



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

November 17, 2020

Ryan Stavig
Plant Manager
Seaboard Energy Missouri, LLC
5701 Stockyards Expressway
St. Joseph, MO 64504

RE: New Source Review Permit Amendment – Permit Number: 032009-010A
Project Number: 2020-06-022; Installation Number: 021-0120

Dear Ryan Stavig:

On June 15, 2020, the Air Pollution Control Program received your request to amend Construction Permit No. 032009-010 to allow for an increase in the water recirculation rate of cooling tower FS004a. Special Condition 3.B of the original permit limited the recirculation rate to 3,000 gallons per minute; however, Seaboard Energy Missouri, LLC is proposing to increase this value to 5,000 gallons per minute.

Seaboard Energy Missouri, LLC operates a biodiesel production plant in St. Joseph, Missouri. The installation produces biodiesel from the enzyme-catalyzed transesterification of raw, non-petroleum oil (vegetable oil, animal fat, etc.) with methanol. Seaboard Energy Missouri, LLC is capable of producing up to 32.85 million gallons of biodiesel per year. The installation is a de minimis source and does not require an operating permit.

Increasing the water recirculation rate of the cooling tower is not expected to affect the operation or potential to emit of any existing equipment at the installation, other than the cooling tower itself. Although there is a construction permit project currently under review for a wastewater treatment system at the installation (2019-09-052), these two projects affect different parts of the facility, and they were clearly not separated to avoid exceeding any applicable emission thresholds.

Potential emissions from the cooling tower include only particulates from drift loss. PM₁₀ emissions from increasing the recirculation rate from 3,000 gallons per minute to 5,000 gallons per minute were calculated using a mass balance and the parameter limits in Construction Permit No. 032009-010. The drift loss (0.005%) was taken from Special Condition 3.D, and the total dissolved solids concentration (3,500 parts per million) was taken from Special Condition 3.E. This yielded an updated potential to emit of 0.44 pounds of PM₁₀ per hour for the project, which is below the “Insignificant Emission Exemption Level,” as listed in 10 CSR 10-6.061 (3)(A)3.A.

Special Condition 3.B in Construction Permit No. 032009-010 was superseded to remove the existing 3,000 gallon per minute recirculation rate limit. A new special condition, limiting the recirculation rate to 5,000 gallons per minute, was then imposed.



Ryan Stavig
Page Two

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.ao.mo.gov/ahc.

If you have any questions regarding this amendment, please contact the Air Pollution Control Program at 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". The signature is written in a cursive style.

Kendall B. Hale
Permits Section Chief

KBH:rsa

Enclosures

c: Kansas City Regional Office
PAMS File: 2020-06-022

Page No.	3
Permit No.	032009-010A
Project No.	2020-06-022

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."

Seaboard Energy Missouri, LLC
Buchanan County (S31, T57N, R35W)

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 3.B in Construction Permit No. 032009-010, previously issued by the Air Pollution Control Program.

Replacement Special Conditions for Construction Permit No. 032009-010:

3. **Cooling Tower Operating Requirements**
 - B. The cooling tower water recirculation rate shall not exceed 5,000 gallons per minute.