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: 092008-009  Project Number: 2008-04-096

Parent Company: The Dow Chemical Company
Parent Company Address: 2030 Dow Center, Midland, MI 48674
Installation Name: The Dow Chemical Company - Riverside Plant
Installation Address: 500 Dow Industrial Drive, Pevely, MO 63070
Location Information: Jefferson County, S18, T41N, R6E

Application for Authority to Construct was made for:
Modification to Styrofoam production process to allow for a new blowing agent.
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.

SEP 25 2008

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 devises 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 sources(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 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 sources(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.
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:   Project Number: 2008-04-096

Parent Company:   The Dow Chemical Company

Parent Company Address: 2030 Dow Center, Midland, MI  48674

Installation Name:   The Dow Chemical Company - Riverside Plant

Installation Address:  500 Dow Industrial Drive, Pevely, MO  63070

Location Information:  Jefferson County, S18, T41N, R6E

Application for Authority to Construct was made for:
Modification to Styrofoam production process to allow for a new blowing agent.
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☐ Standard Conditions (on reverse) are applicable to this permit.

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EFFECTIVE DATE

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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 sources(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).

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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 sources(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.

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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.”

The DOW Chemical Company - Riverside Plant
Jefferson County, S17, T41, R6

1. Control Devices - Baghouse
   A. The Dow Chemical Company - Riverside Plant shall control emissions from EP-04 and EP-05 using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouses shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them.

   B. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

   C. The Dow Chemical Company - Riverside Plant shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

   D. The Dow Chemical Company - Riverside Plant shall maintain an operating and maintenance log for the baghouses which shall include the following:
      i. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
      ii. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

   E. Operation in accordance with Permit Condition EU-0110-001 and EU0120-001 of the Dow Chemical Company’s Operating Permit can be used in lieu of Special Condition 1.A, 1.C and 1.D.
The Dow Chemical Company - Riverside Plant  Complete: April 25, 2008
500 Dow Industrial Drive
Pevely, MO  63070

Parent Company: The Dow Chemical Company
2030 Dow Center
Midland, MI  48674

Jefferson County, S17, T41, R6

REVIEW SUMMARY

- The Dow Chemical Company - Riverside Plant has applied for authority to modify their Styrofoam production process to allow for a new blowing agent.

- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are styrene (CAS# 100-42-5), ethyl benzene (CAS# 100-41-4) and acrylonitrile (CAS# 107-13-1).

- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.


- Baghouses are being used to control particulate matter less than 10 microns (PM$_{10}$) emissions from EP#4 and EP#5. A central vacuum system (EP#10) is also being used to control PM$_{10}$ generated during production.

- 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 de minimis levels.

- This installation is located in Jefferson County, a nonattainment area for ozone (O$_3$) and an attainment area for all other criteria air pollutants.
• This installation is on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2], 20 Chemical Process Plant.

• Ambient air quality modeling was performed to determine the ambient impact of styrene.

• Emissions testing is not required for the source.

• An amendment to your Part 70 Operating Permit is required for this installation within 1 year of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Dow Chemical Company at the Riverside Plant in Pevely manufactures polystyrene and extruded polystyrene foam products.

A Part 70 Operating Permit (Operating Permit No. OP2006-069) was granted on September 22, 2006.

The following permits have been issued to The Dow Chemical Company - Riverside Plant from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0879-008</td>
<td>Expansion to the SAN process, ABS process and polystyrene feedstock plants as well as addition of dock facilities.</td>
</tr>
<tr>
<td>0382-002A</td>
<td>Installation of a 200 hp natural gas-fired steam generator.</td>
</tr>
<tr>
<td>0688-007</td>
<td>Construction of a zinc stearate additive system, which will be made up of a bag emptying station with air filters, transfer system, a 100 gallon melt tank, and a 100 gallon feed tank.</td>
</tr>
<tr>
<td>0688-008</td>
<td>Construction of a 30,000 gallon methyl chloride storage tank to replace a 6,000 gallon storage tank.</td>
</tr>
<tr>
<td>1291-005</td>
<td>Replacement of an existing 300 horsepower extruder motor and gearbox with a 500 horsepower motor and 600 horsepower gearbox, on it's existing 24 inch wide extruded polystyrene foam line.</td>
</tr>
<tr>
<td>0992-022</td>
<td>The production of extruded polystyrene and polystyrene.</td>
</tr>
<tr>
<td>122005-003</td>
<td>Temporary permit to conduct experimental trials for testing alternative blowing agents at the extruded polystyrene foam manufacturing facility.</td>
</tr>
<tr>
<td>122005-003A</td>
<td>Extension of temporary permit.</td>
</tr>
</tbody>
</table>
PROJECT DESCRIPTION

Due to the EPA mandate to eliminate the usage of HCFC 142b by the end of 2009, the Dow Chemical Company, Riverside Plant (Dow) is seeking authority to change to a new blowing agent. The Riverside Plant currently consists of a two step process to produce Styrofoam: a polymer resin production process and a Styrofoam production process. Because the introduction of the new blowing agent generates the need to use a different polystyrene copolymer resin, Dow will receive the new copolymer via rail or truck shipment. The existing polystyrene plant will continue to produce the existing resin for Styrofoam production at other plants and will not be modified at this time.

The new blowing agent that will be used in the Styrofoam production process is not a HAP nor does it contain any VOCs. However, several changes and additions to the existing process are needed as a result of using the new blowing agent. These changes include the following: Modification to an existing silo for storing polymer pellets, modification to two existing blowing agent storage tanks, modification to two reclaim systems, and addition of two day hoppers which feed polymer pellets to the line (EP#61 & 62).

Due to the number of changes to the Styrofoam production process since it was last permitted, the potential emissions of the line were re-evaluated. The Styrofoam process is explained herein.

The polystyrene copolymer is loaded from storage (EP#19 or 63) into four (2 existing and 2 new) polystyrene copolymer feed hoppers (EP#6, 7, 61 & 62) and mixed with additives (EP#1 & 3) en route to the die and forming process. The copolymer is extruded and the blowing agent is introduced to form Styrofoam. After the foam is created, it is then cooled, trimmed, and cut for wrapping and storage. The trimmings and ground scrap are routed through the baghouses (EP#4 & 5) to the fluff bin and are recycled, thereby driving out the blowing agent by passing the stream through a second recycle-only extruding process (EP#2 & 14).

The recycle extruding process reheats the Styrofoam trim and pumps it through a strand die to form polystyrene copolymer strands for cooling, drying, and pellitizing. The strands are cut to size under water in a water ring pellitizer so no particulate emissions result from the cutting process. VOC and HAP emissions from the recycle extruder process are captured by a hood and vented through the reclaim feed vents (EP#2 & 14). A recycle product blower pneumatically conveys the polystyrene copolymer product to the recycle silos for reprocessing into styrofoam.
Table 2: Emission Points associated with the Styrofoam production process

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>M/L Additive Feeders</td>
</tr>
<tr>
<td>02</td>
<td>M/L Reclaim Feed Vent</td>
</tr>
<tr>
<td>03</td>
<td>48&quot; Additive Feeders</td>
</tr>
<tr>
<td>04</td>
<td>M/L Baghouse</td>
</tr>
<tr>
<td>05</td>
<td>48&quot; Baghouse</td>
</tr>
<tr>
<td>06</td>
<td>M/L /Polystyrene Feed Hopper</td>
</tr>
<tr>
<td>07</td>
<td>48&quot; Polystyrene Feed Hopper</td>
</tr>
<tr>
<td>10</td>
<td>Central Vacuum System</td>
</tr>
<tr>
<td>13</td>
<td>M/L Recycle Feed Hopper</td>
</tr>
<tr>
<td>14</td>
<td>48&quot; Reclalm Feed Vent</td>
</tr>
<tr>
<td>16</td>
<td>48&quot; Recycle Feed Hopper</td>
</tr>
<tr>
<td>19</td>
<td>Polystyrene Storage Silo</td>
</tr>
<tr>
<td>20</td>
<td>Recycle Storage Silo</td>
</tr>
<tr>
<td>61</td>
<td>48&quot; Line Polymer Day Hopper</td>
</tr>
<tr>
<td>62</td>
<td>M/L Polymer Day Hopper</td>
</tr>
</tbody>
</table>

Dow has requested that the production throughputs, the maximum design rates, and the process flow diagrams submitted in this application to be treated as confidential. The company believes that the information identified as “Confidential” has competitive value since access to data would put the company at a competitive disadvantage.

EMISSIONS/CONTROLS EVALUATION

The HAP emission factors associated with EP#2 and #14 were obtained from test data collected during trial runs at the Dow Riverside Plant. The particulate emission factors are based on information obtained from similar sources at other Dow facilities. EP#4 and #5 handle scrap extruded polystyrene foam as part of the recycle system. Baghouses are used to control PM$_{10}$ emissions from these emission points and are estimated to have 99% control. A central vacuum system (EP#10) is also used to control PM$_{10}$ emissions and has an estimated control efficiency of 99%.

The following table provides an emissions summary for this project. Existing potential emissions for VOC and HAPs were taken from Operating Permit Number OP2006-069. According to recent Emission Inventory Questionnaires (EIQs), the facility is less than major for all other pollutants. Existing actual emissions were taken from the installation’s 2007 EIQ. Potential emissions of the application represent the potential of the Styrofoam production line, assuming continuous operation (8760 hours per year). Since the project is viewed as a modification, the potential emissions of the application included all emissions affected by the modification including both new and existing equipment. However, a potential minus actuals test was not needed to determine the project’s emissions increase since potential emissions from the production line are already at de minimus levels for all pollutants and the potential minus actuals tests does not change the type of review needed for this permit. The reason that this permit is
required is because the styrene emissions are over the Screen Modeling Action Level.

Table 3: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>&lt;Major</td>
<td>0.15</td>
<td>1.99</td>
<td>N/A</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>&lt;Major</td>
<td>0.01</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>&lt;Major</td>
<td>1.22</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>&lt;95</td>
<td>1.29</td>
<td>3.21</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>&lt;Major</td>
<td>1.03</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>&lt;24.5 total</td>
<td>N/D</td>
<td>3.21</td>
<td>N/A</td>
</tr>
<tr>
<td>Styrene</td>
<td>1.0 / 10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>2.04</td>
<td>N/A</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>10.0 / 10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>1.10</td>
<td>N/A</td>
</tr>
<tr>
<td>Acrylonitrile</td>
<td>10.0 / 10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.07</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined

*The first number listed for each individual HAP represents the Screen Modeling Action Level (SMAL) and the second number represents the regulatory de minimis level. The emission levels for Styrene are above its SMAL and therefore Screen modeling was performed.

**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 de minimis levels.

**APPLICABLE REQUIREMENTS**

The DOW Chemical Company - Riverside 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. 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 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 10-5.160

SPECIFIC REQUIREMENTS

• Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400

• Maximum Achievable Control Technology (MACT) Regulations, 10 CSR 10-6.075, National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins, 40 CFR Part 63, Subpart JJJ


AMBIENT AIR QUALITY IMPACT ANALYSIS

The styrene potential emission rate was calculated to exceed the Screening Modeling Action Level of 1.0 ton per year. A Screen 3 modeling analysis was performed to determine if the Risk Assessment Levels for styrene would be exceeded at or beyond the property line of the Dow Chemical Company – Riverside facility. Styrene has the potential to be emitted from EP#2 and 14 at 0.23 pound per hour from each emission point. The stack parameters and the nearest property boundary from each stack as provided by the applicant are listed in Table 4.

Table 4: Stack Parameters

<table>
<thead>
<tr>
<th>Stack No.</th>
<th>Height (ft)</th>
<th>Diameter (ft)</th>
<th>Temperature (F)</th>
<th>Velocity (ft/sec)</th>
<th>Nearest Property Boundary (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP#2</td>
<td>29.5</td>
<td>1.5</td>
<td>75</td>
<td>16.6</td>
<td>500</td>
</tr>
<tr>
<td>EP#14</td>
<td>37.5</td>
<td>1.33</td>
<td>75</td>
<td>18.7</td>
<td>250</td>
</tr>
</tbody>
</table>
The following table lists the air quality impact for styrene.

Table 5: Ambient Air Quality Impact Analysis

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Stack No.</th>
<th>Modeled Impact (µg/m³)</th>
<th>Risk Assessment Level (µg/m³)</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Styrene</td>
<td>EP#2</td>
<td>6.48</td>
<td>45.0</td>
<td>24-hour</td>
</tr>
<tr>
<td></td>
<td>EP#14</td>
<td>4.85</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>11.33</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>EP#2</td>
<td>1.30</td>
<td>9.5</td>
<td>Annual</td>
</tr>
<tr>
<td></td>
<td>EP#14</td>
<td>0.97</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>2.27</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

As indicated in the above table, styrene emissions from the equipment added under this permit are expected to be in compliance with the Risk Assessment Levels for both the 24 hour and annual average time periods.

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.

____________________________
Susan Heckenkamp  
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 23, 2008, received April 25, 2008, designating The Dow Chemical Company as the owner and operator of the installation.


- Saint Louis Regional Office Site Survey, dated May 21, 2008.
Ms. Carla Roberts  
Site Environmental Delivery Technician  
The DOW Chemical Company - Riverside Plant  
500 DOW Industrial Drive  
Pevely, MO  63070  

RE:  New Source Review Permit - Project Number: 2008-04-096  

Dear Ms. Roberts:  

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 do not hesitate to contact Susan Heckenkamp, 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:shl  

Enclosures  

Saint Louis Regional Office  
PAMS File: 2008-04-096  

Permit Number: