Ms. Lina Klein  
Environmental Director, FWI  
Riverview Commerce Park, LLC  
2320 Creve Coeur Mill Road  
Maryland Heights, MO 63043

RE: New Source Review Permit Correction - Permit Number: 072014-006B  
Project Number: 2014-10-020; Installation Number: 099-0175

Dear Ms. Klein:

On October 6, 2014, the Air Pollution Control Program received your notification of an error that you noticed in Permit 072014-006A regarding superseding of special conditions. In order to provide clarity between the projects, all special conditions from Permit 072014-006 and 072014-006A will be superseded. The conditions of the previously mentioned permits will be replaced by the conditions stated in this permit correction.

Please attach this correction to permit numbers 072014-006 and 072014-006A.

If you have any questions regarding this correction, please do not hesitate to contact J Luebbert, at the department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
Permits Section Chief  
KBH:jlk

Enclosures

c: St. Louis Regional Office  
PAMS File: 2014-10-020

Celebrating 40 years of taking care of Missouri’s natural resources.  
To learn more about the Missouri Department of Natural Resources visit dnr.mo.gov.
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.”

Riverview Commerce Park, LLC
Jefferson County, S20, T41N, R6E

1. Superseding Condition
The conditions of this permit supersede all special conditions found in the previously issued construction Permit Number 072014-006 and Permit Number 072014-006A issued by the Air Pollution Control Program.

2. Best Management Practices (BMPs) Requirement
Riverview Commerce Park shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing BMPs as defined in Attachment AA.

3. Annual Emission Limit
A. Riverview Commerce Park shall emit less than 10.0 tons of PM$_{2.5}$ in any consecutive 12-month period from the entire installation as shown in Table 1.

Table 1: Emission Points

<table>
<thead>
<tr>
<th>ID</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dock 1</td>
<td></td>
</tr>
<tr>
<td>EP1</td>
<td>Truck unloading to Masaba C1 and auxiliary conveyors</td>
</tr>
<tr>
<td>EP2</td>
<td>Masaba C1 conveyor drop to C2 conveyor</td>
</tr>
<tr>
<td>EP3</td>
<td>C2 conveyor drop to 20-ton surge hopper</td>
</tr>
<tr>
<td>EP4</td>
<td>20-ton surge hopper drop to C3 conveyor</td>
</tr>
<tr>
<td>EP5</td>
<td>C3 conveyor drop to C4 conveyor</td>
</tr>
<tr>
<td>EP6</td>
<td>C4 conveyor drop to C5 conveyor</td>
</tr>
<tr>
<td>EP7</td>
<td>New Conveyor C6 drop to C2 conveyor</td>
</tr>
<tr>
<td>EP8</td>
<td>C5 conveyor drop to barge</td>
</tr>
<tr>
<td>EP9</td>
<td>Auxiliary conveyor drop to Masaba C1 conveyor</td>
</tr>
<tr>
<td>EP10</td>
<td>Dock 1 haul road</td>
</tr>
<tr>
<td>Rail</td>
<td></td>
</tr>
<tr>
<td>EP11</td>
<td>Truck unloading to Wilson conveyor</td>
</tr>
<tr>
<td>EP12</td>
<td>Wilson conveyor drop to barge</td>
</tr>
<tr>
<td>EP13</td>
<td>Rail haul road</td>
</tr>
<tr>
<td>EP14</td>
<td>Stockpile</td>
</tr>
</tbody>
</table>
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

<table>
<thead>
<tr>
<th>Dock 2</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP15</td>
<td>Truck unloading to second Masaba conveyor</td>
</tr>
<tr>
<td>EP16</td>
<td>Second Masaba conveyor drop to barge</td>
</tr>
<tr>
<td>EP17</td>
<td>Dock 2 haul road</td>
</tr>
</tbody>
</table>

B. Riverview Commerce Park shall demonstrate compliance with Special Condition 3.A using Attachment A of this permit or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

4. Ambient Air Impact Limitation
   A. Riverview Commerce Park shall not cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM$_{10}$) of 150.0 μg/m$^3$ 24-hour average in ambient air.

B. Riverview Commerce Park shall demonstrate compliance with Special Condition 4.A using Attachment B of this permit or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

5. Control Device Requirement-Baghouse
   A. Riverview Commerce Park shall control emissions from the following equipment at Dock 1 using baghouses as specified in the permit application.
      1.) Masaba conveyor C1 drop to conveyor C2 (EP-2)
      2.) Conveyor C2 drop to 20-ton surge hopper (EP-3)
      3.) 20-ton surge hopper drop to conveyor C3 (EP-4)
      4.) Conveyor C3 drop to conveyor C4 (EP-5)
      5.) Conveyor C4 drop to conveyor C5 (EP-6)

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 Department of Natural Resources’ employees may easily observe them.

C. 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).

D. Riverview Commerce Park shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours while the plant is operating. The
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

E. Riverview Commerce Park shall maintain a copy of the baghouse manufacturer’s performance warranty on site.

F. Riverview Commerce Park 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.

6. Moisture Content Testing Requirement
   A. Riverview Commerce Park shall verify that the moisture content of the zinc and copper concentrate is greater than 4.0 percent by weight.

   B. Testing shall be conducted according to the method prescribed by the American Society for Testing Materials (ASTM) D-2216, C-566 or another method approved by the Director.

   C. The initial test shall be conducted no later than 45 days after the start of operation. A second test shall be performed the calendar year following the initial test during the months of July or August.

   D. The test samples shall be taken from zinc or copper concentrate that has been processed by the plant or from each source of concentrate (e.g. quarry).

   E. The written analytical report shall include the raw data and moisture content of each sample, the test date and the original signature of the individual performing the test. The report shall be filed on-site or at the Riverview Commerce Park main office within 30 days of completion of the required test.

   F. If the moisture content of either of the two tests is less than the moisture content in Special Condition 6.A, another test may be performed within 15 days of the noncompliant test. If the results of that test also exceed the limit, Riverview Commerce Park shall either:
      1.) Apply for a new permit to account for the revised information, or
SPECIAL CONDITIONS:

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

2.) Submit a plan for the installation of wet spray devices to the Compliance/Enforcement Section of the Air Pollution Control Program within 10 days of the second noncompliant test. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.

G. In lieu of testing, Riverview Commerce Park may obtain test results that demonstrate compliance with the moisture content in Special Condition 6.A from the supplier of the concentrate.

7. Record Keeping and Reporting Requirements
   A. Riverview Commerce Park 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.

   B. Riverview Commerce Park shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
attachment a: pm2.5 tracking sheet
riverview commerce park 099-0175
project number: 2014-10-020
permit number: 072014-006b

this sheet covers the period from ______ to ______.
(month, year) (month, year)

<table>
<thead>
<tr>
<th>month</th>
<th>dock 1</th>
<th>rail</th>
<th>dock 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>monthly production (tons)</td>
<td>emission factor (lb/ton)</td>
<td>1 emissions (lbs)</td>
</tr>
<tr>
<td>example</td>
<td>108,504</td>
<td>0.0018</td>
<td>195.31</td>
</tr>
</tbody>
</table>

(a) total monthly emissions (tons). calculate by summing all four subtotal monthly emissions (tons)
(b) 12-month running total emissions (tons) from previous month’s attachment a
(c) total monthly emissions (tons) from previous year’s attachment a for this month
(d) current 12-month running total emissions (tons). calculate by adding (a) and (b) and subtracting (c)

1 Calculate “emissions (lbs)” for each part of the installation (dock 1, rail, dock 2 concentrate, and dock 2 sand) by multiplying each one’s “monthly production (tons)” by its “emissions factor (lb/ton).”
2 Copy the calculated “emissions (lbs)” to the “subtotal monthly emissions (lbs)” on the same line.
3 Calculate each “subtotal monthly emissions (tons)” by dividing “subtotal monthly emissions (lbs)” by 2,000.
4 A 12-month running total of less than 10.0 tons of pm2.5 is necessary for compliance
Riverview Commerce Park, LLC
Jefferson County, S20, T41N, R6E

This sheet covers the period from _______ to _______.

<table>
<thead>
<tr>
<th>Date</th>
<th>Daily Production (tons)</th>
<th>Impact Factor (µg/m³/ton)</th>
<th>¹Impact (µg/m³)</th>
<th>Daily Production (tons)</th>
<th>Impact Factor (µg/m³/ton)</th>
<th>¹Impact (µg/m³)</th>
<th>²Daily Production (tons)</th>
<th>³Impact Factor (µg/m³/ton)</th>
<th>¹Impact (µg/m³)</th>
<th>Background (µg/m³)</th>
<th>⁵Total Impact (µg/m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>2,200</td>
<td>0.0236</td>
<td>56.54</td>
<td>1,404</td>
<td>0.0063</td>
<td>8.8</td>
<td>C=3,025</td>
<td>0.0212</td>
<td>64.1</td>
<td>20.0</td>
<td>149.44</td>
</tr>
<tr>
<td></td>
<td>0.0236</td>
<td></td>
<td></td>
<td>0.0063</td>
<td></td>
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<td>20.0</td>
<td>149.44</td>
</tr>
</tbody>
</table>

1 Calculate the impact for each part of the installation (Dock 1, Rail, and Dock 2) by multiplying the daily production by the impact factor.
2,3 If any copper or zinc concentrate was loaded on this date, specify C and use C impact factor. If only sand was loaded, specify S and use S impact factor.
4 The impacts from concentrate and sand loading on Dock 2 should be evaluated separately any day that both products are loaded.
5 Calculate the total impact by adding the three calculated impacts and background. A total of less than 150.0 µg/m³ is necessary for compliance.