: 2015-09-009
 Installation ID Number: 207-0073
 Permit Number: _____

This sheet covers the month of _____ .
 (month, year)

¹ Grain Received by Truck (tons)	² Grain Received by Straight Truck (tons)	
³ Cumulative Grain Received by Truck (tons)		
⁴ Cumulative Grain Received by Straight Truck (tons)		
⁵ Cumulative Percent Grain Received by Straight Truck		

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.

APPENDIX A

Abbreviations and Acronyms

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

Mr. Hans McDonald
EHS Manager
Lansing Trade Group, LLC
10975 Benson Drive Suite 400
Overland Park, KS 66210

RE: New Source Review Permit - Project Number: 2015-09-009

Dear Mr. McDonald:

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 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, Jefferson City, Missouri 65102, website: www.oa.mo.gov/ahc. If you have any questions regarding this permit, please contact Kathy Kolb, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:kk1

Enclosures

c: Southeast Regional Office
PAMS File: 2015-09-009
Permit Number: