

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 032009-014 Project Number: 2008-11-025

Parent Company: Lohman Producers Exchange

Parent Company Address: 2915 Main Street, Lohman, MO. 65053

Installation Name: Lohman Producers Exchange

Installation Address: 2915 Main Street, Lohman, MO. 65053

Location Information: Cole County, S21, T44N, R13W

Application for Authority to Construct was made for:
Modification of the existing fertilizer stationary plant to achieve higher daily or yearly production. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

MAR 25 2009

EFFECTIVE DATE

A handwritten signature in black ink, appearing to read "James C. Kavanagh".

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 departments' 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 within 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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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."

Lohman Producers Exchange
 Cole County, S21, T44N, R13W

1. **Superseding Condition**
 The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 0189-005A) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. Lohman Producers Exchange shall emit less than 15.0 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the following equipment:

EP1A	Truck Unloading
EP1B	Conveyor to Storage Bins
EP2	Ammonium Nitrate Storage Bin
EP3	DAP Storage Bin
EP4	Pellet Lime Storage Bin
EP5	Potash Storage Bin
EP6	Urea Storage Bin
EP7	Ammonium Sulfate Storage Bin
EP8	Loadout

- B. Lohman Producers Exchange shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the above listed equipment. Attachment A or an equivalent form shall be used for this purpose. Lohman Producers Exchange shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - C. Lohman Producers Exchange 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 2B indicate that the source exceeds the limitation of Special Condition Number 2A.

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

Project Number: 2008-11-025
Installation ID Number: 051-0007
Permit Number:

Lohman Producers Exchange
2915 Main Street
Lohman, MO 65053

Complete: 02-04-2009

Parent Company:
Lohman Producers Exchange
2915 Main Street
Lohman, MO 65053

Cole County, S21, T44N, R13W

REVIEW SUMMARY

- Lohman Producers Exchange has applied for authority to re-evaluate and supercede the existing fertilizer stationary plant (permit # 0189-005A) .
- 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.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned to below de minimis levels
- This installation is located in Cole 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 conditioned to below de minimis levels.

- Emissions testing are not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION PROJECT DESCRIPTION

The following permits have been issued to Lohman Producers Exchange from the Air Pollution Control Program.

Permit Number	Description
0189-005A	Construction permit

In 1989 a fertilizer plant construction permit was issued to Lohman Producers Exchange limiting the facility to 1950 tons/year. Lohman Producers Exchange has submitted an application to reevaluate the calculation for the existing permit (0189-005A) in order to be able to increase their production limit. The new permit will supersede the existing permit (0189-005A) special conditions. The company has voluntarily accepted a limit of less than 15.0 tons per year of PM₁₀ for the fertilizer plant. In addition to the fertilizer plant, Lohman Producers Exchange also operates a grandfathered grain processing operation.

The Truck will unload the different types of raw materials (Ammonium nitrate, DAP, Pellet Lime, Potash Storage, Urea and Ammonium Sulfate) into a portable conveyor that will be loaded into a rooftop into different bins that match the raw material, loader will scoop the raw material and load it into the blender and then the finished product will loaded out through a short conveyor to the wagons.

With the exception of the initial unloading the raw material and loading the finished products, the rest of the handling and blending operations are conducted inside the building associated with this installation.

My calculation was based on the assumption that the maximum Hourly Design Rate (MHDR) of the equipment associated with this installation is 25 tons/hr of fertilizer due to maximum hourly design rate of the blender of 25 ton/hr.

The installation will be using electrical power from utilities for operating the equipment. No air pollution control equipment will be used in association with this new installation

EMISSIONS/CONTROLS EVALUATION

PM₁₀ is the main air pollutant of concern for this project. PM₁₀ emissions will be emitted from the fertilizer handling, blending and load in and load out operations.

The emission factor 0.02 lb/ton was used for the fertilizer handling, blending and load in and load out operations.

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 (year EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	0.44	19.2238	< 15.0
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

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 PM₁₀ were limited by the conditions of this permit to below de minimis levels.

APPLICABLE REQUIREMENTS

Lohman Producers Exchange 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. – modify for sources not required to submit an operating permit.

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 June 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

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was not performed since potential emissions of the application were limited to below de minimis levels

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.

Samer Al-Shoukhi
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 9, 2008, received December 10, 2008, designating Iohman Producers Exchange as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Regional Office Site Survey, dated December 30, 2008.

