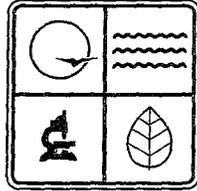


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

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: **122006-016** Project Number: 2006-10-016

Owner: Metro Fill Development, L.L.C.

Owner's Address: 1650 Des Peres Road, Suite 303, St. Louis, MO 63131

Installation Name: Metro Fill Development, L.L.C.

Installation Address: South of Friedens Road, West-Northwest of Arena Parkway, St. Charles, Missouri

Location Information: St. Charles County, T46N, R5E

Application for Authority to Construct was made for:

Construction and operation of a demolition landfill. 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 (listed as attachments starting on page 2) are applicable to this permit.

DEC 19 2006

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. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

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

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, 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 Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

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 Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

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Permit No.	
Project No.	2006-10-016

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."

Metro Fill Development, L.L.C.
St. Charles County, T46N, R5E

1. Emission Limitation
 - A. Metro Fill Development, L.L.C. shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the entire installation.
 - B. Metro Fill Development, L.L.C. shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the entire installation. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. Metro Fill Development, L.L.C. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - C. Metro Fill Development, L.L.C. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Condition Number 1(A).

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

Project Number: 2006-10-016
Installation ID Number: 193-0232
Permit Number:

Metro Fill Development, L.L.C.
South of Friedens Road
West-Northwest of Arena Parkway
St. Charles, Missouri

Complete: October 3, 2006
Reviewed: October 17, 2006

Parent Company:
Metro Fill Development, L.L.C.
1650 Des Peres Road, Suite 303
St. Louis, MO 63131

St. Charles County, T46N, R5E

REVIEW SUMMARY

- Metro Fill Development, L.L.C. has applied for authority to construct and operate a demolition landfill.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment, but in insignificant amounts.
- New Source Performance Standards (NSPS) Subpart WWW, *Standards of Performance for Municipal Solid Waste Landfills* does not apply to the landfill since they only receive construction and demolition solid waste.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, AAAA, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills* does not apply to the installation.
- A flare is being installed to the control landfill gas emissions.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned to below de minimis level.
- This installation is located in St. Charles County, a nonattainment area for ozone (O₃) and an attainment area for all other criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the

application are below de minimis levels.

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Metro Fill Development, L.L.C. will construct and operate a demolition landfill. The proposed location is in St. Charles County, Missouri south of Friedens Road and west-northwest of arena Parkway. No permits have been issued to Metro Fill Development, L.L.C. from the Air Pollution Control Program.

Metro Fill Development, L.L.C. has submitted a solid waste disposal construction permit application for the demolition landfill to the Missouri Department of Natural Resources Solid Waste Management Program. The landfill will be permitted to receive only construction and demolition solid waste.

PROJECT DESCRIPTION

Metro Fill Development, L.L.C. proposes to construct and operate a demolition landfill in St. Charles County, Missouri. The landfill will cover approximately 15 acres of the 27-acre site owned by Metro Fill. The capacity of the landfill is estimated at 3,020,088 cubic yards of construction and demolition waste.

EMISSIONS/CONTROLS EVALUATION

The emissions from the installation consist of fugitive particulate matter emissions from vehicle traffic and material handling; VOC emissions from diesel fuel storage and landfill gas generation; and, HAP emissions from landfill gas generation. The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.2, *Unpaved Roads* (03/06), Section 13.2.4, *Aggregate Handling and Storage Piles* (03/06), and Section 11.9, *Western Surface Coal Mining* (10/98).

The landfill gas emissions are estimated using MDNR's "Landfill Spreadsheet." The flare for the landfill gas collection system has a maximum design rate of 0.04 MMCF per hour. However, emissions from landfill are based on average annual refuse acceptance rate of 331.0 Megagram and 15.0 Acre of landfill. Diesel tank emissions are calculated using EPA's Tank 4.0 program. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	Installation Conditioned Potential
PM ₁₀	15.0	N/A	N/A	20.35	< 15.0
SO _x	40.0	N/A	N/A	0.0002	N/A
NO _x	40.0	N/A	N/A	0.0010	N/A
VOC	40.0	N/A	N/A	0.0031	N/A
CO	100.0	N/A	N/A	0.0188	N/A
HAPs	10.0/25.0	N/A	N/A	0.0005	N/A

*N/A = Not Applicable

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned to below de minimis level.

APPLICABLE REQUIREMENTS

Metro Fill Development, L.L.C. 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

- *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 April 1 for the previous year's emissions.
- *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
- *Control of Odors in the Ambient Air*, 10 CSR 10-5.160

SPECIFIC REQUIREMENTS

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

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.

Fuad Wadud
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 2, 2006, received October 3, 2006, designating Metro Fill Development, L.L.C. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Missouri Department of Natural Resources' "Landfill Spreadsheet."
- St. Louis Regional Office Site Survey, October 17, 2006.

Mr. Michael J. Roberts
Member
Metro Fill Development, L.L.C.
1650 Des Peres Road, Suite 303
St. Louis, MO 63131

RE: New Source Review Permit - Project Number: 2006-10-016

Dear Mr. 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 and 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.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:fwl

Enclosures

c: St. Louis Regional Office
PAMS File: 2006-10-016

Permit Number: