

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 **07 2007 - 006**

Project Number: 2007-04-022

Parent Company: Consolidated Grain and Barge

Parent Company Address: 201 Missouri Ave.  
Mound City, IL 62963

Installation Name: Consolidated Grain and Barge

Installation Address: County Road 337  
Caruthersville, MO 63830

Location Information: Pemiscott County, S18, T1, R12

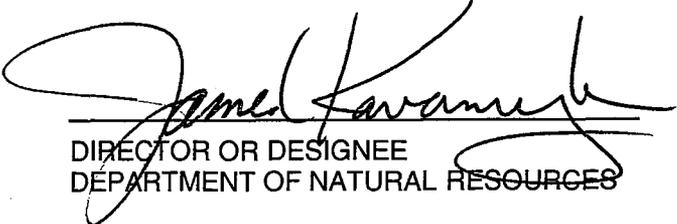
Application for Authority to Construct was made for the installation of a new Dryer, a new 100,000 bushels bin, a new 613,000 bushels bin, a new dry leg and 6 different type of conveyors. This review was conducted in accordance with Section (Section 5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

JUL 23 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 two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

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

You must notify the department's Air Pollution Control Program of the anticipated date of start up of 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 Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, Attention: Construction Permit Unit.

STATE OF MISSOURI



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EFFECTIVE DATE

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DIRECTOR OR DESIGNEE  
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Permit No.	
Project No.	2007-04-022

**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."*

Consolidated Grain and Barge  
Pemiscott County, Section 18, Township 1, Range 12

1. Emission Limitation
  - A. Consolidated Grain and Barge shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM<sub>10</sub>) in any consecutive 12 month period from the equipment of this project.
  - B. Consolidated Grain and Barge shall maintain an accurate record of PM<sub>10</sub> emitted into the atmosphere from the entire installation. Attachment A or an equivalent form shall be used for this purpose. Consolidated Grain and Barge shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Department of Natural Resources' personnel upon request.
  - C. Consolidated Grain and Barge shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Condition Number 1(A)..
2. Pit Choke
  - A. Consolidated Grain and Barge shall control emissions from the dump pit using Pit Choke as specified in the permit application. The Pit Choke shall be applied at all times while this process is in operation in accordance with the manufacturer's specifications.

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

Project Number: 2007-04-022  
Installation ID Number: 155-0041  
Permit Number:

Consolidated Grain and Barge  
County Road 337  
Caruthersville, MO 63830

Complete: April 03, 2007  
Reviewed: July 10, 2007

Parent Company:  
Consolidated Grain and Barge  
201 Missouri Ave  
Mound City, IL 62963

Pemiscott County, S18, T1, R12

REVIEW SUMMARY

- Consolidated Grain and Barge has applied for authority to install a new dryer, a new 100,000 bushels bin, a new 613,000 bushels bin, a new dry leg and a 6 different type of conveyors.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards apply to the proposed equipment. Subpart DD, *Standards of Performance for Grain Elevators*, does not apply to this installation since the storage capacity of the installation is less than 2.5 million bushels of grain.
- None of the National Emission Standards for Hazardous Air Pollutants or currently promulgated Maximum Achievable Control Technology regulations apply to the proposed equipment.
- A Pit Choke and enclosed operations is being used to control the particulate matter less than ten (10) microns in diameter (PM<sub>10</sub>) emissions 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 conditioned to 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 condition to de minimis levels.
- Emissions' testing is not required for the equipment.
- Revision to the Intermediate Operating Permit application is required for this installation within 30 days of equipment startup
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Consolidated Grain and Barge operates a grain processing installation in Pemiscot County. This installation is an intermediate source under operating permit (OP2005-021).

The following permits have been issued to Consolidated Grain and Barge from the Air Pollution Control Program.

Permit Number	Description
0986-004	Addition of two elevator legs
OP2005-021	Intermediate Operating Permit

### PROJECT DESCRIPTION

Consolidated Grain and Barge has applied for authority install a new dryer, a new 100,000 bushels bin, a new 613,000 bushels bin, a new dry leg, new wet leg, 6 different type of conveyors in addition to the existing equipment. A Pit Choke and enclosed operations are being used to PM<sub>10</sub> emissions in this permit. The new wet leg will feed the dryer as well as a new conveyor to unload the dryer into a new dry leg that will fill existing bins 1, 2, 3, 4 and new bins. A truck-receiving pit will be installed to unload directly into the new wet leg. All bushels will go through the dryer which will result in maximum design rate of 112 Tons per hour for the process. The new dryer will use Natural Gas as fuel.

### 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 1.4, Natural Gas Combustion (7/98), Section 9.9.1, Grain Elevators and Processes(5/03). Potential emissions of the application represent the potential of the new equipment, 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	31.2	2.3129	51.71	< 15
SO <sub>x</sub>	40.0	N/A	N/A	0.1	N/A
NO <sub>x</sub>	40.0	N/A	N/A	*48.57	N/A
VOC	40.0	N/A	N/A	0.95	N/A
CO	100.0	N/A	N/A	14.57	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

\* Since there is a limitation of PM<sub>10</sub>, NO<sub>x</sub> emission will be indirectly limited to below de minimis level.

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

### APPLICABLE REQUIREMENTS

Consolidated Grain and Barge 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

#### GENERAL.

- *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

## 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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Samer Al-Shoukhi  
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 March 27, 2007, received April 03, 2007, designating Consolidated Grain and Barge as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated April 11, 2007.



Mr. Kurt Hasty  
Regional Operations Manager  
Consolidated Grain and Barge  
P.O. Box 849  
Caruthersville, MO 63830

RE: New Source Review Permit - Project Number: 2007-04-022

Dear Mr. Hasty:

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 contact Samer Al-Shoukhi or me at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and consideration.,

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH: sak

Enclosures

c: Southeast Regional Office  
PAMS File: 2007-04-022

Permit Number: