



Missouri Department of [dnr.mo.gov](http://dnr.mo.gov)

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 23 2019

Ms. Mitzie Lynn  
Bookkeeper/Marketing/HR Assistant  
Sandy Ridge Cotton Company  
P.O. Box 543  
Malden, MO 63863

RE: New Source Review Permit Amendment/Correction - Permit Number: 012006-018B  
Project Number: 2019-08-025; Installation Number: 069-0072

Dear Ms. Lynn:

Your Construction Permit 012006-018A is being amended in response to an evaluation of stack sampling data collected as part of a study to better characterize and quantify emissions from cyclones controlling ginning process emissions. The study was conducted at seven cotton gins throughout the cotton belt by the U.S. Department of Agriculture Agricultural Research Service (USDA/ARS) and Oklahoma State University. Funding and advisory groups for the project included entities from local, state and national industry groups; state and federal government agencies; and Texas A&M University. A single certified stack sampling company, Reliable Emissions Measurements (Auberry, CA), conducted the tests at all seven gins. Boykin, Buser, and Whitelock were the primary researchers for the project and published results in sixty-eight peer reviewed journal articles in the Journal of Cotton Science from 2013 to 2015.

EPA Method 17 (M17) was one of two methods determined by the advisory groups to be used for stack sampling at each gin and related to measurement of total Particulate Matter (PM). Laser diffraction analysis of the M17 samples was used to determine the fraction of total particulate matter collected that was associated with particulate matter having an effective diameter less than or equal to ten (10) microns or less (PM<sub>10</sub>) and particulate matter having an effective diameter less than or equal to two and one-half (2.5) microns or less (PM<sub>2.5</sub>). The Air Pollution Control Program's Permit and Compliance/Enforcement Sections have concurred that the M17 results coupled with the laser diffraction analysis allows for calculation of the most accurate PM<sub>10</sub> and PM<sub>2.5</sub> emission factors available as compared to: 1) EPA's AP-42 *Compilation of Air Pollutant Emissions Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition*; and 2) the second method determined by the advisory groups to be used for stack sampling at each gin, EPA Method 201A (M201A)). The reasoning behind the concurrence is based on two factors. First, the low data quality ratings in AP-42 for emissions factors related to cotton ginning operations. Second, well-documented issues with Method 201A results occurred that rendered the data unsatisfactory for permitting and compliance purposes.

In addition to changes associated with the availability of more accurate ginning process emission factors, your Construction Permit 012006-018A is being updated to include consideration of mote bale shipping, seed handling, seed shipping, and trash shipping emissions.



Recycled paper

Your permit is revised by addition of Special Condition 5 on the attached pages and replacement of Attachment A with the revised Attachment A on the attached pages. Contributions to the compliance emission factors included in Attachment A are shown in Table 1: Compliance Emission Factor Components. In order to ensure you are using the correct compliance emission factors, please use the replacement Attachment A, or equivalent methodology, for tracking your PM<sub>10</sub> emissions. Demonstration of compliance with the limitation(s) imposed by your permit, as amended, shall begin on October 1, 2019 at zero (0.0) tons of rolling consecutive 12-month PM<sub>10</sub> emissions using your revised compliance emission factors. No fees are owed to the Air Pollution Control Program for this permit amendment.

**Table 1: Compliance Emission Factor Components**

<i>Equipment Description</i>	<i>Controls</i>	<i>Unit of Measure</i>	<i>Emission Factor (lb PM<sub>10</sub>/unit)</i>
Unloading	HE Cyclones	bale	0.185
First Stage Seed Cotton Cleaning	HE Cyclones	bale	0.159
Second Stage Seed Cotton Cleaning	HE Cyclones	bale	0.0555
Overflow	HE Cyclones	bale	0.0213
Master Trash Fan	HE Cyclones	bale	0.106
Combined Lint Cleaning	HE Cyclones	bale	0.0861
Mote Trash Fan	HE Cyclones	bale	0.00931
Battery Condenser	HE Cyclones	bale	0.0171
<b>Total Ginning Process</b>	<b>HE Cyclones</b>	<b>bale</b>	<b>0.639</b>
<b>Combined Natural Gas Combustion</b>	<b>None</b>	<b>MMcf<sup>1</sup></b>	<b>7.6</b>
Seed Handling <sup>2</sup>	Total Encl.	bale	0
Seed Loadout <sup>2</sup>	None	bale	0.0110
<b>Total Seed Handling and Loadout</b>	<b>Various</b>	<b>bale</b>	<b>0.0110</b>
Seed Cotton Receiving Haul Road <sup>2</sup>	Best Mgmt.	bale	0.00610
Lint Bale Shipping Haul Road <sup>2</sup>	Best Mgmt.	bale	0.000924
Seed Shipping Haul Road <sup>2</sup>	Best Mgmt.	bale	0.00193
Trash Shipping Haul Road <sup>2</sup>	Best Mgmt.	bale	0.000340
<b>Total Haul Roads</b>	<b>Best Mgmt.</b>	<b>bale</b>	<b>0.00929</b>
<b>Total Fugitives</b>	<b>Various</b>	<b>bale</b>	<b>0.0203</b>

**Table 1: Compliance Emission Factor Components (continued)**

1. MMcf relates to million cubic feet.
2. The seed handling emission factor in units of lbs PM<sub>10</sub>/bale = (0.381 ton seed/bale) x (0.034 lb PM<sub>10</sub>/ton seed). The seed loadout emission factor in units of lbs PM<sub>10</sub>/bale = (0.381 ton seed/bale) x (0.029 lb PM<sub>10</sub>/ton seed). The seed cotton receiving haul road emission factor in units of lbs PM<sub>10</sub>/bale = [(0.693 ton seed cotton/bale) / (11 ton seed cotton / **0.587 VMT**)] x (0.165 lb PM<sub>10</sub>/VMT). The lint bale shipping haul road emission factor in units of lbs PM<sub>10</sub>/bale = [(0.243 ton lint/bale) / (22.5 ton lint / **0.455 VMT**)] x (0.188 lb PM<sub>10</sub>/VMT). The seed shipping haul road emission factor in units of lbs PM<sub>10</sub>/bale = [(0.381 ton seed/bale) / (22.5 ton seed / **0.606 VMT**)] x (0.188 lb PM<sub>10</sub>/VMT). The trash shipping haul road emission factor in units of lbs PM<sub>10</sub>/bale = [(0.0693 ton trash/bale) / (22.5 ton trash / **0.587 VMT**)] x (0.188 lb PM<sub>10</sub>/VMT). Such calculations assume 35 percent by weight (% w/w) of seed cotton received is lint, 55 percent by weight (% w/w) is seed, and 10 percent by weight (% w/w) is trash. In addition, it is assumed one lint bale weighs 485 pounds.  
\*Trash handling is not included because the AP-42 drop point equation is not valid for the range of trash moisture content.

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.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc). If you have any questions regarding this amendment/correction, please do not hesitate to contact Sitzes, Liberty, at the department's 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  
Permits Section Chief

KBH:sla

Enclosures

c: Southeast Regional Office  
PAMS File: 2019-08-025  
Bob Cheever, R7



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Permit No.	012006-018B
Project No.	2019-08-025

**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 (3)(E). "Conditions required by permitting authority."*

Sandy Ridge Cotton Company  
Dunklin County, S21, T23N, R10E

5. Sandy Ridge Cotton Company shall control emissions from the seed house, drive-under trash loadout hopper(s), and trash pile by performing Best Management Practices. Best Management Practices include the following:
  - A. Closure of all doors to the seed house when loadout of materials is not occurring;
  - B. Use of vinyl strip curtains on all natural draft openings to the seed house not equipped with doors;
  - C. Closure of any and all top access doors/panels to the drive-under trash loadout hopper(s) when loadout of materials is not occurring;
  - D. Documented watering of trash pile or water injection into trash auger; and
  - E. Minimization of the trash pile footprint by frequent spreading or shipping.

