

**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: 112018-004

Project Number: 2018-08-039  
Installation Number: 145-0065

Parent Company: Missouri Walnut, LLC

Parent Company Address: 11417 Oak Road, Neosho, MO 64850

Installation Name: Ohio Log Trading, LLC

Installation Address: 11417 Oak Road, Neosho, MO 64850

Location Information: Newton County (S1, T24N, R33W)

Application for Authority to Construct was made for:

The installation of eight lumber fumigation bays. 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

NOV 14 2018

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 (12)(A)10. "Conditions required by permitting authority."*

Ohio Log Trading, LLC  
Newton County (S1, T24N, R33W)

1. Methyl Bromide Emission Limitation
  - A. Ohio Log Trading, LLC shall emit less than 10.0 tons of methyl bromide in any consecutive 12-month period from the fumigation bays (EP-01 through EP-08).
  - B. Attachment A or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.
2. Record Keeping and Reporting Requirements
  - A. Ohio Log Trading, 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 SDS for all materials used.
  - B. Ohio Log Trading, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2018-08-039  
Installation ID Number: 145-0065  
Permit Number: 112018-004

Installation Address:

Ohio Log Trading, LLC  
11417 Oak Road  
Neosho, MO 64850  
Newton County (S1, T24N, R33W)

Parent Company:

Missouri Walnut, LLC  
11417 Oak Road  
Neosho, MO 64850

REVIEW SUMMARY

- Ohio Log Trading, LLC has applied for authority to install eight lumber fumigation bays.
- The application was deemed complete on September 12, 2018.
- HAPs of concern from this process include methyl bromide (bromomethane) and methyl chloride (chloromethane).
- None of the New Source Performance Standards (NSPS) or NESHAPs apply to the installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used 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 all pollutants are conditioned below de minimis levels.
- This installation is located in Newton 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.
- 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.

- Submittal of an amendment to your Basic Operating Permit is required within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Missouri Walnut, LLC operates an existing sawmill in Neosho, Missouri that was constructed in 2005. The installation receives logs via truck, which are then either staged in the saw mill, graded to assess board quality, steamed to extract sap, or directly loaded into containers for shipment. Missouri Walnut, LLC is a minor source for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> and is required to obtain a Basic Operating Permit.

Ohio Log Trading, LLC (a subsidiary of Missouri Walnut, LLC) was created specifically for the exporting of logs and lumber to other countries directly from the Neosho sawmill. The facility is located at the same address as Missouri Walnut, LLC and is considered the same installation. Ohio Log Trading, LLC will treat and export wood that is processed at the existing sawmill.

The following New Source Review permits have been issued to Missouri Walnut, LLC from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
082008-005	Installation of a sawmill and associated equipment
052016-006	Sawmill modifications and additions

### PROJECT DESCRIPTION

Ohio Log Trading, LLC is in the business of exporting logs and lumber to other countries. The installation plans to begin fumigation operations with the intent to export treated wood commodities from the existing sawmill in Neosho, Missouri. Ohio Log Trading, LLC is required to meet the extensive requirements of the United States Department of Agriculture (USDA) regarding the exportation of goods. The facility will be designed and operated to comply with the requirements of the USDA Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ) division, the regulatory body that oversees Quarantine and Pre-Shipment (QPS) treatments in the United States. The fumigant used at the facility will be methyl bromide, which has been the principal QPS fumigation tool of APHIS for over forty years and has been regularly used at various ports and fumigation facilities throughout the United States. Methyl bromide gas will be used in enclosed rooms equipped with aeration stacks, to remove any pests that may be present in the lumber, prior to exporting.

Ohio Log Trading, LLC is proposing to install eight lumber fumigation bays (EP-01 through EP-08). Each bay will hold the equivalent of two 40 foot (2,389 cubic feet) containers worth of logs and lumber. Four of the bays will directly fit two of the 40 foot containers inside, while the other four bays will hold loose logs/lumber which can hold the equivalent of two container sizes each. Therefore, Ohio Log Trading, LLC will be able to fumigate up to sixteen container loads of wood (38,224 cubic feet) at any given time. Each batch will be put in place, the room will be sealed shut, and methyl bromide gas will be released into the room via an induction line. Logs/lumber will be left inside the closed rooms for a minimum of 24 hours, per USDA standards, with some types up to 72 hours. Upon completion of the appropriate fumigation time, methyl bromide will be released from the stacks. According to APHIS treatment manual, fumigators must use an approved gas detection device to measure gas concentration levels in tarpaulins and containers. Fumigators are also required to use an APHIS-approved leak detection device primarily to check for leaks around tarpaulins, chambers, application equipment, and as a safety device around the fumigation site.

#### EMISSIONS/CONTROLS EVALUATION

In order to reach desired methyl bromide concentrations, Ohio Log Trading, LLC will fill each fumigation bay with 27 pounds of Meth-O-Gas during fumigation. It was conservatively assumed that each batch sits for the minimum fumigation time of 24 hours, yielding a maximum design rate of 1.125 pounds of Meth-O-Gas per hour for each bay (9 pounds per hour total). According to the SDS, Meth-O-Gas is 100% VOC by weight and is composed of up to 100% methyl bromide and up to 1% methyl chloride. It was conservatively assumed that each constituent exists at its maximum concentration. Because the fumigation bay stacks vent to the atmosphere, all Meth-O-Gas is freely emitted. By limiting methyl bromide emissions below 10.0 tons per year, VOC emissions are subsequently limited below 10.0 tons per year, as well.

All log/lumber handling and transportation will occur at the existing sawmill; therefore all wood handling emissions and haul road emissions are already accounted for and were not evaluated as a part of this permit.

The following table provides an emissions summary for this project. Existing potential emissions were taken from the installation's previous construction permit (052016-006). 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 De Minimis Levels/SMAL	Existing Potential Emissions	Existing Actual Emissions (2017 EIQ)	Potential Emissions of the Project	New Installation Potential Emissions
PM	25.0	53.54	N/D	N/A	53.54
PM <sub>10</sub>	15.0	30.00	18.40	N/A	30.00
PM <sub>2.5</sub>	10.0	17.28	13.62	N/A	17.28
SO <sub>x</sub>	40.0	6.20	1.78	N/A	6.20
NO <sub>x</sub>	40.0	54.82	15.73	N/A	54.82
VOC	40.0	6.17	1.45	39.42	16.17
CO	100.0	157.10	43.92	N/A	157.10
Methyl Bromide	10.0/10	N/A	N/A	39.42	<10.0
Methyl Chloride	10.0/10	N/A	N/A	0.39	0.39
Total HAPs	25.0	2.71	1.46	39.42	12.71

N/A = Not Applicable; N/D = Not Determined; SMAL = Screening Model Action Level

### 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 conditioned below de minimis levels.

### APPLICABLE REQUIREMENTS

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

### GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Operating Permits*, 10 CSR 10-6.065
- *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 (or modifications) approved by this permit are 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

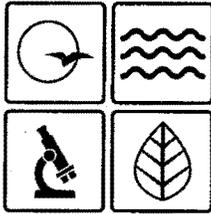
On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 16, 2018, received August 20, 2018, designating Missouri Walnut, LLC as the owner and operator of the installation.





Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

**NOV 14 2018**

Mr. Honghong Chen  
President  
Ohio Log Trading, LLC  
11417 Oak Road  
Neosho, MO 64850

RE: New Source Review Permit - Project Number: 2018-08-039

Dear Mr. Chen:

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.

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 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.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

Mr. Honghong Chen  
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If you have any questions regarding this permit, please do not hesitate to contact Ryan Schott, 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:rsj

Enclosures

c: Southwest Regional Office  
PAMS File: 2018-08-039

Permit Number: **112018-004**

## APPENDIX A

### Abbreviations and Acronyms

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