

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **102012-003** Project Number: 2011-03-015
Installation Number: 173-0001

Parent Company: Continental Cement Company, LLC

Parent Company Address: 14755 North Outer Forty Drive, Suite 514, Chesterfield, MO 63017

Installation Name: Continental Cement Company, LLC

Installation Address: 10107 Hwy 79 South, Hannibal, MO 63401

Location Information: Ralls County, S2, T56N, r4W

Application for Authority to Construct was made for:

The addition of limestone hauling from an outside quarry, the change in handling and mixing procedures for the iron ore and bottom ash blend, and the construction of a fly ash feed system, an alternative fuel material feed system and the bottom material feed system.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

OCT - 5 2012

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

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

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Continental Cement Company, LLC
Ralls County (S2, T56N, R4W)

1. Emission Limitation
 - A. Continental Cement Company, LLC shall emit less than 25.0 tons of Particular Matter (PM) in any consecutive 12-month period from the equipment/processes of this permit. These equipment/processes include the following:
 - 1) Hauling Offsite Limestone into New Storage Piles (RM-77, RM-78 and RM-84)
 - 2) Iron Ore/Bottom Ash Hauling and Blending (RM-79, RM-80, RM-81, RM-82 and RM-83)
 - 3) Fly Ash Feed System (KP-11, KP-12 and KP-13)
 - 4) Bottom Material Feed System for Additions to Synthetic Gypsum Blend (SG-32, SG-33 and SG-34)
 - B. Attachment A, or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.
2. Haul Road and Storage Pile Control Methods
 - A. Paved Haul Roads
 - 1) Continental Cement Company, LLC shall control emissions from the following haul roads as to achieve 95 percent control by periodically watering and washing its surface.

Table 1: Paved Haul Roads Requiring Watering

EP	Description	Round Trip Distance (ft)
RM-79	Iron/Bottom Ash from Front Entrance to Cave	2,500
RM-84	Limestone from Front Entrance to New Storage pile	2,500
SG-32	Bottom Ash from Front Entrance to Syn-Gyp Building	5,100

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SPECIAL CONDITIONS:

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

- 2) Maintenance and/or repair of the surfaces shall be performed as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
- B. Unpaved Haul Roads/Vehicular Activity Areas
- 1) Continental Cement Company, LLC shall control emissions from the following unpaved haul roads and vehicular activity areas so as to achieve 90 percent control by documented watering or the application of chemical dust suppressants.

Table 2: Unpaved Haul Roads Requiring Watering/Suppressants

*EP	Description	Round Trip Distance (ft)
RM-77	Limestone Storage Pile Vehicular Activity	200
RM-78	Hauling of Limestone from Storage Pile to Crusher	2,400
RM-79	Hauling of Iron/Bottom Ash from Front Entrance to Cave	5,800
RM-80	Bottom Ash Cave Storage Pile Vehicular Activity	200
RM-81	Iron Ore Cave Storage Pile Vehicular Activity	200
RM-82	Iron Ore/Bottom Ash Blend Cave Storage Pile Vehicular Activity	100
RM-83	Hauling of Blend from Cave to Raw Material Storage Building	4,400
RM-84	Hauling of Limestone from Front Entrance to New Storage Pile	8,800
KP-11	Hauling of Fly Ash from Church Entrance to Raw Mill Feed Building	5,800
SG-32	Hauling of Bottom Ash from Front Entrance to Syn-Gyp Building	700

*Some of the emission point numbers are the same as those listed in Table 1 (Paved Haul Roads) because the same haul road has both paved and unpaved portions.

- 2) Chemical Dust Suppressant
 - a) The suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) shall be applied in accordance with the manufacturer's suggested application rate and re-

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SPECIAL CONDITIONS:

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

- applied as necessary to achieve control of fugitive emissions from these areas.
 - b) Continental Cement Company, LLC shall keep records of the time, date and the amount of material applied for each application of chemical dust suppressant agent on these haul roads and areas.
 - 3) Documented Watering
 - a) Water shall be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads/vehicular activity areas as necessary to achieve control of fugitive emissions from these areas.
 - b) Continental Cement Company, LLC shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on days the areas are in use (e.g. meteorological situations, precipitation events, freezing, etc.)
 - c) Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the areas are in use, may be substituted for water application until such time as conditions warrant application of water.
 - d) Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. Continental Cement Company, LLC shall record a brief description of such events in the same log that documents the watering.
- 3. Control Device Requirement – Dust Collectors/Baghouses
 - A. Continental Cement Company, LLC shall control emissions from the following equipment using dust collectors as specified in the permit application.
 - 1) Silo loading of the fly ash feed system (KP-12)
 - 2) Airslide of the fly ash feed system (KP-13)
 - 3) Silo loading of the bottom ash feed system (SG-33)

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SPECIAL CONDITIONS:

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

- B. The dust collectors/baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The dust collectors/baghouses shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters/bags for the dust collectors/baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Continental Cement Company, LLC shall monitor and record the operating pressure drop across the dust collectors/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.
 - E. Continental Cement Company, LLC shall maintain an operating and maintenance log for the duct collectors/baghouses 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.
4. Record Keeping and Reporting Requirements
- A. Continental Cement Company, LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - B. Continental Cement Company, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2011-03-015
Installation ID Number: 173-0001
Permit Number:

Continental Cement Company, LLC
10107 Hwy 79 South
Hannibal, MO 63401

Complete: March 3, 2011

Parent Company:
Continental Cement Company, LLC
14755 North Outer Forty Drive, Suite 514
Chesterfield, MO 63017

Ralls County (S2, T56N, R4W)

REVIEW SUMMARY

- Continental Cement Company, LLC has applied for authority to haul in limestone from an outside quarry, to blend bottom ash with the iron source and to construct a new fly ash feed system, new alternative fuel material feed system and a new bottom ash feed system.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- 40 CFR Part 60, Subpart F, *Standards of Performance for Portland Cement Plants*, of the New Source Performance Standards (NSPS) applies to the new limestone stockpile (RM-77) and the underground storage for mill scale (RM-81), bottom ash (RM-80) and blend (RM-82).
- 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*, of the Maximum Achievable Control Technology (MACT) Standards, applies to the silo and the conveying system for the new fly ash feed system and the new bottom ash feed system.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.
- Dust collectors/baghouses are being used to control emissions from the bin and the airslide of the new fly ash feed system and the silo loading of the bottom ash feed system.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM are conditioned below the *de minimis* level.

- This installation is located in Ralls County, an attainment area for all criteria pollutants.
- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation is classified as item number 3. Portland cement plants. The installation's major source level is 100 tons per year and fugitive emissions are counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below *de minimis* levels.
- Emissions testing is not required for the equipment.
- A Part 70 Operating Permit modification application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Continental Cement Company, LLC currently operates a wet process rotary cement kiln on a 3,300-acre site three miles south of the city of Hannibal in Ralls County. The plant operates as a hazardous waste combustor while producing Portland cement. In addition to the kiln system, the installation operates a syngyp process (synthetic gypsum mixed with cement kiln dust) and has an ongoing artificial soils project to support the production of trees as a renewable alternative fuel source. The installation received a PSD permit (072006-003) for the replacement of the wet process kiln with a new preheater/precalciner (PH/PC) kiln system and a PSD permit (072007-008) for the elimination of Saverton Quarry, the development of a new onsite quarry and the increase of daily clinker production. The PSD permit (072007-008) was later amended, in permits 072007-008A and 072007-008B, to change existing permit limits, to add new emission sources and to relocate existing emissions sources.

The existing installation is considered a major source for both construction and operating permits. Continental Cement Company, LLC currently has a Part 70 Operating Permit renewal being processed by the Air Pollution Control Program (Project 2010-04-014).

The following construction permits have been issued to the installation from the Air Pollution Control Program.

Table 3: Permit History

Permit Number	Description
0686-002	A Section (5) permit issued on October 7, 1986 for a new waste fuels storage facility.
1086-004	A Section (5) permit issued on December 24, 1986 to add the capability to

	burn waste fuel in the kiln.
1086-004A	An amendment to Permit No. 1086-004 issued on February 15, 1990 for the use of a substitute raw material.
1086-004B	An amendment to Permit No. 1086-004 to alter a beryllium emission limit.
0890-008	A Section (5) permit issued on August 21, 1990 for the addition of two new 75,000 gallon above ground tanks for liquid fuel storage and one 200 ton capacity dry fuel storage tank and one 50 ton capacity dry fuel surge tank.
1086-004C	An amendment to Permit No. 1086-004A issued on June 11, 1996 to allow the installation to accept and burn 5,000 BTU/pound or greater solid wastes in combination with other liquid waste fuels and coal, as fuel.
0198-014	A Section (5) permit issued on January 13, 1998 to install a syngyp process to manufacture synthetic gypsum and mix it with cement kiln dust.
122001-014	A Section (5) permit issued on December 21, 2001, to utilize a mixture of waste materials to create an artificial soil to support the production of trees as a renewable alternative fuel source.
092009-022	A Section (5) permit issued on October 2, 2002 for the replacement of the existing kiln system with a new kiln. This new kiln was never built. Permit 072006-003 replaced this project.
1086-004D	An amendment to Permit No. 1086-004 issued on August 6, 2003 to allow alternate feed rate limits base don future compliance testing.
072006-003	A section (8) permit issued on July 11, 2006 to install a new PH/PC kiln system and underground mine.
072007-008	A Section (8) permit issued on July 24, 2007 for the elimination of Saverton Quarry, the development of a new onsite quarry and the increase of daily clinker production.
072007-008A	An amendment to the PSD permit (072007-008) to change permit rate limits and to add new emission sources.
032009-002	Addition of a temporary clinker storage pile.
072007-008B	An amendment to the PSD permit (072007-008) to change permit rate limits, to add new emission sources and to relocate existing emission sources.

PROJECT DESCRIPTION

For this project, the installation has asked to add or modify the following:

- Hauling limestone from offsite: Continental Cement Company need to purchase and utilize 1,400 tons per day of limestone from an outside quarry. The stone will be hauled into the plant (RM-84) from the front entrance and will be placed at a new limestone storage pile (RM-77). The storage pile will be less than 1 acre and will be located between the current limestone surge piles (RM-75 and RM-75) and the shale storage pile (RM-22). The new limestone will be hauled from the storage pile to the crusher over an unpaved haul road (RM-78)
- Iron Ore/Bottom Ash Blend: In the current permit, the facility is allowed to haul the iron source directly to the raw materials building where it is dumped and fed into the mix going to the raw mill. Because of the high iron content of the mill scale currently being used as the iron source, the facility has to blend it with another material to reduce the iron content so the feeder can run at its designed rate. The blend material will be bottom ash from a power plant. The iron ore and the bottom ash will be hauled (RM-79) through the front

entrance to the underground storage area where it will be offloaded. Blending will occur inside the underground storage area. There will be piles of mill scale (RM-81), bottom ash (RM-80) and blend (RM-82). The blend will be hauled, through haul road RM-83, to the existing raw material building where it will be dumped and loaded into the hopper to be fed into the system. The bottom ash and the iron ore will be processed at a maximum of 600 tons per day each. The blend will be processed at a maximum of 840 tons per day.

- Fly Ash Feed System: The facility will construct a 500-ton feed silo next to the raw mill building that will be used to feed power plant fly ash into the raw meal stream. Fly ash will be hauled, using haul road KP-11, into the facility from the church entrance and pneumatically transferred into the bin KP-12). Then it will be metered into an airslide (KP-13) and blown into the raw mill exit gas/material stream. A dust collector will be used to control emissions from the feed bin and the airslide. The fly ash feed system will have a maximum rate of 500 tons per day.
- Alternate Fuel Material Feed System: The facility will construct a 100-ton feed bin next to the kiln burner building (BB-1) and use a screw conveyor to meter granular nonhazardous alternate fuel materials into the burner building and pneumatically convey them into the preheater along with the solid hazardous waste fuel. Emissions from the pneumatic loading of the feed bin will be piped to the burner building by using the negative pressure of the building to pull the particulate from the bin. Transfer of material onto the belt going to the pneumatic feed system will be inside the burner building so emissions will also be controlled through the burner building system.
- Bottom Ash Feed System for Additions to Synthetic Gypsum (Syn Gyp) Blend: The facility will construct a 100-ton tank next to the syn gyp building to store and feed calcium sulfate-rich bottom ash material into the syn gyp blend system. The tank will be loaded pneumatically and transferred by screw (S-34) into a hopper inside the blending building where it will be mixed with the syn gyp that is subsequently conveyed to the blend tank. The ash tank will be equipped with a dust collector. The bottom ash feed system has a maximum rate of 100 tons per day.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition. The expected pollutants are particulate matter (PM), particulate matter less than ten microns in diameter (PM₁₀) and particulate matter less than two-and-a-half microns in diameter (PM_{2.5}). Emission factors for the haul roads and vehicular activity areas were calculated using the equation found in AP-42, Chapter 13.2.2, *Unpaved Roads*, (11/2006). For unpaved haul roads and vehicular activity areas using either documented watering or chemical dust suppressants, a 90% control efficiency was used. For paved roads with water wash, a 95% control was used.

Emission factors for the load-in and load-out of materials were calculated using AP-42, Chapter 13.2.5, *Aggregate Handling and Storage Piles*, (11/2006). Emission factor from wind erosion of storage piles was calculated using an equation proposed by the Environmental Protection Agency (EPA) in 1989 to calculate wind erosion emissions.

Emissions from the pneumatic transfer and the airslide of the new fly ash feed system and from the pneumatic transfer of the new bottom ash feed system were calculated using the emission factor for product storage with fabric filter control (scc 3-08-038-13) in Table 11.19.2-4, "Emission Factors for Pulverized Mineral Processing Operations," AP-42, Chapter 11.19.2, *Crushed Stone Processing and Pulverized Mineral Processing*, (8/2004). Emissions from the screw conveyor of the bottom ash feed system were calculated using the conveyor emission factor (scc 3-05-020-06) in Table 11.19.2-2, "Emission Factors for Crushed Stone Processing Operations," of AP-42, Chapter 11.19.2.

The alternate fuel material feed system is not expected to emit any pollutants into the atmosphere. The emissions from pneumatic loading of the feed bin will be piped to the burner building. The transfer of material onto the belt going to the pneumatic feed system will also occur inside the building. The burner building is vented to the kiln and the particulate matter emitted from the alternate fuel material feed system will be burned by the kiln as fuel. 100% capture is expected since the burner building is required to be operated under negative pressure according to the previous permit (072007-008B) issued to the facility.

Table 4: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2010 EIQ)	Potential Emissions of the Application	¹ New Application Conditioned Potential
PM _{2.5}	10.0	Major	0.09	1.62	0.92
PM ₁₀	15.0	Major	89.56	13.51	7.21
PM	25.0	Major	N/D	43.84	<25.0
SO _x	40.0	Major	29.84	N/A	N/A
NO _x	40.0	Major	645.27	N/A	N/A
VOC	40.0	Major	108.42	N/A	N/A
CO	100.0	Major	436.40	N/A	N/A
HAPs	10.0/25.0	Major	44.27	N/A	N/A

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

Note 1: PM conditioned potential based on limit to avoid prevention of significant deterioration (PDS) review. Other pollutants proportionally reduced.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Conditioned potential emissions of all pollutants are below *de minimis* levels.

APPLICABLE REQUIREMENTS

Continental Cement Company, LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an EIQ is required by April 1st, if submitting a hardcopy and by May 1st, if submitting online at www.dnr.mo.gov/moeis/main/login, for the previous years' emissions. Payment is due June 1st.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *New Source Performance Regulations*, 10 CSR 10-6.070 – *New Source Performance Standards (NSPS) for Portland Cement Plants*, 40 CFR Part 60, Subpart F.
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Portland Cement Manufacturing Industry*, 40 CFR Part 63, Subpart LLL.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be

granted with special conditions.

Chia-Wei Young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 7, 2011, received March 7, 2011, designating Continental Cement Company, LLC as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated March 10, 2011.

Attachment A – PM Compliance Worksheet

Continental Cement Company, LLC
 Ralls County (S2, T56N, R4W)
 Project Number: 2011-03-015
 Installation ID Number: 173-0001
 Permit Number: _____

This sheet covers the month of _____
 (month, year)

EP	Description	EF (lbs/ton)	Material Processed (tons)	¹ Emissions (lbs)	² Emissions (tons)
RM-84	Paved Haul Road - Limestone	0.0070			
RM-84	Unpaved Haul Road – Limestone	0.0495			
RM-77	Limestone Load-In	0.009			
RM-77	Limestone Load-Out	0.009			
RM-77	Limestone Pile Vehicular Activity	0.0029			
RM-77	Limestone Pile Wind Erosion	N/A	N/A	N/A	0.781
RM-78	Unpaved Haul Road – Limestone to Crusher	0.0075			
RM-79	Paved Haul Road – Ash to Cave	0.0070			
RM-79	Unpaved Haul Road – Ash to Cave	0.0326			
RM-80	Ash Storage Pile Load-In	0.0002			
RM-80	Ash Storage Pile Load-Out	0.0002			
RM-80	Ash Storage Pile Vehicular Activity	0.0041			
RM-81	Iron Ore Cave Storage Pile Load-In	0.0051			
RM-81	Iron Ore Cave Storage Pile Load-Out	0.0051			
RM-81	Iron Ore Storage Pile Vehicular Activity	0.0041			
RM-82	Blend Storage Pile Load-In	0.0033			
RM-82	Blend Storage Pile Load-Out	0.0033			
RM-82	Blend Vehicular Activity	0.0020			
RM-83	Unpaved Haul Road – Blend to Raw Material Bldg	0.0232			
KP-11	Unpaved Haul Road – Fly Ash	0.0326			
KP-12	500 tons Fly Ash Silo	0.0099			
KP-13	Airslide	0.0099			
SG-32	Paved Haul Road – Ash to Syn-Gyp Building	0.0136			
SG-32	Unpaved Haul Road – Ash to Syn-Gyp Building	0.0039			
SG-33	100 ton Bottom Ash Feed Tank	0.0098			
SG-34	Screw Conveyor	0.0300			
³Total Emissions This Month (tpy) =					
⁴Total Monthly Emissions of the Previous Eleven (11) Months (tpy) =					
⁵Total Emissions from the Current 12-Month Period (tpy) =					

Note 1: Emissions (lbs) calculated by multiplying the EF (lbs/ton) by Material Processed (tons)
 Note 2: Emissions (tons) calculated from: [Emissions (lbs) ÷ 2,000 lbs/ton]
 Note 3: Total Project PM Emissions (tons) calculated by summing the Emissions (tons) of each emission point.
 Note 4: Total Monthly Emissions of the Previous Eleven (11) Months (tons) calculated by summing the Attachment A of the previous eleven (11) months.
 Note 5: Total Emissions from the Current 12-Month Period (tons) calculated by summing the Total Emissions This Month (tons) and the Total Emissions of the Previous Eleven (11) Months (tons). A total emission of less than **25.0 tons** indicates compliance.

Mr. Leonard Rosenkrans
Environmental Specialist
Continental Cement Company, LLC
10107 Hwy 79 South
Hannibal, MO 63401

RE: New Source Review Permit - Project Number: 2011-03-015

Dear Mr. Rosenkrans:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young, at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:cwyl

Enclosures

c: Northeast Regional Office
PAMS File: 2011-03-015

Permit Number: