

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: **032012-002** Project Number: 2011-10-056
Installation Number: 021-0038

Parent Company: National Beef Leather, LLC

Parent Company Address: 12200 N. Ambassador Drive, #500, Kansas City, MO 64163

Installation Name: National Beef Leather, LLC

Installation Address: 205 Florence Road, St. Joseph, MO 64504

Location Information: Buchanan County, S20, T57N, R35W

Application for Authority to Construct was made for:

The installation of a new chromium sulfate powder mixing system (EP-73) and the inclusion of equipment permitted in Permit No. 072011-014 (20 liming drums, 20 leather drums and a 12 million British Thermal Unit per hour (MMBtu/hr) natural gas-fired water heater) in this project. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

MAR - 1 2012

EFFECTIVE DATE

Handwritten signature of Kyrna L. Moore in black ink.

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."

National Beef Leather, LLC
Buchanan County, S20, T57N, R35W

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit no. 072011-014 issued by the Air Pollution Control Program.
2. **Control Device Requirement – Scrubbers**
 - A. National Beef Leathers, LLC shall control emissions from the liming and tanning drums using two vertical packed bed scrubbers equipped with mist elimination as specified in the permit application. The scrubbers shall be operated and maintained in accordance with the manufacturer's specifications and recommendations and within the operational range limits established in Special Condition 5.E.
 - B. The scrubbers shall be equipped with a flow meter that indicates the scrubbing air and fluid flow. The scrubbers shall be equipped with a pH monitor and control system. The scrubbers shall be equipped with a pressure drop gauge. These meters shall be located in such a way that they may be easily observed by the Department of Natural Resources' personnel.
 - C. National Beef Leathers, LLC shall monitor and record the scrubbing air and fluid flow rates, pH, and pressure drop through the scrubbers at least once every 24 hours of operation. The flow rates, pH, and pressure drop shall be maintained within the operating limits specified by Special Condition 5.
 - D. National Beef Leather, LLC shall maintain an operating and maintenance log for the scrubbers 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.

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SPECIAL CONDITIONS:

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

3. Control Device Requirement-Baghouse
 - A. National Beef Leather, LLC shall control emissions from all of the equipment in the chromium sulfate powder system (EP-73) and from the lime silo (EP-38) using baghouses as specified in the permit application. Equipment in the chromium sulfate powder system include a bag unloading system, a flexible screw conveyor and a sealed mixing tank.
 - B. The baghouses 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 the Department of Natural Resources' employees may easily observe them.
 - C. 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).
 - D. National Beef Leather, LLC shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours while the unit is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. National Beef Leather, LLC shall maintain an operating and maintenance log for the baghouse 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. Operational Requirement

National Beef Leather, LLC shall keep all chemicals in sealed containers whenever the materials are not in use. National Beef Leather, LLC shall provide and maintain suitable, easily read, permanent markings on the chemicals used at the installation.

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SPECIAL CONDITIONS:

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

5. Performance Testing

- A. National Beef Leather, LLC shall conduct performance testing on the liming and tanning drum exhaust immediately prior to one of the scrubbers (SB-1 or SB-2) and in the scrubber's exhaust stack for total chromium, hexavalent chromium, hydrogen sulfide, and sulfuric acid mist to establish uncontrolled and controlled emission factors (in pounds per ton of fresh hides) for these pollutants. The tests shall be performed over a complete batch cycle.
- B. Total chromium shall be measured using Environmental Protection Agency (EPA) method 19 or 0060 or another method approved by the Air Pollution Control Program. Hexavalent chromium shall be measured using EPA Method 0061 or another method approved by the Air Pollution Control Program. Testing shall be conducted at the maximum production rate possible (after completion of Phase II construction permitted in Permit No. 072011-014). All of the drums at the installation shall be in use during the performance tests. Emissions from the drums shall be routed exclusively to the single tested scrubber.
- C. These tests shall be performed within 60 days after achieving the maximum production rate after Phase II construction has been completed and while using the chromium prepared with the new chromium powder mixer, but no later than 365 days after the initial start-up of any drums installed under Phase I construction. The tests shall be conducted in accordance with the performance testing procedures outlined in Special Condition 5.A.
- D. A completed Proposed Test Plan form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- E. Two copies of a written report of the performance test results shall be submitted to the Director within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA method for at least one sample run.

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SPECIAL CONDITIONS:

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

- F. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations. The test report shall note liming, deliming, bating, pickling, and tanning batch times (hours and minutes), weights (tons of fresh hides and wet blue leather), and process chemical amounts (tons). The test report shall establish operational range limits for scrubber air and fluid flow rates (standard cubic feet per minute and gallons per minute respectively), scrubber fluid pH, and scrubber pressure drop.

- G. No later than 30 days after the performance test results are submitted, National Beef Leathers, LLC shall provide the Director with a report that establishes the total chromium, hexavalent chromium, hydrogen sulfide, and sulfuric acid mist uncontrolled emission factors for SB-1 and SB-2. The report shall establish the emission factors in units of pounds per ton of fresh hides in scientific notation to the hundredth decimal place. The report shall also include the emission rates in pounds per hour and the tons of fresh hides produced during the tests.

- H. If the results of the performance testing show that the controlled emission factors are greater than those in Table 1 below, National Beef Leathers, LLC shall evaluate what effects these differences would have had on the permit applicability of this project. National Beef Leathers, LLC shall submit the results of any such evaluation, in an amendment application, within 30 days of submitting the report required in Special Condition 5.F of this permit.

Table 1: Emission Factors (Pounds per Ton of Fresh Hides)

Emission Point	Total Chromium	Hexavalent Chromium	Hydrogen Sulfite	Sulfuric Acid Mist
SB-1 or SB-2	4.53E-04	Minimum Detection Level	7.14E-03	4.53E-04

- I. National Beef Leathers, LLC shall calculate the hexavalent chromium emissions using the minimum detection level. If the emissions are greater than the Screening Model Action Level (SMAL) of 0.002 tons per year (4 pounds per year), National Beef Leathers, LLC shall submit one of the following:

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SPECIAL CONDITIONS:

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

- 1) A screening analysis on the ambient impact of hexavalent chromium emissions from this project showing that the concentrations of hexavalent chromium from this project at and beyond the property boundary are less than the significance level of $0.004 \mu\text{g}/\text{m}^3$ on a 24-hour basis and $4\text{E}-06 \mu\text{g}/\text{m}^3$ on an annual basis; or
 - 2) A full Ambient Air Quality Impact Analysis on the hexavalent chromium emissions from the entire installation showing that the concentrations of hexavalent chromium from the entire installation at and beyond the property boundary are less than the Risk Assessment Levels (RALs) of $0.1 \mu\text{g}/\text{m}^3$ on a 24-hour basis and $0.00001 \mu\text{g}/\text{m}^3$ on an annual basis.
6. Operational Restrictions
- A. The new chromium sulfate mixing system (EP-73) shall be installed by April 30, 2012.
 - B. After startup of the new chromium sulfate mixing system, the installation shall stop using pre-made liquid chromium.
 - C. Within 15 days after startup of the new chromium sulfate mixing system, the installation shall notify the Enforcement Unit of the Missouri Air Pollution Control Program of the startup date of the new chromium sulfate mixing system.
7. Operating Permit Application Requirements
- Within 90 days after the completion of the stack tests required in Special Condition No. 5, National Beef Leather, LLC shall submit a request to the Operating Permit Unit of the Air Pollution Control Program asking for a determination on whether the facility should be considered a basic installation for operating permits. The request shall include at the least a list of equipment currently at the site, the maximum hourly design rate of each equipment, and an emissions analysis for the entire installation. The emissions analysis shall be based on the emission factors developed from the performance tests required in Special Condition No. 5.
8. Record Keeping and Reporting Requirements
- National Beef Leather, 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.

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

Project Number: 2011-10-056
Installation ID Number: 021-0038
Permit Number:

National Beef Leather, LLC
205 Florence Road
St. Joseph, MO 64504

Complete: October 28, 2011

Parent Company:
National Beef Leather, LLC
12200 N. Ambassador Drive, #500
Kansas City, MO 64163

Buchanan County, S20, T57N, R35W

REVIEW SUMMARY

- National Beef Leather, LLC (NBL) has applied for authority to construct a chromium sulfate powder mixing system (EP-73).
- Equipment permitted in Permit No. 072011-014 has been included as part of this project.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. The HAPs of concern from this project are chromium and its compounds.
- 40 CFR Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, of the New Source Performance Standards (NSPS) applies to the natural gas-fired water heater no. 4 (EP-72)
- 40 CFR 63 Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*, of the Maximum Achievable Control Technology (MACT) Standards applies to the natural gas-fired water heater no. 4 (EP-72).
- This installation is not subject to 40 CFR 63 Subpart TTTT, *National Emissions Standards for Hazardous Air Pollutants for Leather Finishing Operations*, of the MACT Standards because it does not apply coatings comprised of dye, pigments, film-forming materials, or performance modifiers to leather surfaces. The installation is not subject to 40 CFR 63 Subpart NNNNNN, *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources: Chromium Compounds*, because it does not use chromite ore as the basic feed stock to manufacture chromium compounds. The installation is not subject to 40 CFR 63 Subpart BBBB, *National Emissions Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry*, because its primary activity is classified under North America Industry Classification System (NAICS) code 316110, and not under NAICS code 325998.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.
- Two parallel, vertical packed bed scrubbers, each equipped with single stage mist eliminators (SB-1 and SB-2) are being used to control the hydrogen sulfide (H₂S) emissions from the liming and tanning drums.
- Baghouses are being used to control particulate emissions from the lime silo (EP-38) and the new chromium sulfate powder mixing system (EP-73).
- 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 Buchanan County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below *de minimis* levels.
- Emissions testing are not required for the equipment.
- The current basic operating permit for the installation expires August 20, 2012. The basic operating permit renewal application is required by February 20, 2012. After the stack tests required in Special Condition No. 5 are completed, the facility shall submit a request to the Operating Permit Unit of the Air Pollution Control Program asking for a determination on whether the facility is a Basic installation for operating permits.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

NBL operates a beef leather tanning installation in St. Joseph. NBL was formed in 2009 from the purchase of the Prime Tanning Corporation installation. NBL receives fresh beef hides and produces wet blue leather through dehairing, liming, bating, pickling, chrome tanning, and splitting. The installation does not fat-liquor, dye, buff, or otherwise finish leather. NBL is a minor source for construction permits and currently holds a basic operating permit.

During the last permit review (Permit No. 072011-014), it was determined that the existing potential emissions from the installation were calculated using information from the 1997 Emissions Inventory Questionnaire (EIQ) and Permit No. 022001-016, which was issued in 2001. The existing potential emissions calculated using these sources may not be representative of emissions currently emitted by the plant. Therefore, the facility is required to submit a request to the Operating Permit Unit of the Air Pollution

Control Program to determine if the facility is still a Basic installation for operating permits. An emissions analysis of the entire plant should be included in the applicability determination request and should be based on the stack test required in Special Condition No. 5 of this permit. However, the facility's current basic operating permit expires in August 20, 2012 and the facility is required to submit a basic operating permit renewal application by February 20, 2012. It is doubtful that the facility can perform the stack test before this deadline. Therefore, the facility should submit a basic operating permit renewal application first, by the February 20, 2012 deadline, and then submit the applicability determination request within 90 days after the stack tests are completed (See Special Condition 7 of this permit).

The following construction permits have been issued to National Beef Leather, LLC from the Air Pollution Control Program. The facility has received numerous Notices of Violations (NOV) for odor while under Prime Tanning.

Table 2: Permit History

Permit Number	Description
112000-003	Two tanning drums
0899-002	Kiln dust silo
052000-002	Ammonium sulfate batching
022001-016	One tanning drum
112000-013A	Suspend special condition
112000-013	Tanning drum additives
072011-014	20 liming drums, 20 leather tanning drums and a natural gas-fired water heater

PROJECT DESCRIPTION

NBL currently operates a liquid chromium receiving and unloading system. The installation is proposing to install a chromium sulfate powder mixing system to prepare its own liquid chromium solution. The powders will be brought in 900 kg (1,984 pounds) bags where they will be unloaded through a bulk bag discharger, which can empty one bag per hour. The powders are then transported through a 20 foot auger into a sealed mixing tank where they will be mixed with water. The resulting liquid chromium will be held in storage tanks until they are needed. The installation of the mixing system will not increase the tanning capacity. It will only replace how the facility receives chromium for the tanning process.

Equipment permitted in Permit No. 072011-014 (Project No. 2011-03-024), which includes 20 liming drums, 20 tanning drums and a 12 million British Thermal unit per hour (MMBtu/hr) natural gas-fired water heater, are also included in this permit as part of this project because the liquid chromium produced by the new chromium sulfate powder mixing system will be used in the tanning drums. The facility will no longer use the pre-made liquid chromium that it has in the past. All of the special conditions in Permit No. 072011-014 are superseded by this permit. The performance test required in Special Condition No. 5 shall be conducted using the liquid chromium produced by the new powder mixing system.

EMISSIONS/CONTROLS EVALUATION

Emissions from the chromium sulfate powder mixing system include particulate matter less than two-and-a-half microns in diameter (PM_{2.5}), particulate matter less than ten

microns in diameter (PM₁₀), particulate matter (PM) and chromium sulfate (in particulate form). The chromium associated with chromium sulfate is chromium (III). Currently, there are no emission factors for the unloading and transport of chromium sulfate powders. Therefore, emission factors for the loadout of cement were used to estimate emissions since both materials are powders. The cement powders are expected to be finer than the chromium sulfate powders and using cement emission factors should yield conservative estimates. PM₁₀ emissions were calculated from cement loadout emission factor taken from WebFIRE, the internet version of the Environmental Protection Agency's Factor Information Retrieval Software (FIRE). No particle size distribution data were available for chromium sulfate powders. Therefore, the particle size distribution for cement was used to calculate PM_{2.5} and PM emissions from the PM₁₀ emissions. According to numerous literature sources, PM_{2.5} should be less than 15% of PM while PM₁₀ should be less than 30% of PM.

The baghouse is expected to achieve 100% capture due to its design. The dust collector creates a negative pressure on the system in which the bags are collapsed during the bag unloading process. However, to calculate emissions conservatively, the facility is willing to accept a 90% capture efficiency. A default control efficiency of 99% was also used for the baghouse.

Emissions from equipment permitted in Permit 072011-014 were included in the potential emissions of the application. Potential emissions of the application represent the potential of the new 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 <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2010 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM _{2.5}	10.0	N/D	2.55	1.96	N/A
PM ₁₀	15.0	N/D	2.55	6.66	N/A
PM	25.0	N/D	N/D	8.45	N/A
SO _x	40.0	N/D	0.03	0.03	N/A
NO _x	40.0	N/D	4.89	5.15	N/A
VOC	40.0	N/D	2.36	4.55	N/A
CO	100.0	N/D	6.32	8.85	N/A
Individual HAP	10.0	N/D	N/D	0.67	N/A
Combined HAPs	25.0	N/D	N/D	0.67	N/A
Sulfuric Acid Mist	7.0	N/D	N/D	0.03	N/A
Hydrogen Sulfide	10.0	N/D	N/D	0.50	N/A
Chromium III Compounds	10.0	N/D	N/D	0.67	N/A
Chromium III Metal	¹ 5.0	N/D	N/D	0.19	N/A

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

The existing potential emissions were listed as not determined (N/D) because they were calculated previously using outdated data, as suggested in the "Installation Description" section of this permit.

PERMIT RULE APPLICABILITY

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

APPLICABLE REQUIREMENTS

National Beef Leather, 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
- *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

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400 applies to the ammonium sulfate batching equipment.
- *New Source Performance Regulations*, 10 CSR 10-6.070 – *New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc, applies to the natural gas-fired water heater (EP-72)
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*, 40 CFR Part 63, Subpart JJJJJJ, applies to the natural gas-fired water heater (EP-72)
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260

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 October 27, 2011, received October 28, 2011, designating National Beef Leather, LLC as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey, dated November 22, 2011.

Mr. William A. Ludwig
Corporate Environmental Director
National Beef Leather, LLC
205 Florence Road
St. Joseph, MO 64504

RE: New Source Review Permit - Project Number: 2011-10-056

Dear Mr. Ludwig:

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 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 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: cyl

Enclosures

c: Kansas City Regional Office
PAMS File: 2011-10-056

Permit Number: