

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

OCT - 9 2007

Mr. Tex C. Mahler
EHS Manager
Ritchie Brothers Auctioneers, Inc.
3901 Faulkner Drive
Lincoln, NE 68516-4738

RE: New Source Review Permit, Permit by Rule
Project Number: 2007-09-053
Facility ID Number: 107-0062

Dear Mr. Mahler:

Enclosed with this letter is your permit to construct. Please review your permit carefully. You submitted a \$700.00 review fee, received on September 19, 2007. Section A and Section B of your permit application "General Notification Information for Authority to Construct" and "Special Conditions for Surface Coating Operations" are part 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.

Operation in accordance with these conditions is necessary for continued compliance.

In order to streamline the permitting process, the initial on-site compliance inspection requirement (which is mandatory prior to issuance of a permit) has been waived. However, an on-site compliance inspection will be performed at a later date, to validate your statements and conditions claimed on the permit by rule notification.

If you have any questions regarding this permit, please contact Mr. James Broadfoot at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102 or (573) 526-3835.. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Maher Jaafari, P.E.
Initial Source Review Unit Chief

MJ:jbn

Enclosure

c: Kansas City Regional Office
PAMS File 2007-09-053

Permit Number: 102007-005

Recycled Paper



PERMIT TO CONSTRUCT

PERMIT BY RULE

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

Construction Permit Number: **102007-005**
Project Number: 2007-09-053
Installation ID: 107-0062

Installation Name and Address

Ritchie Bros. Auctioneers, Inc.
Southwest corner of I-70 and Reich Road
Odessa, MO 64076
Lafayette County

Parent Company's Name and Address

Ritchie Bros. Auctioneers, Inc.
3901 Faulkner Drive
Lincoln, NE 68516-4738

Installation Description:

Auction Grounds, main structures will include a central office building and refurbished building. Buildings will be heated with natural gas fired exempt combustion units (heat input rate exempt). The refurbished building includes a totally enclosed, pressurized media blasting booth with media recovery and a high efficiency dust collector; pressurized paint booth with high efficiency filtration of the exhaust air and capability of heating inlet air for curing.

OCT - 9 2007

Effective Date


Director or Designee *for DNR*
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 and 10 CSR 10-6.062 if you fail to adhere to the specifications and conditions listed in your permit by rule application and this permit. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department of Natural Resources Regional office responsible for the area within which the equipment is located within 15 days after the actual start up of this air contaminant source.

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

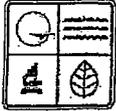
You may appeal this permit or any of the listed special conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

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 Permit Section, Initial Source Review Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102-0176, attention: Initial Review Unit.

RECEIVED

2007 SEP 28 AM 9:55



STATE OF MISSOURI
 DEPARTMENT OF NATURAL RESOURCES
 P.O. BOX 176, JEFFERSON CITY, MO 65102-0176
**APPLICATION FOR AUTHORITY TO CONSTRUCT
 PERMIT BY RULE NOTIFICATION
 SURFACE COATING OPERATIONS**

APCP USE ONLY	
CHECK NO. 152108	CHECK RECEIVED (MM/DD/YY) 9/19/07
CHECK AMOUNT \$ 700.00	CHECK DATE (MM/DD/YY) 9/18/07
PROJECT NO. 2007-09-053	PERMIT NO.

SECTION A: GENERAL NOTIFICATION INFORMATION - ALL NOTIFICATIONS MUST BE ACCOMPANIED BY A \$700 FEE

SECTION A-1: GENERAL INSTALLATION INFORMATION

1. INSTALLATION NAME Ritchie Bros Auctioneers Inc.		2. FIPS 107	2. PLANT NO.
3. INSTALLATION STREET ADDRESS Southwest corner of I-70 and Reich Road			
4. INSTALLATION MAILING ADDRESS 3901 Faulkner Drive, Lincoln, NE 68516 (until constructed)			
5. CITY Odessa		STATE MO	ZIP CODE 64076
6. COUNTY NAME LaFayette	7. 1/4, of 1/4, of SECTION TOWNSHIP RANGE S 36, T 49N, R 28W		
8. PARENT COMPANY Ritchie Bros. Auctioneers, Inc.			
10. PARENT COMPANY MAILING ADDRESS 3901 Faulkner Drive			
11. CITY Lincoln		STATE NE	ZIP CODE 68516-4738
12. INSTALLATION CONTACT PERSON Mr. Tex C. Mahler		13. CONTACT PERSON'S TITLE CSO	
14. CONTACT PERSON'S MAILING ADDRESS same as above			
15. INSTALLATION CONTACT TELEPHONE NO. (402) 421 3631		16. INSTALLATION CONTACT FAX NO. (402) 421 1738	
17. INSTALLATION CONTACT E-MAIL ADDRESS tmahler@rbauktion.com			
18. PROJECTED DATE TO COMMENCE CONSTRUCTION 9/24/07		19. PROJECT DATE OF OPERATION STARTUP 01/05/08	

SECTION A-2: INSTALLATION DESCRIPTION

20. Auction grounds. Main structures will include a central office building and refurbish building. Buildings are heated with natural gas fired exempt combustion units (heat input rate exempt). The refurbish bldg includes a totally enclosed, pressurized media blasting booth with media recovery and a high eff dust collector; pressurized paint booth with high efficiency filtration of the exhaust air, and the capability of heating inlet air for curing.

SECTION A-3: CERTIFICATION STATEMENT

I certify that I have personally examined and am familiar with the information in this application and believe that the information submitted is accurate and complete. I am aware that making a false statement or misrepresentation in this application is grounds for denying or revoking this permit.

21. SIGNATURE OF RESPONSIBLE OFFICIAL 		22. DATE 09/27/2007
23. TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL Mr. Tex C. Mahler CSO		24. RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER (402) 421 3631 604-273-7564
25. TITLE OF RESPONSIBLE OFFICIAL CSO TEX MAHLER		

SECTION B: SPECIAL CONDITIONS FOR PRINTING OPERATIONS

Construction and operation of this new air pollution source is subject to the special conditions listed below. These special conditions are based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically RSMo. 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.062 "Construction Permits by Rule").

Please indicate by marking the appropriate box as to whether or not the emission source complies with the rule listed in the applicable emission limit or standard. If any of the applicable emission source boxes are checked no, your source is not eligible for a printing operation permit by rule.

This Permit By Rule applies only to Surface Coating Operations constructed after Oct. 31, 2003.

SPECIAL CONDITION	EMISSION SOURCE COMPLIES?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)3.A.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Metalizing, spraying molten metal onto a surface to form a coating, is not permitted under this permit-by-rule. The use of coatings that contain metallic pigments is permitted.	Proper work practice.
10 CSR 10-6.062(3)(B)3.B.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	All facilities shall implement good housekeeping procedures to minimize fugitive emissions, including all spills, which shall be cleaned up immediately. The booth or work area exhaust fans shall be operating when cleaning spray guns and other equipment. All new and used coatings and solvents shall be stored in closed containers. All waste coatings and solvents shall be removed from the site by an authorized disposal service or disposed of at a permitted on-site waste management facility.	To ensure proper work practices the operator shall provide and maintain suitable, easily read, permanent markings on all coatings and solvents containers.
10 CSR 10-6.062(3)(B)3.C.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Drying and curing ovens shall either be electric or meet the following conditions: The maximum heat input to any oven must not exceed forty (40) million British thermal units (Btu's) per hour. Heat shall be provided by the combustion of one of the following: natural gas, liquid petroleum gas, fuel gas containing no more than twenty (20) grains of total sulfur compounds (calculated as sulfur) per one hundred (100) dry standard cubic feet, or number 2 fuel oil with not more than three tenths percent (0.3%) sulfur by weight.	Proper work practice.
10 CSR 10-6.062(3)(B)3.D.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Emissions shall be calculated using a material balance that assumes that all VOC's and hazardous air pollutants in the paints and solvents used are directly emitted to the atmosphere. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations: Forty (40) tons per twelve (12)-month period, rolled monthly, of VOC's for all surface coating operations on the property.</p> <p>A sum of twenty-five (25) tons per twelve (12)-month period, rolled monthly, of all hazardous air pollutants for all surface coating operations on the property.</p> <p>Each individual hazardous air pollutant shall not exceed the emission threshold levels established in 10 CSR 10-6.060(12)(J), rolled monthly.</p>	<p>Determined through proper record keeping. Worksheets A, B, and C (or equivalent) shall be used to demonstrate compliance with this condition. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request. The operator shall report to the Air Pollution Control.</p> <p>Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which these conditions are exceeded.</p>

SECTION B: SPECIAL CONDITIONS FOR PRINTING OPERATION (CONTINUED)

SPECIAL CONDITION	EMISSION SOURCE COMPLIES?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)3.E.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>The surface coating operations shall be performed indoors, in a booth or in an enclosed work area. The booth shall be designed to meet a minimum face velocity at the intake opening of each booth or work area of one hundred feet (100') per minute. Emissions shall be exhausted through elevated stacks that extend at least one and one-half (1 1/2) times the building height above ground level. All stacks shall discharge vertically. There shall be no obstructions, such as rain caps, unless such services are designed to automatically open when booths are operated.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.F.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>For spraying operations, emissions of particulate matter must be controlled using either a water wash system or a dry filter system with a ninety-five percent (95%) removal efficiency as documented by the manufacturer. The face velocity at the filter shall not exceed two hundred fifty feet (250') per minute or that specified by the filter manufacturer, whichever is less. Filters shall be replaced according to the manufacturer's schedule or whenever the pressure drop across the filter no longer meets the manufacturer's recommendation.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.G.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Coating operations shall be conducted at least fifty feet (50') from the property line and at least two hundred fifty feet (250') from any recreational area, residence, or other structure not occupied or used solely by the owner of the property upon which the facility is located.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.H.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>The facility shall not be located in an ozone non-attainment area.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.I.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Record keeping. The operator shall maintain the following records and reports: All material safety data sheets for all coating materials and solvents. A monthly report indicating the days the surface coating operation was in operation and the total tons emitted during the month, and the calculation showing compliance with the rolling average emission limits of sub paragraphs 10 CSR 10-6.062(3)(B)3.d.</p> <p>A set of example calculations showing the method of data reduction including units, conversion factors, assumptions, and the basis of assumptions.</p> <p>These reports and records shall be immediately available for inspection at the installation.</p>	<p>Determined through proper record keeping. Worksheets A, B, and C (or equivalent) shall be used to demonstrate compliance with this condition. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request.</p> <p>The operator shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (1) days after the end of the month during which these conditions are exceeded.</p>

SECTION C: OTHER POTENTIALLY APPLICABLE REQUIREMENTS

This section is intended to identify regulations that may apply to this installation. There may be others not listed that apply. To determine rule applicability and specific standards please consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. Please note: this 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.

REGULATION OR CONSTRUCTION PERMIT REFERENCE	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-2.100, 10-3.030, or 10-4.090, 10-5.070 Open Burning Restrictions	Shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.	Any person intending to engage in open burning shall submit a request to the Director.
10 CSR 10-2.070, 10-3.090 or 10-4.070, Restriction of Emission of Odors	No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when air is diluted to 1:7 volumes of odorous to odor-free air for 2 separate trails not less than 15 minutes apart within 1 hour.	No odor violations noted, if and when scentometer readings are taken.
10 CSR 10-5.160 Control of Odors in the Ambient Air	No person shall emit odorous matter as to cause objectionable odors unless within the limits established by this rule.	No odor violations noted, if an when scentometer readings are taken.
10 CSR 10-6.065, Operating Permits	The permittee shall comply with all applicable requirements identified in the operating permit (OP); file for timely renewal of this OP; and retain a copy of the OP on-site and make available to any MDNR personnel upon request.	The permittee shall submit an annual compliance certification in accordance with the regulation. The permittee shall maintain a current equipment list on-site with the date of installation of the equipment.
10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information	Submittal of Emission Inventory Questionnaire (EIQ) and emission fees by frequency noted in 10 CSR 10-6.110.	The permittee shall complete and submit an EIQ in accordance with 10 CSR 10-6.110.
10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions	Shall not commence construction or modification of any installation subject to this rule; begin operation after construction or modification; or begin operation of any installation which has been shut down longer than 5 years without first obtaining a permit.	In the event of a malfunction, which results in excess emissions that exceed 1 hour, the permittee shall implement corrective action and submit reports.
10 CSR 10-5.530, Control of Volatile Organic Compound Emissions From Wood Furniture Manufacturing Operations	The owner or operator shall limit VOC emissions from finishing operations by complying with requirements found in 10 CSR 10-5.530(3).	Proper work practice, and maintenance of records as required by the rule.
10 CSR 10-2.210, and 10-5.300 Control of Emissions From Solvent Metal Cleaning	No person shall cause or allow solvent metal cleaning or degreasing operations without adhering to the operations procedures in the rule, following the use recommendations by the equipment manufacturer, without minimum operator and supervisor training, and the equipment must conform to the specifications established in the rule.	Proper work practice, and maintenance of records as required by the rule.

SECTION C: OTHER POTENTIALLY APPLICABLE REQUIREMENT (CONTINUED)

REGULATION OR CONSTRUCTION PERMIT REFERENCE	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-2.215 and 10 CSR 10-5.455 Control of Emissions from Solvent Cleanup Operations	Any person performing certain industrial cleaning involving the use of a VOC solvent shall demonstrate a thirty percent (30%) reduction in plant-wide industrial VOC cleaning solvent emissions by May 1, 2003 (10-2.215) or May 31, 2003 (10-5.455). The emission reduction shall be based on an average of the summation of the emissions in 1997 and 1998 (10-2.215) or by a representative year 1990 or 1995 (10-5.445).	Proper work practice, and maintenance of records as required by the rule.
10 CSR 10-2.230, 10-5.330, Control of Emissions From Industrial Surface Coating Operations	No person shall emit any VOC from any surface coating operation in excess of amounts listed in tables 10 CSR 10-2.230(4) and 10-5.330(4).	Proper work practice, and maintenance of records as required by the rule.
10 CSR 10-6.070 New Source Performance Regulations	The following federal NSPS standards may apply: (EE) Surface Coating of Metal Furniture, (MM) Automobile and Light Duty Truck Surface Coating Operations, (SS) Industrial Surface Coating: Large Appliances, (TT) Metal Coil Surface Coating, (WW) Beverage Can Surface Coating Industry, (FFF) Flexible Vinyl and Urethane Coating and Printing, (TTT) Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines.	As required by regulations.
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	The following federal MACT standards may apply: (JJ) National Emission Standards for Wood Furniture Manufacturing Operation, (KKKK) Metal Can Surface Coating, (MMMM) Miscellaneous Metal Parts and Products Surface Coating, (NNNN) Large Appliance Surface Coating, (PPPP) Plastic Parts Surface Coating, (QQQQ) Wood Building Products Surface Coating, (RRRR) Metal Furniture Surface Coating, and (SSSS) Metal Coil Surface Coating.	As required by regulations.