

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: 022014-002

Project Number: 2013-10-047
Installation Number: 023-0071

Parent Company: Southeast Cooperative Service Company Inc.

Parent Company Address: Highway 25 PO BOX 340, Advance, MO 63730

Installation Name: Southeast Cooperative Service Company, Inc.

Installation Address: 18631 Highway 53, Qulin, MO 63961

Location Information: Butler County, S3, T22N, R8E

Application for Authority to Construct was made for:
Dry Fertilizer Mixing. 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.

FEB - 3 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 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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Project No.	2013-10-047

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."

Southeast Cooperative Service Company, Inc.
Butler County, S3, T22N, R8E

1. PM₁₀ Emission Limitation
 - A. Southeast Cooperative Service Company, Inc. shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the entire installation emission points listed in 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. Record Keeping and Reporting Requirements
 - A. Southeast Cooperative Service Company, 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. These records shall include MSDS for all materials used
 - B. Southeast Cooperative Service Company, Inc. 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 (5) REVIEW

Project Number: 2013-10-047
Installation ID Number: 023-0071
Permit Number:

Southeast Cooperative Service Company, Inc.
18631 Highway 53
Quilin, MO 63961

Complete: October 18, 2013

Parent Company:
Southeast Cooperative Service Company Inc.
Highway 25 PO BOX 340
Advance, MO 63730

Butler County, S3, T22N, R8E

REVIEW SUMMARY

- Southeast Cooperative Service Company, Inc. has applied for authority to construct a dry fertilizer mixing installation.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 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 PM₁₀ are conditioned below de minimis levels.
- This installation is located in Butler 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 the application are conditioned below de minimis levels.

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation because the installation is conditioned below de minimis levels.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Southeast Cooperative Service Company, Inc. is a farmer owned cooperative which operates a total of seven separate locations in Stoddard, new Madrid, Scott and Butler counties. Southeast Cooperative Service Company, Inc. is an agriculture input cooperative providing fuel, seed, fertilizer, feed agricultural chemicals and custom application. Their organization is not a grain handling facility other than seed (pre-packaged).

No permits have been issued to Southeast Cooperative Service Company, Inc. from the Air Pollution Control Program.

PROJECT DESCRIPTION

Southeast Cooperative Service Company, Inc. has purchased the facility between Quilin and Glennonville, Missouri formerly known as Belcher Liquid Fertilizer for the purpose of expanding business and better serving their existing customer base to the southwest in Butler County. They want to expand their dry fertilizer operation to include a new 124' x 50' building consisting of eight bins, portable conveyor and mixer. A front end loader will transport the fertilizer from the bins to the mixer. Concrete pads located outside at opposite ends of the building will be the unloading and shipping pads for the facility.

The new emission units for the facility are summarized in the Table 1 below.

Table 1: Project Emissions Units

Emission Point	Description	MHDR Tons per hour	Bottleneck MHDR Tons per hour
EP-01	Fertilizer Receiving	50	50
EP-02	Portable Conveyor	50	50
EP-03	Storage Bins	50	50
EP-04	Loader	100	50
EP-02	Mixer	100	50
EP-06	Loadout/Conveyor	50	50
EP-07	Haul Roads and Vehicular Activity	2.68 VMT	50

Hauls roads will be 143 feet (receiving) and 300 feet (shipping). A combination of hopper and straight trucks will be used for transporting the fertilizer.

EMISSIONS/CONTROLS EVALUATION

The fertilizer 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. This emission factor was obtained from WebFIRE (Factor Information Retrieval System), EPA's online emission factor repository. Potential emissions from the haul roads and vehicular activity were calculated using AP-42 Section 13.2.2 *Unpaved Roads*, November 2006 and AP-42 Section 13.2.1 *Paved Roads*, January 2011.

The following table provides an emissions summary for this project. The existing facility has not been previously permitted; therefore there are no Existing Potential Emissions and no Existing Actual Emissions. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/A	N/A	42.20	20.69
PM ₁₀	15.0	N/A	N/A	30.58	<15.0
PM _{2.5}	10.0	N/A	N/A	6.98	3.42
SO _x	40.0	N/A	N/A	N/D	N/D
NO _x	40.0	N/A	N/A	N/D	N/D
VOC	40.0	N/A	N/A	N/D	N/D
CO	100.0	N/A	N/A	N/D	N/D
GHG (CO ₂ e)	75,000 / 100,000	N/A	N/A	N/D	N/D
GHG (mass)	0.0 / 100.0 / 250.0	N/A	N/A	N/D	N/D
HAPs	10.0/25.0	N/A	N/A	N/D	N/D

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*. Potential emissions of PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Southeast Cooperative Service Company, 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

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110. Submission of and Emissions Inventory Questionnaire (EIQ)
- *No Operating Permit is required because the facility's conditioned potential emission are below the de minimis level.*
- *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 Emissions From Industrial processes*, 10 CSR 10-6.400 does not apply because the emissions could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. These emissions are considered to be fugitive.

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*, I recommend this permit be granted with special conditions.

Kathy Kolb
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 14, 2013, received October 18, 2013, designating Southeast Cooperative Service Company Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- WebFIRE (Factor Information Retrieval System), EPA's online emission factor repository

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	SIC	Standard Industrial Classification
GHG	Greenhouse Gas	SIP	State Implementation Plan
gpm	gallons per minute	SMAL	Screening Model Action Levels
gr	grains	SO_x	sulfur oxides
GWP	Global Warming Potential	SO₂	sulfur dioxide
HAP	Hazardous Air Pollutant	tph	tons per hour
hr	hour	tpy	tons per year
hp	horsepower	VMT	vehicle miles traveled
lb	pound	VOC	Volatile Organic Compound
lbs/hr	pounds per hour		
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Mr. Mike Galloway
General Manager
Southeast Cooperative Service Company, Inc.
Highway 25 PO Box 340
Advance, MO 63730

RE: New Source Review Permit - Project Number: 2013-10-047

Dear Mr. Galloway:

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 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:kk1

Enclosures

c: Southeast Regional Office
PAMS File: 2013-10-047

Permit Number: