

**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: 072020-015      Project Number: 2020-03-020  
Installation Number: 031-0112

Parent Company: SEMO Milling LLC

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


Installation Name: SEMO Milling LLC

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

Location Information: Cape Girardeau County, S21, T30N, R14E

Application for Authority to Construct was made for:  
Degerminator Upgrade, and Gentle Roller, Hominy Loop, System 4, and Great Western Loop updates. 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

\_\_\_\_\_  
July 30, 2020  
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."*

SEMO Milling LLC  
 Cape Girardeau County, S21, T30N, R14E

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

Table 1: Baghouse Controlled Equipment

Description	EU ID	Control ID	Description	EU ID	Control ID
Positive Pneumatic Transfer System	EU105	C152	Satake Degerminator #11 (1st Floor)	EU354	C155
Gentle Roller Cleaner	EU338	C154	Positive Pressure Pneumatic Transfer from 1st Floor Degerminators to Kice Primary Aspirators	EU122	C102
Positive Pneumatic Transfer from Grain Silos to EU338	EU339	C107	Kice Primary Aspirator and Cyclone Tailstock	EU259	C155
Positive Pneumatic Transfer for broken corn kernals to EU229	EU340	C125	Kice Primary Aspirator and Cyclone Tailstock	EU355	C155
Positive Pneumatic Transfer for clean corn kernals to EU236	EU341	C105	Positive Pressure Pneumatic Transfer from Kice Primary Aspirator to sifter	EU197	C110
Satake Degerminator #3 (4th Floor)	EU127	CY011	Positive Pressure Pneumatic Transfer from Sifter to Carrier Fluid Bag Dryer	EU356	C112
Satake Degerminator #4 (4th Floor)	EU128	CY011	Positive Pressure Pneumatic Transfer from Sifter to 4th Floor Degerminators	EU162	C104
Satake Degerminator #5 (4th Floor)	EU129	CY011	Positive pneumatic transfer system #7 Satake tailstock: 4th FL	EU316	C107
Satake Degerminator #1 (1st Floor)	EU125	C155 (new)	Positive Pressure Pneumatic Transfer from Degerminators to Tornesh Dryer	EU195	C155
Satake Degerminator #2 (1st Floor)	EU126	C155 (new)	Positive Pressure Pneumatic Transfer from Sifter to Davis Cutters	EU358	C108

**SPECIAL CONDITIONS:**

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

Satake Degerminator #6 (1st Floor)	EU266	C155 (new)	Positive Pressure Pneumatic System from Tornesh Dryer to Hominy	EU359	C102
Satake Degerminator #7 (1st Floor)	EU267	C155 (new)	Pneumatic Blower	EU179	C108
1st Floor Degerminator Screw Conveyor	EU350	C155 (new)	Pneumatic Line from C101 to EU230	EU361	C126
Satake Degerminator #8 (1st Floor)	EU351	C155	Pneumatic Line from C112 to EU112	EU362	C108
Satake Degerminator #9 (1st Floor)	EU352	C155	Pneumatic Line from Great Western Sifter to EU234	EU186	C101 and C110
Satake Degerminator #10 (1st Floor)	EU353	C155			

- B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications.
- C. 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.
- D. 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).
- E. 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.
- F. SEMO Milling LLC shall maintain a copy of the baghouse manufacturer's performance warranty on site.
- G. 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.

**SPECIAL CONDITIONS:**

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

2. 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](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: 2020-03-020  
Installation ID Number: 031-0112  
Permit Number: 072020-015

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

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

Cape Girardeau County, S21, T30N, R14E

REVIEW SUMMARY

- SEMO Milling LLC has applied for authority to undergo a Degerminator Upgrade, and Gentle Roller, Hominy Loop, System 4, and Great Western loop updates.
- The application was deemed complete on March 12, 2020.
- 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.
- Baghouses are being used to control the PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from 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/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 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

SEMO Milling, LLC operates a grain elevator in Scott City, Missouri. 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. SEMO Milling, LLC is considered a minor source for construction permits.

The following New Source Review permits have been issued to SEMO Milling LLC from the Air Pollution Control Program.

Table 3: Permit History

Permit Number	Description
072012-014	Installation of various equipment (degerminators, sifters, aspirators, etc.)
122014-006	Addition of handling equipment to existing product stream
032015-008	Installation of a corn/soy blending system
092016-017	Installation of sifting and enriching process for coarse cornmeal
122017-012	Addition of collecting, diverting, sifting, and milling processing
122017-012A	Control device updates
072018-001	Installation of new fine grinding and transfer system.

### PROJECT DESCRIPTION

SEMO Milling is instituting updates to their facility that will be broken down into five parts. This includes the Gentle Roller Update, Degerminator Upgrade, Hominy Loop Update, System 4 Loop Update, and Great Western Loop Update.

Table 2: Project Emission Unit List

EU ID	Description	Old MHDR	New MHDR	Control Device	Control Efficiency
EU105	Positive Pneumatic Transfer System	26	42	C152	99.5%
EU117	Part of Previous Cleaning System	17	0	N/A	N/A
EU118	Part of Previous Cleaning System	17	0	N/A	N/A
EU119	Part of Previous Cleaning System	17	0	N/A	N/A
EU120	Part of Previous Cleaning System	17	0	N/A	N/A
EU338	Gentle Roller Cleaner	N/A	40	C154	99.5%
EU339	Positive Pneumatic Transfer from Grain Silos to EU338	N/A	1	C107	99.5%
EU340	Positive Pneumatic	N/A	2	C125	99.5%

EU ID	Description	Old MHDR	New MHDR	Control Device	Control Efficiency
	Transfer for broken corn kernels to EU229				
EU341	Positive Pneumatic Transfer for clean corn kernels to EU236	N/A	40	C105	99.5%
EU127	Satake Degerminator #3 (4th Floor)	7	7	CY010	99.5%
EU128	Satake Degerminator #4 (4th Floor)	7	7	CY011	99.5%
EU129	Satake Degerminator #5 (4th Floor)	7	7	CY011	99.5%
EU125	Satake Degerminator #1 (1st Floor)	7	7	C155 (new)	99.5%
EU126	Satake Degerminator #2 (1st Floor)	7	7	C155 (new)	99.5%
EU266	Satake Degerminator #6 (1st Floor)	5	5	C155 (new)	99.5%
EU267	Satake Degerminator #7 (1st Floor)	5	5	C155 (new)	99.5%
EU350	1st Floor Degerminator Screw Conveyor	N/A	35	C155 (new)	99.5%
EU351	Satake Degerminator #8 (1st Floor)	N/A	5	C155	99.5%
EU352	Satake Degerminator #9 (1st Floor)	N/A	5	C155	99.5%
EU353	Satake Degerminator #10 (1st Floor)	N/A	5	C157	99.5%
EU354	Satake Degerminator #11 (1st Floor)	N/A	5	C155	99.5%
EU122	Positive Pressure Pneumatic Transfer from 1st Floor Degerminators to Kice Primary Aspirators	26	28	C102	99.5%
EU259	Kice Primary Aspirator and Cyclone Tailstock	20	14	C155	0%
EU355	Kice Primary Aspirator and Cyclone Tailstock	N/A	14	C155	0%
EU197	Positive Pressure Pneumatic Transfer from Kice Primary Aspirator to sifter	22	22	C110	99.5%
EU356	Positive Pressure Pneumatic Transfer from Sifter to Carrier Fluid Bag Dryer	N/A	18	C112	99.5%
EU357	Forseberg Sifter	N/A	27	none	0%
EU162	Positive Pressure Pneumatic Transfer from Sifter to 4th Floor	7	10	C104	99.5%



EU ID	Description	Old MHDR	New MHDR	Control Device	Control Efficiency
	Degerminators				
EU316	Positive pneumatic transfer system #7 Satake tailstock: 4th FL	4.75	4.75	C107	99.5%
EU195	Positive Pressure Pneumatic Transfer from Degerminators to Tornesh Dryer	9	9	C155	99.5%
EU358	Positive Pressure Pneumatic Transfer from Sifter to Davis Cutters	N/A	4	C108	99.5%
EU359	Positive Pressure Pneumatic System from Tornesh Dryer to Hominy	N/A	22	C102	99.5%
EU179	Pneumatic Blower	4	4	C108	99.5%
EU361	Pneumatic Line from C101 to EU230	N/A	0.5	C126	99.5%
EU362	Pneumatic Line from C112 to EU112	N/A	1.25	C108	99.5%
EU186	Pneumatic Line from Great Western Sifter to EU234	20	22.5	C101 and C110	99.5%

### **Gentle Roller Update**

SEMO Milling will install an enhanced corn cleaning system and components to create a higher quality and more uniform clean corn stream for more efficient milling operations. This new system replaces the following parts of the previous cleaning system: EU117, EU118, EU119, and EU120.

The "gentle roller" cleaning system will utilize raw uncleaned corn from existing storage silos EU090 and/or EU104 and be transferred from these storage silos using existing positive pneumatic transfer system EU105 to the new gentle roller cleaner EU338. Oversize and fine materials will be sieved from the incoming stream and reclaimed to the existing hominy feed system using a new positive pneumatic transfer EU339 to existing gravity collection spouting, as well as existing positive pneumatic transfer EU179. Thin and broken corn kernels will be separated and transferred to storage using a new positive pneumatic transfer EU340 to existing storage bin EU229 for storage, resale and transfer. Clean uniform corn kernels will be transferred via a new positive pneumatic transfer EU341 to the existing color sorter system conveyor EU236. This system will increase the overall throughputs specifically of inbound and outbound grain and feed shipments and may increase overall throughput capabilities of milling equipment. New Kice baghouse BH54 (control device ID C154) will also be added for primary control of particulate emissions from the gentle roller cleaning system.

### **Degerminator Upgrade**

SEMO Milling is also proposing to make changes to the degerming process at the facility. These changes will improve product flow efficiency by relocating the majority of the degerming equipment from the fourth floor to the first floor, but will not debottleneck the facility.

Degerminators #3, #4, and #5 (EU 127, 128, and 129) will remain in the same location. Degerminators #1, #2, #6, and #7 (EU 125, 126, 266, and 267) will be relocated to the first floor. Four new degerminators (EU351, 352, 353, and 354) will be installed on the first floor. A new screw conveyor (EU350) will distribute material to the degerminators.

Pneumatic Line 1 (EU122 - Tempered corn pneumatic transfer to Satakes: 4th floor) will be re-routed. Currently, this line flows from the tempered corn bin (EU155) to the degerminator distribution screw conveyor (EU089). After the project, this pneumatic line will instead run from the first floor degerminators to an existing aspirator (EU259) and a new aspirator (EU355).

Pneumatic Line 2 (EU197) will not change; however, the facility has determined the Pneumatic Lines 2 and 3 were previously grouped under a single emission unit ID and should be split apart. Therefore, Pneumatic Line 3 will be assigned a new emission unit ID (EU356). EU197 runs from an airlock below the aspirators (EU259 and EU355) to an existing Forseberg sifter that will be assigned a new emission unit ID of EU357 (this unit was not previously assigned an EUID).

Pneumatic Line 4 (EU162) will be re-routed. This line currently runs from the Forseberg sifter (EU 357) to the Davis Cutters (EU317). After this project, this pneumatic line will run from EU357 back to the degerminator distribution screw conveyor (EU089).

Pneumatic Line 6 (EU195) will receive additional material. This line currently runs from the fourth floor degerminators to the outdoor Tornesh Dryer (EU196). After this project, this pneumatic line will collect material from both the fourth floor and first floor degerminators and carry them to the Tornesh Dryer.

A new pneumatic line, Pneumatic Line 7 (EU358) will be installed as part of this project. EU358 will run from existing sifter (EU178) to the Davis Cutters (EU317).

A new pneumatic line, Pneumatic Line 8 (EU359) will be installed as part of this project. EU359 will collect material from the Tornesh Dryer (EU196) and carry it to the hominy scale (EU112).

A new baghouse, C155, will be installed as part of this project. C155 will control emissions from the aspirators (EU259 and EU 346) and the first floor degerminators (EU125, 126, 266, 267, 342, 343, 344, and 345).

### **Hominy Loop Update**

Currently, hominy reclaim is served by a single pneumatic blower (EU179) in a closed loop. EU179 currently collects material from baghouse C101, as well as several surge hoppers, and transports it to the hominy scale (EU 112). Under this project, the hominy

reclaim will be split into two pneumatic lines. EU179 will still collect material from the surge hoppers and deliver it to the hominy scale, however, it will no longer collect material from baghouse C101. Material from baghouse C101 will be delivered via a new pneumatic line (EU361) straight to the NW hominy storage bin (EU230), bypassing the hominy scale.

#### **System 4 Loop Update**

Positive pressure pneumatic transfer line EU356 currently runs from an airlock below Forsberg sifter EU357 to the Carrier Fluid Bed Drying System (EU243). Previously this loop would also collect output from filter C112 and convey it on to the hominy scale (EU112). Now this loop will be split into two. EU356 will end at the cyclone above the Carrier Fluid Bed Drying System (EU243) and a new pneumatic line (EU362) will deliver material collected from C112 to the hominy scale (EU112). This update will increase reliability of the loop when it undergoes temporary surge conditions.

#### **Great Western Loop Update**

Current pneumatic line EU186 pulls material from a cyclone above the Great Western Sifter and airlock below the Great Western Sifter and delivers it to the surge bin/bag packer (EU234). EU186 does not currently have a dedicated blower, and instead receives positive pressure from one of the three other blowers on the loop (EU 188, 201, and 205). Now, EU186 will be receiving a dedicated blower. EU186 will still collect material from the airlock below the Great Western Sifter and deliver it to EU234. Material from the cyclone above the Great Western Sifter will no longer be connected to EU186 and will instead be conveyed straight to baghouse C112.

The installation has requested confidentiality for the MHDRs, recipes, and raw material names. Confidentiality was granted based upon 10 CSR 10-6.210, Confidential Information. This is the redacted public version of the permit. The confidential version has project number 2019-10-026. The installation requested that portions of the project description be held confidential. This information is contained in the confidential documentation under project number 2020-03-0281.

### EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Ch. 9.9.1. Headhouse and Grain Handling, Grain Cracker, Rice Aspirator, and Grain Cleaning – Internal Vibrating (May, 2003). For the Grain Cracker emission factor, a PM distribution of 0.5 for PM<sub>10</sub> and 0.138 PM<sub>2.5</sub> were used in accordance with AP-42 Appendix B.1, B.2, and B.3. For the Rice Aspirator emission factor, a PM distribution of 0.5 for PM<sub>10</sub> and 0.138 PM<sub>2.5</sub> were used in accordance with AP-42 App B.1.

Pneumatic transfer operations at the facility have been given the “headhouse and grain handling” emission factor from Table 9.9.1-1 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200530). This emission factor “represents dust emissions from bin and basement conveyors, internal cleaners not vented to the atmosphere, scales, garners, legs and distributors.”

For the new gentle roller corn cleaner, the “headhouse and grain handling” emission factor from Table 9.9.1-1 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200530) was used. This emission factor is the best fit, as it “represents dust emissions from bin and basement conveyors, internal cleaners not vented to the atmosphere, scales, garners, legs and distributors.” and the gentle roller is an internal cleaner.

The degerminators were given the “grain cracker” emission factor from Table 9.9.1-2 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200819). This is consistent with the emission factors utilized for the degerminators in the facility’s 2012 permit. The AP-42 emission factor for grain cracking only provides a value for PM, but states that PM<sub>10</sub> emission factors can be estimated by taking 50% of the filterable PM emission factor. An emission factor for PM<sub>2.5</sub> was derived by utilizing the particulate size distribution in AP-42 Appendix B.1 for grain unloading in country elevators.

For screw conveyors, the “headhouse and grain handling” emission factor from Table 9.9.1-1 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200530) was used. This emission factor “represents dust emissions from bin and basement conveyors, internal cleaners not vented to the atmosphere, scales, garners, legs and distributors.”

For the aspirators, the “rice aspirator” emission factor from Table 9.9.1-2 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200777) was used.

For the sifter, the “grain cleaning -internal vibrating” emission factor from Table 9.9.1-1 of AP-42 Chapter 9.9.1, *Grain Elevators and Processes* (SCC 30200537) was used. This is a controlled emission factor that includes a built-in cyclone. While the sifting process is not a grain cleaning process, the sifter separates material by grain size through the use of several stacked vibrating screens; therefore, its design is similar to the vibrating screen used in a traditional grain drying process.

The baghouses were given a capture efficiency and control efficiency of 99% for all sources of PM. This aligns with the standard for the Air Pollution Control Program as well as the baghouse manufacturers’ specifications.

Table 4 provides an emissions summary for this project. Existing potential emissions were taken from previous permit 072018-001. Existing actual emissions were taken from the installation’s 2017 EIQ. Potential emissions of the application represent the potential of the new and modified equipment, assuming continuous operation (8760 hours per year).

Table 4: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2017 EIQ)	Potential Emissions of the Project
PM	25.0	N/D	N/D	9.68
PM <sub>10</sub>	15.0	28.10	5.79	2.86
PM <sub>2.5</sub>	10.0	7.44	3.47	0.47
SO <sub>x</sub>	40.0	0.08	5.3 x 10 <sup>-3</sup>	N/A

NOx	40.0	5.25	0.37	N/A
VOC	40.0	0.69	0.05	N/A
CO	100.0	4.48	0.32	N/A
HAPs	10.0/25.0	0.48	N/A	N/A

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

Potential emissions for this project were determined by totaling the post project potential emissions of all new and modified equipment. This controlled total is below the insignificant levels for all pollutants, therefore, the pre-project potential to emit was not subtracted. Even though the controlled emissions of the project are below the insignificant levels for each criteria pollutant, a permit is required in order to establish the control equipment.

### 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

- *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

- No NSPSs, NESHAPs, or MACTs apply to the permitted equipment.

## 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 February 26, 2020, received March 12, 2020, designating SEMO Milling LLC as the owner and operator of the installation.

## 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	



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

July 30, 2020

Charles Schiwitz  
EHS Manager  
SEMO Milling LLC  
261 River Road  
Scott City, MO 63780

RE: New Source Review Permit - Project Number: 2020-03-020

Dear Charles 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 and your new source review permit application are 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).





Charles Schiwitz  
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If you have any questions regarding this permit, please do not hesitate to contact Dakota Fox 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, appearing to read 'S Heckenkamp', is written over the typed name.

Susan Heckenkamp  
New Source Review Unit Chief

SH:ra

Enclosures

c: Southeast Regional Office  
PAMS File: 2020-03-020

Permit Number: 072020-015