



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: 122009-007 Project Number: 2009-08-004

Parent Company: ISP Minerals, Incorporated

Parent Company Address: 1101 Opal Court, Hagerstown, MD 21740

Installation Name: ISP Minerals, Incorporated

Installation Address: 1 Hillcrest Drive, Annapolis, MO 63620

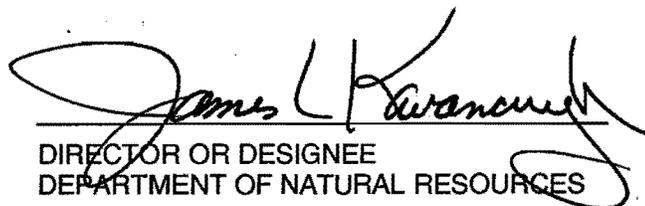
Location Information: Iron County, S22, T31N, R3E

Application for Authority to Construct was made for:
Replacement of two existing rotating drying kilns with two new dryers of larger capacity. 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.

DEC 09 2009

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 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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Permit No.	
Project No.	2009-08-004

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."

ISP Minerals, Incorporated
Iron County, S22, R31N, R3E

1. Stack Testing Requirements

- A. A performance test shall be conducted to verify PM₁₀ (condensable and filterable) emissions from the emission units listed in Table 1. These emission units are vented to a common baghouse (CD17) and stack (EP17). The stack test results shall be used to determine a controlled emission factor in units of pounds per ton throughput (roofing granules).

Table 1: Emission Units vented to Emission Point 17

Emission Unit ID	Description	MHDR (ton/hr) ^[1]	Potential Emissions (lb PM ₁₀ /hr)
EU17C			0.40
EU17D			0.40
EU17E			0.084
EU17F			0.084
EU17G			0.00018
EU17H			0.00022
EU17I			0.00018
EU17J			0.00018
EU17K			0.00022
EU17L			0.00044
EU17M			0.00022
EU17N			0.00022
Total EP-17 Potential Controlled Emissions (lb PM ₁₀ /hr)			0.969
Total EP-17 Controlled Emission Factor (lb PM ₁₀ /ton)			

¹MHDR = Maximum 1-Hour Design Rate

- B. A completed Proposed Test Plan (form enclosed) must be submitted to the Air Pollution Control Program at least 30 days prior to the proposed test date of any such performance tests so that a pretest meeting may be arranged, if necessary, and to assure that the test date is acceptable for an observer to be present. The Proposed Test Plan must include

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Project No.	2009-08-004

SPECIAL CONDITIONS:

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

specification of test methods to be used and be approved by the director prior to conducting the required emissions testing.

- C. The stack testing shall be performed within sixty (60) days after achieving the maximum production rate of the preheater kilns (EU17C & EU17D) but not later than 180 days after initial start of operation.
 - D. Two copies of a written report of the performance test results must be submitted to the director within 90 days of completion of the performance testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required Environmental Protection Agency (EPA) Method for at least one sample run for each air pollutant tested.
 - E. No later than 30 days after the performance test results are submitted, ISP Minerals shall provide the director with a report that establishes the potential emissions of each air pollutant tested in Special Conditions 1.A. The results shall report the emission rates in pounds per hour and tons per year in order that the Air Pollution Control Program may verify the potential emissions from this project.
 - F. If the results of the performance testing shows that the emission factor is greater than that indicated in Table 1, then ISP Minerals shall submit an amendment to this permit with an evaluation of what effects the higher emission rate would have had on the permit review for this project. ISP Minerals shall submit the results of any such evaluation within 30 days of submitting the Performance Test Results report required in Special Condition 1.E. of this permit.
 - G. The above time frames associated with this performance testing condition may be extended upon request of then ISP Minerals and approval by the Director.
2. Capture Device Requirements
- A. ISP Minerals shall use hoods to capture emissions from the emission units indicated in Attachment A. A hood is a shaped inlet to a pollution control system that does not totally surround emissions from an emissions unit.
 - B. ISP Minerals shall use total enclosures to capture emissions from the preheater kilns (EU17C & EU17D), the preheater kiln feed conveyors (EU17M and EU17N), and the emission units indicated in Attachment A. A total enclosure is an enclosure that completely surrounds emissions from an emissions unit.

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SPECIAL CONDITIONS:

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

3. Control Device Requirements – Baghouses

- A. ISP Minerals shall control emissions from the preheater kilns (EU17C & EU17D) and the emission units listed in Attachment A that are vented to a baghouse by using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Each 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 the DNR employees may easily observe them. Replacement filters for the 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).
- B. ISP Minerals 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.
- C. ISP Minerals shall maintain an operating and maintenance log for the 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 Requirements

ISP Minerals 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.

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

Project Number: 2009-08-004
Installation ID Number: 093-0007
Permit Number:

ISP Minerals, Incorporated
1 Hillcrest Drive
Annapolis, MO 63620

Complete: August 5, 2009

Parent Company:
ISP Minerals, Incorporated
1101 Opal Court
Hagerstown, MD 21740

Iron County, S22, R31N, R3E

REVIEW SUMMARY

- ISP Minerals has applied for the authority to replace two existing rotating drying kilns with two new kilns of larger capacity. The larger capacity kilns will debottleneck the existing emission units that are part of the roofing granules coloring plant.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment due to the combustion of natural gas.
- Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*, of the New Source Performance Standards (NSPS) applies to the preheater kilns (EU17C and EU17D).
- Baghouses (CD17, 18, 19, 20, 30 & 31) are being used to control the PM₁₀ emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Iron County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is required for the equipment (EU17C and EU17D) to verify

emission rates used in this analysis and to demonstrate compliance with 40 CFR 60 Subpart UUU *Standards of Performance for Calciners and Dryers in Mineral Industries*

- An application to amend the Basic Operating Permit for this installation is required within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

ISP Minerals is an existing roofing shingle granules production facility located in Iron County, Missouri. ISP Minerals quarries granite on site and processes the rock through crushing and screening operations to form raw roofing granules of a precise size. The raw roofing granules are then processed in a coloring plant where the raw granules are coated with a pigmented clay slurry and fired in a kiln to create a finished ceramic coated roofing granule.

This installation was originally classified as a major source of PM₁₀. However, the facility has since installed a number of fabric filter control devices which has reduced the potential emissions of PM₁₀ to minor source levels. The facility is an existing minor source of PM₁₀ and Nitrogen Oxides (NO_x). ISP Minerals currently holds a Basic State Operating Permit. The following construction permits have been issued to ISP Minerals from the Air Pollution Control Program.

Table 2: Construction Permits History

Permit Number	Description
0680-006	Rotary rock dryer for the secondary crusher, 20 MMBtu/hr burner, two conveyors
0680-007	4 Underground storage tanks
0680-008	Rock storage and conveyors
0680-009	Rock storage and conveyors
0680-010	Conveyor
0680-011	Hopper and conveyor
0680-012	2-500 ton storage bins and conveyors
0680-013	1-1000 ton storage bun and conveyor
1187-005	Incinerator
1290-002	Modifications to process
0792-034	Tertiary crusher, screens, elevators, conveyors, and storage bins
0393-006	Conveyor and screens
0394-015	Conveyor and slurry tank
0395-016	Outside storage stockpile
0395-017	2 screens
0298-002A	4 conveyors, 2 elevators, 2 screens for the Recovery System

PROJECT DESCRIPTION

ISP Minerals has requested confidentiality with regards to the specific process equipment and the processing rates due to the proprietary nature of the information.

ISP Minerals proposes to replace the two existing preheater kilns (EU17A and EU17B) with two new preheater kilns (EU17C and EU17D) of larger capacity. Each new kiln (EU17C and EU17D) will have a maximum design rate of █ tons roofing granules per hour and each new kiln will be equipped with a █ million Btu per hour natural gas-fired burner. Increasing the maximum hourly design rate of the preheater kilns will increase the maximum hourly design rate for all of the emission units within the coloring plant. As a result of this project, the bottleneck for each coating line will transfer from the preheater kilns to the conveyors for each coating line rated at █ ton per hour. Therefore, the maximum design rate for the coloring plant will then be █ tons roofing granules per hour. ISP Minerals will also be adding two new feed conveyors, referred to as the North Conveyor 258 and the South Conveyor 258 (EU17M and EU17N), which will transfer the raw granules from Surge Bin 257 (EU17L) to the new preheater kilns (EU17C and EU17D). All of the emission units, maximum design rates, and control devices considered for the debottlenecking part of the project are listed in Attachment A.

The coloring plant is separated from the crushing and screening operations by a raw granule stockpile and large raw granule storage bins. The storage bins and stockpile allow the coloring plant to function independently from the rest of the facility and does not act as a bottleneck for the entire installation.

In addition to the installation of the new preheater kilns (EU17C and EU17D), ISP Minerals has also proposed to install a █ ton per hour feed hopper (EU39A) and a █ ton per hour material chute (EU39B) to feed raw granules onto a raw feed conveyor belt in the coloring plant. This equipment will be installed for the purpose of evaluating different feedstock and may only be a temporary installation. However, the potential emissions of the equipment were included in the potential emissions of the application to allow the facility some flexibility in utilizing the equipment on an as needed basis. Emissions from the equipment will not be vented to a control device.

As part of the modernization of the coloring plant, ISP Minerals is replacing several material handling units and emissions control equipment with units of similar design and capacity. These activities will not increase throughput rates and are considered like-kind replacements for construction permitting purposes. Potential emissions of like-kind replacements are excluded from project potential emissions and were not included in the potential emissions of the application. Activities considered like-kind replacements associated with this project, include: the rotary valve and distributor chutes used to direct material from a conveyor belt to one of the 6 raw granule storage tanks; the three cyclone separators used in the exhaust stream of the coloring plant kilns; the hoppers and discharge chutes below the scalping screens in the loadhouse.

EMISSIONS/CONTROLS EVALUATION

Emissions from the equipment that are vented to baghouse dust collectors are captured by either total enclosures or hoods. Total enclosures completely surround the emissions from an emission unit and are assumed to capture 100% of the emissions. Hoods are shaped inlets to a pollution control system that do not completely surround the emissions but are designed to capture and discharge the emissions to control equipment. The emission units with hoods are located inside a building and are assumed to capture at least 80% of the emissions.

The emission factors for filterable PM₁₀ used in the analysis of the preheater kilns (EU17C and EU17D) were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 11.19.1 *Sand & Gravel Processing* (November 1995). A control efficiency of 99.9% was allowed for the baghouse dust collector (CD17) which is used to control emissions from the preheater kilns (EU17C and EU17D). As this is a higher control efficiency than what is listed in AP-42, Appendix B.2 *Generalized Particle Size Distributions* (September 1996), a special condition of this permit is to verify the controlled emission factor for these units (EU17C and EU17D) through stack testing. The emission factors for condensable PM₁₀ and the other pollutants emitted due to the combustion of natural gas in the burners for the preheater kilns (EU17C and EU17D) were obtained from Chapter 1.4 *Natural Gas Combustion* (July 1998). The emission factors for the new material transfer equipment (EU17M, EU17N, EU39A and EU39B) were obtained from Chapter 11.19.2 *Crushed Stone Processing and Pulverized Mineral Processing* (August 2004).

The net emissions increase for the debottlenecked emission units in the coloring plant was calculated as the potential of the debottlenecked emission units minus the actual emissions for the years 2004 and 2005. The potential net emissions increase was determined for the increased throughput of roofing granules and the increased utilization of natural gas. Potential emissions of the application represent the potential of the new equipment and the net emissions increase for the debottlenecked equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions^[1]	Existing Actual Emissions (2008 EIQ)	Potential Emissions of the Application	New Installation Potential^[2]
Total PM ₁₀	15.0	110.18	38.53	11.40	118.49
Non-Fugitive PM ₁₀	15.0	32.42	N/D	11.40	40.73
SO _x	40.0	2.39	0.15	0.18	2.45
NO _x	40.0	72.96	18.18	30.57	82.69
VOC	40.0	6.25	0.93	1.68	6.78
CO	100.0	67.18	3.48	25.68	75.36
HAPs	10.0/25.0	N/D	N/D	0.02	N/D

N/D = Not Determined

¹The Non-Fugitive and Total PM₁₀ values were determined during the 1998 EIQ audit. All other values were determined for this project based on information provided in the 2008 EIQ.

²The new installation potential considers the removal of the existing preheater kilns (EU17A and EU17B) and does not include the potential minus actual emissions due to the combustion of natural gas calculated for debottlenecking portion of the project.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are below de minimis levels.

APPLICABLE REQUIREMENTS

ISP Minerals, Incorporated 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 Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *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

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *New Source Performance Regulations*, 10 CSR 10-6.070 – *New Source Performance Standards (NSPS) for Calciners and Dryers in Mineral Industries*, 40 CFR Part 60, Subpart UUU

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.

Kathi Jantz
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 30, 2009, received August 5, 2009, designating ISP Minerals, Incorporated as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated August 20, 2009.

Attachment A – Debottlenecked Emission Unit List

ISP Minerals, Incorporated
 Iron County, S22, R31N, R3E
 Project Number: 2009-08-004
 Installation ID Number: 093-0007
 Permit Number:

Emission Point	Unit Description	Existing (Bottlenecked) MHDR (tons/hr) ^[1]	Project (De-Bottlenecked) MHDR (tons/hr) ^[2]	Emission Factor (lb/ton) ^[3]	Capture Device	Control Device	Control Efficiency (%) ^[4]
17 ^[a]				0.00110	Hood	Baghouse CD 17	99.9
17 ^[a]				0.00110	Total Enclosure	Baghouse CD 17	99.9
17 ^[a]				0.00110	Hood	Baghouse CD 17	99.9
17 ^[a]				0.00110	Hood	Baghouse CD 17	99.9
17 ^[a]				0.00110	Total Enclosure	Baghouse CD 17	99.9
17 ^[a]				0.00110	Total Enclosure	Baghouse CD 17	99.9
18				0.00110	Total Enclosure	Baghouse CD 18	99.5
18				0.00110	Hood	Baghouse CD 18	99.5
19				0.00110	Total Enclosure	Baghouse CD 19	99.5
19				0.00110	Hood	Baghouse CD 19	99.5
20				0.00110	Total Enclosure	Baghouse CD 20	99.5
20				0.00110	Hood	Baghouse CD 20	99.5
21				4.6E-05		Water Spray	0.0
22				4.6E-05		Water Spray	0.0
23				4.6E-05		Water Spray	0.0
24				4.6E-05		Moisture Content/Liquid Coating	0.0
25				4.6E-05		Moisture Content/Liquid Coating	0.0
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.07200	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5

Emission Point	Unit Description	Existing (Bottlenecked) MHDR (tons/hr) ^[1]	Project (De-Bottlenecked) MHDR (tons/hr) ^[2]	Emission Factor (lb/ton) ^[3]	Capture Device	Control Device	Control Efficiency (%) ^[4]
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Hood	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
30				0.00110	Total Enclosure	Baghouse CD 30	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.07200	Hood	Baghouse CD 31	99.5
31				0.00110	Hood	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.00110	Hood	Baghouse CD 31	99.5
31				0.00110	Hood	Baghouse CD 31	99.5
31				0.00110	Hood	Baghouse CD 31	99.5
31				0.00110	Hood	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
31				0.00110	Total Enclosure	Baghouse CD 31	99.5
38				4.6E-05		CD 3 (oil& silicone)	0.0
38				4.6E-05		CD 3 (oil& silicone)	0.0

¹MHDR provided by the applicant based on the bottleneck rate of the preheater kilns.

²MHDR provided by the applicant based on the bottleneck shifting from the preheater kilns to the expected maximum load of the conveyors

³Emission factors obtained from AP 42, Volume I, Fifth Edition, Chapter 11.19.2 *Crushed Stone Processing and Pulverized Mineral Processing* (August 2004)

⁴Except where noted, control efficiencies obtained from AP 42, Volume I, Fifth Edition, Appendix B.2 *Generalized Particle Size Distributions* (September 1996)

^aControl efficiency provided by applicant, the controlled emission factor will be verified through stack testing

Mr. Garry Pogue, Jr.
EH&S Coordinator
ISP Minerals, Incorporated
1 Hillcrest Drive
Annapolis, MO 63620

RE: New Source Review Permit - Project Number: 2009-08-004 (2009-08-005 Confidential)

Dear Mr. Pogue:

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 Kathi Jantz, at the departments' 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

Kendall B. Hale
New Source Review Unit Chief

KBH:kjl

Enclosures

c: Southeast Regional Office
PAMS File: 2009-08-005

Permit Number: