



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

**MISSOURI AIR CONSERVATION COMMISSION**

**PERMIT TO CONSTRUCT**

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

Permit Number: 072020-002      Project Number: 2019-10-044  
Installation Number: 041-0038

Parent Company: Nutrien Ag Solutions

Parent Company Address: 24A Professional Park Drive, Maryville, IL 62062

Installation Name: Nutrien Ag Solutions - Keytesville Plant

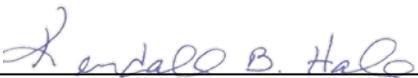
Installation Address: 29260 Highway K, Keytesville, MO 65261

Location Information: Chariton County, S9, T53N, R18W

Application for Authority to Construct was made for:

Permitting of an existing retail sales facility that includes a dry fertilizer warehouse, seed treater, and liquid warehouse in Keytesville, Missouri. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

\_\_\_\_\_  
July 9, 2020  
Effective Date

STANDARD CONDITIONS:

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

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

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

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

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

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:  
Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102-0176  
(573) 751-4817

The regional office information can be found at the following website:  
<http://dnr.mo.gov/regions/>

**SPECIAL CONDITIONS:**

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

*The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."*

Nutrien Ag Solutions - Keytesville Plant  
Chariton County, S9, T53N, R18W

1. PM<sub>10</sub> Emission Limitation

- A. Nutrien Ag Solutions - Keytesville Plant shall emit less than 15.0 tons of PM<sub>10</sub> in any consecutive 12-month period from the emission points listed below in Table 1. The SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions* shall be included in the limit.

Table 1: PM<sub>10</sub> Emission Units

Emission Unit Number	Description
EP-1	Fertilizer Receiving
EP-2	Conveyor
EP-3	Elevator
EP-4	Screw Auger
EP-5	Storage Bins
EP-6	Loader
EP-7	Scale Hopper
EP-8	Conveyor
EP-9	Blender
EP-10	Conveyor
EP-11	Fertilizer Shipping
EP-12	Seed Receiving
EP-13	Seed Treater Bin
EP-14	Conveyor
EP-15	Treater/Drum
EP-16	Conveyor
EP-17	Seed Bins
EP-18	Seed Shipping
EP-19	Haul Road - Receiving
EP-20	Haul Road - Shipping

- B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A.

**SPECIAL CONDITIONS:**

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

2. Alternative Treatment Solutions

- A. When considering an alternative seed treatment solution that is different to those listed in the Application for Authority to Construct for Project No. 2019-10-044, Nutrien Ag Solutions – Keytesville Plant must calculate the potential emissions for each individual Hazardous Air Pollutant (HAP) in each alternative treatment solution. If the potential HAP emissions for the alternative solutions are less than the Screening Model Action Level (SMAL), then the Nutrien Ag Solutions – Keytesville Plant does not need to obtain approval from the Air Pollution Control Program before the use of the alternative treatment solution. If the potential HAP emissions for the alternative solution are equal to or greater than the SMAL, Nutrien Ag Solutions – Keytesville Plant must obtain approval from the Air Pollution Control Program before use of the alternative treatment solution.
- B. The VOC content of any alternative seed treatment solution must not exceed 20% by weight.
- C. Calculations for the alternative solutions shall be maintained for five years after the last day the alternative coating is used and shall be made available for Department of Natural Resources' personnel on request. Nutrien Ag Solutions – Keytesville Plant shall use electronic forms approved by the Air Pollution Control Program that contain, at a minimum, the following information.
  - 1) Name of proposed alternative treatment solution.
  - 2) Proposed application rate.
  - 3) Density of proposed alternative treatment solution in pounds per gallon.
  - 4) Individual HAP content in weight percentage.
  - 5) Potential individual HAP emissions in tons per year, calculated by multiplying the application rate by the density and then by the highest HAP percentage.
  - 6) SMAL for each individual HAP in tons per year.
  - 7) VOC content in weight percentage.
  - 8) Potential VOC emissions in tons per year, calculated by multiplying the application rate by the density and then by the VOC percentage.
- D. Nutrien Ag Solutions – Keytesville Plant shall maintain a copy of the alternative material's information.

**SPECIAL CONDITIONS:**

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

3. Record Keeping and Reporting Requirements
  - A. Nutrien Ag Solutions - Keytesville Plant shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
  - B. Nutrien Ag Solutions - Keytesville Plant shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2019-10-044  
Installation ID Number: 041-0038  
Permit Number: 072020-002

Installation Address:

Nutrien Ag Solutions - Keytesville Plant  
29260 Highway K  
Keytesville, MO 65261

Parent Company:

Nutrien Ag Solutions  
24A Professional Park Drive  
Maryville, IL 62062

Chariton County, S9, T53N, R18W

REVIEW SUMMARY

- Nutrien Ag Solutions - Keytesville Plant has applied for authority to permit their existing retail sales facility that includes a dry fertilizer warehouse, seed treater, and liquid warehouse in Keytesville, Missouri.
- The application was deemed complete on October 25, 2019.
- HAP emissions are not expected from the proposed equipment. Future alternative treatment solutions may contain HAP emissions.
- None of the New Source Performance Standards (NSPS) apply to the installation.
  - 40 CFR 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, does not apply as the tank storage capacities for each tank is 5,100 gallons, which is less than the 19,812.9 gallon level required for this subpart.
- None of the NESHAPs apply to this installation. None of the currently promulgated 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 all pollutants are conditioned below de minimis levels.
- This installation is located in Chariton County, an attainment/unclassifiable area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below or conditioned below de minimis levels.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- No Operating Permit is required for this installation since all emissions are below or conditioned below de minimis levels.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Nutrien Ag Solutions – Keytesville Plant includes a dry fertilizer warehouse, a seed treater, and a liquid warehouse. This installation will be a de minimis source because all pollutants from the installation will be below or conditioned below de minimis.

The dry fertilizer process is composed of receiving bulk materials, storing, blending, and then shipping bulk materials. The principal raw materials handled include di-ammonium, phosphate, potash, granular urea, sulfur coated urea, various N-P-K fertilizers and lime. The materials are mixed for approximately five minutes and then shipped to a truck loading station.

The seed treatment process is composed of receiving clean seeds, storing them, adding one type of liquid treatment chemical, that can vary, sorting them again, and then loading them to a truck. Some of the chemicals include nematicide, fungicide, etc.

The liquid warehouse houses bulk chemicals in 10 bulk tanks that are 5,100 gallons each. Some of the chemicals include herbicides and insecticides.

No permits have been issued to Nutrien Ag Solutions - Keytesville Plant from the Air Pollution Control Program. Before this project, Nutrien Ag Solutions Keytesville Plant sent in an applicability determination, Project Number 2019-07-047, due to the installation being inspected and receiving a letter of warning, LOW. It was determined a permit is required and thus an application was sent in for this permit.

## PROJECT DESCRIPTION

Since no permits have been issued previously to this installation, all equipment and processes currently at the installation are included in this project. The list of all the emission units are in Table 2 along with the bottlenecked MHDRs.

No controls are being used for any emission units at this time. The only emissions associated with this project are PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC. There are no HAP emissions currently, however, Special Condition 2 allows for future alternative treatment solutions. Those alternative treatment solutions may contain HAP emissions but they are required to stay under each respective SMAL and under 25 tpy of combined HAPs. The VOC emissions are below the de minimis level. All the particulate emissions are above their respective levels thus requiring a permit. Nutrien Ag Solutions – Keytesville Plant is taking a 15 tpy limit on PM<sub>10</sub> to make them a de minimis source, which will indirectly limit PM and PM<sub>2.5</sub>.

The dry fertilizer process is bottlenecked at 125 tons/hr due to the MHDR of the blender.

The seed treatment process is bottlenecked at 20 tons/hr due to the MHDR of the treater. The treater is rated at 800 units per hour and each unit is approximately 50 lbs. That is equivalent to 20 tons/hr. The chemical usage is rated at 10 lbs of chemical per ton of seed processes. With the MHDR of 20 tons/hr for the seed treatment process, this led to a MHDR of 0.1 tons/hr for the chemical usage.

The bottlenecks of the dry fertilizer and seed treatment processes in turn bottleneck how much material can be brought in and shipped out. Combining both processes creates a bottlenecked MHDR of 145 tons/hr for the haul roads for receiving and shipping.

The MHDR, or maximum throughput, for the liquid storage calculations was 21.08 gal/hr. This was calculated using the chemical usage rate and the average density of the insecticides/pesticides.

The alternative treatments have a limit on the VOC content to less than 20% by weight. This limit prevents future use of treatments that could result in VOC emissions in excess of major source levels (250 tpy). At the time of this permit, treatments are not expected to have VOC contents in excess of 3%, which is the VOC content of the solutions evaluated with this permit. However, to ensure that this remains the case, a limit was included in the special conditions on maximum VOC content of the alternative treatment solutions.

Table 2: Emission Unit List

Emission Unit Number	Description	Bottlenecked MHDR
EP-1	Fertilizer Receiving	125 tons/hr
EP-2	Conveyor	125 tons/hr
EP-3	Elevator	125 tons/hr
EP-4	Screw Auger	125 tons/hr
EP-5	Storage Bins	125 tons/hr
EP-6	Loader	125 tons/hr
EP-7	Scale Hopper	125 tons/hr
EP-8	Conveyor	125 tons/hr
EP-9	Blender	125 tons/hr
EP-10	Conveyor	125 tons/hr
EP-11	Fertilizer Shipping	125 tons/hr
EP-12	Seed Receiving	20 tons/hr
EP-13	Seed Treater Bin	20 tons/hr
EP-14	Conveyor	20 tons/hr
EP-15	Treater/Drum	20 tons/hr
EP-15a	Treater/Drum Chemical Usage	0.1 tons/hr
EP-16	Conveyor	20 tons/hr
EP-17	Seed Bins	20 tons/hr
EP-18	Seed Shipping	20 tons/hr
EP-19	Haul Road - Receiving	145 tons/hr
EP-20	Haul Road - Shipping	145 tons/hr
EP-21	Storage Tanks	21.08 gal/hr

## EMISSIONS/CONTROLS EVALUATION

The emission factors used to determine the potential emissions from haul roads and vehicular activity were obtained from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.2, *Unpaved Roads* (November 2006) and Section 13.2.1, *Paved Roads* (January 2011).

The fertilizer PM and PM<sub>10</sub> emission factors for the dry fertilizer process (EP-01 through EP-011) were obtained from the ammonium nitrate bulk loading Source Classification Code (SCC) 30102709, each at 0.02 pounds per ton of fertilizer, and the emission factor of 0.005 pounds per ton of fertilizer for PM<sub>2.5</sub>. These emission factors were obtained from WebFIRE (Factor Information Retrieval System), EPA's online emission factor repository.

The emission factors used to determine the potential emissions from the seed treatment process (EP-12 through EP-18) were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.9.2, Tables 9.9.1-1 and 9.9.1-2, *Grain Elevators & Processes* (May 2003). PM<sub>2.5</sub> emission factor was estimated to be 17% of PM<sub>10</sub> from Reference 40 per footnote g of Table 9.9.1-1.

Potential emissions for the chemical usage (EP-15a) were estimated using a mass balance approach and information obtained from the Safety Data Sheets (SDS) provided. 100% of the VOC content of the coatings is assumed to be emitted into the atmosphere. Only one chemical at a time is applied during seed treatment.

To estimate the storage tank emissions (EP-21), an excel template titled “Tanks Fixed Roofs Version 3” was used. It calculated the total losses using data and equations from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 7.1, *Organic Liquid Storage Tanks* (November 2019). The insecticides/pesticides were assumed to be similar to furfural because of similar vapor pressures.

No control devices or processes are currently being used for any of the emission units.

Table 3 provides an emissions summary for this project. Existing potential emissions and existing actual emissions have yet to be determined since this is the first permit for the installation. Potential emissions of the project represent the potential of the new equipment, assuming continuous operation (8760 hours per year). New equipment conditioned potential represents the 15.0 tpy limit taken for PM<sub>10</sub>. PM and PM<sub>2.5</sub> will be indirectly limited by this to less than de minimis.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Potential Emissions of the Project Including Fugitives	New Conditioned Potential
PM	25.0	N/A	N/A	288.27	25.07
PM <sub>10</sub>	15.0	N/A	N/A	172.50	<15.0
PM <sub>2.5</sub>	10.0	N/A	N/A	36.21	3.15
SO <sub>x</sub>	40.0	N/A	N/A	0	N/A
NO <sub>x</sub>	40.0	N/A	N/A	0	N/A
VOC	40.0	N/A	N/A	26.52*	N/A
CO	100.0	N/A	N/A	0	N/A
Total HAPs	10.0/25.0	N/A	N/A	0	N/A

N/A = Not Applicable

\*This value is based on the expected maximum VOC content of 3% of the treatment solutions. However, potential VOC emissions could be higher due to the allowance of alternative treatment solutions, but will never exceed major source levels.

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below or conditioned below de minimis levels.

## APPLICABLE REQUIREMENTS

Nutrien Ag Solutions - Keytesville Plant 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

- *Operating Permits*, 10 CSR 10-6.065 is not required because all emissions are below or conditioned below de minimis.
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
  - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

## SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400. The potential emissions of PM from both processes are below 53.54 lbs/hr, for the dry fertilizer process, and 30.51 lbs/hr, for the seed treatment process, (Process Rate Rules) and therefore the installation complies with this regulation.

## STAFF RECOMMENDATION

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

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 25, 2019, received October 25, 2019, designating Nutrien Ag Solutions as the owner and operator of the installation.
- Safety Data Sheets for seed treatment chemicals.

## Attachment A – PM<sub>10</sub> Compliance Worksheet

Nutrien Ag Solutions - Keytesville Plant

Chariton County, S9, T53N, R18W

Project Number: 2019-10-044

Installation ID Number: 041-0038

Permit Number: 072020-002

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

(a)	(b)		(c)	(d)	(e)	(f)	(g)	(h)
Month	Material Handled (tons)		PM <sub>10</sub> Emission Factor (lb/ton)	Monthly PM <sub>10</sub> Emissions (pounds)	Monthly PM <sub>10</sub> Emissions (tons)	Previous Month's 12-Month PM <sub>10</sub> Emissions (tons)	Monthly PM <sub>10</sub> Emissions from Previous Year (tons)	Current 12-Month PM <sub>10</sub> Emissions (tons)
<i>Example</i> 08/2019	<i>Seed Received</i>	2,000	0.208	416	0.913	0	0	0.913
	<i>Fertilizer Received</i>	5,000	0.282	1410				
	<i>Seed Received</i>							
	<i>Fertilizer Received</i>							
	<i>Seed Received</i>							
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	<i>Fertilizer Received</i>							

- a) Record the current date.
- b) Record this month's seed received and fertilizer received.
- c) PM<sub>10</sub> emission factor for each process.
- d) (d) = (b) x (c). Do this calculation for each process.
- e) (e) = [(d) for seed received + (d) for fertilizer receiving] / 2,000
- f) Record the 12-month PM<sub>10</sub> emissions (h) from last month.
- g) Record the monthly PM<sub>10</sub> emissions (e) from this month last year.
- h) Calculate the new 12-month PM<sub>10</sub> emissions. (h) = (e) + (f) – (g) A value less than **15.0 tons** of PM<sub>10</sub> indicates compliance

## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> ..... percent	<b>Mgal</b> ..... 1,000 gallons
<b>°F</b> ..... degrees Fahrenheit	<b>MW</b> ..... megawatt
<b>acfm</b> ..... actual cubic feet per minute	<b>MHDR</b> ..... maximum hourly design rate
<b>BACT</b> ..... Best Available Control Technology	<b>MMBtu</b> .... Million British thermal units
<b>BMPs</b> ..... Best Management Practices	<b>MMCF</b> ..... million cubic feet
<b>Btu</b> ..... British thermal unit	<b>MSDS</b> ..... Material Safety Data Sheet
<b>CAM</b> ..... Compliance Assurance Monitoring	<b>NAAQS</b> .... National Ambient Air Quality Standards
<b>CAS</b> ..... Chemical Abstracts Service	<b>NESHAPs</b> National Emissions Standards for Hazardous Air Pollutants
<b>CEMS</b> ..... Continuous Emission Monitor System	<b>NO<sub>x</sub></b> .....nitrogen oxides
<b>CFR</b> ..... Code of Federal Regulations	<b>NSPS</b> ..... New Source Performance Standards
<b>CO</b> ..... carbon monoxide	<b>NSR</b> ..... New Source Review
<b>CO<sub>2</sub></b> ..... carbon dioxide	<b>PM</b> .....particulate matter
<b>CO<sub>2e</sub></b> ..... carbon dioxide equivalent	<b>PM<sub>2.5</sub></b> ..... particulate matter less than 2.5 microns in aerodynamic diameter
<b>COMS</b> ..... Continuous Opacity Monitoring System	<b>PM<sub>10</sub></b> ..... particulate matter less than 10 microns in aerodynamic diameter
<b>CSR</b> ..... Code of State Regulations	<b>ppm</b> ..... parts per million
<b>dscf</b> ..... dry standard cubic feet	<b>PSD</b> ..... Prevention of Significant Deterioration
<b>EIQ</b> ..... Emission Inventory Questionnaire	<b>PTE</b> ..... potential to emit
<b>EP</b> ..... Emission Point	<b>RACT</b> ..... Reasonable Available Control Technology
<b>EPA</b> ..... Environmental Protection Agency	<b>RAL</b> ..... Risk Assessment Level
<b>EU</b> ..... Emission Unit	<b>SCC</b> ..... Source Classification Code
<b>fps</b> ..... feet per second	<b>scfm</b> ..... standard cubic feet per minute
<b>ft</b> ..... feet	<b>SDS</b> ..... Safety Data Sheet
<b>GACT</b> ..... Generally Available Control Technology	<b>SIC</b> ..... Standard Industrial Classification
<b>GHG</b> ..... Greenhouse Gas	<b>SIP</b> ..... State Implementation Plan
<b>gpm</b> ..... gallons per minute	<b>SMAL</b> ..... Screening Model Action Levels
<b>gr</b> ..... grains	<b>SO<sub>x</sub></b> ..... sulfur oxides
<b>GWP</b> ..... Global Warming Potential	<b>SO<sub>2</sub></b> ..... sulfur dioxide
<b>HAP</b> ..... Hazardous Air Pollutant	<b>SSM</b> ..... Startup, Shutdown & Malfunction
<b>hr</b> ..... hour	<b>tph</b> ..... tons per hour
<b>hp</b> ..... horsepower	<b>tpy</b> ..... tons per year
<b>lb</b> ..... pound	<b>VMT</b> ..... vehicle miles traveled
<b>lbs/hr</b> ..... pounds per hour	<b>VOC</b> ..... Volatile Organic Compound
<b>MACT</b> ..... Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> ..... micrograms per cubic meter	
<b>m/s</b> ..... meters per second	



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

July 9, 2020

Beverly Tevebaugh  
Safety, Health & Environmental Manager  
Nutrien Ag Solutions - Keytesville Plant  
29260 Highway K  
Keytesville, MO 65261

RE: New Source Review Permit - Project Number: 2019-10-044

Dear Beverly Tevebaugh:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).



Beverly Tevebaugh  
Page Two

If you have any questions regarding this permit, please do not hesitate to contact Jonathan Halla, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in blue ink, appearing to read "S Heckenkamp".

Susan Heckenkamp  
New Source Review Unit Chief

SH:hja

Enclosures

c: Northeast Regional Office  
PAMS File: 2019-10-044

Permit Number: 072020-002