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: 122017-012

Project Number: 2017-09-017
Installation Number: 031-0112

Parent Company: SEMO Milling, LLC

Parent Company Address: 261 River Rd, Scott City, MO 63780

Installation Name: SEMO Milling, LLC

Installation Address: 261 River Rd, Scott City, MO 63780

Location Information: Cape Girardeau County, S28, T30N, R14E

Application for Authority to Construct was made for:
Addition of new processes and associated equipment for expansion of various corn milling equipment for the purpose of collecting, diverting, and sifting existing mill flows for greater production flexibility. 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.

Jordan Hull

Prepared by
Jordan Hull
New Source Review Unit

Kendall B. Hale for

Director or Designee
Department of Natural Resources

DEC 28 2017

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 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."

SEMO Milling, LLC
Cape Girardeau County, S28, T30N, R14E

1. Control Device Requirement-Baghouse
   A. SEMO Milling, LLC shall control emissions from the equipment in Table 1 using baghouses as specified in the permit application.

Table 1: Equipment Controlled by Baghouses

Emission Unit:	Description:	Control ID:
EU-267	#7 Satake degermer: 2nd FL	C106
EU-309	Pneumatic transfer system gravity table top cut	C106
EU-310	Positive pneumatic transfer system 610	C106
EU-311	Cones negative lift transfer system 1 East :4th FL	C110
EU-312	Cones negative lift transfer system 2 East :4th FL	C110
EU-313	2nd Reduction negative lift transfer system 1 East: 4th FL	C110
EU-314	2nd Reduction negative lift transfer system 2 East: 4th FL	C110
EU-315	Norvell sifter 6 box: 3rd FL	C110
EU-316	Positive pneumatic transfer system #7 Satake tailstock: 4th FL	C107
EU-317	Davis corn cutters #1	C109
EU-318	Davis corn cutter #1 positive pneumatic transfer system: 4th FL	C107
EU-319	610 Collection conveyor	C110
EU-321	Positive pneumatic transfer to Greatwestern sifter	C106
EU-322	Positive pneumatic transfer to Macrowave	C106
EU-323	Macrowave feed in conveyor	C111
EU-325	Macrowave feed out conveyor	C111
EU-326	Positive pneumatic transfer to aspirator/cooler	C106
EU-327	Macrowave aspirator cooler	C106
EU-328	Positive pneumatic transfer Macrowave asp/cool to storage	C123
EU-329	Thermal treatment screw feed in conveyor	C111
EU-330	Thermal treatment screw feed in conveyor	C111
EU-331	Positive pneumatic transfer from thermal to mill	C110

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

B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse 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 baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). The replacement filter material type shall meet or exceed the specifications of the existing filter. The air to cloth ratio shall not be increased when filter replacement is performed.

D. SEMO Milling, LLC shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

E. SEMO Milling, LLC shall maintain a copy of the baghouse and filters manufacturer's performance warranties on site.

F. SEMO Milling, LLC shall maintain an operating and maintenance log for the baghouses 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.

2. Capture Requirement
   A. SEMO Milling, LLC shall enclose all equipment listed in Special Condition 1.A. such that the only openings are for material entry & exit, and emissions exiting the control devices.

3. Record Keeping and Reporting Requirements
   A. SEMO Milling, 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.

   B. SEMO Milling, 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, 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: 2017-09-017
Installation ID Number: 031-0112
Permit Number: 122017-012

Installation Address:
SEMO Milling, LLC
261 River Rd
Scott City, MO 63780

Parent Company:
SEMO Milling, LLC
261 River Rd
Scott City, MO 63780

Cape Girardeau County, S28, T30N, R14E

REVIEW SUMMARY

- SEMO Milling, LLC has applied for authority to install new processes and associated equipment for expansion of various corn milling equipment for the purpose of collecting, diverting, and sifting existing mill flows for greater production flexibility.
- The application was deemed complete on September 18, 2017.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation. 40 CFR 60 Subpart DD, *Standards of Performance for Grain Elevators*, of the NSPS does not apply to this installation because the installation has a maximum storage capacity less than one million bushels.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Baghouses are being used to control the PM, PM_{10}, $PM_{2.5}$ emissions from some of the equipment in this permit.
- 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 below de minimis levels.
- This installation is located in Cape Girardeau 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 as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

SEMO Milling, LLC is an existing minor source located in Cape Girardeau County. The installation produces food grade corn products including flour, cornmeal, and brewer's grits. A process by-product, known as hominy, is also produced for the animal feed industry. The installation is considered a minor source for construction permits and a basic source for operating permits.

The following New Source Review permits have been issued to SEMO Milling, LLC from the Air Pollution Control Program. Project number: 2017-07-001 was closed out and combined with this project as it was still in house when this project was received.

Table 2: Permit History

Permit Number	Description
072012-014	Installation of various equipment such as degerminators, sifters, aspirators, ect.
122014-006	Handling Equipment to an existing product stream.
032015-008	Blending system.
092016-017	New sifting and enriching process for coarse cornmeal.

PROJECT DESCRIPTION

SEMO Milling, LLC proposed the installation and operational expansion of various corn milling equipment as listed for the purpose of collecting, diverting, milling, and sifting existing mill flows for a greater production flexibility. This project also has an addition of a new process and associated equipment for collecting existing sifted/separated mill streams. None of the additions will debottleneck the existing product flows. These process additions are being added for safety, efficiency, and quality measures. They are all located in the same existing structure.

Particulate emissions for the pneumatic transfers, the existing storage tank, and a feed in conveyor will be controlled by baghouses. Other equipment will be uncontrolled. There are cyclones for the pneumatic transfers, but these are considered inherent part of the process and are therefore, not required by a permit condition. The cyclones are

used as a pre-separator to prevent clogging of the baghouse and are viewed as

inherent because they must be used to prevent product loss from the product streams pneumatic transfer of certain products.

These changes re-route existing product streams for further thermal treatment, grinding and sifting to make combining streams more efficient for existing products. Thus, there are no increases in MHDR of the existing equipment and no increases in haul road traffic.

Table 3: Project Emission Units

Emission Unit	Description:	MHDR (tph):
EU-267	#7 Satake degermer: 2nd FL	2.25
EU-309	Pneumatic transfer system gravity table top cut	5.00
EU-310	Positive pneumatic transfer system 610	3.00
EU-311	Cones negative lift transfer system 1 East : 4th FL	3.00
EU-312	Cones negative lift transfer system 2 East : 4th FL	3.00
EU-313	2nd Reduction negative lift transfer system 1 East: 4th FL	3.00
EU-314	2nd Reduction negative lift transfer system 2 East: 4th FL	1.50
EU-315	Norvell sifter 6 box: 3rd FL	18.00
EU-316	Positive pneumatic transfer system #7 Satake tailstock: 4th FL	4.75
EU-317	Davis corn cutters #1	3.00
EU-318	Davis corn cutter #1 positive pneumatic transfer system: 4th FL	3.00
EU-319	610 Collection conveyor	3.00
EU-320	Premium meal collection screw to Greatwestern sifter	4.05
EU-321	Positive pneumatic transfer to Greatwestern sifter	4.05
EU-322	Positive pneumatic transfer to Macrowave	3.00
EU-323	Macrowave feed in conveyor	3.00
EU-324	Macrowave thermal treatment conveyor	3.00
EU-325	Macrowave feed out coneyor	3.00
EU-326	Positive pneumatic transfer to aspirator/cooler	3.00
EU-327	Macrowave aspirator cooler	3.00
EU-328	Positive pneumatic transfer Macrowave asp/cool to storage	3.00
EU-329	Thermal treatment screw feed in conveyor	3.00
EU-330	Thermal treatment screw feed in conveyor	3.00
EU-331	Positive pneumatic transfer from thermal to mill	3.00

EMISSIONS/CONTROLS EVALUATION

$PM_{2.5}$, PM_{10}, and PM emissions are expected from this project. Emissions from the storage tank vents, sifters, and feeders, were calculated using emission factors from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors,* Fifth Edition, Chapter 9.9.1, *Grain Elevator & Processes,* May 2003. There are no emission factors for the sifters and feeders, so emission factors from handling equipment were used as it gives a reasonable estimate of emissions. Baghouses were given an efficiency of 99%. The equipment is completely enclosed except for material entry and exit, so capture efficiency is expected to be close to 100%. However, in previous site visits performed on the facility, an amount of dust that does not commensurate with 100% capture efficiency was observed on the floor of the plant. Therefore, a capture efficiency of 90% was used as a conservative estimate for emissions. Emissions from the pneumatic transfers were calculated using emission factors from for cement unloading to elevated storage silo in AP-42, Chapter 11.12, *Concrete Batching,* (June 2006). Using these emission factors should yield a conservative estimate of emissions because cement is finer than cornmeal and its emissions should be higher. No emission factors for $PM_{2.5}$ were found so all PM_{10} emissions were considered $PM_{2.5}$. These emission factors include the use of baghouses so no additional control efficiency was given.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit number 092016-017. Existing actual emissions were taken from the installation's 2016 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 4: Emissions Summary (tpy)

Pollutant	Regulatory *De Minimis* Levels	Existing Potential Emissions	Existing Actual Emissions (2016 EIQ)	Potential Emissions of the Project	Conditioned Potential Emissions of the Project
PM	25.0	N/D	N/A	16.05	4.66
PM_{10}	15.0	25.88	2.42	8.90	1.95
$PM_{2.5}$	10.0	6.66	1.43	4.90	1.35
SOx	40.0	0.1	0.0004	N/A	N/A
NOx	40.0	5.3	0.30	N/A	N/A
VOC	40.0	0.7	0.04	N/A	N/A
CO	100.0	4.5	0.26	N/A	N/A
GHG (CO_2e)	N/A	N/D	N/D	N/A	N/A
GHG (mass)	N/A	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	0.5	0.00	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*. Potential emissions of all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

SEMO Milling, 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

- *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 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

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 September 6, 2017, received September 11, 2017, designating SEMO Milling, LLC as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% .....percent
°F .....degrees Fahrenheit
acfm.....actual cubic feet per minute
BACT.....Best Available Control Technology
BMPs.....Best Management Practices
Btu.....British thermal unit
CAM .....Compliance Assurance Monitoring
CAS.....Chemical Abstracts Service
CEMS .....Continuous Emission Monitor System
CFR.....Code of Federal Regulations
CO.....carbon monoxide
CO_2.....carbon dioxide
CO_2e.....carbon dioxide equivalent
COMS.....Continuous Opacity Monitoring System
CSR.....Code of State Regulations
dscf.....dry standard cubic feet
EIQ.....Emission Inventory Questionnaire
EP.....Emission Point
EPA.....Environmental Protection Agency
EU .....Emission Unit
fps.....feet per second
ft.....feet
GACT .....Generally Available Control Technology
GHG.....Greenhouse Gas
gpm .....gallons per minute
gr.....grains
GWP .....Global Warming Potential
HAP.....Hazardous Air Pollutant
hr.....hour
hp .....horsepower
lb.....pound
lbs/hr.....pounds per hour
MACT.....Maximum Achievable Control Technology
$\mu g/m^3$.....micrograms per cubic meter
m/s.....meters per second
Mgal .....1,000 gallons
MW .....megawatt
MHDR.....maximum hourly design rate
MMBtu ....Million British thermal units
MMCF .....million cubic feet
MSDS.....Material Safety Data Sheet
NAAQS ....National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NO_x.....nitrogen oxides
NSPS .....New Source Performance Standards
NSR.....New Source Review
PM.....particulate matter
$PM_{2.5}$.....particulate matter less than 2.5 microns in aerodynamic diameter
PM_{10} .....particulate matter less than 10 microns in aerodynamic diameter
ppm .....parts per million
PSD.....Prevention of Significant Deterioration
PTE .....potential to emit
RACT.....Reasonable Available Control Technology
RAL.....Risk Assessment Level
SCC .....Source Classification Code
scfm .....standard cubic feet per minute
SDS.....Safety Data Sheet
SIC.....Standard Industrial Classification
SIP.....State Implementation Plan
SMAL.....Screening Model Action Levels
SO_x.....sulfur oxides
SO_2.....sulfur dioxide
SSM.....Startup, Shutdown & Malfunction
tph .....tons per hour
tpy.....tons per year
VMT.....vehicle miles traveled
VOC .....Volatile Organic Compound

2017-09-017 SEMO Milling LLC
PTE Calculation

			Unc EF (lb/ton)			Unc E (lb/hr)			Unc E (tpy)					Cont E (tpy)			EF Source
EU	Description	MHDR (tph)	PM2.5	PM10	PM	PM2.5	PM10	PM	PM2.5	PM10	PM	Control	Control %	PM2.5	PM10	PM	
267	#7 satake Degermer: 2nd FL	2.25000	0.06700	0.06700	0.06700	0.15075	0.15075	0.15075	0.66029	0.66029	0.66029	Baghouse	89%	0.072	0.072	0.072	No EF under scc code. Used EF for 30200817, hammermill for animal feed mills. EF controlled with cyclone
309*	Pneumatic Transfer system gravity table top cut	5.00000	0.00034	0.00034	0.00099	0.00170	0.00170	0.00495	0.00745	0.00745	0.02168	Built into EF	0%	0.007	0.007	0.022	AP-42 Chapter 11.12, Concrete Batching, June 2006
310*	Positive pnematic transfer system 610	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004	0.004	0.013	AP-42 Chapter 11.12, Concrete Batching, June 2006
311	Cones negative lift transfer system 1 East :4th FL	3.00000	0.00580	0.03400	0.06100	0.01740	0.10200	0.18300	0.07621	0.44676	0.80154	Baghouse	89%	0.008	0.049	0.087	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
312	Cones negative lift transfer system 2 East :4th FL	3.00000	0.00580	0.03400	0.06100	0.01740	0.10200	0.18300	0.07621	0.44676	0.80154	Baghouse	89%	0.008	0.049	0.087	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
313	2nd Reduction Negative lift transfer system 1 East: 4th FL	1.50000	0.00580	0.03400	0.06100	0.00870	0.05100	0.09150	0.03811	0.22338	0.40077	Baghouse	89%	0.004	0.024	0.044	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
314	2nd Reduction Negative lift transfer system 2 East: 4th FL	1.50000	0.00580	0.03400	0.06100	0.00870	0.05100	0.09150	0.03811	0.22338	0.40077	Baghouse	89%	0.004	0.024	0.044	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
315	Norvell sifter 6 box: 3rd FL	18.00000	0.00580	0.03400	0.06100	0.10440	0.61200	1.09800	0.45727	2.68056	4.80924	Baghouse	89%	0.050	0.292	0.524	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
316*	Positive pnematic transfer system #7 Satake tailstock:4th FL	4.75000	0.00034	0.00034	0.06100	0.00162	0.00162	0.28975	0.00707	0.00707	1.26911	Built into EF	0%	0.007	0.007	1.269	AP-42 Chapter 11.12, Concrete Batching, June 2006
317	Davis Corn Cutters #1	3.00000	0.06700	0.06700	0.06700	0.20100	0.20100	0.20100	0.88038	0.88038	0.88038	Baghouse	89%	0.096	0.096	0.096	No EF under scc code. Used EF for 30200817, hammermill for animal feed mills. EF controlled with cyclone
318*	Davis Corn Cutter #1 positive pneumatic transfer system: 4th FL	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004	0.004	0.013	AP-42 Chapter 11.12, Concrete Batching, June 2006
319	610 Collection conveyor	3.00000	0.00580	0.03400	0.06100	0.01740	0.10200	0.18300	0.07621	0.44676	0.80154	Baghouse	89%	0.008	0.049	0.087	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
						0.53111	1.37711	2.48239	2.32624	6.03172	10.87287		Total =	0.274	0.678	2.358	

			Unc EF (lb/ton)			Unc E (lb/hr)			Unc E (tpy)					Cont E (tpy)			EF Source
EU	Description	MHDR (tph)	PM2.5	PM10	PM	PM2.5	PM10	PM	PM2.5	PM10	PM	Control	Control %	PM2.5	PM10	PM	
320	Premium meal collection screw to greatwestern sifter	4.05000	0.00580	0.03400	0.06100	0.02349	0.13770	0.24705	0.10289	0.60313	1.08208	none	0%	0.102886	0.603126	1.082079	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain
321*	Positve pneumatic transfer to greatwestern sifter	4.05000	0.00034	0.00034	0.00099	0.00138	0.00138	0.00401	0.00603	0.00603	0.01756	Built into EF	0%	0.006031	0.006031	0.017562	AP-42 Chapter 11.12, Concrete Batching, June 2006
322*	Positve pneumatic transfer to Macrowave	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004468	0.004468	0.013009	AP-42 Chapter 11.12, Concrete Batching, June 2006
323	Macrowave feed in conveyor	3.00000	0.05800	0.03400	0.06100	0.17400	0.10200	0.18300	0.76212	0.44676	0.80154	Baghouse	89%	0.083071	0.048697	0.087368	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
324	Macrowave thermal treatment conveyor	3.00000	0.05800	0.03400	0.06100	0.17400	0.10200	0.18300	0.76212	0.44676	0.80154	none	0%	0.76212	0.44676	0.80154	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling

325	Macrowave feed out coneyor	3.00000	0.05800	0.03400	0.06100	0.17400	0.10200	0.18300	0.76212	0.44676	0.80154	Baghouse	89%	0.083071	0.048697	0.087368	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
326*	Positive pneumatic transfer to aspirator/cooler	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004468	0.004468	0.013009	AP-42 Chapter 11.12, Concrete Batching, June 2006
327	Macrowave aspirator cooler	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Baghouse	89%	0.000487	0.000487	0.001418	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
328*	Positive pneumatic transfer Macrowave asp/cool to storage	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004468	0.004468	0.013009	AP-42 Chapter 11.12, Concrete Batching, June 2006
329	Thermal Treatment screw feed in conveyor	3.00000	0.00580	0.03400	0.06100	0.01740	0.10200	0.18300	0.07621	0.44676	0.80154	Baghouse	89%	0.008307	0.048697	0.087368	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
330	Thermal Treatment screw feed in conveyor	3.00000	0.00580	0.03400	0.06100	0.01740	0.10200	0.18300	0.07621	0.44676	0.80154	Baghouse	89%	0.008307	0.048697	0.087368	AP- 42 Chapter 9.9.1 Table 9.9.1-1. Grain handling
331*	Positive pnematice transfer from thermal to mill	3.00000	0.00034	0.00034	0.00099	0.00102	0.00102	0.00297	0.00447	0.00447	0.01301	Built into EF	0%	0.004468	0.004468	0.013009	AP-42 Chapter 11.12, Concrete Batching, June 2006
						0.58677	0.65418	1.18091	2.57004	2.86530	5.17238		Total =	1.072151	1.269062	2.304104	

Summary:	De Minimis Levels	Unc E (tpy)	Cont E (tpy)
PM	25	16.05	4.663
PM10	15	8.90	1.947
PM2.5	10	4.90	1.347

*A controlled EF for Pneumatic transfer was used from AP-42 Chapter 11.12, Concrete Batching, June 2006. Using these emission factors should yield a conservative estimate of emissions because cement is finer than cornmeal and its emissions should be higher. No emission factors for PM2.5 were found so all PM10 emissions were considered PM2.5
(reason there is no control efficiency applied in the table for pnematic transfer)

EF	Control
267	C106
309*	C106
310*	C106
311	C110
312	C110
313	C110
314	C110
315	C110
316*	C107
317	C109
318*	C107
319	C110
320	none
321*	C106
322*	C106
323	C111
324	none
325	C111
326*	C106
327	C106
328*	C123
329	C111
330	C111
331*	C110

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

DEC 2 8 2017

Mr. Charles Schiwitz
EHS Manager
SEMO Milling, LLC
261 River Rd
Cape Girardeau, MO 63702

RE: New Source Review Permit - Project Number: 2017-09-017

Dear Mr. Schiwitz:

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.

If you have any questions regarding this permit, please do not hesitate to contact Jordan Hull, 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:jhj

Enclosures

c: Southeast Regional Office
PAMS File: 2017-09-017

Permit Number: 122017-012