

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: 122010 - 010 Project Number: 2010-03-007

Parent Company: Ray-Carroll County Grain Growers, Inc.

Parent Company Address: P.O. Box 158, Richmond, MO 64085

Installation Name: Ray-Carroll County Grain Growers, Inc.

Installation Number: 033-0023

Installation Address: 26274 Highway 24, Carrollton, MO 64633

Location Information: Carroll County, S35, T53N, R23W

Application for Authority to Construct was made for:
A Zimmerman Z-4036 grain dryer. This review was conducted in accordance with Section (6), 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.

DEC 13 2010

EFFECTIVE DATE

A handwritten signature in cursive script, reading "Kyna L. Moore".

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 within 30 days of actual startup. 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."

Ray-Carroll County Grain Growers, Inc.
Carroll County, S35, T53N, R23W

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permits 042008-005 and 042008-005A issued by the Air Pollution Control Program.
2. **Operational Limitations – Fertilizer**
 - A. The following limitations apply during the months of January, February, June, July, August, and September.
 - 1) Ray-Carroll County Grain Growers, Inc. shall limit the daily fertilizer received to 170 tons.
 - 2) Ray-Carroll County Grain Growers, Inc. shall limit the daily fertilizer shipped to 170 tons.
 - 3) Ray-Carroll County Grain Growers, Inc. shall operate the fertilizer plant during the hours of 8 am to 5 pm, exclusively (i.e. total 9 hours). This hourly limitation also applies to the haul roads for fertilizer receiving and shipping.
 - B. The following limitations apply during the months of March, April, May, October, November, and December.
 - 1) Ray-Carroll County Grain Growers, Inc. shall limit the daily fertilizer received to 310 tons.
 - 2) Ray-Carroll County Grain Growers, Inc. shall limit the daily fertilizer shipped to 310 tons.
 - 3) Ray-Carroll County Grain Growers, Inc. shall operate the fertilizer plant during the hours of 7 am to 8 pm, exclusively (i.e. total 13 hours). This hourly limitation also applies to the haul roads for fertilizer receiving and shipping.
 - C. To demonstrate compliance with Special Conditions 2.A. and 2.B., Ray-Carroll County Grain Growers, Inc. shall keep a written or electronic record of the daily amount of fertilizer received and shipped.

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SPECIAL CONDITIONS:

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

3. **Control Device Requirement – Fertilizer**
 - A. Ray-Carroll County Grain Growers, Inc. shall install a flexible drop sleeve on the fertilizer truck loadout (14VOL) spout such that the end of the sleeve is located within the top of the truck bed. The drop sleeve must be constructed of material appropriate for the handling of fertilizer.
 - B. Ray-Carroll County Grain Growers, Inc. shall completely enclose the fertilizer storage bays, with the exception of the bottom 3 feet of the south wall of each bay for the removal of fertilizer. During periods of shut-down, additional lower sections of the bay fronts may be removed to accommodate entry for bay cleaning. Fertilizer shall not be received during the shut-down period.

4. **Operational Limitations – Grain Elevator**
 - A. Ray-Carroll County Grain Growers, Inc. shall receive grain only from 7am to 10pm, exclusively (i.e. total 15 hours).
 - B. Ray-Carroll County Grain Growers, Inc. shall operate the dryer (EP-09) only from 10am to 3pm, exclusively (i.e. total 5 hours) during the months of December, January, February, March, April, May, June, and July.
 - C. Ray-Carroll County Grain Growers, Inc. shall fill the storage pile (EP-4B) only from 7am to 9pm, exclusively (i.e. total 14 hours) during the months of September and October. Filling during other months is prohibited.
 - D. Ray-Carroll County Grain Growers, Inc. shall convey grain to Show-Me Ethanol, LLC only during from 7am to 7pm, exclusively.
 - E. Ray-Carroll County Grain Growers, Inc. shall load trucks (EP-7A1) only from 8am to 5pm, exclusively (i.e. total 9 hours).
 - F. Ray-Carroll County Grain Growers, Inc. shall limit rail car loading (7BVOL) to 11,220 tons of grain daily.
 - G. Ray-Carroll County Grain Growers, Inc. shall not receive grain by rail without notifying and receiving written authorization from the Air Pollution Control Program. Written notification shall be submitted to the Air Pollution Control Program at least 5 days prior to the receipt of grain by rail. The written request must contain, at minimum, the expected date of receipt and the amount of receipt.

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SPECIAL CONDITIONS:

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

- H. To demonstrate compliance with Special Condition 4.F., Ray-Carroll County Grain Growers, Inc. shall keep a written or electronic record of the amount of grain shipped by rail at the installation.
5. Control Device Requirement – Grain Elevator
- A. Ray-Carroll County Grain Growers, Inc. shall install a flexible drop sleeve on the truck loading (EP-7A1) spout such that the end of the sleeve is located within the top of the truck bed. The drop sleeve must be constructed of material appropriate for the handling of grain.
 - B. Ray-Carroll County Grain Growers, Inc. shall apply food grade mineral oil approved for direct contact with grain, on all grain processed through rail shipping (7BVOL).
 - C. Mineral oil shall be applied at a location prior to occurrence of emissions from emission point 7BVOL and in accordance with manufacturer's recommendations.
6. Control Device Requirement – Grain Elevator Cyclone
- A. Ray-Carroll County Grain Growers, Inc. shall control receiving (EP-1A), elevator legs (EP-2A and EP-2B), and shipping leg (EP-6) with a cyclone.
 - B. The cyclone and any related instrumentation or equipment shall be operated and maintained in accordance with the manufacturer's specifications.
 - C. The cyclones shall be equipped with gauges or meters, which indicate the pressure drop across the cyclone. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - D. Ray-Carroll County Grain Growers, Inc. shall monitor and record, in an operating and maintenance log, the operating pressure drop across the cyclones at least once every 24 hours. Either paper copy or electronic formats of the log are acceptable. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. If the pressure drop reading shall fall outside of this normal operating range, then the associated equipment shall be shut down as quickly as is feasible and corrective action taken to address the cause of the pressure drop problem. The problem shall be corrected and the cyclone shall be operational before restarting the equipment.

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SPECIAL CONDITIONS:

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

- E. As an alternative to Special Conditions 6.C. and 6.D., visible emissions may be used as an indicator of the proper operation of the control device. During proper operation no visible emissions are expected from this emission unit. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a USEPA Method 22 trained observer and USEPA Method 22 like procedures.
- 1) Frequency: Visible emissions from the exhaust shall be monitored on a daily basis when the process is in operation.
 - 2) Duration: The duration of the observation shall be for a 2 minute time period.
 - 3) Threshold: The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions taken.
 - 4) The observation of visible emissions from this emission unit will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the applicable requirement. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with 10 CSR 10-6.400. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source into compliance and demonstrate that compliance.
- F. Ray-Carroll County Grain Growers, Inc. shall maintain an operating and maintenance log for the cyclones which 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) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspections. Either paper copy or electronic formats are acceptable.

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SPECIAL CONDITIONS:

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

7. Haul Road Controls

- A. Ray-Carroll County Grain Growers, Inc. shall pave all haul roads with materials such as asphalt, concrete, and/or other material(s). If materials other than asphalt or concrete are used, Ray-Carroll County Grain Growers, Inc. must receive approval from the Air Pollution Control Program. The pavement shall be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
- B. Maintenance and/or repair of the road surface shall be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas.
- C. Ray-Carroll County Grain Growers, Inc. shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

8. Haul Road Emission Calculations

- A. Paved haul road emissions were calculated using AP-42, *Paved Roads* Draft Section 13.2.1 June 10, 2010. If the parameters in the final section differ from those in the draft section such that an emissions increase would be calculated, then Ray-Carroll County Grain Growers, Inc. shall evaluate what effects the increase would have had on the permit applicability and modeling applicability of this project. Ray-Carroll County Grain Growers, Inc. shall submit the results of any such evaluation, in an amendment application, within 30 days of the publishing of the final section and apply food grade mineral oil approved for direct contact with grain, on all grain processed through truck loading (EP-7A1).
- B. If the draft section is not approved by June 10, 2011, then Ray-Carroll County Grain Growers, Inc. shall submit an amendment application by July 10, 2011 using AP-42 Section 13.2.2 *Unpaved Roads* November 2006, with control efficiency for paving to calculate paved haul road emissions and apply food grade mineral oil approved for direct contact with grain, on all grain processed through truck loading (EP-7A1).

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SPECIAL CONDITIONS:

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

9. **Ambient Air Quality Analysis**
 - A. This permit may be modified if the Air Pollution Control Program determines changes are necessary based upon an ambient air quality analysis (analysis) conducted for Ray-Carroll County Grain Growers, Inc./Show-Me Ethanol, LLC (installation 033-0023) or an analysis that contains the installation.
 - B. This permit may be modified if the installation submits a New Source Review application prior to the Air Pollution Control Program conducting an analysis.
 - C. The permit modification shall include a revised analysis that accounts for all differences between information in the approved analysis for project 2010-03-007 and as-built and operated parameters.
10. **Record Keeping and Reporting Requirements**
 - A. Ray-Carroll County Grain Growers, Inc. 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. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - B. Ray-Carroll County Grain Growers, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten 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 (6) REVIEW

Project Number: 2010-03-007
Installation ID Number: 033-0023
Permit Number:

Ray-Carroll County Grain Growers, Inc.
26274 Highway 24
Carrollton, MO 64633

Complete: March 01, 2010

Parent Company:
Ray-Carroll County Grain Growers, Inc.
P.O. Box 158
Richmond, MO 64085

Carroll County, S35, T53N, R23W

REVIEW SUMMARY

- Ray-Carroll County Grain Growers, Inc. has applied for authority to install a Zimmerman Z-4036 grain dryer.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment from the combustion of propane.
- New Source Performance Standards (NSPS) 40 CFR 60 Subpart DD, "Standards of Performance for Grain Elevators" does not apply to the installation. The total storage capacity is 2,060,000 bushels. Permanent storage capacity is 1,060,000 bushels. Show-Me Ethanol produces ethanol through dry corn milling not for human consumption, therefore the installation is not a grain storage elevator. Permanent storage capacity is less than the 2.5 million bushel applicability threshold required to meet the definition of grain terminal elevator.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- The following control devices are being used to control the particulate matter (PM) and particulate matter less than 10 microns in aerodynamic diameter (PM₁₀) emissions from the equipment in this permit: A flexible drop chute at fertilizer loading (14VOL) and grain truck loading (EP7A1); partial enclosure of fertilizer bays; oil suppression at shipping leg (EP6) during rail loading; and cyclone control at truck receiving (EP1A), elevator legs (EP2A and EP2B), and shipping leg (EP6).
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM₁₀ are above de minimis levels.

- This installation is located in Carroll County, an attainment 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 performed to determine the ambient impact of PM₁₀ and CO for the combined installation.
- Emissions testing are not required for the equipment.
- A modification to the Intermediate Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Ray-Carroll County Grain Growers, Inc. (RCCGG) is an existing grain elevator in Carrollton, Missouri. It is considered one installation (033-0023) with Show-Me Ethanol, LLC (SME), and Ray-Carroll Fuels, LLC. The combined installation is a minor source under construction permits for PM₁₀, SO_x, NO_x, VOC, and CO. The combined installation is an intermediate source under operating permits.

The following permits have been issued to RCCGG, SME, and Ray-Carroll Fuels, LLC from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0494-019	Grain elevator
0596-014	Fertilizer distribution
012003-009	Throughputs and loadouts
042008-004	Ethanol plant
2006-11-085	Basic operating permit for grain elevator
042008-005	Increase production
072008-003	Add fuel station
042008-004A	Revised Modeling
072008-003A	Revised Modeling
042008-005A	Fuel station and elevator modeling
042008-004B	Revised Modeling for SME

PROJECT DESCRIPTION

RCCGG is installing a Zimmerman Z-4036 column grain dryer rated at 4,000 bushels per hour. The dryer combusts propane at 41.634 million British thermal units per hour. This project also includes stack testing results for PM₁₀ and CO required by permit 042008-004A for SME, removal of control devices, and changes in operational hours at RCCGG and SME. Emissions from the dryer are uncontrolled.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis for grain were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, *Grain Elevators & Processes* Section 9.9.1, May 2003. The emission factors for paved haul roads were obtained from AP-42, *Paved Roads*, Draft Section June 10, 2010. The emission factors for propane combustion were obtained from AP-42, *Liquified Petroleum Gas Combustion*, Section 1.5 July 1998.

Two scenarios for calculating potential emissions have been used in previous permits and this determination. Under scenario 1, RCCGG receives 5,040 tons of grain daily via truck. SME receives 5,040 tons of corn daily from a combination of truck and from RCCGG via conveyor. Under scenario 2, RCCGG receives 10,080 tons of grain daily via truck. SME receives no corn via truck, but 5,040 tons of corn daily from RCCGG via conveyor. Scenario 2 represents the greater potential emissions for RCCGG.

Existing potential emissions are cited from permit 042008-005A. Project potential emissions reflect the unconditioned potential for the new dryer operating 8,760 hours per year. The conditioned project potential includes the new dryer, hourly limitations, and control devices for all grain and fertilizer processes at RCCGG under scenario 2. The installation conditioned potential reflects the conditioned potential emissions for the combined RCCGG, SME, and Ray-Carroll Fuels. The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Ray-Carroll Existing Potential	Project Potential	Ray-Carroll Conditioned Project Potential	Combined Installation Conditioned Potential
PM ₁₀	15.0	45.2	26.98	44.61	61.82
SO _x	40.0	4.36	2.99	1.41	46.73
NO _x	40.0	19.14	25.90	12.25	57.95
VOC	40.0	0.50	1.99	0.94	68.36
CO	100.0	3.22	14.95	7.07	107.05
¹ Combined HAPs	25.0	0.17	0.34	0.16	22.62

¹ The potential emissions of each individual HAP is below 10 tons per year.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are above de minimis levels.

APPLICABLE REQUIREMENTS

Ray-Carroll County Grain Growers, 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. For a complete list of applicable requirements for your installation, please consult your 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 a hardcopy Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions. Submission of an electronic EIQ via MoEIS is required May 1.
- *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 performed to determine the ambient impact of PM₁₀ and CO for the combined installation. CO was modeled because the limits under permit 042008-005A were exceeded in stack testing. For modeling details please refer to the document titled, *Ambient Air Quality Impact Analysis (AAQIA) for Show Me Ethanol, LLC & Ray Carroll County Grain Growers – Revision 2 – March 1, 2010 Submittal*. Special conditions of this permit are based upon modeling requirements.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

David Little
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 26, 2010, received March 01, 2010, designating Ray-Carroll County Grain Growers, Inc. 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 Site Survey, dated March 22, 2010.
- Modeling Memorandum, *Ambient Air Quality Impact Analysis (AAQIA) for Show Me Ethanol, LLC & Ray Carroll County Grain Growers – Revision 2 – March 1, 2010 Submittal*, dated August 27, 2010.

Mr. Tim Phillips
Operations Manager
Ray-Carroll County Grain Growers, Inc.
P.O. Box 158
Richmond, MO 64085

RE: New Source Review Permit - Project Number: 2010-03-007

Dear Mr. Phillips:

Enclosed with this letter is your permit to construct. Please study it carefully. 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 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 David Little, at the Departments' 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

Kendall B. Hale
New Source Review Unit Chief

KBH:dll

Enclosures

c: Northeast Regional Office
PAMS File: 2010-03-007

Permit Number: