

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: 052009-019 Project Number: 2009-01-013

Parent Company: Fred Weber Inc.

Parent Company Address: 2320 Creve Coeur Mill Rd., Maryland Heights, MO 63043

Installation Name: Mississippi Sand at Festus Stone Quarry

Installation Address: 838 VFW Drive, Festus, MO 63028

Location Information: Jefferson County, 16, 40N, 6E

The modification of an existing sand manufacturing plant. This permit acknowledges the addition of: universal jaw crusher 42" x 30" (CR-101), simplicity feeder 45-18 (F-101), conveyor 48" x 40' (C-101), generator 380 HP 1800 RPM, conveyor 42" x 30' (C-102), double deck screen (SC-101), and two stackers (STK-101 and STK-102). Best Management Practices will be used to control fugitive emissions from haul roads and storage piles. The sand manufacturing plant has a maximum hourly design rate (MHDR) of 300 tons per hour (tph). This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

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

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

MAY 29 2009

EFFECTIVE DATE

Steven Feiler for JLK

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/18 months 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/18 months 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 this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

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

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

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

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit 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); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority"; by 10 CSR 10-6.010 "Ambient Air Quality Standards" and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3. Furthermore, one or more of the Subparts of 40 CFR Part 60, New Source Performance Standards (NSPS), applies to this installation.

1. **Best Management Practices**
Mississippi Sand at Festus Stone Quarry shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)**
 - A. The operator(s) for Mississippi Sand at Festus Stone Quarry's rock crushing plant (099-0008) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The total daily ambient impact of PM₁₀ at this site shall include the combined impact of the rock crushing plant and any ambient background concentration from installations or equipment located on the same site as the rock crushing plant.
 - C. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM₁₀ Impact Tracking Record*, or other equivalent form(s), will be used for this purpose.
 - D. To demonstrate compliance during concurrent (same owner) operations, the operator(s) shall maintain a daily record of material processed.
 - i.) For concurrent (same owner) operations, Attachment A, *Daily Ambient PM₁₀ Impact Tracking Record, Concurrent (Same Owner) Operations*, or other equivalent form(s), shall be used for this purpose.
3. **Annual Emission Limit of Nitrogen Oxides (NO_x)**
 - A. The operator(s) shall ensure that the diesel engine located at Mississippi Sand at Festus Stone Quarry's rock crushing plant emits less than 40.0 tons of NO_x into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and NO_x. Attachment B, *Monthly NO_x Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Usage of Wet Suppression Control System on Equipment**
 - A. Mississippi Sand at Festus Stone Quarry shall install and operate wet spray devices to restrict the emission of particulate matter. These wet spray devices must be used to control fugitive emissions whenever these units are in operation. The wet spray devices shall be installed on the triple deck screen (SCR-01).
 - B. Watering may be suspended during periods of freezing conditions, when use of the wet spray devices may damage the equipment. During these conditions, the operator(s) shall adjust the production rate to control fugitive emissions from these units. The operator shall record a brief description of such events in a daily log.
5. **Moisture Content Testing of Storage Piles Requirement**
 - A. The moisture content of the stockpiled rock will reduce particulate emissions. Mississippi Sand at Festus Stone Quarry claimed the moisture content of the stored rock to be greater than or equal to 1.5 wt.%, which shall be verified by testing.

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SPECIAL CONDITIONS:

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

- B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director. Mississippi Sand at Festus Stone Quarry shall provide proof of the first test no later than 45 days after startup. Testing shall be conducted for three consecutive years during the months of June through September, while the rock crushing plant is active at this site. If the test results have been consistently greater than 1.5 wt% and there is no reported emission exceedances from the plant, then no further testing is required and this site shall be deemed to have met this condition on all subsequent permits. Verification of the results will be performed during a routine inspection. If the test results have been less than 1.5 wt% and/or there is substantial change in the emissions from the plant, then Mississippi Sand at Festus Stone Quarry shall apply for a new construction permit to account for the revised information or operate a wet suppression system capable of maintaining visible emissions standards for each unit within 30 days.
 - C. The operator shall obtain test samples from each storage pile (Pile 2 and Pile 3). The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be filed on-site or at the Mississippi Sand's main office.
6. Performance Testing for New Source Performance Standards (NSPS)
 - A. Mississippi Sand at Festus Stone Quarry shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program for all equipment applicable to NSPS Subpart "OOO". Mississippi Sand at Festus Stone Quarry shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date.
 - B. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. The performance test results shall be submitted to the Enforcement section no later than 30 days after completion of any required testing.
 7. Restriction on Process Configuration of Primary Emission Point(s)

The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). Mississippi Sand at Festus Stone Quarry has designated the following unit(s) as the primary emission point(s) of the rock crushing plant: primary crusher (CR-01). Bypassing the primary emission point(s) for processing is prohibited.
 8. Record Keeping Requirement

The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 9. Reporting Requirement

The operator(s) shall report to the Air Pollution Control Program (APCP) Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
 10. Superseding Condition

This permit supersedes the NAAQS limitation Special Condition (2) found in the previously issued construction permit(s) (062008-011) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

Currently, this property houses a permanent limestone crushing and sand manufacturing plant that is jointly listed as Plant # 099-0008 and a permanent asphalt plant that is listed as Plant # 099-0007. The limestone crushing and sand manufacturing plant are considered to be the same installation. The limestone crushing plant uses an existing grandfathered quarry as its source. It has been determined that the asphalt plant does not have a support relationship with the limestone crushing/ sand manufacturing plant because 1) the first two digits of the SIC codes are not the same, 2) less than 50% of the rock produced at the limestone crushing plant are supplied to the asphalt plant, and 3) the asphalt plant gets its feed source from more than one location. Therefore the asphalt plant is considered a separate installation.

This permit acknowledges the addition of universal jaw crusher 42" x 30" (CR-101), simplicity feeder 45-18 (F-101), conveyor 48" x 40' (C-101), generator 380 HP 1800 RPM, conveyor 42" x 30' (C-102), double deck screen (SC-101), and two stackers (STK-101 and STK-102) to the existing sand manufacturing plant. The installation voluntarily requested a PM₁₀ limit of less than 15.0 tons per year for this project in order to be below *De Minimis* level in order to avoid dispersion modeling and increment analysis. This permit also supersedes the NAAQS special conditions of Permit 062008-011 and recognizes that the new equipment is combined in the currently permitted installation.

The installation is located in Jefferson County, a nonattainment area for ozone (O₃) and an attainment area for all other criteria air pollutants.

Table 1. Other Permits Issued for Site 099-0008

Permit Number	Completed	Description
0690-011	6/20/1990	New portable asphaltic plant; Sec 5 & 6 De Minimis and Minor
0697-022	6/24/1997	Permit existing conveyors; Sec 5 & 6 De Minimis and Minor
5671A	8/11/1999	Sec 4: relocate to new site
0697-022	9/13/2001	Replace crusher
OP2004-028	8/5/2004	Intermediate operating permit renewed; rock crushing
052005-008	5/11/2005	Added conveyor and separator
012001-005B	4/13/2005	Asphalt-was stationary; Sec 4: Relocate to new site
062007-001	6/1/2007	New portable concrete; Sec 5 & 6
062008-011	6/30/2008	Sand processing; Sec 5 & 6

The stationary quarry plant is permitted to operate under two (2) scenarios:

- Solitary: The ambient impact from the haul roads and stockpiles has a background level of 20.00 µg/m³ which is reserved for the use of Best Management Practices. The remaining balance of 130.00 µg/m³ shall be used by Mississippi Sand at Festus Stone Quarry.
- Concurrent (Same Owner) Operations: The ambient impact from the haul roads and stockpiles has a background level of 20.00 µg/m³ which is reserved for the use of Best Management Practices. The remaining balance of 130.00 µg/m³ shall be used by Mississippi Sand at Festus Stone Quarry and other asphalt, concrete, rock-crushing or rock-screening plants owned by Fred Weber, Inc.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutants of concern are PM₁₀ and NO_x. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a *De Minimis* source under 10 CSR 10-6.060 section (5).

This diesel engine has an annual emission limit of less than 40.0 tons of NO_x in any 12-month period. A composite PM₁₀ emission factor was developed for the rock crushing plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment B.

Table 2: Emissions Summary (tons per year)

Air Pollutant	Regulatory De Minimis Levels	*Existing Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	**New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	72.81	53.97	5.10	3.82	0.0593
SO _x	40.0	N/A	N/A	3.51	2.63	N/A
NO _x	40.0	N/A	N/A	53.34	< 40.0	N/A
VOC	40.0	N/A	N/A	4.35	3.26	N/A
CO	100.0	N/A	N/A	11.49	8.62	N/A
HAPs	10.0/25.0	N/A	N/A	0.05	0.037	N/A

Note: N/A = Not Applicable

* Existing potential emissions taken from permit # 062008-011 (project 2007-12-0010).

** Conditioned potential based on voluntary limit. Other pollutants proportionately reduced.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 1050 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the rock crushing plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM₁₀ at or beyond the nearest property boundary. Previously, Fred Weber, Inc. was permitted for solitary, concurrent same owner, concurrent separate owners, and concurrent same and separate owners operation scenarios. Fred Weber, Inc. agrees to only operate in solitary and concurrent same owner scenarios.

Table 3: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

Operation	Ambient Impact Factor (µg/m ³ /ton)	Modeled Impact (µg/m ³)	*Background (µg/m ³)	NAAQS (µg/m ³)	Daily Production Limit (tons)
Solitary	0.01031	**	20.00	150.00	**
Concurrent, Same Owner	0.01031	**	20.00	150.00	**

* Background PM₁₀ level of 20.00 µg/m³ are from haul roads and stockpiles.

** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded. Other ambient impact factors are listed in Attachment A.

APPLICABLE REQUIREMENTS

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *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 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- 40 CFR Part 60 Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, of the New Source Performance Standards (NSPS)
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

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.

Daronn Williams
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Fred Weber Inc. as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*.
- Noyes Data Corp. book, Orlemann, et al.1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- St. Louis Regional Office Site Survey.
- Best Management Practices

Attachment AA: Best Management Practices (BMPs)- Construction Industry Fugitive Emissions

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

For Haul Roads:

1. Pavement of Road Surfaces –
 - A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions¹” while the plant is operating.
 - B. Maintenance and/or repair of the road surface will be conducted 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.
 - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Usage of Chemical Dust Suppressants –
 - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
 - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. Usage of Documented Watering –
 - A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will 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 as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
 - B. The operator(s) 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 day(s) the plant is in operation (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 plant is operating.
 - 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. The operator(s) shall record a brief description of such events in the same log as the documented watering.

¹ For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

- E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

For Vehicle Activity Areas around Open Storage Piles:

1. Pavement of Stockpile Vehicle Activity Surfaces –
 - A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
 - B. Maintenance and/or repair of the road surface will be conducted 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.
 - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
2. Usage of Chemical Dust Suppressants –
 - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
 - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
3. Usage of Documented Watering –
 - A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will 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 vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
 - B. The operator(s) 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 day(s) the plant is in operations (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 plant is operating.
 - 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. The operator(s) shall record a brief description of such events in the same log as the documented watering.
 - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

Mr. Joe Elbl
Assistant Environmental Manager
Fred Weber Inc.
2320 Creve Coeur Mill Rd.
Maryland Heights, MO 63043

RE: New Source Review Permit - Project Number: 2009-01-013

Dear Mr. Elbl:

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.

Operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2009-01-013, and your amended operating permit, if required, is necessary for continued compliance.

The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:dwl

Enclosures

c: St. Louis Regional Office
PAMS File: 2009-01-013
Permit Number: