



INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2006-032
Expiration Date: JUN 14 2011
Installation ID: 033-0013
Project Number: 2002-11-168

Installation Name and Address

Agriservices of Brunswick, LLC.
Highway 24 West
P.O. Box 38
Brunswick, MO 65236
Carroll County

Parent Company's Name and Address

Agriservices of Brunswick, LLC.
Highway 24 West
Brunswick, MO 65236

Installation Description:

AGRIServices of Brunswick, LLC. Formerly Brunswick River Terminal, Inc., is operating a grain and fertilizer processing plant located four (4) miles west of Brunswick, Missouri on Highway 24. The installation's process operations include: grain and fertilizer storage and handling and corn storage.

JUN 15 2006

Effective Date

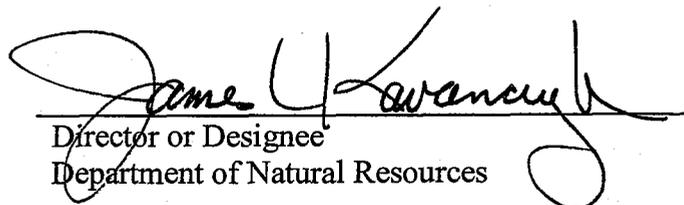

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

AGRIServices of Brunswick, LLC. Formerly Brunswick River Terminal, Inc., is operating a grain and fertilizer processing plant located four (4) miles west of Brunswick, Missouri on Highway 24.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	14.49	-	0.83	0.23	0.14	-	-
2003	12.41	0.01	0.36	0.23	0.06	-	-
2002	15.19	-	0.44	0.23	0.08	-	-
2001	16.00	-	0.44	0.23	0.08	-	-

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	Emission Point Number
EU0001	Grain Receiving Truck Dump	EP01
EU0002	Grain Loadout Truck	EP02
EU0003	Grain Rail Load Out – Elevator	EP03
EU0004	Grain Dryer	EP04
EU0005	Corn Screen Cleaner/Loadout	EP05
EU0006	Corn Whopper Loadout	EP06
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)	EP07
EU0008	Grain Loadout Barge	EP08
EU0009	Grain Barge Conveyor -Loadout	EP09
EU0010	Barge Unloading – Fertilizer Hopper	EP10
EU0011	Barge Receiving – Fertilizer Conveyor	EP11
EU0012	Fertilizer Receiving Rail	EP12
EU0013	Fertilizer Receiving Conveyor	EP13
EU0014	Fertilizer Loadout Hopper (Both Loadouts)	EP14
EU0015	Fertilizer Loadout (Truck, Both Loadouts)	EP15
EU0016	Fertilizer Loadout – Open Hopper #2	EP16
EU0017	Fertilizer Loadout Spout #2	EP17
EU0019	Haul Road	EP19
EU0020	Fertilizer Receiving (Retail)	EP20
EU0021	Fertilizer Weight Hopper (Retail)	EP21
EU0022	Fertilizer Mixing and Blending	EP22
EU0023	Fertilizer Loadout	EP23
EU0024	Grain Shipping into Trucks – Temp	EP24
EU0025	Grain Receiving from Straight Trucks – Temp	EP1a
EU0026	Grain Shipping into Trucks – Temp	EP2a

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>	<u>Emission Point Number</u>
7989.11 m ³ Diesel Storage Tank	EP18

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 1086-002
- 2) Construction Permit 1086-003
- 3) Construction Permit 082002-008

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Permit Condition PW001

Voluntary Limitation

Emission Limitation:

The permittee shall not exceed for the entire installation more than 500,000 tons throughput of dry fertilizer during any consecutive 12-month period.

Monitoring, Recordkeeping:

- 1) The permittee shall maintain an accurate record of receipts of dry fertilizer.
- 2) The permittee shall record the monthly total of dry fertilizer with a consecutive 12-month total (See Attachment A).
- 3) The permittee shall maintain these records on site for the most recent 60 months.
- 4) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 500,000 tons of dry fertilizer.

Permit Condition PW002

10 CSR 10-6.060 Construction Permits Required

Construction Permit 1086-002

Emission Limitation:

The permittee shall not exceed for the entire installation more than 45,000 tons throughput of grain during any consecutive 12-month period.

Monitoring, Recordkeeping:

- 1) The permittee shall maintain an accurate record of receipts of grain.
- 2) The permittee shall record the monthly total of grain with a consecutive 12-month total (See Attachment A).
- 3) The permittee shall maintain these records on site for the most recent 60 months.
- 4) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 45,000 tons of grain.

Permit Condition PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 1086-003

Emission Limitation:

The permittee shall not exceed for the entire installation more than 60,000 tons throughput of corn during any consecutive 12-month period.

Monitoring, Recordkeeping:

- 1) The permittee shall maintain an accurate record of receipts of corn.
- 2) The permittee shall record the monthly total of corn with a consecutive 12-month total (See Attachment A).
- 3) The permittee shall maintain these records on site for the most recent 60 months.
- 4) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 60,000 tons of corn.

II. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0001, EU0002, EU0003 AND EU0024 - GRAIN RECEIVING OR SHIPPING INTO RAILROAD OR TRUCK			
Emission Unit	Description	Manufacturer/ Model #	EQ Reference #
EU0001	Grain Unloading (Receiving) from Straight Trucks	Unknown	EP01
EU0002	Grain Loading (Shipping) into Trucks of Unspecified Type	Unknown	EP02
EU0003	Grain Loading (Shipping) into Railcars	Unknown	EP03
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)	Unknown	EP07
EU0024	Grain Loading (Shipping) from Temporary Storage Pile to Trucks of unspecified Type	Unknown	EP24
EU0025	Grain (Unloading) Receiving from Temporary Storage Pile to Straight Trucks	Unknown	EP1a
EU0026	Grain Shipping (Loading) into Trucks from Temporary Storage Pile	Unknown	EP2a

Permit Condition [(EU0001 – EU0003), (EU0007) and (EU0024 – EU0026)] -001
 10 CSR 10-6.220
Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%. [*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.

- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions (See Attachment C).
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition (See Attachment D).
- 4) Attachments B, C and D contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0008 through EU0009 - GRAIN RECEIVING OR SHIPPING INTO BARGE

Emission Unit	Description	Manufacturer/Model #	EQ Reference #
EU0008	Grain Loadout Barge	Unknown	EP08
EU0009	Grain Barge Conveyor - Loadout	Unknown	EP09

Permit Condition (EU0008 through EU0009) -001

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0008 through EU0009 in excess of the emission rates listed in the following table:

Emission Unit	Allowable Emission Rate (lb/hr)
EU0008	63.0
EU0009	63.0

- 2) These emission rates were calculated using the following equation:

For process weight rates of 60,000 lb/hr or more:

$$E = 55.0P^{0.11} - 40$$

Where: E = rate of emission in lb/hr and

P = process weight rate in tons/hr

- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases

Monitoring/Record Keeping/Reporting:

The permittee is assumed always to be in compliance with this regulation. Calculations demonstrating compliance are in Attachment F. The permittee shall keep this attachment with this permit. No monitoring, additional record keeping, or reporting is required for this permit condition.

Permit Condition (EU0010 through EU0017 and EU0020 through EU0023) -002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%. [*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the

observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.

- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions (See Attachment C).
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition (See Attachment D).
- 4) Attachments B, C and D contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0005 through EU0006 – CORN SHIPPING INTO TRUCKS			
Emission Unit	Description	Manufacturer/Model #	EQ Reference #
EU0005	Corn Screen Cleaner / Unloading (Shipping) into Trucks of Unspecified Type	Unknown	EP05
EU0006	Corn Whopper / Unloading (Shipping) into Trucks of Unspecified Type	Unknown	EP06

Permit Condition (EU0005 through EU0006) -001

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0005 through EU0006 in excess of the emission rates listed in the following table:

Emission Unit	Allowable Emission Rate (lb/hr)
EU0005	63.0
EU0006	59.8

- 2) These emission rates were calculated using the following equation:

For process weight rates of 60,000 lb/hr or more:

$$E = 55.0P^{0.11} - 40$$

Where: E = rate of emission in lb/hr and
 P = process weight rate in tons/hr

- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases

Monitoring/Record Keeping/Reporting:

The permittee is assumed always to be in compliance with this regulation. Calculations demonstrating compliance are in Attachment F. The permittee shall keep this attachment with this permit. No monitoring, additional record keeping, or reporting is required for this permit condition.

Permit Condition (EU0010 through EU0017 and EU0020 through EU0023) -002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%. [*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions (See Attachment C).
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition (See Attachment D).
- 4) Attachments B, C and D contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These records shall be maintained for five years.

Reporting:

- 3) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 4) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0004 – GRAIN DRYER			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0004	Grain Dryer – Column Type	Unknown	EP04

Permit Condition EU004-001

10 CSR 10-3.060

Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.60 pounds per million BTU of heat input.

Operation Limitation/Equipment Specifications:

This emission unit shall be limited to burning propane.

Monitoring/Record Keeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment E).
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0010, EU0011, EU0012, EU0013, EU0014, EU0015, EU0016, EU0017, EU0020, EU0021, EU0022 AND EU0023 - FERTILIZER RECEIVING OR SHIPPING			
Emission Unit	Description	Manufacturer /Model #	EQ Reference #
EU0010	Barge Unloading – Fertilizer Hopper	Unknown	EP10
EU0011	Barge Receiving – Fertilizer Conveyor	Unknown	EP11
EU0012	Fertilizer Receiving Rail	Unknown	EP12
EU0013	Fertilizer Receiving Conveyor	Unknown	EP13
EU0014	Fertilizer Loadout Hopper (Both Loadouts)	Unknown	EP14
EU0015	Fertilizer Loading (Truck, Both Loadouts)	Unknown	EP15
EU0016	Fertilizer Loadout – Open Hopper #2	Unknown	EP16
EU0017	Fertilizer Loadout Spout #2	Unknown	EP17
EU0020	Fertilizer Receiving (Retail)	Unknown	EP20
EU0021	Fertilizer Weight Hopper (Retail)	Unknown	EP21
EU0022	Fertilizer Mixing and Blending (Retail)	Unknown	EP22
EU0023	Fertilizer Loadout (Retail)	Unknown	EP23

Permit Condition [(EU0010 through EU0017) and (EU0020 through EU0023)] -001
 10 CSR 10-6.400
Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

1) Particulate matter shall not be emitted from EU0010 through EU0017 and EU0020 through EU0023 in excess of the emission rates listed in the following table:

Emission Unit	Allowable Emission Rate (lb/hr)
EU0010	58.5
EU0011	58.5
EU0012	69.0
EU0013	69.0
EU0014	66.3
EU0015	66.3
EU0016	69.0
EU0017	69.0
EU0020	43.6
EU0021	43.6
EU0022	43.6
EU0023	43.6

2) These emission rates were calculated using the following equation:

For process weight rates of 60,000 lb/hr or more:

$$E = 55.0P^{0.11} - 40$$

Where: E = rate of emission in lb/hr and
 P = process weight rate in tons/hr

- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases

Monitoring/Record Keeping/Reporting:

The permittee is assumed always to be in compliance with this regulation. Calculations demonstrating compliance are in Attachment F. The permittee shall keep this attachment with this permit. No monitoring, additional record keeping, or reporting is required for this permit condition.

Permit Condition (EU0010 through EU0017 and EU0020 through EU0023) -002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 3) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%. [*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 4) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- b) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- c) The following monitoring schedule must be maintained:
- 5) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
- 6) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
- 7) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 8) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment B), noting:
- a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions (See Attachment C).
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition (See Attachment D).

- 4) Attachments B, C and D contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These records shall be maintained for five years.

Reporting:

- 5) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 6) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0019 – HAUL ROAD			
Emission Unit	Description	Manufacturer/Model #	EQ Reference #
EU0019	Haul Road	Unknown	EP19

Permit Condition EU0019-001

10 CSR 10-6.060 Construction Permits Required

Construction Permit 2002-07-175

Operational/Equipment Limitation:

- 1) The permittee shall control the emission of PM₁₀ from the unpaved haul road consistently and correctly using the application of a water spray on the haul road.
- 2) This periodic watering shall be applied whenever conditions exist that would allow visible fugitive emissions from the haul road to enter the ambient air beyond the property boundaries.

Monitoring/Recordkeeping:

- 1) Water sprays systems shall operate within a pressure range that provides adequate wetting of the haul road and shall be inspected quarterly to confirm usage and that no visible emissions are generated at the haul road. These inspections shall be documented and maintained on site for five years.
- 2) Water sprays shall be calibrated at least quarterly. These calibrations shall be documented and maintained on site.
- 3) The permittee shall maintain records of water spray calibrations.
- 4) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 5) These records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by the permit conditions, or any malfunction, which causes a deviation from or exceedance of the conditions of this permit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph (a.) information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt AGRIServices of Brunswick, LLC. -West from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

10 CSR 10-6.100, Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

**10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants
40 CFR Part 61 Subpart M, National Emission Standard for Asbestos**

1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

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- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
 - 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";

- ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

III. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- I) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- II) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102,
 - b) The permittee shall submit a report of all required monitoring by:
 - 1) October 1st for monitoring which covers the January through June time period, and
 - 2) April 1st for monitoring which covers the July through December time period.
 - 3) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - e) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
- iv) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- f) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- g) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirement

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065,§(5)(C)1,§(5)(C)3,§(6)(C)3.B, and§(6)(C)3.E.(I)–(III) and (V)–(VI) Compliance Requirements

- I) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

- II) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
- a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- III) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
- A) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - B) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- IV) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
- A) The identification of each term or condition of the permit that is the basis of the certification,
 - B) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
 - C) Whether compliance was continuous or intermittent,
 - D) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
 - E) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- I) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency.

This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

- II) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- I) Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
- A) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - B) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - C) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - D) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this was signed by Brian Hayes, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened with cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

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- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

ATTACHMENT D Method 9 Opacity Observations

Company:	Observer:
Location:	Observer Certification Date:
Date:	Emission Unit:
Time:	Control Device:

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Start	End

Readings ranged from _____ to _____ % opacity.
 Was the emission unit in compliance at the time of evaluation? Yes No

Signature of Observer

Attachment E
Calculations Demonstrating Compliance with Permit Condition EU0004 -001

This attachment may be used to demonstrate compliance with 10 CSR 10-3.060 *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

Emission Limit for EU0004

0.6 lb/MMBtu/hr for existing units < 10 MMBtu/hr

0.915 MMBtu/hr * 0.6 lb/MMBTU/hr = 0.55 lb/hr

The following equipment was used to obtain the total heat input (Q) for the above equation:

Equipment	Heat Input (MMBtu/hr)
Grain Dryer (EU0004)	0.915
TOTAL	0.915

The following table demonstrates compliance with the emission limit:

Emission Rate (lb/hr) = MHDR*Emission Factor/Heat Capacity (mmBtu/hr)

Emission Unit #	Heat Capacity ¹	Maximum Hourly Design Rate	PM Emission Factor	Emission Factor Reference	Potential Emission Rate	Emission Rate Limit
EU0004 (propane)	.915 (MMBtu/hr)	0.01 (10 ³ gal)/hr	0.6 lb/(10 ³ gal)	AP-42 Table 1.5-1	0.006 (lb/MMBtu)	0.55 (lb/MMBtu)

¹ Max. design rate in volume basis = 0.01 (10³/hr); converted to energy basis by multiplying by heating value of 91.5 MMBtu/10³ gal for propane (AP-42 1.5-1)

ATTACHMENT F

This attachment may be used to demonstrate that emission units EU0010 through EU0017 and EU0020 through EU0023 are in compliance with Permit Condition [(EU0010 through EU0017) and (EU0020 through EU0023)] -001.

This permit condition is based on 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*.

Limitation on Pounds per Hour of PM₁₀ Emissions

Emission Unit #	Description	MHDR/Process Weight Rate (tons/hr)	Overall Control Efficiency (%)	Potential PM ₁₀ Emission Rate (lb/hr)	Allowable PM ₁₀ Emission Rate (lb/hr)	In Compliance?
EU0010	Barge Unloading – Fertilizer Hopper	200	0	4.0	58.5	YES
EU0011	Barge Receiving – Fertilizer Conveyor	200	0	4.0	58.5	YES
EU0012	Fertilizer Receiving Rail	500	0	10.0	69.0	YES
EU0013	Fertilizer Receiving Conveyor	500	0	10.0	69.0	YES
EU0014	Fertilizer Loadout Hopper (Both Loadouts)	400	0	8.0	66.3	YES
EU0015	Fertilizer Loading (Truck, Both Loadouts)	400	0	8.0	66.3	YES
EU0016	Fertilizer Loadout – Open Hopper #2	500	0	10.0	69.0	YES
EU0017	Fertilizer Loadout Spout #2	500	0	10.0	69.0	YES
EU0020	Fertilizer Receiving (Retail)	45	0	0.9	43.6	YES
EU0021	Fertilizer Weight Hopper (Retail)	45	0	0.9	43.6	YES
EU0022	Fertilizer Mixing and Blending (Retail)	45	0	0.9	43.6	YES
EU0023	Fertilizer Loadout (Retail)	45	0	0.9	43.6	YES
EU0008	Grain Loadout Barge	300	0	1.2	63.0	YES
EU0009	Grain Barge Conveyor - Loadout	300	0	1.2	63.0	YES
EU0005	Corn Screen Cleaner / Unloading (Shipping) into Trucks	300	0	8.70	63.0	YES
EU0006	Corn Whopper / Unloading (Shipping) into Trucks	225	0	6.52	59.8	YES

The Maximum Hourly Design Rates (MHDR), Overall Control Efficiencies and Emission Factors are taken from the 2004 Emission Inventory Questionnaire.

The Potential PM₁₀ Emission Rates are calculated using the following equation:

$$\text{Potential PM}_{10} \text{ Emission Rate} = \text{MHDR} \times \text{Emission Factor} \times (100\% - \text{Overall Control Efficiency})$$

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received November 18, 2002
- 2) 2004 Emissions Inventory Questionnaire, received March 14, 2005;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

On Form OP-A03, the permittee indicated that 10 CSR 10-3.060 was not applicable to the installation. However, the installation operates a propane-fired column grain dryer, with a Maximum Hourly Design Rate (MHDR) of 0.915 MMBTU/hr. Although no information was received in either the permit application or the 2004 Emissions Inventory Questionnaire regarding the column dryer as a direct or indirect heating source, it is assumed to be an indirect heating source. It is typically recommended by dryer manufacturers that the products of combustion should not come into contact with any food-grade items such as grain.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-3.050 *Restriction of Emission of Particulate Matter from Industrial Processes* was included in the previous operating permit. This regulation was rescinded on March 30, 2001 and replaced with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*, which is included in this permit.
- 2) 10 CSR 10-3.080 *Restriction of Emission of Visible Air Contaminants* was included in the previous operating permit. This regulation was rescinded on May 30, 2000 and replaced with 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*, which is included in this permit.

- 3) 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* does not apply to the following sources because of the exemption in Section (B)3 “ The receiving and shipping of whole grain from or into a railroad or truck transportation source at a grain elevator”:

Emission Unit	Description
EU0001	Grain Unloading (Receiving) from Straight Trucks
EU0002	Grain Loading (Shipping) into Trucks of Unspecified Type
EU0003	Grain Loading (Shipping) into Railcars
EU0007	Grain Receiving from Hopper Trucks (To Load Barge)
EU0024	Grain Loading (Shipping) from Temporary Storage Pile to Trucks of unspecified Type
EU0025	Grain (Unloading) Receiving from Temporary Storage Pile to Straight Trucks

Construction Permit Revisions

The following revisions were made to construction permits for this installation:
None.

New Source Performance Standards Applicability

None.

Maximum Available Control Technology Applicability

None.

National Emission Standards for Hazardous Air Pollutants Applicability

None.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that meets all of the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

This regulation is not applicable because the installation does not have pre-control emissions that exceed or are equivalent to the major source thresholds. The potential to emit is limited by requirements found in the construction permits issued to the installation.

Other Regulatory Determinations

None.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the ACP a schedule for achieving compliance for that regulation(s).

Prepared by:



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