

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

MAR 23 2020

Seth Ricketts
Owner/President
Ricketts Farm Service, Inc
PO Box 183
Salisbury, MO 65281

RE: New Source Review Permit - Project Number: 2019-10-035

Dear Seth Ricketts:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office 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.



Recycled paper

Seth Ricketts
Page Two

If you have any questions regarding this permit, please do not hesitate to contact Jared Rhodes, 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

A handwritten signature in blue ink that reads "Kendall B. Hale" with a stylized flourish at the end.

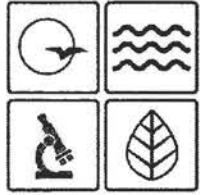
Susan Heckenkamp
New Source Review Unit Chief

SH:jara

Enclosures

c: Northeast Regional Office
PAMS File: 2019-10-035

Permit Number: **032020-006**



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: **032020-006** Project Number: 2019-10-035
Installation Number: 041-0021

Parent Company: Ricketts Farm Service, Inc

Parent Company Address: 29394 Sterling Ave, Salisbury, MO 65281

Installation Name: Ricketts Farm Service, Inc

Installation Address: 29394 Sterling Ave, Salisbury, MO 65281

Location Information: Chariton County, S8, T53N, R17W

Application for Authority to Construct was made for:

The installation of a new dry fertilizer storage and handling facility at Ricketts Farm Service, Inc's Salisbury installation. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

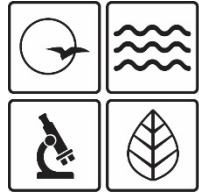
-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Kendall B. Hale

Director or Designee
Department of Natural Resources

MAR 23 2020

Effective Date



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: 2019-10-035
Installation Number: 041-0021

Parent Company: Ricketts Farm Service, Inc

Parent Company Address: 29394 Sterling Ave, Salisbury, MO 65281

Installation Name: Ricketts Farm Service, Inc

Installation Address: 29394 Sterling Ave, Salisbury, MO 65281

Location Information: Chariton County, S8, T53N, R17W

Application for Authority to Construct was made for:

The installation of a new dry fertilizer storage and handling facility at Ricketts Farm Service, Inc's Salisbury installation. 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

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 start up 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 start up of this (these) air contaminant source(s).

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

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

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

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

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

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

SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."

Ricketts Farm Service, Inc
Chariton County, S8, T53N, R17W

1. PM Emission Limitation
 - A. Ricketts Farm Service, Inc shall emit less than 25.0 tons of PM in any consecutive 12-month period from the emission points of this project listed here in Table 1. The SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions* shall be included in the limit.

Table 1: Emissions Points

Emission Point	Description
EP-21	Dry Fertilizer Receiving Pit
EP-22	Dry Fertilizer Inclined Drag Conveyor
EP-23	Dry Fertilizer Screw Conveyor
EP-24	8 Dry Fertilizer Storage Bays
EP-25	Dry Fertilizer Transfer from Bays to Mixer with Loader
EP-26	Dry Fertilizer Mixing/Conveying in Declining Weight Blending System
EP-27	Dry Fertilizer Load Out Belt Conveyor
EP-28	Vehicular Activity Areas

- 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. Record Keeping and Reporting Requirements
 - A. Ricketts Farm Service, Inc 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.
 - B. Ricketts Farm Service, Inc 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

SPECIAL CONDITIONS:

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

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: 2019-10-035
Installation ID Number: 041-0021
Permit Number:

Installation Address:

Ricketts Farm Service, Inc
29394 Sterling Ave
Salisbury, MO 65281

Parent Company:

Ricketts Farm Service, Inc
29394 Sterling Ave
Salisbury, MO 65281

Chariton County, S8, T53N, R17W

REVIEW SUMMARY

- Ricketts Farm Service, Inc has applied for authority to install a new dry fertilizer storage and handling facility at their Salisbury installation.
- The application was deemed complete on October 22, 2019.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- The New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart X, *Standards of Performance for the Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facilities* does not apply to the proposed equipment because triple superphosphate is not produced at this facility.
- None of the NESHAPs apply to this installation. None of the currently promulgated 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 all pollutants are conditioned below de minimis levels.
- This installation is located in Chariton County, an attainment/unclassifiable 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 the application are conditioned below de minimis levels.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

This installation consists of a grain elevator, feed mill, bulk fertilizer facility, and a seed treatment unit in Salisbury, Missouri. The grain elevator, feed mill, and bulk fertilizer facilities are exempt from construction permitting rules since original construction or modification occurred prior to May 13, 1982 according to 10 CSR 10-6.060(1)(C)3. However, this exemption does not apply to Operating Permit applicability. The seed treatment facility is permitted under construction permit 082014-002. No installation wide potential to emit has been established for this installation in any Air Pollution Control Program permits. The conditioned potential emissions for the entire installation is estimated in this permit based on the MOEIS data listed for Ricketts Farm Service, Inc.

Construction permit 082014-002 is the only permit issued to Ricketts Farm Service, Inc from the Air Pollution Control Program.

PROJECT DESCRIPTION

Ricketts Farm Service, Inc is constructing a new dry fertilizer storage, blending, and load out facility in Salisbury, Missouri. This new fertilizer facility will be operated in addition to their current bulk fertilizer facility and will be located across the street from their current facility with its own haul roads and vehicular activity areas. The facility consists of a new 93 ft wide by 166.5 ft long building with a storage capacity for approximately 2800 tons of dry fertilizer. Equipment in the building consists of a 120 ton/hr receiving pit, which feeds an inclined drag conveyor that feeds a screw conveyor with drop doors to fill 8 fertilizer storage bays. A loader is used to load fertilizer from the storage bays into bulk ingredient hoppers of an automated declining weight blending system consisting of a screw/blending conveyor feeding a belt load out conveyor. The blending system has a design capacity of 120 ton/hr. No emission controls will be used to control emissions from the equipment of this project.

A construction permit is required for this project since potential emission of PM₁₀ exceed the insignificance level of 1.0 lb/hr and are conditioned below de minimis levels to avoid ambient air quality modeling requirements.

EMISSIONS/CONTROLS EVALUATION

The fertilizer PM and PM₁₀ emission factors for EP-01 through EP-06 were obtained from the ammonium nitrate bulk loading Source Classification Code (SCC) 30102709, each at 0.02 pounds per ton of fertilizer, and the emission factor of 0.005 pounds per ton of fertilizer for PM_{2.5}. These emission factors were obtained from WebFIRE (Factor Information Retrieval System), EPA’s online emission factor repository.

Emissions from vehicular activity areas for fertilizer receiving and shipping were calculated using the predictive equation from Section 13.2.2 “Unpaved Roads,” November 2006. Emissions from vehicular activity areas for the loader were calculated using the predictive equation from AP-42 Section 13.2.1 “Paved Roads,” January 2011.

The following table provides an emissions summary for this project. Existing Installation Potential Emissions were estimated using the MHDR and emission factors listed in MOEIS for Ricketts Farm Service, Inc considering the seed throughput limitation of Special Condition 1 of Permit 082014-002. Existing actual emissions were taken from the installation’s most recent full EIQ in 2014. Potential emissions of the project represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Conditioned potential emission of the project represents the potential emissions of the new equipment with PM emissions conditioned to 25.0 tpy. Conditioned potential emissions of the installation represent the summation of conditioned potential emissions of the project and existing installation potential emissions.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Installation Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Project	Conditioned Potential Emissions of the Project	Conditioned Potential Emissions of the Installation
PM	25.0	N/D	N/D	179.5	<25.0	N/D
PM ₁₀	15.0	87.3	0.8	102.8	14.3	101.6
PM _{2.5}	10.0	19.4	0.2	21.6	3.0	22.4
SO _x	40.0	N/A	N/D	N/A	N/A	N/A
NO _x	40.0	N/A	N/D	N/A	N/A	N/A
VOC	40.0	0.7	0.03	N/A	N/A	0.7
CO	100.0	N/A	N/D	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/D	N/A	N/A	N/A

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

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. PM potential emissions are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Ricketts Farm Service, Inc 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

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *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. Particulate emissions from the receiving pit, inclined drag conveyor, screw conveyor, screw/blending conveyor, and belt load out conveyor can reasonably be captured and controlled by a control device. The uncontrolled potential emissions from each of these emission units is 2.4 lb/hr PM which is less than 53.13 lb/hr (Process Rate Rule), and therefore complies with this regulation.

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 October 21, 2019, received October 22, 2019, designating Ricketts Farm Service, Inc as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MWmegawatt
acfm actual cubic feet per minute	MHDRmaximum hourly design rate
BACT Best Available Control Technology	MMBtuMillion British thermal units
BMPs Best Management Practices	MMCFmillion cubic feet
Btu British thermal unit	MSDSMaterial Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPSNew Source Performance Standards
CO carbon monoxide	NSRNew Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppmparts per million
dscf dry standard cubic feet	PSDPrevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTEpotential to emit
EP Emission Point	RACTReasonable Available Control Technology
EPA Environmental Protection Agency	RALRisk Assessment Level
EU Emission Unit	SCCSource Classification Code
fps feet per second	scfmstandard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SICStandard Industrial Classification
GHG Greenhouse Gas	SIPState Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_xsulfur oxides
GWP Global Warming Potential	SO₂sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	