

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: **032018-006**

Project Number: 2017-12-019

Installation Number: 217-0004

Parent Company: 3M Company

Parent Company Address: 3M Center, Bldg. 0224-05W-03, St. Paul, MN 55144

Installation Name: 3M Nevada

Installation Address: 2120 East Austin Blvd., Nevada, MO 64772

Location Information: Vernon County, S10, T35N, R31W

Application for Authority to Construct was made for:

Adding a third coating station to the Maker 51 web coating line. 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.

Prepared by
Chad Stephenson
New Source Review Unit

Director or Designee
Department of Natural Resources

MAR 14 2018

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 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."

3M Nevada
Vernon County, S10, T35N, R31W

1. Superseding Condition

The conditions of this permit supersede all special conditions found in the previously issued construction permit 082016-001 issued by the Air Pollution Control Program.

2. Alternative Solvents

A. 3M Nevada may use alternative solvents on Maker 51 provided all of the following conditions are met:

- 1) 3M Nevada shall not use any solvents or any combination of solvents on Maker 51 which from the three coating stations combined at maximum coating rates result in potential toluene emissions greater than 78.57 lb/hr.
- 2) 3M Nevada shall not use any solvents or any combination of solvents on Maker 51 which from the three coating stations combined at maximum coating rates result in potential combined HAP emissions (excluding toluene and methanol) in excess of 0.5 lb/hr.
- 3) 3M Nevada shall not use any solvents or any combination of solvents on Maker 51 which from the three coating stations combined at maximum coating rates result in potential individual HAP emissions (excluding toluene) greater than the SMAL. A listing of SMALs can be obtained at: <http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>
- 4) 3M Nevada shall document periods of control and periods of bypass for Maker 51. 3M Nevada shall only include control efficiency in HAP emissions calculations during documented control periods.

B. 3M Nevada shall maintain records of individual HAP potential emissions and combined HAP potential emissions for each solvent used by Maker 51.

3. The permittee shall notify the Air Pollution Control Program before initial startup of any modifications to the facility design that could impact the release parameters or toluene emission rates as specified in the Memorandum from the Modeling Unit titled, "Ambient Air Quality Impact Analysis (AAQIA) for the 3M

SPECIAL CONDITIONS:

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

Company Nevada Facility-Use of Additional Materials on Maker 51 – Revision #1” (June 2016). In the event the Air Pollution Control Program determines that the changes are significant, the permittee shall submit an updated AAQIA to the Air Pollution Control Program that this project continues to demonstrate compliance with the toluene RAL.

4. 3M Nevada is required to amend their Part 70 Operating Permit within 1 year of the third coating station startup
5. **Record Keeping and Reporting Requirements**
3M Nevada shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include SDS for all materials used.

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

Project Number: 2017-12-019
Installation ID Number: 217-0004
Permit Number: 032018-006

Installation Address:

3M Nevada
2120 East Austin Blvd.
Nevada, MO 64772

Parent Company:

3M Company
3M Center, Bldg. 0224-05W-03
St. Paul, MN 55144

Vernon County, S10, T35N, R31W

REVIEW SUMMARY

- 3M Nevada has applied for authority to add a third coating station to Maker 51 and to increase the line speed parameter in the software controlling the Maker 51 line.
- The application was deemed complete on January 16, 2018.
- HAP emissions are expected from the solvents used on Maker 51. The solvents included in the permit application contain benzene (71-43-2), formaldehyde (50-00-0), methanol (67-56-1) and toluene (108-88-3). Alternative solvents language in Special Condition 2 allows for the use of alternative solvents which may result in the emission of other individual HAPs; however, any combined HAP emissions (excluding toluene and methanol) increase is limited to 0.5 lb/hr and potential individual HAP emissions are limited to the SMAL (whichever is less)¹.
- 40 CFR 60 Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations" applies to Maker 51.
- 40 CFR 60 Subpart FFF, "Standards of Performance for Flexible Vinyl and Urethane Coating and Printing" applies to Maker 51.
- 40 CFR Part 63, Subpart JJJJ – *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* applies to Maker 51.
- Thermal oxidizers are being used to control the HAP emissions from the equipment in this permit.

¹ As an emissions increase of more than 0.5 lb/hr of combined HAP (excluding toluene and methanol) or potential individual HAP emissions greater than the SMAL triggers a permit per 10 CSR 10-6.061(3)(A)3.B.

- 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. A permit was required as potential emissions of the project for methanol exceed 0.5 lb/hr.
- This installation is located in Vernon 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 not performed as part of this project. Ambient air quality modeling was performed as part of permit 082016-001 to determine the ambient impact of toluene from Maker 51.
- Emissions testing is not required for the equipment as a part of this permit. The destruction efficiencies of the thermal oxidizers were tested in June and August of 2015. The capture efficiency of the permanent total enclosure was tested in August of 2015. 3M Nevada is required to revalidate the destruction efficiencies and capture efficiency at least every 60 months by their VOC PAL permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

3M Company owns and operates an existing commercial graphics plant in Nevada, Missouri. The installation is a major source of VOC emissions. The installation operates under their current Part 70 operating permit OP2017-040. The following construction permits have been issued to 3M Nevada from the Air Pollution Control Program:

Table 1: Previously issued permits

| Permit Number | Description |
|---------------|---|
| 0782-002 | DMC Paint Line (Dismantled) |
| 0184-013 | Storage/Extruder Fume Exhausts |
| 0884-005 | Three Roll Mill |
| 0585-001 | Corona Treater |
| 0988-003 | Replacement Boiler |
| 0289-005 | Roll Grinder |
| 0590-011 | Replacement of Line Drives for 42 Maker |
| 0590-012 | Five Aboveground Solvent Storage Tanks |
| 0291-003 | 47 Maker |
| 0395-012 | 48 Maker |
| 0895-025 | 533 Gallon Kettle |
| 0395-012A | Amendments to Permit 0395-012 |

| | |
|-------------|--|
| 1195-009 | 250 Gallon Kettle |
| 1095-014 | N3 Maker |
| 1195-018 | Chromium and Copper Electroplating |
| 0396-019 | 49 Maker |
| 0396-020 | Case Printer |
| 1195-018A | Amendments to Permit 1195-018 |
| 0596-010 | Temporary Permit for 40 Maker |
| 0596-011 | Temporary Permit for Corona Treaters |
| 0796-003 | New Lathe |
| 1096-003 | Distillation Unit |
| 0297-017 | Electrostatic Printer and Two Flexographic Printers |
| 1098-017 | Flexible sign face substrate production line |
| 0199-025 | New Parts Cleaning Vat |
| 0899-012 | Temporary permit for an air compressor |
| 012000-020 | Temporary permit for two 175 kW-hr diesel generators |
| 1098-017A | Amendment to Permit Number 1098-017 |
| 1098-017B | Amendment to Permit Number 1098-017A |
| 042004-002 | Flexible VOC permit |
| 042004-002A | Mixer |
| 042004-002B | Ductwork changes |
| 042004-002C | Line modification |
| 112007-007 | Temporary boiler permit - Expired |
| 112008-009 | Boilers |
| 042004-002D | Boiler recordkeeping |
| 042004-002E | Printing line |
| 042004-002F | Special condition changes |
| 072015-012 | VOC PAL |
| 032015-005 | Drum washer |
| 082016-001 | Solvent Change Maker 51 |

The installation's PAL permit, 072015-012, supersedes the special conditions of most of the previous permits. The only construction permits with special conditions applicable to the installation at this time are 112008-009, 032015-005, 072015-012 and 082016-001. The conditions of permit 082016-001 are being superseded by the conditions of this permit.

3M Nevada has requested confidentiality as allowed per 10 CSR 10-6.210 with regards to process flow diagram, process rates, emission factors and safety data sheets (SDS) due to the proprietary nature of the information. This information can only be obtained by the public with written permission from 3M Nevada. This permit is a public version and there is no confidential version of the permit.

PROJECT DESCRIPTION

Maker 51 is an existing emission source. Maker 51 currently contains two separate coating stations. 3M Nevada has requested to add a third coating station to the Maker 51 web coating line to enable it to produce a greater array of products. Maker 51 was last modified in permit 082016-001 to use a new solvent (Solvent 5) on Maker 51. Solvent 5 resulted in an increase in toluene and methanol emissions from Maker 51. This project is being considered a separate project from permit 082016-001. The original two coating stations were planned, designed, funded and installed as part of the original web coating line. This work began back in 2012 and start-up of the line occurred on December 1, 2014. The third coating station being added as part of this project was not planned, designed, or funded as part of the original project that began in 2012. The third coating station will allow Maker 51 to create products that it currently cannot.

In addition to the third coating station being added as part of this project, the line speed parameter in the software controlling the Maker 51 line will be increased, to allow for an overall faster, greater production rate previously not achievable due to poor quality concerns. As a result, the two existing coating stations will see potential emissions increases of toluene and methanol as well.

VOC emissions were not analyzed by this project as 3M Nevada operates under a VOC PAL. Maker 51 is currently designated as a continuously controlled emission source for compliance with their VOC PAL; therefore, no federally enforceable control device requirement for the permanent total enclosure and thermal oxidizers was included in this permit. The restrictions in Special Condition 2 ensure that 3M Nevada only includes control efficiency for VOC HAPs during documented control periods. 3M Nevada is required to document control periods of Maker 51 as never controlled, continuously controlled, or intermittently controlled. These restrictions are necessary as Maker 51 was modeled as a continuously controlled source for permit 082016-001. Special Condition 2 also allows for the use of alternative solvents provided certain conditions are met.

- The toluene modeling analysis in permit 082016-001 indicated that toluene emissions from Maker 51 are less than 4% of the toluene RAL at a potential toluene emissions rate of 78.57 lb/hr; therefore, while Maker 51 remains a continuously controlled source toluene-containing solvents with potential controlled toluene emissions from Maker 51 of less than 78.57 lb/hr may be used. If Maker 51 becomes an intermittently controlled or never controlled source in the future, 3M Nevada may use toluene-containing solvents provided potential uncontrolled toluene emissions from Maker 51 are less than 78.57 lb/hr. With the addition of the third coating station and the increase in production on the existing two coating stations, the total toluene emissions from Maker 51 remain below 78.57 lb/hr.
- None of the solvents evaluated by this project contained individual HAPs other than benzene, formaldehyde, toluene and methanol. Missouri's current

construction permit exemptions allow for a change in solvent provided the construction/modification increases combined HAP emissions (excluding toluene and methanol) by no more than 0.5 lb/hr or causes individual HAP potential emissions to exceed the SMAL, whichever is less (see 10 CSR 10-6.061(3)(A)3.B); therefore, 3M Nevada is not required to obtain a permit for a new individual HAP-containing solvent provided the controlled combined HAP emissions (excluding toluene and methanol) increase from Maker 51 is less than 0.5 lb/hr and the controlled potential emissions of each individual HAP (except toluene) from Maker 51 are below the SMAL. If Maker 51 becomes a never controlled source in the future, 3M Nevada may use new individual HAP-containing solvents provided the uncontrolled combined HAP emissions (excluding toluene and methanol) increase from Maker 51 is less than 0.5 lb/hr and the uncontrolled potential emissions of each individual HAP (excluding toluene) from Maker 51 are below the SMAL.

The stack tested capture efficiency of the permanent total enclosure on Maker 51 was determined to be 99.93% in August of 2015.

Captured emissions from Maker 51 are sent to one of the installation's three thermal oxidizers for destruction. The destruction efficiency of each of the thermal oxidizers was tested in June and August of 2015. The destruction efficiencies ranged from 97.9% to 98.5%. The lowest destruction efficiency of 97.9% is the worst-case and was used to determine potential HAP emissions from this project.

EMISSIONS/CONTROLS EVALUATION

Emissions from this project were calculated using a mass balance approach to determine the uncontrolled emission rate (which assumed 100% emission and 0% retention within the product being coated) and then applying the capture and destruction efficiencies. The following tables provide an emissions summary for this project. Existing potential emissions were unavailable for the installation; however, past actuals indicate the installation is a major source. Existing actual emissions were taken from the installation's 2015 and 2016 EIQ. Maker 51 potential emissions represent the continuously controlled potential of Maker 51, assuming continuous operation (8760 hours per year).

Since this project involves a modification of an existing emissions unit, the emissions increase of methanol and toluene on the existing two coating stations for Maker 51 was determined by calculating the difference between the potential emissions and the baseline actual emissions. Baseline actual emissions of methanol were calculated as the average of actual emissions from 2015 to 2016. Project emission increases were calculated by subtracting the baseline actuals from the potential emissions of the application. Toluene emissions from Maker 51 remain below 78.57 lb/hr which is the rate specified in the Memorandum from the Modeling Unit titled, "Ambient Air Quality Impact Analysis (AAQIA) for the 3M Company Nevada Facility-Use of Additional Materials on Maker 51 – Revision #1" (June 2016).

Table 2: Emissions Summary (tpy)

| Pollutant | Regulatory <i>De Minimis</i> Levels | Existing Facility Potential Emissions ¹ | Existing Actual Maker 51 Actual Emissions 2015-2016 Average | Maker 51 Potential Emissions | Project Emissions Increase Maker 51 (Potential Minus Baseline Actuals) ¹ |
|-------------------|-------------------------------------|--|---|------------------------------|---|
| PM | 25.0 | N/D | N/A | N/A | N/A |
| PM ₁₀ | 15.0 | N/D | N/A | N/A | N/A |
| PM _{2.5} | 10.0 | N/D | N/A | N/A | N/A |
| SOx | 40.0 | N/D | N/A | N/D | N/D |
| NOx | 40.0 | N/D | N/A | N/D | N/D |
| VOC | 40.0 | Major | N/D | N/D | N/D |
| CO | 40.0 | N/D | N/A | N/D | N/D |
| HAPs | 10.0/25.0 | Major | N/D | 29.82 | N/D |
| Toluene | 10.0 | Major | 1.52 | 29.82 | 28.30 |
| Methanol | 10.0 | Major | 1.77 | 10.61 | 8.81 |
| Benzene | 10.0/2.0 ² | Major | N/D | 0.04 | 0.04 |
| Formaldehyde | 10.0/2.0 ² | Major | N/D | 0.03 | 0.03 |

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

¹Since the emissions increase for methanol is below *de minimis* and SMAL, the proposed upgrades are being permitted as a *de minimis* emissions increase.

²SMAL

Table 3: Past Actual and Potential Emissions Summary (tpy)

| Pollutant | Equipment Maker 51 Actual Emissions (2015) | Equipment Maker 51 Actual Emissions (2016) | Baseline Maker 51 Actual Emissions 2015-2016 Average | Maker 51 Potential Emissions | Emissions Increase Maker 51 (Potential Minus Baseline Actuals) |
|-------------------|--|--|--|------------------------------|--|
| PM | N/A | N/A | N/A | N/A | N/A |
| PM ₁₀ | N/A | N/A | N/A | N/A | N/A |
| PM _{2.5} | N/A | N/A | N/A | N/A | N/A |
| SOx | N/A | N/A | N/A | N/A | N/A |
| NOx | N/A | N/A | N/A | N/A | N/A |
| VOC | N/D | N/D | N/D | N/D | N/D |
| CO | N/A | N/A | N/A | N/D | N/D |
| HAPs | N/D | N/D | N/D | N/D | N/D |
| Toluene | 1.16 | 1.87 | 1.52 | 29.82 | 28.30 |
| Methanol | 1.41 | 2.13 | 1.77 | 10.61 | 8.81 |
| Benzene | N/D | N/D | N/D | 0.04 | 0.04 |
| Formaldehyde | N/D | N/D | N/D | 0.03 | 0.03 |

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

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 the de minimis levels. A permit was required as potential emissions of the project for methanol exceed 0.5 lb/hr. A Section (9) permit is not required as Maker 51 is subject to MACT JJJJ

APPLICABLE REQUIREMENTS

3M Nevada 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

- *Operating Permits*, 10 CSR 10-6.065
- *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
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *New Source Performance Regulations*, 10 CSR 10-6.070
 - *Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations* 40 CFR Part 60, Subpart RR
 - *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing* 40 CFR Part 60, Subpart FFF
- *MACT Regulations*, 10 CSR 10-6.075
 - *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*, 40 CFR Part 63, Subpart JJJJ

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

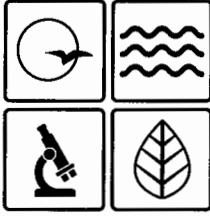
The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 30, 2017, received December 8, 2017, designating 3M Company as the owner and operator of the installation.
- The Ambient Air Quality Impact Analysis (AAQIA) for the 3M Company Nevada Facility-Use of Additional Materials on Maker 51 – Revision #1 (June 2016)

APPENDIX A

Abbreviations and Acronyms

| | |
|---|---|
| %percent | Mgal1,000 gallons |
| °Fdegrees Fahrenheit | MWmegawatt |
| acfmactual cubic feet per minute | MHDRmaximum hourly design rate |
| BACTBest Available Control Technology | MMBtuMillion British thermal units |
| BMPsBest Management Practices | MMCFmillion cubic feet |
| BtuBritish thermal unit | MSDSMaterial Safety Data Sheet |
| CAM Compliance Assurance Monitoring | NAAQSNational Ambient Air Quality Standards |
| CASChemical Abstracts Service | NESHAPs National Emissions Standards for Hazardous Air Pollutants |
| CEMS Continuous Emission Monitor System | NO_xnitrogen oxides |
| CFRCode of Federal Regulations | NSPSNew Source Performance Standards |
| COcarbon monoxide | NSRNew Source Review |
| CO₂carbon dioxide | PMparticulate matter |
| CO₂ecarbon dioxide equivalent | PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter |
| COMSContinuous Opacity Monitoring System | PM₁₀particulate matter less than 10 microns in aerodynamic diameter |
| CSRCode of State Regulations | ppmparts per million |
| dscfdry standard cubic feet | PSDPrevention of Significant Deterioration |
| EIQEmission Inventory Questionnaire | PTEpotential to emit |
| EPEmission Point | RACTReasonable Available Control Technology |
| EPAEnvironmental Protection Agency | RALRisk Assessment Level |
| EUEmission Unit | SCCSource Classification Code |
| fpsfeet per second | scfmstandard cubic feet per minute |
| ftfeet | SDSSafety Data Sheet |
| GACTGenerally Available Control Technology | SICStandard Industrial Classification |
| GHGGreenhouse Gas | SIPState Implementation Plan |
| gpmgallons per minute | SMALScreening Model Action Levels |
| grgrains | SO_xsulfur oxides |
| GWPGlobal Warming Potential | SO₂sulfur dioxide |
| HAPHazardous Air Pollutant | SSMStartup, Shutdown & Malfunction |
| hrhour | tphtons per hour |
| hphorsepower | tpytons per year |
| lbpound | VMTvehicle miles traveled |
| lbs/hrpounds per hour | VOCVolatile Organic Compound |
| MACTMaximum Achievable Control Technology | |
| µg/m³micrograms per cubic meter | |
| m/smeters per second | |



Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 14 2018

Mr. Andrew Willing
Environmental Specialist
3M Nevada
3M Center, Bldg. 0224-05W-03
St. Paul, MN 55144

RE: New Source Review Permit - Project Number: 2017-12-019

Dear Mr. Willing:

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 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.

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.



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Mr. Andrew Willing
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If you have any questions regarding this permit, please do not hesitate to contact Chad Stephenson, 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



Susan Heckenkamp
New Source Review Unit Chief

SH:csj

Enclosures

c: Southwest Regional Office
PAMS File: 2017-12-019

Permit Number: **032018-006**