



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

DEPARTMENT OF NATURAL RESOURCES

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JAN 21 2010

Mr. Tom Rader
Buzzi Unicem USA Incorporated
1000 River Cement Road
P.O. Box 1003
Festus, MO 63028

RE: New Source Review Permit Application
Installation ID: 099-0002, Expiration Date: December 31, 2010
Temporary Permit Number: **012010-011**

Dear Mr. Rader:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your October 21, 2009 request to operate four rental natural gas-fired heaters at the River Cement Company located at 1000 River Cement Road in Festus, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary activity according to Missouri State Rule 10 CSR 10-6.060(3), *Temporary Installation Permits*. Operation of the temporary heaters at this site shall not go beyond December 31, 2010.

The River Cement Company dba Buzzi Unicem USA (Buzzi) operates an existing Portland cement plant located in Jefferson County. During a recent plant modernization project when process equipment were temporarily out of service, a stockpile of slag was created that is now too wet for standard processing conditions. In order to utilize the wet slag, Buzzi has proposed to temporarily supply additional heat to the vertical roller mill with four 10 million Btu per hour natural gas-fired heaters. The temporary heaters will be rented and installed for the purposes of processing the wet slag, and once the wet slag has been processed, the rental heaters will be removed from service. Buzzi has indicated that a more permanent upgrade to the vertical roller mill is being considered, so that wet slag may be processed on a continuous basis; however, there are currently no plans to upgrade the unit at this time. As the four 10 million Btu per hour natural gas-fired heaters do not meet the requirements of emission units that are exempt from construction permitting, a construction permit shall be required to continue operation of the temporary heaters beyond the expiration date of this permit.

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors, Fifth Edition, Section 1.4, Natural Gas Combustion* (July 1998). Continuous operation between November 19, 2009, and December 31, 2010, results in a maximum potential operating time of 9,768 hours. Potential emissions were calculated assuming hours of operation to be 9,768 hours for all four temporary heaters. Potential emissions for this project are summarized in Table 1 below.



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Table 1: Potential Emissions Summary (tons)

PM ₁₀	SO _x	NO _x	VOC	CO	HAPs
1.46	0.12	19.15	1.05	16.09	0.02

Given that the potential emissions are well below 100 tons for each pollutant, the request was made prior to the installation of the heaters, and ambient air quality standards are expected to be maintained; the proposed temporary permit is granted according to provisions of Missouri State Rule 10 CSR 10-6.060(3). Subsequent notification should be made to the Air Pollution Control Program once the temporary heaters are no longer located at the facility.

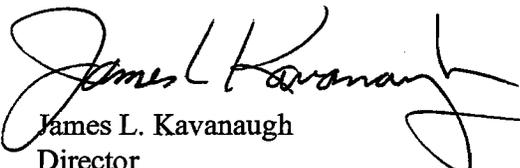
You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should also avoid violating 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*; 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*; and 10 CSR 10-5.160, *Control of Odor in the Ambient Air*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request.

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 by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


James L. Kavanaugh
Director

JLK:kjk

c: Mr. Steve Feeler, Compliance/Enforcement Section
St. Louis Regional Office
PAMS File: 2009-10-047