

STATE OF MISSOURI

PERMIT BOOK



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: 022007 - 005 Project Number: 2006-12-003

Parent Company: Still Gin and Grain, Inc.

Parent Company Address: 110 Michie St., Steele, MO 63877

Installation Name: Still Gin and Grain, Inc.

Installation Address: 110 Michie St., Steele, MO 63877

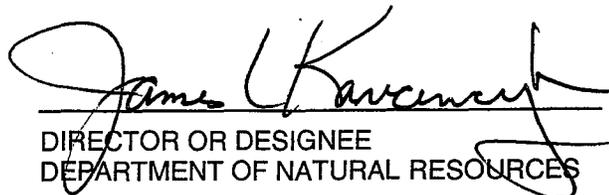
Location Information: Pemiscot County, S26, T17N, R11E

Application for Authority to Construct was made for:  
Still Gin and Grain, Inc. requested a re-evaluation of emission factors used in permit 0794-015. This change allowed the annual bale limit to be removed. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

FEB - 9 2007

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant 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 at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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Permit No.	
Project No.	2006-12-003

### SPECIAL CONDITIONS:

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

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Still Gin and Grain, Inc.  
Pemiscot County, S26, T17N, R11E

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 0794-015) from the Air Pollution Control Program.
2. **Control Device Requirement – Cyclones**
  - A. The cyclones must be in use at all times on all exhausts when this plant is in operation and shall be operated and maintained in accordance with the manufacturer's specifications.
  - B. Still Gin and Grain, Inc. shall maintain an operating and maintenance log for the cyclone that shall include the following:
    - 1) Incidents of malfunction: with impact on emissions, duration of event, probable cause and corrective actions.
    - 2) Maintenance activities: with inspection schedule, repair actions and replacements, etc.
3. **Fugitive Emission Control Requirement**  
Still Gin and Grain, Inc. shall water all haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2006-12-003  
Installation ID Number: 155-0024  
Permit Number:

Still Gin and Grain, Inc.  
110 Michie St.  
Steele, MO 63877

Complete: 11/30/06  
Reviewed: 12/13/06

Parent Company:  
Still Gin and Grain, Inc.  
110 Michie St.  
Steele, MO 63877

Pemiscot County, S26, T17N, R11E

REVIEW SUMMARY

- Still Gin and Grain, Inc. has applied for authority to increase their annual bale limit.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Cyclones are being used to control the PM<sub>10</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 PM<sub>10</sub> are below de minimis levels.
- This installation is located in Pemiscot County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- 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.
- A Basic Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Still Gin and Grain, Inc. is an existing source, emitting less than 15 tons of PM<sub>10</sub> per year. Seed cotton is brought to the gin in large modules. A module feeder removes some large debris and separates these modules. From the module feeder, the seed cotton is pneumatically conveyed to cleaners and dryers and is then sent to a gin stand. An overhead screw auger feeds the gin stands at a controlled rate. The gin stands separate the seeds from the lint using rotation saws. The cottonseed is pneumatically conveyed to a seed house for storage. The lint is cleaned and condensed into uniform bales. Still Gin and Grain, Inc. processes 12 bales per hour.

The following permits have been issued to Still Gin and Grain, Inc. from the Air Pollution Control Program.

Permit Number	Description
0794-015	Install Mote Press

### PROJECT DESCRIPTION

In 1994, Still Gin and Grain Inc. applied for authority to construct a mote press at their existing cotton gin. The mote press takes trash from the lint cleaner, separates the remaining lint and condenses it into mote bales. A permit (0794-015) was issued limiting the gin to 20,000 bales per year, which equated to approximately 15 tons of PM<sub>10</sub> from the installation according to the 1994 AP-42 emission factors. Still Gin and Grain has requested that the Air Pollution Control Program re-evaluate their emissions using the current AP-42 emission factors.

Permit 0794-015 incorrectly limits the entire installation to 15 tons of PM<sub>10</sub>. Section (5) requires that the net emissions increase not exceed the *de minimis* levels. Permit 0794-015 should have limited emissions from the mote press to 15 tons of PM<sub>10</sub>.

The emission points associated with the mote press are the mote fan (EP-8) and the mote trash fan (EP-9.) Upon re-evaluation, potential emissions from the mote press are now below *de minimis* levels. Because the net emission increase is below *de minimis* levels, no emission limit is needed, and this permit will remove the emission limit in permit # 0794-015.

## EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.7 Supplement B, June 1996. Potential emissions of the application represent the potential of the mote press, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	*Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	**Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	36.24	8.64	7.93	N/A
SO <sub>x</sub>	40.0	N/D	0.00	N/A	N/A
NO <sub>x</sub>	40.0	N/D	0.11	N/A	N/A
VOC	40.0	N/D	0.01	N/A	N/A
CO	100.0	N/D	0.09	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

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

\*Existing Potential Emissions are from the unconditioned-grandfathered equipment.

\*\*Emissions are from the mote fan (EP-8) and the mote trash fan (EP-9.)

The Existing Potential Emissions were recalculated using current AP-42 emission factors and assuming continuous operation. The Potential Emissions of the Application are from the emission points in permit number 0794-015, the mote fan (EP-8) and the mote trash fan (EP-9.)

The following table lists the installations emission points and their corresponding emission factor.

Table 2: Emission Points at 155-0024

Emission Point Number	Description	AP-42 Emission Factor*
EP-1	Unloading	0.12
EP-2	#1 Dryer	0.12
EP-3	#2 Dryer	0.093
EP-4	Overflow Fan	0.026
EP-5	Lint Cleaner	0.24
EP-6	Battery Condenser	0.014
EP-7	Mote Fan	0.13
EP-8	Mote Trash Fan	0.021
EP-9	Master Trash Fan	0.074
EP-10	Dryer Heater	N/A
EP-11	Haul Road	1.36**

\*Emission factor units are pounds of PM<sub>10</sub> per bale of lint cotton

\*\*The haul road emission factor unit is pounds of PM<sub>10</sub> per vehicular mile traveled.

## 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 PM<sub>10</sub> are below de minimis levels.

## APPLICABLE REQUIREMENTS

Still Gin and Grain, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *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 10-3.090*

### SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260*
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-3.060*

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Michael Mittermeyer  
Environmental Engineer

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Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 11/25/2006, received 11/30/2006, designating Still Gin and Grain, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Mr. Kevin Still  
President  
Still Gin and Grain, Inc.  
110 Michie St.  
Steele, MO 63877

RE: New Source Review Permit - Project Number: 2006-12-003

Dear Mr. Still:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

Kendall B. Hale  
New Source Review Unit Chief

KBH:mml

Enclosures

c: Southeast Regional Office  
PAMS File 2006-12-003

Permit Number: