



## PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

**Operating Permit Number:** OP2010-021  
**Expiration Date:** FEB 25 2015  
**Installation ID:** 139-0008  
**Project Number:** 2004-01-094

**Installation Name and Address**

Christy Minerals LLC  
P.O. Box 159  
High Hill, MO 63350  
Montgomery County

**Parent Company's Name and Address**

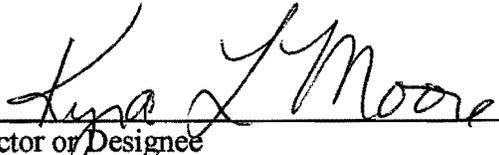
O'Brien Industrial Holdings, LLC  
4641 McRee Avenue  
St. Louis MO, 63110

**Installation Description:**

Christy Minerals calcines clay for the manufacture of refractory materials. The processing of the clay involves calcining, grinding, and sizing of the alumina silicate materials.

FEB 26 2010

Effective Date

  
Director or Designee  
Department of Natural Resources

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## **I. Installation Description and Equipment Listing**

### **INSTALLATION DESCRIPTION**

Christy Minerals calcines clay for the manufacture of refractory materials. The processing of the clay involves calcining, grinding, and sizing of the alumina silicate materials.

The process begins with the stockpiling of the raw materials. From here, the raw clay materials are processed through the kiln system, the drier system, the hammer mill system, or shipped off-site as raw material.

If the raw clay is sent to the Kiln System, it will be crushed and fed to the calcining kiln. After the kiln, the calcined material will be either shipped off-site as is, or sent to the calcined clay storage shed to wait further processing through the Barmac, West, East, Abbe Mill, or Hardinge Mill Systems.

If the raw clay is sent to the Drier System, it will be dried and sent to the Hammer Mill System or off-site for further processing. Calcined clay may also be sent to the Drier System, which then sends the dried calcined clay to the Barmac, West, East, Abbe Mill, or Hardinge Mill Systems for further processing.

If the raw clay is sent to the Hammer Mill System (EP 600 series), it will be milled, screened and sent to packaging for shipment off-site.

The Barmac, West, and East Systems all process calcined clay. The Barmac System receives the material and either processes it through crushers and screens, or sends the material to the East System or to the West System. The East System processes the material through screens and crushers and either sends the material to packaging for shipment off-site, or sends the material to the West System for further processing. The West System receives material from the Barmac and East Systems and processes it through crushers and screens and sends it to packaging for shipment off-site.

The Abbe Mill and Hardinge Mill Systems process calcined clay and share a feed system. The Abbe Mill System receives material and either processes it through mills and screens, then sends it to packaging for shipment off-site, or sends the material to the Hardinge Mill System. The Hardinge Mill System receives material and processes it through mills and screens, and then sends it to packaging for shipment off-site.

Calcined product lines include: Calcined Missouri Flint Clay; Calcined Burley; Calcined Diaspore; Calcined Plastic Fireclay; the STKO® family of Precision Investment Casting Alumino-Silicate Grains and Flours; Hawthorn® Bond; and Red Plastic Fireclay. Calcined Missouri Flint Clay is used by the refractory industry for manufacturing bricks, castables, and plastics. It is also used in the pottery and terra cotta industry as a grog in a variety of bodies formulations. Calcined Burley, Calcined Diaspore, and Calcined Plastic Fireclay are all used in a variety of applications including refractory castables, bricks, and plastics. The STKO® family of Precision Investment Casting Alumino-Silicate Grains and Flours are used as a ceramic refractory mold media in the production of refractory shells. Hawthorn® Bond, Red Plastic Fireclay, and Calcined Missouri Flint Clay are all used in the Pottery/Art industries. Calcined Missouri Fireclay is also used as a fluidizing agent for fluid bed boilers.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb) <sup>1</sup>	Hazardous Air Pollutants (HAPs) <sup>2</sup>
2008	48.72	25.04	578.44	170.16	0.01	82.34	--	--
2007	49.26	24.25	603.84	162.41	0.01	79.73	--	--
2006	71.79		475.99	139.98	0.07	67.79	--	--
2005	84.65		308.75	129.03	0.02	92.16	--	--
2004	71.58		272.10	113.71	0.03	81.22	--	--

**EMISSION UNITS WITH LIMITATIONS**

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Point	Emission Point Description	Equipment Number
<b>Hammer Mill</b>		
602	Material transfer from hopper HM-0015 to Chain Conveyor HM-01	HM-0015 HM-01
603	Dust collector CD1	HM-07B HM-0015 HM-01 HM-00 HM-001 HM-02 HM-08 HM-03 HM-05 HM-04 HM-06
606	Material transfer from Bucket Elevator HM-02 to Screen HM-03/Bin HM-05	HM-03 HM-05
609	Packaging operation of material transfer from Bin HM-05 to bags	HM-04
611	Bulk truck/rail loading from Auger HM-06	HM-06
<b>Railcar Bulk Loading at Kiln</b>		
702	Bulk railcar loading from Bucket Elevator K-520	n/a
703	Dust Collector CD7	K-525 K-518 K-520

<sup>1</sup> Below the minimum reporting threshold.

<sup>2</sup> Below the minimum reporting threshold.

Emission Point	Emission Point Description	Equipment Number
<b>Kiln System</b>		
1002	Eagle Crusher K-021	K-021
1003	Material transfer from Eagle Crusher K-021 to Conveyor Belt K-024	K-021
		K-024
1004	Material transfer from Belt Conveyor K-024 to Bucket Elevator K-027 (via Flop Gate)	K-024
		K-027
		K-033
		K-035
1004E	Material transfer from Bin 1 K-033 to East Vibratory Feeder K-034	K-033
		K-034
1004W	Material transfer from Bin 2 K-035 to West Vibratory Feeder K-036	K-035
		K-036
1005	Material transfer from Belt Conveyor K-024 to Bypass Conveyor Belt K-030 (via Flop Gate)	K-024
		K-030
1006	Material transfer from East K-034 and West K-036 Vibratory Feeders and Bypass Belt Conveyor K-030 to Kiln Feed Conveyor Belt K-037	K-034
		K-036
		K-030
		K-037
		K-040
1007	Material transfer from Feed Scale K-040 to Kiln K-041	K-037
		K-040
		K-041
1008	Dust Collector CD19	K-548
		K-054
		K-547
		K-554
1009	Material transfer from Stacker K-554 to Stockpile	K-554
1011	RKF transfer from Auger K-553 to Stockpile	K-553
1012	Dust Collectors CD13A, 13B, 13C, 13D (single stack)	K-057
		K-058
		K-059
		K-060
		K-043
		K-043A
		K-042
		K-041
		K-049
		K-016
		K-017

Emission Point	Emission Point Description	Equipment Number
		K-014
		K-543A
		K-543B
		K-543C
1014	Coal transfer from Hopper/Pan Feeder K-001 to Coal Crusher K-003	K-001 K-003
1016	Coal transfer from bin K-008 to Conveyor Belt Scale K-009	K-003 K-005 K-008 K-009
1017	Coal transfer from Conveyor Belt Scale K-009 to Coal Mill K-016 via Air Lock K-014	K-009
1019	Material transfer from Cooler K-049 to CMC Rerun Concrete Pit (via Flop Gate)	K-049
<b>Dryer</b>		
1102	Dust Collector CD10	ZPLT-03 ZPLT-04 ZPLT-01
1103	Material transfer from Drier ZPLT-01 to Stockpile	ZPLT-01
<b>BARMAC System</b>		
101	Front end loader material transfer to Hopper BR-01A	BR-01A
102	Dust Collector CD4	BR-37 BR-00 BR-01A BR-02 BR-04 BR-10 BR-11 BR-12 BR-18 BR-23 BR-13 BR-14 BR-15
103	Dust Collector CD3	BR-36 BR-01 BR-02
104	Material transfer from Vibratory Feeder BR-03 to Conveyor Belt BR-04	BR-03 BR-04
105	Material transfer from Conveyor Belt BR-04 to Bucket Elevator BR-05	BR-04 BR-05

Emission Point	Emission Point Description	Equipment Number
106	Dust Collector CD17	BR-39 BR-04 BR-05 BR-06 BR-07 BR-09 BR-00 BR-10 BR-11 BR-12 BR-18 BR-19 BR-20 BR-21 BR-20B
109	Jaw Crusher BR-34	BR-34
110	Material transfer from BARMAC Screen BR-07 to Belt Conveyor BR-09	BR-09
111	Material transfer from Belt Conveyor BR-09 to BARMAC Crusher BR-00 (enclosed)	BR-09
118	SWECO Screen BR-40	BR-40
119	DCF bulk truck loading from Auger BR-39B	BR-39B
120	DCF bag packaging BR-40B from SWECO Screen BR-40	BR-40B
122	Vibratory Feeder BR-03	BR-03
<b>East System</b>		
301	Front end loader material transfer to Hopper EA-01A	EA-01A
302	Vibratory Feeder EA-01	EA-01
304	Dust Collector CD14	EA-13 EA-01A EA-02 EA-04B EA-08 EA-09 EA-10
306	Vibratory Feeder EA-05	EA-05
308	Material transfer from BARMAC Screen BR-07 to Oversize Product Bin EA-09	EA-09
309	Material transfer from Oversize Product Bin EA-09 to Belt Conveyor BR-35	EA-09 BR-35
310	Material transfer from Packaging Bin EA-08 to Belt Conveyor EA-11	EA-08 EA-11
311	Material transfer from Belt Conveyor EA-11 to intermediate stockpile	EA-11

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
312	Bag Packaging EA-07 from Packaging Bin EA-08	EA-07
313	Supersack Packaging EA-07A from Packaging Bin EA-08	EA-07A
314	Material transfer from Vibratory Feeder EA-01 to Bucket Elevator EA-02	EA-01 EA-02
315	Material transfer from Vibratory Feeder EA-05 to Bucket Elevator EA-02	EA-05 EA-02
316	Material transfer from BARMAC Screen BR-07 to Green Bin EA-10	EA-10
317	Material transfer from BARMAC Screen BR-07 to Packaging Bin EA-08	EA-08
318	Dust Collector CD6	EA-14 EA-08 EA-09 EA-10 EA-07 BR-29 BR-30 BR-31A BR-31B BR-31C BR-32A BR-32B BR-32C BR-43
319	Front end loader material pickup from intermediate stockpile	n/a
<b>West System</b>		
112A	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 1 BR-10	BR-10
112B	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 2 BR-11	BR-11
112C	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 3 BR-12	BR-12
113A	Material transfer from BARMAC Bin 1 BR-10 to Conveyor Belt BR-18	BR-10 BR-18
113B	Material transfer from BARMAC Bin 2 BR-11 to Conveyor Belt BR-18	BR-11 BR-18
113C	Material transfer from BARMAC Bin 3 BR-12 to Conveyor Belt BR-18	BR-12 BR-18
114	Material transfer from Conveyor Belt BR-18 to Bucket Elevator BR-19	BR-18 BR-19
116	Bag Packaging BR-21 of material from Bin BR-20	BR-21
117	Supersack Packaging BR-20B of material from Bin BR-20	BR-20B
123	Material transfer from BARMAC Bin 3 BR-12 to West Conveyor Belt BR-23	BR-12 BR-23

Emission Point	Emission Point Description	Equipment Number
124	Material transfer from BARMAC Bin 2 BR-11 to West Conveyor Belt BR-23	BR-11 BR-23
206A	Material transfer from BARMAC Screen BR-07 to West Bin 1 BR-13	BR-13
206B	Material transfer from BARMAC Screen BR-07 to West Bin 2 BR-14	BR-14
206C	Material transfer from BARMAC Screen BR-07 to West Bin 3 BR-15	BR-15
207A	Material transfer from West Bin 1 BR-13 to West Conveyor Belt BR-23	BR-13 BR-23
207B	Material transfer from West Bin 2 BR-14 to West Conveyor Belt BR-23	BR-14 BR-23
207C	Material transfer from West Bin 3 BR-15 to West Conveyor Belt BR-23	BR-15 BR-23
208	Material transfer from West Conveyor Belt BR-23 to Bucket Elevator BR-24	BR-23 BR-24
209	Material transfer via Turn Head from Bucket Elevator BR-24 to Belt Conveyor BR-29, Bulk Loading via Pipe BR-33, South Packaging Bin BR-26, or North Packaging Bin BR-25	BR-24 BR-24A
210	Material transfer from Belt Conveyor BR-29 to Bucket Elevator BR-30	BR-29 BR-30
210A	Dust Collector CD12	BR-30A BR-30
210B	Material transfer via Turn Head from Bucket Elevator BR-30 to Outside Storage Bin 1 BR-31A, Outside Storage Bin 2 BR-31B, Outside Storage Bin 3 BR-31C, Outside Storage Bin 4 BR-32A, Outside Storage Bin 5 BR-32B, or Outside Storage Bin 6 BR-32C	BR-30 BR-30A
213A	Bulk truck loading from Outside Storage Bin 4 BR-32A	BR-32A
213B	Bulk truck loading from Outside Storage Bin 5 BR-32B	BR-32B
213C	Bulk truck loading from Outside Storage Bin 6 BR-32C	BR-32C
215	Bag Packaging BR-41 of material from North Packaging Bin BR-25	BR-41
216	Supersack Packaging BR-25B of material from North Packaging Bin BR-25	BR-25B
219	Supersack Packaging BR-26B of material from South Packaging Bin BR-26	BR-26B
220	Bulk railcar/truck loading from Bucket Elevator BR-24	BR-33
221	Dust Collector CD5	BR-38B BR-13 BR-14 BR-15 BR-35 BR-23 BR-24 BR-29

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
		BR-33
		BR-26
		BR-26B
		BR-25
		BR-41
		BR-25B
222	Bulk truck loading of DCF from CD5	n/a
223	Front end loader material pickup from Outside Storage Bin 1 BR-31A	n/a
224	Front end loader material pickup from Outside Storage Bin 2 BR-31B	n/a
225	Bag Packaging BR-43 from Outside Storage Bin 3 BR-31C	BR-43
226	Material transfer from East System Belt Conveyor BR-35 to West Conveyor Belt BR-23	BR-35
		BR-23
<b>Feed for Abbe and Hardinge Mills</b>		
402	Dust Collector CD20	HRAB-05
		HRAB-00
		HRAB-01
		HRAB-02
403	Material transfer from Bucket Elevator HRAB-01 to Belt Conveyor HRAB-02	HRAB-01
		HRAB-02
<b>Abbe Mill</b>		
404	Material transfer from Belt Conveyor HRAB-02 to Abbe Bin AB-01	HRAB-02
		AB-01
404A	Material transfer from Abbe Bin AB-01 to Vibratory Feeder AB-02	AB-01
		AB-02
405	Material transfer from Vibratory Feeder AB-02 to Belt Conveyor AB-03	AB-02
		AB-03
406	Material transfer from Belt Conveyor AB-03 and AB-10 to Hopper AB-04	AB-03
		AB-04
407	Material transfer from Hopper AB-04 to Vibratory Feeder #1 AB-04B	AB-04
		AB-04B
408	Material transfer from Hopper AB-04 to Vibratory Feeder #2 AB-04A	AB-04
		AB-04A
409	Dust Collector CD2	HRAB-03
		AB-04A
		AB-04B
		AB-00A
		AB-00B
		AB-05
		AB-06

Emission Point	Emission Point Description	Equipment Number
		AB-07
		AB-11
		AB-08
		AB-12
		AB-09B
		HR-00
		HR-03
		HR-04
		HR-05
		HR-06
		HR-07
		HRAB-04
415	Bag/Supersack Packaging AB-09B from Bin AB-12	AB-09B
416	Oversize material transfer from Screen AB-07 to Belt Conveyor AB-10	AB-10
<b>Hardinge Mill</b>		
501	Material transfer from Belt Conveyor HRAB-02 to Hardinge Bin HR-01	HRAB-02 HR-01
501A	Material transfer from Hardinge Bin HR-01 to Vibratory Feeder HR-02	HR-01 HR-02
509	Bag/Supersack Packaging HR-07 from Bin HR-06	HR-07

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Emission Point	Emission Point Description	Equipment Number
<b>Raw Material and Calcined Clay Storage Piles</b>		
802	Plastic Shed (Raw Clay Storage)	n/a
804	Outdoor Calcined Storage (piles and stalls)	n/a
805	Sheltered Calcined Storage (ANH Shed, Calcined Flint Shed, Old Flint Shed, Quonset Hut)	n/a
808	Raw Clay Storage (outdoor piles and raw flint shed)	n/a
810	Coal Storage Shed	n/a
<b>Hammer Mill</b>		
601	Front end loader material transfer to Hopper HM-0015	HM-0015
<b>Railcar Bulk Loading at Kiln</b>		
701	Front end loader material transfer to Hopper K-518	K-518
<b>Kiln System</b>		
1001	Front end loader material transfer to Hopper K-019A	K-019A K-019
1010	Material pickup at Stacker Stockpile by Front End Loader	n/a

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
1013	Coal transfer from Front End Loader into Hopper/Pan Feeder K-001	K-001
1020	Material pickup at CMC Rerun Concrete Pit to Outdoor Stockpiles	n/a
1021	Material pickup at RKF Stockpile by Front End Loader	n/a
<b>Dryer</b>		
1101	Front end material transfer to Hopper ZPLT-02	ZPLT-02
1104	Front end material transfer from Stockpile to Calcine Shed	n/a
<b>Feed for Abbe and Hardinge Mills</b>		
401	Front end loader material transfer to Hopper HRAB-00	HRAB-00
<b>Abbe Mill</b>		
413	Off-spec bag loading into Bucket Elevator AB-08	AB-08
<b>Hardinge Mill</b>		
503	Off-spec bag loading into Bucket Elevator HR-03	HR-03
<b>Aboveground Storage Tanks</b>		
902	Gasoline AST	n/a
903	No. 2 Fuel Oil (Diesel) AST	n/a
904	No. 1 Fuel Oil (Kerosene) AST	n/a
905	Used Oil AST	n/a
<b>Haul Roads</b>		
1200	HYUNDAI	n/a
1201	CAT938	n/a
1202	KOMATSU	n/a
1203	Pneumatics	n/a
1204	Single Axle	n/a
1205	Flatbed Vans	n/a
1206	Dump Trailer	n/a
1207	Dump Trucks	n/a
1208	Dump and Pups	n/a

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

1. Construction Permit 0194-001
2. Construction Permit 122006-002
3. *Christy Minerals LLC, CAM Monitoring Approach for Particulate Matter Emissions, Dust Collectors CD4 and CD17*, approved November 3, 2009 (via email).

## II. Plant Wide Emission Limitations

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

### **Monitoring:**

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations.

### **Recordkeeping:**

The permittee shall record all inspections and corrective actions on the appropriate forms.

### **Reporting:**

The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance, to:

**Air Pollution Control Program  
Compliance/Enforcement Section  
P.O. Box 176  
Jefferson City, MO 65102**

The permittee shall submit an annual certification<sup>3</sup> that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by **April 1<sup>st</sup>**, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to each agency:

**EPA Region VII  
901 North 5th Street  
Kansas City, Kansas 66101**

**Air Pollution Control Program  
Compliance/Enforcement Section  
P.O. Box 176  
Jefferson City, MO 65102**

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<sup>3</sup> Refer to Section V. General Permit Requirements for more details.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

**Permit Condition Group<sup>4</sup> NSPS OOO CS-001**  
10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60 Subpart OOO  
Standards of Performance for Nonmetallic Mineral Processing Plants

**Emission Limitation:**

The permittee must meet a PM limit of 0.05 g/dscm (0.022 gr/dscf)<sup>5</sup>.

**Permit Condition Group NSPS OOO CS-002**  
10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60 Subpart OOO  
Standards of Performance for Nonmetallic Mineral Processing Plants

**Emission Limitation:**

The permittee must also meet an opacity limit of seven (7%) percent for dry control devices.

**Permit Condition Group<sup>6</sup> NSPS OOO CSCAM-001**  
10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60 Subpart OOO  
Standards of Performance for Nonmetallic Mineral Processing Plants  
40 CFR Part 64 Compliance Assurance Monitoring

**Emission Limitation:**

The permittee must meet a PM limit of 0.05 g/dscm (0.022 gr/dscf)<sup>7</sup>.

<sup>4</sup> Please refer to Group NSPS OOO CS on page 39 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<sup>5</sup> Exceptions to the PM limit apply for individual enclosed storage bins and other equipment. See §60.672(d) through (f).

<sup>6</sup> Please refer to Group NSPS OOO CSCAM on page 43 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<sup>7</sup> Exceptions to the PM limit apply for individual enclosed storage bins and other equipment. See §60.672(d) through (f).

**Monitoring:**

Christy Minerals LLC CAM Monitoring Approach for Particulate Matter Emissions Dust Collectors CD4 and CD17		
	Indicator #1	Indicator #2
<b>Indicator</b>	Visible Emissions	Pressure Drop
<b>Measurement Approach</b>	Visible emissions from each dust collector exhaust shall be performed using EPA Reference Method 22-like procedures.	Pressure drop across each dust collector shall be measured with a differential pressure gauge.
<b>Indicator Range</b>	The indicator range is defined as no visible emissions. An excursion is defined as the presence of visible emissions.	The indicator range is defined as a pressure drop between 3 and 8 inches of water column (in WC) for each dust collector. An excursion is defined as a pressure drop that is less than 3 in WC and/or greater than 8 in WC.
	An excursion <sup>8</sup> of either indicator constitutes an excursion. If visible emissions are present when the pressure drop is within its specified indicator range, the pressure drop indicator range shall be re-evaluated by Christy Minerals. Excursions trigger an inspection, corrective action, and need to be included in the next Semiannual Monitoring Report. Excursions shall be corrected immediately <sup>9</sup> upon detection; if an excursion results in excess emissions <sup>10</sup> exceeding 1 hour, Christy Minerals may elect to file a startup, shutdown, and malfunction assertion under 10 CSR 10-6.050 if appropriate to the situation.	
<b>QIP Threshold</b>	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If an emission unit reaches the QIP threshold, Christy Minerals shall submit a QIP for that unit along with the Semiannual Monitoring Report for that reporting period.	
Performance Criteria		
<b>Data Representativeness</b>	Measurements shall be made at the emission point (e.g., stack exhaust).	Pressure drop taps are located at the inlet and outlet of each dust collector. The differential pressure gauges have a minimum accuracy of 0.5 in WC.
<b>Verification of Operational Status</b>	NA	Pressure drop taps are checked for plugging daily.
<b>QA/QC Practices and Criteria</b>	The visible emissions observer shall be familiar with EPA Reference Method 22 and follow Method 22-like procedures.	The magnehelic differential pressure gauges shall be calibrated no less frequently than annually in accordance with the manufacturer's specifications.
<b>Monitoring Frequency</b>	A 6-minute Method 22-like observation shall be performed daily.	Continuously <sup>11</sup> .
<b>Data Collection Procedure</b>	The VE observation is manually recorded (documented) daily by the observer.	An instantaneous measurement shall be manually recorded daily.
<b>Averaging Period</b>	NA	None
<b>Reporting</b>	Semiannually as part of the installation's Part 70 Semiannual Monitoring Report.	

<sup>8</sup> Excursion (from 40 CFR Part 64.1) shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

<sup>9</sup> Corrected immediately means that corrective action will be initiated immediately upon discovery of the excursion.

<sup>10</sup> Excess emissions (from 10 CSR 10-6.020(2)(E)9.) means emissions which exceed the requirements of any applicable emission control regulation.

<sup>11</sup> Continuously means that the monitoring equipment is present and functional at all times. It does not mean that the data is *recorded* continuously.

**Permit Condition Group<sup>12</sup> NSPS OOO FE-001**

10 CSR 10-6.070 New Source Performance Regulations

40 CFR Part 60 Subpart OOO

Standards of Performance for Nonmetallic Mineral Processing Plants

**Emission Limitation:**

The permittee must also meet an opacity limit of ten (10%) percent.

<b>Group CP0194-001</b>
<b>Emission Group<sup>13</sup></b>
BARMAC System (100) Group 4
East System (300) Group 5
West System (200) Group 6

**Permit Condition Group CP0194-001-001**

10 CSR 10-6.060 *Construction Permits Required,*

Permit Number: 0194-001, Special Condition 2.

**Emission Limitation:**

The permittee shall not emit more than a total of 31.5 tons of PM<sub>10</sub>, (particulate matter less than ten microns) from East, Barmac and West crusher systems during any consecutive 12-month period.

**Record Keeping:**

The permittee shall calculate emissions of PM<sub>10</sub> during each calendar month, using the following formula:

$$PM_{10} = \sum_1^{12} \left[ \frac{(MT * EF_{PM10}) * (1 - C_{Eff})}{2,000} \right]$$

Where:

- PM<sub>10</sub> is the summation of all emissions within the BARMAC, East, and West Systems in tons per 12-month period;
- MT is the monthly throughput in tons material per month;
- EF<sub>PM10</sub> is the PM<sub>10</sub> emission factor (obtained from AP-42, or determined to apply) in pounds per ton of material; and
- C<sub>Eff</sub> is the control device efficiency expressed as a percentage reduction of the inlet particulate matter loading.

<sup>12</sup> Please refer to Group NSPS OOO FE on page 41 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<sup>13</sup> Please refer to Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

The permittee shall perform this calculation monthly for each emission point that is active no later than ten (10) days after the end of each month for the previous consecutive 12-month period, to demonstrate compliance with this condition.

**Permit Condition Group VE20<sup>14</sup>-001**

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

The permittee shall not discharge into the atmosphere from this group any visible emissions in excess of twenty percent (20%).<sup>15</sup>

**Permit Condition Group VE40<sup>16</sup>-001**

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

The permittee shall not discharge into the atmosphere from this group any visible emissions in excess of forty percent (40%).<sup>17</sup>

**Group CP122006-002**

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
304	Dust Collector CD14	EA-04B	Screen	Rotex M55GP	2006

**Permit Condition CP122006-002-001**

10 CSR 10-6.060 *Construction Permits Required*,  
Permit Number: 122006-002, Special Condition 1.A.

**Emission Limitation:**

The permittee shall emit less than 15 tons of PM<sub>10</sub>, (particulate matter less than ten microns) from the East System Screener (EA-04B) during any consecutive 12-month period.

**Record Keeping:**

The permittee shall maintain an accurate record of PM<sub>10</sub> emitted into the atmosphere from the East System Screener (EA-04B). Attachment F or an equivalent form shall be used for this purpose.

<sup>14</sup> Please refer to Group VE20 on page 45 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<sup>15</sup> Refer to *Core Requirement Restriction of Emission of Visible Air Contaminants*, page 26, for monitoring, record keeping and reporting.

<sup>16</sup> Please refer to Group VE40 on page 50 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<sup>17</sup> Refer to *Core Requirement Restriction of Emission of Visible Air Contaminants*, page 26, for monitoring, record keeping and reporting.

**Permit Condition CP122006-002-002**

10 CSR 10-6.060 *Construction Permits Required*,  
Permit Number: 122006-002, Special Condition 2.A.

**Operation Limitation/Equipment Specifications:**

The permittee shall control emissions from the East System Screener (EA-04B) using a baghouse (EP304, Dust Collector CD14). The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse 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 Department of Natural Resources' employees may easily observe them.

**Record Keeping:**

The permittee 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.

The permittee shall maintain an operating and maintenance log for the baghouses and drum filters which shall include the following: 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

**Permit Condition CP122006-002-003**

10 CSR 10-6.060 *Construction Permits Required*,  
Permit Number: 122006-002, Special Condition 2.A.

**Operation Limitation/Equipment Specifications:**

Replacement filters for the baghouse 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).

**Permit Condition Sulfur 6260<sup>18</sup>-001**

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

**Emission Limitation:**

1. Emissions from any existing source operation shall not contain more than two thousand parts per million by volume (2000 ppmv) of sulfur dioxide.
2. Stack gasses shall not contain more than seventy milligrams (70 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

<sup>18</sup> Please refer to Sulfur 6260 on page 53 in Attachment E, Emission Points & Group Lists, for a detailed listing of the emission points/emission units subject to the permit conditions.

<b>Pollutant</b>	<b>Concentration by Volume</b>	<b>Remarks</b>
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (μg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 μg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 μg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 μg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 μg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 μg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Operational Limitation/Equipment Specifications:**

The emission unit shall be limited to fuel with a sulfur content of no more than four percent (4%) sulfur by weight.

**Monitoring:**

The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - (B) Yard waste, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
      - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
      - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
      - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Christy Minerals LLC may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Christy Minerals LLC fails to comply with the provisions or any condition of the open burning permit.
  - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

#### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
  - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
  - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
  - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

#### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

#### **10 CSR 10-6.170**

#### **Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

##### **Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.
    - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

**10 CSR 10-3.090 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

### **10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants**

#### **Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

#### **Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

#### **Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

#### **10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

#### **10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

- d) The permit shield shall not apply to these changes.

**10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Jeffrey W. Porter, Vice-President of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## VI. Attachments

Attachments follow.





**Attachment C**

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_\_\_  
 YES NO Signature of Observer



**Attachment E**  
 Emission Points & Grouping Lists

<b>Group NSPS 000 CS</b> control systems					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
318	Dust Collector CD6	EA-14	Dust Collector 6	Sly, PC-106-6 Pactecon	1993
		EA-08	Packaging Bin	SM	pre 1971
		EA-09	Oversize Product Bin	SM	pre 1971
		EA-10	Green Bin	SM	pre 1971
		EA-07	Packer	Black Diamond, LPF6	1976
		BR-29	Conveyor Belt	SM, 18"	pre 1971
		BR-30	Bucket Elevator	Drycon	1981
		BR-31A	Outside Bin 1	SM	1981
		BR-31B	Outside Bin 2	SM	1981
		BR-31C	Outside Bin 3	SM	1981
		BR-32A	Outside Bin 4	SM	1994
		BR-32B	Outside Bin 5	SM	1994
		BR-32C	Outside Bin 6	SM	1994
221	Dust Collector CD5	BR-38B	Dust Collector 5	Sly, PC-206-6	1970/2006
		BR-13	West Bin 1	SM	pre 1971
		BR-14	West Bin 2	SM	pre 1971
		BR-15	West Bin 3	SM	pre 1971
		BR-35	Conveyor Belt	Hytrol TT	1989
		BR-23	Conveyor Belt	SM, 18"	pre 1971

<b>Group NSPS 000 CS</b> control systems					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
		BR-24	Bucket Elevator	Unknown	1971
		BR-29	Conveyor Belt	SM, 18"	pre 1971
		BR-33	Expandable Pipe	Superior System, XP8	pre 1971
		BR-26	South Packing Bin	SM	1981
		BR-26B	Supersack Bagging Station	SM	1980
		BR-25	North Packing Bin	SM	1981
		BR-41	Packer	Black Diamond, LPF6	1976
		BR-25B	Supersack Bagging Station	SM	1980
102	Dust Collector CD4	BR-37	Dust Collector 4	Sly, PC-205-6 Pactecon	1989
		BR-00	BARMAC Crusher	Tidco, 908022	1991
		BR-01A	Hopper	SM	1971
		BR-02	Bucket Elevator	SM	1971
		BR-04	Conveyor Belt	Drycon, 24"	1991
		BR-10	BARMAC Bin 1	SM	1991
		BR-11	BARMAC Bin 2	SM	1991
		BR-12	BARMAC Bin 3	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
		BR-23	Conveyor Belt	SM, 18"	pre 1971
		BR-13	West Bin 1	SM	pre 1971
		BR-14	West Bin 2	SM	pre 1971
BR-15	West Bin 3	SM	pre 1971		

<b>Group NSPS OOO CS</b> control systems					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
106	Dust Collector CD17	BR-39	Dust Collector 17	Sly, PC-208-6 Pactecon	1993
		BR-04	Conveyor Belt	Drycon, 24"	1991
		BR-05	Bucket Elevator	Drycon	1991
		BR-06	Enclosed Feeder Spreader	Kinergy, KDF60SD	1991
		BR-07	BARMAC Screen	Mogensen, #1556	1991
		BR-09	Conveyor Belt	Drycon, 18"	1991
		BR-00	BARMAC Crusher	Tidco, 908022	1991
		BR-10	BARMAC Bin 1	SM	1991
		BR-11	BARMAC Bin 2	SM	1991
		BR-12	BARMAC Bin 3	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
		BR-19	Bucket Elevator	Drycon	1991
		BR-20	Bin	SM	1991
		BR-21	Packer	Robey, RPERF6	1991
BR-20B	Packer	SM	1991		

<b>Group NSPS OOO FE</b> fugitive emissions					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
104	Material transfer from Vibratory Feeder BR-03 to Conveyor Belt BR-04	BR-03	Vibratory Feeder	Jeffrey's	1991
		BR-04	Conveyor Belt	Drycon, 24"	1991
105	Material transfer from Conveyor Belt BR-04 to Bucket Elevator BR-05	BR-04	Conveyor Belt	Drycon, 24"	1991
		BR-05	Bucket Elevator	Drycon	1991

<b>Group NSPS OOO FE</b> fugitive emissions					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
110	Material transfer from BARMAC Screen BR-07 to Belt Conveyor BR-09	BR-09	Conveyor Belt	Drycon, 18"	1991
111	Material transfer from Belt Conveyor BR-09 to BARMAC Crusher BR-00 (enclosed)	BR-09	Conveyor Belt	Drycon, 18"	1991
118	SWECO Screen BR-40	BR-40	SWECO Screen	SWECO, 30"	1991
119	DCF bulk truck loading from Auger BR-39B	BR-39B	Screw Conveyor	American Iron & Steel, 6"	1991
120	DCF bag packaging BR-40B from SWECO Screen BR-40	BR-40B	Supersack Bagging Station	Shop made	1991
122	Vibratory Feeder BR-03	BR-03	Vibratory Feeder	Jeffrey's	1991
309	Material transfer from Oversize Product Bin EA-09 to Belt Conveyor BR-35	EA-09	Oversize Product Bin	SM	pre 1971
		BR-35	Conveyor Belt	Hytrol TT	1989
112A	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 1 BR-10	BR-10	BARMAC Bin 1	SM	1991
112B	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 2 BR-11	BR-11	BARMAC Bin 2	SM	1991
112C	Material transfer from BARMAC Screen BR-07 to BARMAC Bin 3 BR-12	BR-12	BARMAC Bin 3	SM	1991
113A	Material transfer from BARMAC Bin 1 BR-10 to Conveyor Belt BR-18	BR-10	BARMAC Bin 1	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
113B	Material transfer from BARMAC Bin 2 BR-11 to Conveyor Belt BR-18	BR-11	BARMAC Bin 2	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
113C	Material transfer from BARMAC Bin 3 BR-12 to Conveyor Belt BR-18	BR-12	BARMAC Bin 3	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
114	Material transfer from Conveyor Belt BR-18 to Bucket Elevator BR-19	BR-18	Conveyor Belt	Drycon	1991
		BR-19	Bucket Elevator	Drycon	1991

<b>Group NSPS OOO FE</b> fugitive emissions					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
116	Bag Packaging BR-21 of material from Bin BR-20	BR-21	Packer	Robey, RPERF6	1991
117	Supersack Packaging BR-20B of material from Bin BR-20	BR-20B	Packer	SM	1991
123	Material transfer from BARMAC Bin 3 BR-12 to West Conveyor Belt BR-23	BR-12	BARMAC Bin 3	SM	1991
		BR-23	Conveyor Belt	SM, 18"	pre 1971
124	Material transfer from BARMAC Bin 2 BR-11 to West Conveyor Belt BR-23	BR-11	BARMAC Bin 2	SM	1991
		BR-23	Conveyor Belt	SM, 18"	pre 1971
213A	Bulk truck loading from Outside Storage Bin 4 BR-32A	BR-32A	Outside Bin 4	SM	1994
213B	Bulk truck loading from Outside Storage Bin 5 BR-32B	BR-32B	Outside Bin 5	SM	1994
213C	Bulk truck loading from Outside Storage Bin 6 BR-32C	BR-32C	Outside Bin 6	SM	1994
226	Material transfer from East System Belt Conveyor BR-35 to West Conveyor Belt BR-23	BR-35	Conveyor Belt	Hytrol TT	1989
		BR-23	Conveyor Belt	SM, 18"	pre 1971

<b>Group NSPS OOO CSCAM</b> control systems					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
102	Dust Collector CD4	BR-37	Dust Collector 4	Sly, PC-205-6 Pactecon	1989
		BR-00	BARMAC Crusher	Tidco, 908022	1991
		BR-01A	Hopper	SM	1971
		BR-02	Bucket Elevator	SM	1971
		BR-04	Conveyor Belt	Drycon, 24"	1991
		BR-10	BARMAC Bin 1	SM	1991
		BR-11	BARMAC Bin 2	SM	1991

<b>Group NSPS 000 CSCAM</b> control systems					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
		BR-12	BARMAC Bin 3	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
		BR-23	Conveyor Belt	SM, 18"	pre 1971
		BR-13	West Bin 1	SM	pre 1971
		BR-14	West Bin 2	SM	pre 1971
		BR-15	West Bin 3	SM	pre 1971
106	Dust Collector CD17	BR-39	Dust Collector 17	Sly, PC-208-6 Pactecon	1993
		BR-04	Conveyor Belt	Drycon, 24"	1991
		BR-05	Bucket Elevator	Drycon	1991
		BR-06	Enclosed Feeder Spreader	Kinergy, KDF60SD	1991
		BR-07	BARMAC Screen	Mogensen, #1556	1991
		BR-09	Conveyor Belt	Drycon, 18"	1991
		BR-00	BARMAC Crusher	Tidco, 908022	1991
		BR-10	BARMAC Bin 1	SM	1991
		BR-11	BARMAC Bin 2	SM	1991
		BR-12	BARMAC Bin 3	SM	1991
		BR-18	Conveyor Belt	Drycon	1991
		BR-19	Bucket Elevator	Drycon	1991
		BR-20	Bin	SM	1991
		BR-21	Packer	Robey, RPERF6	1991
BR-20B	Packer	SM	1991		

<b>Group VE20</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
603	Dust collector CD1	HM-07B	Dust Collector CD1	Sly, PC-206-6	1970/2007
		HM-0015	Hopper	SM	Pre 1970
		HM-01	Chain Conveyor	SM	Pre 1970
		HM-00	Hammer Mill	Williams, 215	Pre 1970/1990
		HM-001	Screw Conveyor	American Iron and Steel, 9"	Pre 1970/1990
		HM-02	Bucket Elevator	SM	Pre 1970/1990
		HM-08	Screw Conveyor	American Iron and Steel, 7"	Pre 1970/1990
		HM-03	Screen	Star, 461 E1-12.5	Pre 1970/1990
		HM-05	Bin	Star, 461 E1-12.5	Pre 1970/1990
		HM-04	Packer	St. Regis, 77OFF	1973
		HM-06	Screw Conveyor	Drycon, 9"	Pre 1970/1993
609	Packaging operation of material transfer from Bin HM-05 to bags	HM-04	Packer	St. Regis, 77OFF	1973
702	Bulk railcar loading from Bucket Elevator K-520	n/a	n/a	n/a	n/a
703	Dust Collector CD7	K-525	Dust Collector CD7	Flex-Kleen, 100WSBS-144IIIG	1996
		K-518	Hopper	SM	1979
		K-520	Bucket Elevator	Mexico Heating	1979/1985
1002	Eagle Crusher K-021	K-021	Eagle Crusher	Eagle, 17693	1978
1003	Material transfer from Eagle Crusher K-021 to Conveyor Belt K-024	K-021	Eagle Crusher	Eagle, 17693	1978
		K-024	Conveyor Belt	SM 18"	1978
1004	Material transfer from Belt Conveyor K-024 to Bucket Elevator K-027 (via Flop Gate)	K-024	Conveyor Belt	SM 18"	1978
		K-027	Bucket Elevator	SM	1978

Group VE20					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
		K-033	Bin 1	SM	1978
		K-035	Bin 2	SM	1978
1004E	Material transfer from Bin 1 K-033 to East Vibratory Feeder K-034	K-033	Bin 1	SM	1978
		K-034	Vibratory Feeder	Marco 151	1978
1004W	Material transfer from Bin 2 K-035 to West Vibratory Feeder K-036	K-035	Bin 2	SM	1978
		K-036	Vibratory Feeder	Marco 151	1978
1005	Material transfer from Belt Conveyor K-024 to Bypass Conveyor Belt K-030 (via Flop Gate)	K-024	Conveyor Belt	SM 18"	1978
		K-030	Conveyor Belt	SM, 16"	1978
1006	Material transfer from East K-034 and West K-036 Vibratory Feeders and Bypass Belt Conveyor K-030 to Kiln Feed Conveyor Belt K-037	K-034	Vibratory Feeder	Marco 151	1978
		K-036	Vibratory Feeder	Marco 151	1978
		K-030	Conveyor Belt	SM, 16"	1978
		K-037	Conveyor Belt	Ramsey, 10-11-24	1978
		K-040	Feed Scale	Ramsey, 10-11-24	1978
1007	Material transfer from Feed Scale K-040 to Kiln K-041	K-037	Conveyor Belt	Ramsey, 10-11-24	1978
		K-040	Feed Scale	Ramsey, 10-11-24	1978
		K-041	Kiln	Allis Chambers, 8x180	1978
1008	Dust Collector CD19	K-548	Dust Collector CD19	Sly, PC-208-6 Pactecon	2006
		K-054	Conveyor Belt	SM 18"	1978/2005
		K-547	Cyclone	MAC, H68	2005
		K-554	Stacker	MAC, H68	1978
1009	Material transfer from Stacker K-554 to Stockpile	K-554	Stacker	SM	1978

Group VE20					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
1011	RKF transfer from Auger K-553 to Stockpile	K-553	Screw Conveyor	Martin	1978
1012	Dust Collectors CD13A, 13B, 13C, 13D (single stack)	K-057	Dust Collector 13A	American Air Filter, Farri 12-168-2694	1978
		K-058	Dust Collector 13B	American Air Filter, Farri 12-168-2694	1978
		K-059	Dust Collector 13C	American Air Filter, Farri 12-168-2694	1978
		K-060	Dust Collector 13D	American Air Filter, Farri 12-168-2694	1978
		K-043	Air-to-Air Heat Exchanger	Amerair	2008
		K-043A	Screw Conveyor	Conveyors Inc.	2008
		K-042	Draft Chamber	In House Construction	1978
		K-041	Kiln	Allis Chambers, 8x180	1978
		K-049	Cooler	MAC, H68	1978
		K-016	Coal Mill	Raymond 412	1978/1995 /2005
		K-017	Coal Mill Fan	Raymond 412	1978/1995 /2005
		K-014	Coal Air Lock	Raymond 412	1978/199 5/2005
		K-543A	Natural Gas Burner 1	North American Manufacturing	1982
		K-543B	Natural Gas Burner 2	North American Manufacturing	1982
		K-543C	Natural Gas Burner 3	North American Manufacturing	1982
1014	Coal transfer from Hopper/Pan Feeder K-001 to Coal Crusher K-003	K-001	Hopper and Pan Feeder	Universal	1978
		K-003	Crusher	Bleckman	1978
1016	Coal transfer from bin K-008 to Conveyor Belt Scale K-009	K-003	Crusher	Bleckman	1978
		K-005	Bucket Elevator	Bleckman	1978

Group VE20					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
		K-008	Bin	Bleckman	1978
		K-009	Conveyor Belt	Ramsey	1978
1017	Coal transfer from Conveyor Belt Scale K-009 to Coal Mill K-016 via Air Lock K-014	K-009	Conveyor Belt	Ramsey	1978
1019	Material transfer from Cooler K-049 to CMC Rerun Concrete Pit (via Flop Gate)	K-049	Cooler	MAC, H68	1978
1102	Dust Collector CD10	ZPLT-03	Dust Collector CD10	Pneumafil Corp, PKE-8	1999
		ZPLT-04	Screw Conveyor	Unknown	1973
		ZPLT-01	Dryer	Century, SC	1973
1103	Material transfer from Drier ZPLT-01 to Stockpile	ZPLT-01	Dryer	Century, SC	1973
103	Dust Collector CD3	BR-36	Dust Collector 3	Tenkay/Farr Company, L94583	1986
		BR-01	Bin	SM	1971
		BR-02	Bucket Elevator	SM	1971
109	Jaw Crusher BR-34	BR-34	Jaw Crusher	Kue Ken Model #22 A/N 229163	1979/1998
304	Dust Collector CD14	EA-13	Dust Collector 14	Sly, PC-105-6 Pactecon	1989
		EA-01A	Hopper	SM	pre 1971
		EA-02	Bucket Elevator	SM	pre 1971
		EA-04B	Screen	Rotex M55GP	2006
		EA-08	Packaging Bin	SM	pre 1971
		EA-09	Oversize Product Bin	SM	pre 1971
		EA-10	Green Bin	SM	pre 1971
312	Bag Packaging EA-07 from Packaging Bin EA-08	EA-07	Packer	Black Diamond, LPF6	1976

Group VE20					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
313	Supersack Packaging EA-07A from Packaging Bin EA-08	EA-07A	Supersack Bagging Station	SM	1976
208	Material transfer from West Conveyor Belt BR-23 to Bucket Elevator BR-24	BR-23	Conveyor Belt	SM, 18"	pre 1971
		BR-24	Bucket Elevator	Unknown	1971
209	Material transfer via Turn Head from Bucket Elevator BR-24 to Belt Conveyor BR-29, Bulk Loading via Pipe BR-33, South Packaging Bin BR-26, or North Packaging Bin BR-25	BR-24	Bucket Elevator	Unknown	1971
		BR-24A	Turn Head from BR-24	Unknown	1971
210	Material transfer from Belt Conveyor BR-29 to Bucket Elevator BR-30	BR-29	Conveyor Belt	SM, 18"	pre 1971
		BR-30	Bucket Elevator	Drycon	1981
210A	Dust Collector CD12	BR-30A	Dust Collector 12	Torit-Donaldson	2002 <sup>1</sup>
		BR-30	Bucket Elevator	Drycon	1981
210B	Material transfer via Turn Head from Bucket Elevator BR-30 to Outside Storage Bin 1 BR-31A, Outside Storage Bin 2 BR-31B, Outside Storage Bin 3 BR-31C, Outside Storage Bin 4 BR-32A, Outside Storage Bin 5 BR-32B, or Outside Storage Bin 6 BR-32C	BR-30	Bucket Elevator	Drycon	1981
		BR-30A	Turn Head from BR-30	Unknown	1981
215	Bag Packaging BR-41 of material from North Packaging Bin BR-25	BR-41	Packer	Black Diamond, LPF6	1976
216	Supersack Packaging BR-25B of material from North Packaging Bin BR-25	BR-25B	Supersack Bagging Station	SM	1980
219	Supersack Packaging BR-26B of material from South Packaging Bin BR-26	BR-26B	Supersack Bagging Station	SM	1980
226	Material transfer from East System Belt Conveyor BR-35 to West Conveyor Belt BR-23	BR-35	Conveyor Belt	Hytrol TT	1989
		BR-23	Conveyor Belt	SM, 18"	pre 1971

Group VE20					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
501A	Material transfer from Hardinge Bin HR-01 to Vibratory Feeder HR-02	HR-01	Hardinge Bin	SM	1980
		HR-02	Vibratory Feeder	Jeffrey's	1970

Group VE40					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
602	Material transfer from hopper HM-0015 to Chain Conveyor HM-01	HM-0015	Hopper	SM	Pre 1970
		HM-01	Chain Conveyor	SM	Pre 1970
606	Material transfer from Bucket Elevator HM-02 to Screen HM-03/Bin HM-05	HM-03	Screen	Star, 461 E1-12.5	Pre 1970/1990
		HM-05	Bin	Star, 461 E1-12.5	Pre 1970/1990
611	Bulk truck/rail loading from Auger HM-06	HM-06	Screw Conveyor	Drycon, 9"	Pre 1970/1993
302	Vibratory Feeder EA-01	EA-01	Vibratory Feeder	Jeffrey's	pre 1971
306	Vibratory Feeder EA-05	EA-05	Vibratory Feeder	Jeffrey's	pre 1971
308	Material transfer from BARMAC Screen BR-07 to Oversize Product Bin EA-09	EA-09	Oversize Product Bin	SM	pre 1971
310	Material transfer from Packaging Bin EA-08 to Belt Conveyor EA-11	EA-08	Packaging Bin	SM	pre 1971
		EA-11	Conveyor Belt	SM	pre 1971
311	Material transfer from Belt Conveyor EA-11 to intermediate stockpile	EA-11	Conveyor Belt	SM	pre 1971
314	Material transfer from Vibratory Feeder EA-01 to Bucket Elevator EA-02	EA-01	Vibratory Feeder	Jeffrey's	pre 1971
		EA-02	Bucket Elevator	SM	pre 1971
315	Material transfer from Vibratory Feeder EA-05 to Bucket Elevator EA-02	EA-05	Vibratory Feeder	Jeffrey's	pre 1971
		EA-02	Bucket Elevator	SM	pre 1971
316	Material transfer from BARMAC Screen BR-07 to Green Bin EA-10	EA-10	Green Bin	SM	pre 1971
317	Material transfer from BARMAC Screen BR-07 to Packaging Bin EA-08	EA-08	Packaging Bin	SM	pre 1971

<b>Group VE40</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
206A	Material transfer from BARMAC Screen BR-07 to West Bin 1 BR-13	BR-13	West Bin 1	SM	pre 1971
206B	Material transfer from BARMAC Screen BR-07 to West Bin 2 BR-14	BR-14	West Bin 2	SM	pre 1971
206C	Material transfer from BARMAC Screen BR-07 to West Bin 3 BR-15	BR-15	West Bin 3	SM	pre 1971
207A	Material transfer from West Bin 1 BR-13 to West Conveyor Belt BR-23	BR-13	West Bin 1	SM	pre 1971
		BR-23	Conveyor Belt	SM, 18"	pre 1971
207B	Material transfer from West Bin 2 BR-14 to West Conveyor Belt BR-23	BR-14	West Bin 2	SM	pre 1971
		BR-23	Conveyor Belt	SM, 18"	pre 1971
207C	Material transfer from West Bin 3 BR-15 to West Conveyor Belt BR-23	BR-15	West Bin 3	SM	pre 1971
		BR-23	Conveyor Belt	SM, 18"	pre 1971
220	Bulk railcar/truck loading from Bucket Elevator BR-24	BR-33	Expandable Pipe	Superior System, XP8	pre 1971
222	Bulk truck loading of DCF from CD5	n/a	n/a	n/a	n/a
225	Bag Packaging BR-43 from Outside Storage Bin 3 BR-31C	BR-43	Packer	Exact Weight	pre 1971
402	Dust Collector CD20	HRAB-05	Dust Collector 20	Pangborne	2007
		HRAB-00	Hopper	SM	Pre 1970/1980
		HRAB-01	Bucket Elevator	SM	Pre 1970/1980
		HRAB-02	Conveyor Belt	SM	Pre 1970/1980
403	Material transfer from Bucket Elevator HRAB-01 to Belt Conveyor HRAB-02	HRAB-01	Bucket Elevator	SM	Pre 1970/1980
		HRAB-02	Conveyor Belt	SM	Pre 1970/1980
404	Material transfer from Belt Conveyor HRAB-02 to Abbe Bin AB-01	HRAB-02	Conveyor Belt	SM	Pre 1970/1980
		AB-01	Abbe Bin	SM	Pre 1970
404A	Material transfer from Abbe Bin AB-01 to	AB-01	Abbe Bin	SM	Pre 1970

<b>Group VE40</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
	Vibratory Feeder AB-02	AB-02	Vibratory Feeder	Jeffrey's	Pre 1970/1980
405	Material transfer from Vibratory Feeder AB-02 to Belt Conveyor AB-03	AB-02	Vibratory Feeder	Jeffrey's	Pre 1970/1980
		AB-03	Conveyor Belt	Hytrol, TL	Pre 1970/1980
406	Material transfer from Belt Conveyor AB-03 and AB-10 to Hopper AB-04	AB-03	Conveyor Belt	Hytrol, TL	Pre 1970/1980
		AB-04	Hopper	SM	Pre 1970/1980
407	Material transfer from Hopper AB-04 to Vibratory Feeder #1 AB-04B	AB-04	Hopper	SM	Pre 1970/1980
		AB-04B	Vibratory Feeder 1	Syntron	Pre 1970/1980
408	Material transfer from Hopper AB-04 to Vibratory Feeder #2 AB-04A	AB-04	Hopper	SM	Pre 1970/1980
		AB-04A	Vibratory Feeder 2	Syntron	Pre 1970/1980
409	Dust Collector CD2	HRAB-03	Dust Collector 2	Sly, PC-206-6	1970/2008
		AB-04A	Vibratory Feeder 2	Syntron	Pre 1970/1980
		AB-04B	Vibratory Feeder 1	Syntron	Pre 1970/1980
		AB-00A	Abbe Mill #11	Abbe, A244	Pre 1970
		AB-00B	Abbe Mill #13	Abbe, A244	Pre 1970
		AB-05	Screw Conveyor	SM	Pre 1970/1980
		AB-06	Bucket Elevator	SM	Pre 1970
		AB-07	Screen	SWECO, 48"	Pre 1970/1980
		AB-11	Bin	SM	Pre 1970
		AB-08	Bucket Elevator	SM	Pre 1970
		AB-12	Bin	SM	Pre 1970
		AB-09B	Packer	Exact Weight, 2220	Pre 1970
HR-00	Hardinge Mill	Hardinge, 2024	1970		

<b>Group VE40</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
		HR-03	Bucket Elevator	SM	1970
		HR-04	Screen	SWECO, 48"	1970
		HR-05	Bucket Elevator	SM	1970
		HR-06	Bin	SM	1970
		HR-07	Packer	St. Regis, 77OFF	1970
		HRAB-04	Screw Conveyor	SM	1970
415	Bag/Supersack Packaging AB-09B from Bin AB-12	AB-09B	Packer	Exact Weight, 2220	Pre 1970
416	Oversize material transfer from Screen AB-07 to Belt Conveyor AB-10	AB-10	Conveyor Belt	SM	Pre 1970/1980
501	Material transfer from Belt Conveyor HRAB-02 to Hardinge Bin HR-01	HRAB-02	Conveyor Belt	SM	Pre 1970/1980
		HR-01	Hardinge Bin	SM	Pre 1970
509	Bag/Supersack Packaging HR-07 from Bin HR-06	HR-07	Packer	St. Regis, 77OFF	1970

<b>Group Sulfur 6260</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
1012	Dust Collectors CD13A, 13B, 13C, 13D (single stack)	K-057	Dust Collector 13A	American Air Filter, Farri 12-168-2694	1978
		K-058	Dust Collector 13B	American Air Filter, Farri 12-168-2694	1978
		K-059	Dust Collector 13C	American Air Filter, Farri 12-168-2694	1978
		K-060	Dust Collector 13D	American Air Filter, Farri 12-168-2694	1978
		K-043	Air-to-Air Heat Exchanger	Amerair	2008
		K-043A	Screw Conveyor	Conveyors Inc.	2008
		K-042	Draft Chamber	In House Construction	1978

<b>Group Sulfur 6260</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
		K-041	Kiln	Allis Chambers, 8x180	1978
		K-049	Cooler	MAC, H68	1978
		K-016	Coal Mill	Raymond 412	1978/1995 /2005
		K-017	Coal Mill Fan	Raymond 412	1978/1995 /2005
		K-014	Coal Air Lock	Raymond 412	1978/1995 /2005
		K-543A	Natural Gas Burner 1	North American Manufacturing	1982
		K-543B	Natural Gas Burner 2	North American Manufacturing	1982
		K-543C	Natural Gas Burner 3	North American Manufacturing	1982



## STATEMENT OF BASIS

### Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received January 22, 2004;
- 2) 2008 Emissions Inventory Questionnaire
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Settlement Agreement between MDNR and Christy Minerals dated July 17, 1992;
- 5) Settlement Agreement between ERA Region VII and Christy Minerals dated June 20, 1994;
- 6) No Construction Permit Required letter dated 04/06/2000;
- 7) Letter dated September 27, 2005 from Steven Feeler, Air Pollution Control Program Compliance/Enforcement Section Chief to John Barsanti, Armstrong Teasdale, LLP, representing Christy Minerals, detailing the reclassification of the kiln as an existing source; and
- 8) Correspondence from JoAnn Heiman, Branch Chief, Air Permit Section, EPA Region VII to James Kavanaugh, Director, APCP regarding the applicability of 40 CFR Part 63 Subpart SSSS to the operations at Christy Minerals, dated 2/23/2007.
- 9) *Request to Waive NSPS-OOO Performance Test*, Letter from Steven Feeler, Compliance/Enforcement Section Chief, dated October 7, 2009, granting waiver for two devices.

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

None

### Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

#### 10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

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

This regulation applies to any operation, process, or activity that emits particulate matter.

**Subsection (B)** states: *The provisions of this rule shall not apply to the following:*

**Paragraph (1)(B)7.** *Fugitive emissions*<sup>19</sup>;

The following units have been determined to be exempt:

EP-802  
EP-804  
EP-805  
EP-808  
EP-810  
EP-1010  
EP-1020  
EP-1104  
EP-224  
EP-401  
EP-1200  
EP-1201  
EP-1202  
EP-1203  
EP-1204  
EP-1205  
EP-1206  
EP-1207  
EP-1208

**Paragraph (1)(B)12.** *Emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter;*

The following units have been determined to be exempt:

EP-601	EP-1004W	EP-1021	EP-415
EP-602	EP-1005	EP-1101	EP-416
EP-606	EP-1006	EP-404	EP-501
EP-609	EP-1007	EP-404A	EP-501A
EP-611	EP-1011	EP-405	EP-503
EP-1001	EP-1013	EP-406	EP-509
EP-1003	EP-1014	EP-407	
EP-1004	EP-1016	EP-408	
EP-1004E	EP-1017	EP-413	

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<sup>19</sup> Fugitive emissions—those emissions which according to good engineering practice could not pass through a stack, chimney, vent or other functionally equivalent opening.

**Paragraph (1)(B)15.** *Any particulate matter emission unit that is subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions;*

The following units have been determined to be exempt:

EP-603	EP-1012	EP-210A
EP-703	EP-1102	EP-402
EP-1008	EP-304	EP-409

**Paragraph (1)(B)16.** *Emission units that at maximum hourly design rate (MHDR) have an uncontrolled potential to emit less than the allowable emissions as calculated in paragraphs (3)(A)1. and (3)(A)2. of this rule.*

The following units have been determined to be exempt:

EP-701	EP-302	EP-317	EP-210
EP-702	EP-306	EP-319	EP-210B
EP-1002	EP-308	EP-206A	EP-215
EP-1009	EP-310	EP-206B	EP-216
EP-1019	EP-311	EP-206C	EP-219
EP-1103	EP-312	EP-207A	EP-220
EP-101	EP-313	EP-207B	EP-222
EP-103	EP-314	EP-207C	EP-223
EP-109	EP-315	EP-208	EP-225
EP-301	EP-316	EP-209	EP-403

**Subsection (C)** *In the event that other rules in Title 10 Code of State Regulations are also applicable to particulate matter emission units, the more stringent requirement shall apply.*

The following units have been determined to be subject to 10 CSR 10-6.070 (Subpart OOO) and so exempt:

EP-102	EP-119	EP-112C	EP-123
EP-104	EP-120	EP-113A	EP-124
EP-105	EP-122	EP-113B	EP-213A
EP-106	EP-309	EP-113C	EP-213B
EP-110	EP-318	EP-114	EP-213C
EP-111	EP-112A	EP-116	EP-221
EP-118	EP-112B	EP-117	EP-226

***Title 40: Protection of Environment***

***Part 60—Subpart Y—Standards of Performance for Coal Preparation Plants***

Applicability and designation of affected facility.

- (a) The provisions of this subpart are applicable to any of the following affected facilities in coal preparation plants which process more than 181 Mg (**200 tons**) *per day*: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems.

The 1941 Raymond 412 model coal mill is rated at 4.0 tons per hour, or 96.0 tons per day. Thus, NSPS Subpart Y does not apply<sup>20</sup>.

*Part 60-Subpart HH-Standards of Performance for Lime Manufacturing Plants*

This regulation applies to each rotary lime kiln used in the manufacture of lime. The permittee does not produce lime, therefore this regulation does not apply.

*Part 60 Subpart LL-Standards of Performance for Metallic Mineral Processing Plants*

This regulation applies to metallic mineral processing plants. A metallic mineral processing plant is defined as any combination of equipment that produces metallic mineral concentrates from ore. The permittee does not produce metallic mineral concentrates from ore; therefore this regulation does not apply.

*Part 60 Subpart UUU-Standards of Performance for Calciners and Dryers in Mineral Industries*

The provisions of this subpart apply to each calciner and dryer at a mineral processing plant that commences construction, reconstruction, or modification after April 23, 1986. For the clay products industry, only the calcining and drying of raw materials prior to firing of the brick are covered. The permittee does not fire the brick; they calcine raw clay in a rotary kiln and dry soft clay in a rotary drier.

The permittee installed this unit prior to April 23, 1986, and has not reconstructed or modified this equipment. Therefore, this regulation does not apply to the rotary kiln.

The permittee installed the dryer in 1973, and has not reconstructed or modified this equipment. Therefore, this regulation does not apply to the dryer.

*Part 60 Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This regulation applies to any storage vessel with a capacity greater than or equal to 75 m<sup>3</sup> that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

All of the permittee's storage tanks have capacities less than 75 m<sup>3</sup>, therefore this rule does not apply.

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<sup>20</sup> Refer to April 6, 2000 letter from Randy Raymond (signed by Refaat Mefrakis) addressed to Ms. Robin Overkamp regarding project no. 2000-03-085.

**Maximum Available Control Technology (MACT) Applicability**

*Part 63 Subpart T-National Emissions Standards for Halogenated Solvent Cleaning*

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The permittee uses Safety Kleen solvents, which do not contain any of the chemicals listed above. Therefore, this regulation does not apply.

*Part 63 Subpart SSSSS-National Emission Standards for Hazardous Air Pollutants for Refractory Products Manufacturing*

This regulation applies to a refractory products manufacturing facility that is a major source of HAP. According to EPA "...the facility processes minerals that are used by various industries, one of which is the refractory industry. One of the processes is the calcining of raw clay in a rotary kiln which creates a material (mullite) that is more easily crushed. The alumino-silicate materials could not be used for boilers, kilns and other processing units and equipment where extreme temperatures, corrosion, and abrasion that would destroy other materials, and are not the same as the products listed in the regulation (refractory bricks, kiln furniture, crucibles, and refractory ceramic fiber). The facility does not make clay refractory products. However it processes fire clay, common clay, shale and other minerals. The raw material is not a refractory product, and cannot be used as "lining for boilers, kilns, and other processing units and equipment where there are extreme temperatures, corrosion, and other abrasion would destroy other materials." Therefore, Subpart SSSSS does not apply to the permittee.

*Part 63 Subpart KKKKK-National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing*

This regulation applies to clay ceramic manufacturing facilities that are located at a major source of HAPs. The permittee is not a clay ceramic manufacturing facility; therefore, this regulation does not apply.

*Part 63 Subpart JJJJJ-National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing*

This regulation applies to Brick and Structural Clay products manufacturing facilities that are major sources of HAPs. The permittee is not a brick and structural clay products manufacturing facility; therefore, this regulation does not apply.

***Construction Permits Determined to No Longer be Valid***

Construction permit 0393-020 no longer applies because it has been replaced with construction permit 0194-001.

The following construction permits have expired and are no longer valid:

1296-018	082000-019
1296-018A	082000-019A
0898-030	012006-001
082000-018	

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

122006-002 – Attachment A, Column 2, has been updated to the current emission factor for this screen. The uncontrolled emission factor used for the potential to emit as well as the 2007 and 2008 emission inventory questionnaires is 0.21 lbs/ton PM-10 uncontrolled. This factor was developed using AP-42 Table 11.24-2 for low moisture ore (SCC 3-03-024-04), which amounts to 0.06 lbs/ton. However, emissions contributing to EP-304 consist of 3.5 material handling and transfer points, thus yielding an uncontrolled PM-10 emission factor of  $0.06 \times 3.5 = 0.21$  lbs/ton. A half of a transfer point was used to account for the back half of the screen – air indirectly vents through the product bins. Since the screen is controlled by a dust collector, which achieves 99.94% control, the controlled PM-10 emission factor would be 0.000126 lbs/ton.

### **New Source Performance Standards (NSPS) Applicability**

#### ***Title 40: Protection of Environment***

#### ***Part 60 Subpart OOO—Standards of Performance for Nonmetallic Mineral Processing Plants***

Four air pollution control devices are subject to Subpart OOO, CD-4 (EP-102), CD-5 (EP-221), CD-6 (EP-318) and CD-17 (EP-106). The Missouri Air Pollution Control Program granted Christy Minerals a waiver from performance testing CD-5 and CD-6 (see *Permit Reference Documents* number 9 above), based on the information contained in the letter *Request to Waive NSPS OOO Performance Testing*, dated September 17, 2009, from Mr. Jeff Porter to Mr. Steve Feeler.

The permittee conducted NSPS OOO testing on dust collectors CD-4 and CD-17 on October 21, 1993. From the results reported on that testing, CD-4's average outlet concentration was 0.000793 gr/dscf, while CD-17's outlet concentration was 0.0208 gr/dscf, both less than the 0.022 gr/dscf standard for particulate matter imposed by Subpart OOO.

The permittee has no uncontrolled crushers subject to NSPS OOO (therefore, no sources subject to Table 3, Column 3 of NSPS OOO).

### **Maximum Available Control Technology (MACT) Applicability**

None

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

### **Compliance Assurance Monitoring (CAM) Applicability**

#### ***40 CFR Part 64, Compliance Assurance Monitoring (CAM)***

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

The following table presents the CAM subject units:<sup>21</sup>

**CAM Applicability Determination**  
**Christy Minerals - High Hill, MO**

Control Device	Brass Tag	Emission Point	Description	Processes Controlled	Uncontrolled PM tpy <sup>1</sup>	Uncontrolled PM 10 tpy <sup>1</sup>	Meets Pre-Control PTE Requirement?	Subject to NSPS OOO? <sup>2</sup>	Subject to State Emission Limitation? <sup>3</sup>	Subject to CAM Requirement? <sup>4</sup>
CD1	HM-07B	EP603	Hammer Mill Dust Collector	Hammer Mill	4.38	1.75	No	No	No	No
CD2	HRAB-03	EP409	Abbe & Hardinge Mills Dust Collector	Abbe & Hardinge Mills	53.61	15.24	No	No	No	No
CD3	BR-36	EP103	A West Dust Collector	BARMAC	39.42	19.71	No	No	No	No
<b>CD4</b>	BR-37	EP102	B West Dust Collector	BARMAC & West	<b>145</b>	<b>72</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>
CD5	BR-38B	EP221	C West Dust Collector	Hammer Mill & West	39.42	19.71	No	Yes	Yes	No
CD6	EA-14	EP318	B East Dust Collector	East & West	39.42	19.71	No	Yes	Yes	No
CD7	K-525	EP703	Car Loading Dust Collector	Kiln	37.15	18.58	No	No	No	No
CD10	ZLPT-03	EP1102	Rotary Dryer	Dryer	1,424	350	Yes	No	No	No
CD12	BR-30A	EP210A	Shipping Tanks Dust Collector	West	15.77	7.88	No	No	No	No
CD13A	K-057	EP1012	Kiln Baghouse #1	Kiln	113,520	91,160	Yes	No	No	No
CD13B	K-058		Kiln Baghouse #2							
CD13C	K-059		Kiln Baghouse #3							
CD13D	K-060		Kiln Baghouse #4							
CD14	EA-13	EP304	A East Dust Collector	East	22.08	11.04	No	No	No	No
<b>CD17</b>	BR-39	EP106	D West Dust Collector	BARMAC, East & West	<b>223</b>	<b>112</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>
CD19	K-548	EP1008	Stacker Dust Collector	Kiln	24.77	12.38	No	No	No	No
CD20	HRAB-05	EP402	Feed for Abbe & Hardinge Dust Collector	Abbe & Hardinge Mills	9.46	4.73	No	No	No	No

**Notes:**  
 1. Per potential to emit (PTE) calculations dated September 2, 2008.  
 2. Based on installation dates of equipment vented to the individual dust collectors.  
 3. Plantwide dust collectors are not subject to a PM emission limitations, however are subject to visible emission and opacity limitations. Visible emission and opacity limitations are not applicable requirements under CAM.  
 4. Those dust collectors meeting all applicability requirements to be subject to CAM under 40 CFR Part 64.

**Conclusion:**  
 Dust collectors CD4 and CD17 are subject to CAM requirements.

Even though control devices CD10 and CD13A-D exceed the pre-controlled emission threshold of 100 tons per year of PM, they are not subject a PM emission rate standard. Devices CD10 and CD13A-D are subject to the visible emissions standard. The federal regulation at 40 CFR 64.2(3) reads:

*The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.*

Since the emissions of the applicable regulated air pollutant is visible emissions and has no mass measure, federal regulation at 40 CFR 64 does not apply to control devices CD10 and CD13A-D.

The post control emission rates of control devices CD4 and CD17 are both below the "major source" threshold; therefore, continuous emission monitoring (i.e. multiple recorded data points per hour) equipment is not required.

<sup>21</sup> Refer to Enclosure A for a larger image of this table.

## **Other Regulatory Determinations**

### *10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds*

The permittee was determined<sup>22</sup> to be subject to the “existing” unit (2,000 ppmv) and not the “new” unit (500 ppmv) provisions. “The kiln, EP-1012, is the only emission source subject to this regulation. The Dryer, equipment number ZPLT-01 and EP-1102, was found to qualify for the pipeline grade natural gas exemption found at paragraph (1)(A) 2.

### *Settlement Agreement between MDNR and Christy Minerals dated July 17, 1992*

This agreement resolves the issuance of eight notices of violations from 1981 to 1992 for violations of 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants* and contains five requirements that must be completed by September 30, 1993. The requirements and completion dates are listed below:

Requirement 1: By September 30, 1992, have design engineering complete on the following items: the motor operated isolation dampers at the end of each baghouse; the opposed blade dampers in the outlet of each baghouse; replacing the existing gas cooling bleed-in damper with a motorized damper controlled by a setpoint controller; and relocation of the temperature sensor in the outlet of each baghouse. The design engineering for the modifications of the kiln dust collector system were completed on September 15, 1992.

Requirement 2: By December 31, 1992, replace all 168 cages and bags in baghouse #4 with proper fit galvanized steel 20 wire units and blue max bags or their equivalent. This requirement was modified on 9/15/1992 to reflect the replacement of bags in baghouse #2 instead of baghouse #4. Baghouse #2 needed bag replacement first. All the bags and cages for baghouse #2 were replaced on May 22, 1992 with BHA recommended bags and cages. This modification does not change the overall schedule for project completion by September 30, 1992.

Requirement 3: Replace all 168 cages and bags in the other three baghouses, one complete baghouse at a time as the service life limit is reached. This is to be completed by September 30, 1992.

Requirement 4: If Christy Minerals must bring down any of the baghouses prior to the dates listed above, they will replace the cages in these baghouses as well.

Requirement 5: Install a dust particulate sensor in the ductwork downstream of the dust collector baghouses by December 31, 1992. Christy Minerals installed a triboflow sensor to complete this requirement.

The Missouri Department of Natural Resources was notified on September 13, 1993, that Christy Minerals fulfilled all five requirements. Therefore, these requirements have not been included as permit conditions in this Operating Permit.

### *Settlement Agreement between EPA Region VII and Christy Minerals dated June 20, 1994*

This settlement agreement was filed in response to a Complaint and Notice of Opportunity for Hearing, Docket # VII-94-CAA-181, which was filed based on a violation Section 111 of the Clean Air Act,

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<sup>22</sup> Refer to the letter from Steve Feeler, Compliance/Enforcement Section Chief of the Air Pollution Control Program, to Mr. John R. Barsanti, Jr. dated September 27, 2005.

specifically of 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. The complaint states that the permittee did not timely notify the Administrator of the commencement of construction or of the initial startup date of one or more affected facilities, and did not timely conduct performance test(s) and furnish the Administrator a written report of the results on the affected facilities. The consent agreement indicates that performance tests were conducted on the following equipment to demonstrate compliance with 40 CFR Part 60 Subpart OOO: Mogenson Screener, S/N: 908022; Robey Bag Packer, S/N: 5155; 4 Drycon Bins; 1 Drycon Belt Conveyor; and 1 Drycon Bucket Elevator.

The permittee has fulfilled the requirements in this settlement agreement. These requirements have not been incorporated as permit conditions.

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Randy E. Raymond  
Environmental Engineer

**Enclosure A**

**CAM Applicability Determination  
Christy Minerals - High Hill, MO**

CAM applicability: CAM is applicable to emission units within a facility meeting ALL of the below requirements. - Required to obtain a Part 70 Permit (Title V Permit) - Subject to an emission limitation or standard - Uses a control device to achieve compliance - Potential pre-control emissions greater or equal to major source thresholds (100 tpy in attainment areas)										
Christy Minerals is a major source of particulate matter emissions. Some emission points are subject to the emission limitations given in NSPS OOO for Nonmetallic Mineral Plants. However, all emission points are subject to at least one state emission limitation requirement (10 CSR 10-6.170: Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin). Dust collectors are used throughout the facility to achieve compliance with these emission limitations and standards.										
Control Device	Brass Tag	Emission Point	Description	Processes Controlled	Uncontrolled PM tpy <sup>1</sup>	Uncontrolled PM 10 tpy <sup>1</sup>	Meets Pre-Control PtE Requirement?	Subject to NSPS OOO? <sup>2</sup>	Subject to State Emission Limitation? <sup>3</sup>	Subject to CAM Requirement? <sup>4</sup>
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<b>Notes:</b> 1. Per potential to emit (PtE) calculations dated September 2, 2008. 2. Based on installation dates of equipment vented to the individual dust collectors 3. Plantwide dust collectors are not subject to a PM emission limitations, however are subject to visible emission and opacity limitations. Visible emission and opacity limitations are not applicable requirements under CAM. 4. Those dust collectors meeting all applicability requirements to be subject to CAM under 40 CFR Part 64.										
<b>Conclusion:</b> Dust collectors CD4 and CD17 are subject to CAM requirements.										

CERTIFIED MAIL: 70073020000315699781  
RETURN RECEIPT REQUESTED

Mr. Jeffrey W. Porter  
Christy Minerals LLC  
P.O. Box 159  
High Hill, MO 63350

Re: Christy Minerals LLC, 139-0008  
Permit Number: **OP2010-021**

Dear Mr. Porter:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit 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 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 AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Randy Raymond at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:rrk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
St. Louis Regional Office  
PAMS File: 2004-01-094