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.
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)\(^1\).


- Thermal oxidizers are being used to control the HAP emissions from the equipment in this permit.

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\(^1\)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>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0782-002</td>
<td>DMC Paint Line (Dismantled)</td>
</tr>
<tr>
<td>0184-013</td>
<td>Storage/Extruder Fume Exhausts</td>
</tr>
<tr>
<td>0884-005</td>
<td>Three Roll Mill</td>
</tr>
<tr>
<td>0585-001</td>
<td>Corona Treater</td>
</tr>
<tr>
<td>0988-003</td>
<td>Replacement Boiler</td>
</tr>
<tr>
<td>0289-005</td>
<td>Roll Grinder</td>
</tr>
<tr>
<td>0590-011</td>
<td>Replacement of Line Drives for 42 Maker</td>
</tr>
<tr>
<td>0590-012</td>
<td>Five Aboveground Solvent Storage Tanks</td>
</tr>
<tr>
<td>0291-003</td>
<td>47 Maker</td>
</tr>
<tr>
<td>0395-012</td>
<td>48 Maker</td>
</tr>
<tr>
<td>0895-025</td>
<td>533 Gallon Kettle</td>
</tr>
<tr>
<td>0395-012A</td>
<td>Amendments to Permit 0395-012</td>
</tr>
</tbody>
</table>
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)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Regulatory De Minimis Levels (^2)</th>
<th>Existing Facility Potential Emissions (^1)</th>
<th>Existing Actual Maker 51 Actual Emissions 2015-2016 Average</th>
<th>Maker 51 Potential Emissions</th>
<th>Project Emissions Increase Maker 51 (Potential Minus Baseline Actuals) (^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>15.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>10.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SO(_x)</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>NO(_x)</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>Major</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CO</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>Major</td>
<td>29.82</td>
<td>N/D</td>
<td>28.30</td>
</tr>
<tr>
<td>Toluene</td>
<td>10.0</td>
<td>Major</td>
<td>1.52</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>Methanol</td>
<td>10.0</td>
<td>Major</td>
<td>1.77</td>
<td>N/D</td>
<td>8.81</td>
</tr>
<tr>
<td>Benzene</td>
<td>10.0/2.0 (^2)</td>
<td>Major</td>
<td>N/D</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>10.0/2.0 (^2)</td>
<td>Major</td>
<td>N/D</td>
<td>0.03</td>
<td>0.03</td>
</tr>
</tbody>
</table>

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

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

\(^2\)SMAL

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

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SO(_x)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NO(_x)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CO</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>HAPs</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>Toluene</td>
<td>1.16</td>
<td>1.87</td>
<td>1.52</td>
<td>29.82</td>
<td>28.30</td>
</tr>
<tr>
<td>Methanol</td>
<td>1.41</td>
<td>2.13</td>
<td>1.77</td>
<td>10.61</td>
<td>8.81</td>
</tr>
<tr>
<td>Benzene</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>0.03</td>
<td>0.03</td>
</tr>
</tbody>
</table>

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
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
°F .......... degrees Fahrenheit
acfm .......... actual cubic feet per minute
BACT ...... Best Available Control Technology
BMPs ...... Best Management Practices
Btu .......... British thermal unit
CAM ...... Compliance Assurance Monitoring
CAS .......... Chemical Abstracts Service
CEMS ..... Continuous Emission Monitor System
CFR .. Code of Federal Regulations
CO .......... carbon monoxide
CO₂ ........ carbon dioxide
cO₂e ...... carbon dioxide equivalent
COMS ...... Continuous Opacity Monitoring System
CSR ....... Code of State Regulations
dscf .. dry standard cubic feet
EIQ......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA ........ Environmental Protection Agency
EU .......... Emission Unit
fps .......... feet per second
ft ............. feet
GACT ...... Generally Available Control Technology
GHG ....... Greenhouse Gas
gpm ...... gallons per minute
gr .......... grains
GWP ...... Global Warming Potential
HAP ...... Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ...... pounds per hour
MACT ...... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ...... 1,000 gallons
MW ........ megawatt
MHDR .... maximum hourly design rate
MMBtu ...... Million British thermal units
MMCF ...... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS .... National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NOₓ .......... nitrogen oxides
NSPS ...... New Source Performance Standards
NSR .... New Source Review
PM .......... particulate matter
PM₁₀ .... particulate matter less than 10 microns in aerodynamic diameter
PM₂.₅ .... particulate matter less than 2.5 microns in aerodynamic diameter
ppm ...... parts per million
PSD .......... Prevention of Significant Deterioration
PTE .......... potential to emit
RACT ...... Reasonable Available Control Technology
RAL ........ Risk Assessment Level
SCC ........ Source Classification Code
scfm ...... standard cubic feet per minute
SDS ...... Safety Data Sheet
SIC ........ Standard Industrial Classification
SIP ........ State Implementation Plan
SMAL ...... Screening Model Action Levels
SO₂ ...... sulfur oxides
SO₃ ...... sulfur dioxide
SSM ...... Startup, Shutdown & Malfunction
tph ........ tons per hour
tpy ........ tons per year
VMT ...... vehicle miles traveled
VOC ...... Volatile Organic Compound
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.
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