

STATE OF MISSOURI

PERMIT 322X



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: 122014-008

Project Number: 2014-06-018  
Installation Number: 203-0006

Parent Company: Royal Oak Enterprises, LLC

Parent Company Address: 1 Royal Oak Avenue, Roswell, GA 30076

Installation Name: Royal Oak Enterprises, LLC - Summersville Plant

Installation Address: Shannon County Road 341, Mountain View, MO 65548

Location Information: Shannon County, S7, T29N, R6W

Application for Authority to Construct was made for:  
Installation of 16 new charcoal kilns with two afterburners. 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 24 2014

EFFECTIVE DATE

A handwritten signature in black ink, appearing to read "Ryan L. Moore".  
\_\_\_\_\_  
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 Department's 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."*

Royal Oak Enterprises, LLC - Summersville Plant  
Shannon County, S7, T29N, R6W

1. NOx Emission Limitations
  - A. Royal Oak Enterprises, LLC - Summersville Plant shall emit less than 40.0 tons of NOx in any consecutive 12-month period from the two thermal oxidizers, Afterburner 5 (AB-5) and Afterburner 6 (AB-6).
  - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A.
2. Shut Down of Existing Equipment at Installation
  - A. Royal Oak Enterprises, LLC - Summersville Plant shall render Kilns #53-64 inoperable within six months of the date the new kilns #65-80, that are being added under this permit, begin operation. The dates of start-up of the new kilns shall be kept on file. Kiln #53-64 may not be operated after being shut down without first obtaining a New Source Review permit or receiving approval for the like kind replacement of other existing equipment at the installation from the Air Pollution Control Program.
  - B. Royal Oak Enterprises, LLC – Summersville Plant shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 15 days after the date the existing equipment (as indicated in Special Condition Number 2 A.) was rendered inoperable.
3. Charcoal Kiln Processing Requirements
  - A. Royal Oak Enterprises, LLC-Summerville Plant shall not simultaneously burn more than four (4) kilns in the bank of eight kilns known as charcoal kilns (EU65-EU72) using Afterburner (AB-5) and charcoal kilns (EU73-80) using Afterburner (AB-6).

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#### SPECIAL CONDITIONS:

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

- B. Royal Oak Enterprises, LLC-Summerville Plant shall maintain a daily log for each charcoal kiln that includes start-up time, cool-down time, and re-light time to demonstrate compliance with Special Conditions 3.A. and 3.B.
4. Control Device Requirements
- A. Royal Oak Enterprises, LLC - Summersville Plant shall control emissions from the charcoal kilns (EU65-EU72) using afterburner (AB-5) and charcoal kilns (EU73-EU80) using afterburner (AB-6) as specified in the permit application. The afterburner shall be operated and maintained in accordance with the manufacturer's specifications.
  - B. Royal Oak Enterprises, LLC - Summersville Plant shall continuously monitor and record the temperature of the afterburners (AB-5 and AB-6) any time the charcoal kilns (EU65-EU72 and EU73-EU80) respectively are in operation.
  - C. Royal Oak Enterprises, LLC - Summersville Plant shall ensure that the temperature of the afterburner (AB-5 and AB-6) is maintained within the normal operating range established in the emissions test reports that were provided with the application. Emission test reports indicate that a minimum temperature of 1430°F must be maintained to ensure continued compliance.
  - D. Royal Oak Enterprises, LLC - Summersville Plant may submit an afterburner temperature control analysis and may propose an alternate temperature control plan to the Director of the Air Pollution Control Program. Upon approval by the Director, an alternate temperature control plan may be implemented.
  - E. Royal Oak Enterprises, LLC - Summersville Plant shall maintain an operating and maintenance log for the afterburners (AB-5 and AB-6) 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.
5. Record Keeping and Reporting Requirements
- A. Royal Oak Enterprises, LLC - Summersville Plant 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

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**SPECIAL CONDITIONS:**

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

Resources' personnel upon request. These records shall include SDS for all materials used.

- B. Royal Oak Enterprises, LLC - Summersville Plant 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.

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

Project Number: 2014-06-018  
Installation ID Number: 203-0006  
Permit Number:

Royal Oak Enterprises, LLC - Summersville Plant      Complete: June 4, 2014  
Shannon County Road 341  
Mountain View, MO 65548

Parent Company:  
Royal Oak Enterprises, LLC  
1 Royal Oak Avenue  
Roswell, GA 30076

Shannon County, S7, T29N, R6W

REVIEW SUMMARY

- Royal Oak Enterprises, LLC - Summersville Plant has applied for authority to construct 16 new charcoal kilns with two afterburners.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are Methanol and Polycyclic Organic Matter (POM).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Afterburners are being used to control the CO, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC 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 emission of NO<sub>x</sub> is conditioned below de minimis.
- This installation is located in Shannon County, an attainment area for all criteria pollutants.
- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation is classified as item number 25. *Charcoal Production Facilities*. The installation's major source level is 100 tons per year and fugitive emissions are counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- An emission testing is not required for the equipment.
- An amended Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Royal Oak Enterprises, LLC operates a charcoal production facility in Summersville, Missouri. According to Air Pollution Control Program's permit history, Royal Oak submitted its first Part 70 Operating Permit application in 1996 which was completed in 1999. A screening operation (Permit # 0197-019) was added in 1997. In 2004, Craig Industries purchased the Summersville plant and in 2005, constructed 40 new kilns (Permit # 072005-018) with ten thermal oxidizers (afterburners). Construction would be in two phases: first phase would consist of 16 kilns with four afterburners and the final phase would be 24 kilns with six afterburners being constructed afterwards. Testing was required. Potentially, the facility would have 55 controlled charcoal kilns and the screening/briquetting process. After testing was completed, Craig Industries' Part 70 Operating Permit was terminated in 2007 and they obtained a Basic Operating permit. In 2010, Royal Oak Enterprises, LLC obtained ownership once again.

The following is a list of kilns currently at the site:

- Kilns #1-26 Dismantled
- Kilns #27-30 Being used as storage buildings
- Kilns #31-48 Dismantled
- Kilns # 49-52 Operational steel kilns with afterburner AB-1
- Kilns #53-56 Operational concrete kilns with AB-2, scheduled for shutdown
- Kilns #57-60 Operational concrete kilns with AB-3, scheduled for shutdown
- Kilns #61-64 Operational concrete kilns with AB-4, scheduled for shutdown
- Kilns #65-72 Proposed concrete kilns with AB-5 from this project
- Kilns # 73-80 Proposed concrete kilns with AB-6 from this project

The following New Source Review permits have been issued to Royal Oak Enterprises, LLC - Summersville Plant from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
1097-019	Charcoal Screening
072005-018	40 New Charcoal Kilns

## PROJECT DESCRIPTION

Royal Oak Enterprises, LLC plans to construct 16 new charcoal kilns and two thermal oxidation control systems (afterburners) at the Summersville Plant in Shannon County, Missouri. The proposed kilns, numbered 65 through 80, will be concrete, Missouri-type kilns. The thermal oxidizer and kilns will be built to the same specifications as the previous Royal Oak projects in Salem, Ellsinore and Mountain View. The design has been successfully tested and approved at Mountain View on 9/15/1999, Salem on 7/26/2001 and Ellsinore on 6/23/2005. The maximum hourly design rate for each kiln system will be 1.04 tons of charcoal produced per hour.

Emission factors for this application are derived from the test results and production values obtained in the 2005 Ellsinore stack test. (Note: In the original stack test report, there was an error in the calculation of the average condensable particulate emission rate. Table 2-4 of the test report gives the average condensable PM emission rate as 0.179 lb/hr. The actual average of the reported results for each run yields a corrected rate of 0.198 lb/hr.)

The configuration of this design will be eight kilns connected to one afterburner with four kilns burning in a series at any given time.

The thermal oxidizer will use propane to maintain the minimum temperature if the kilns do not provide adequate combustion gases. The stack test results include the contribution from any propane combustion.

As a result of this production capacity increase, particulate emissions from hauling, handling and storage at the site will also increase accordingly. The area of the charcoal storage pile will not increase from the current maximum stated size of 1.0 acre. Therefore, storage pile emissions due to wind erosion are not expected to increase.

The potential emission of the lump charcoal processing and bulk screening activities will not increase due to this project. The associated equipment is not being changed and according to Permit # 072005-018, the screening/packaging process has a conditional limit of 15 ton per year for PM<sub>10</sub>. A 15 ton/year limit for PM<sub>10</sub> equates to approximately 10,000 tons of charcoal being screened and packaged. The current kiln system and future kiln system are capable of producing more the 10,000 tons. Therefore, the screening/packaging process is not being debottlenecked.

When this project is completed, the operation of this facility at Summersville will consist of the 16 new kilns (Kilns #65-80) with Afterburner #5 & 6, the four existing steel kilns (Kilns #49-52) with Afterburner #1, packaging process, storage piles and haul roads.

## EMISSIONS/CONTROLS EVALUATION

Emissions from the sixteen charcoal kilns #65-80 will be controlled by propane-fired afterburners (AB-5 & 6). Emission factors for this project were determined by prior stack testing performed on units of similar design and capacity. According to Missouri State Rule 10 CSR 10-6.330, *Restriction of Emissions from Batch-Type Charcoal Kilns*, new charcoal kilns may operate without initial performance testing if three (3) separate and similar systems have successfully demonstrated compliance with the emission limit requirements of the rule. Royal Oak Enterprises, LLC-Summersville submitted an emissions test report for testing that was performed on similar units having four (4) operating charcoal kilns equipped with afterburner controls of the same design and capacities as those proposed for this project. The testing was performed on three (3) afterburners: located in Mountain View, Missouri on September 15, 1999; located in Salem, Missouri, on July 26, 2001; and located in Ellsinore, Missouri, on June 23, 2005. Results of this testing were used to develop the emission factors and control efficiencies for PM<sub>10</sub>, NO<sub>x</sub>, VOCs, and CO. The test results have been reviewed and approved by the Air Pollution Control Program's Testing Oversight Unit. In a memo dated September 1, 2005, the Air Pollution Control Program's Testing Oversight Unit determined that no further testing was required unless the afterburner should be reconfigured to control more than four (4) kilns simultaneously. Therefore, a special condition of this permit requires that no more than four kilns, being controlled by the same afterburner, may operate in the burn phase simultaneously.

The potential emissions of methanol and POM were determined using emission factors from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 10.7 *Charcoal* (September, 1995). Test reports confirm that the expected control efficiency for volatile HAPs is 99.98%, resulting in potential emissions of 0.20 tons per year for methane, 0.27 tons per year for methanol and an insignificant level of POM. Sulfur oxides (SO<sub>x</sub>) emissions are expected to be negligible and were not determined.

CO<sub>2</sub> emissions were calculated using the stack data test report stating that CO<sub>2</sub> concentration was 14.27 % of the dry flow volume. Using the mass emission rate calculation, CO<sub>2</sub>, GHG (mass) and GHG(CO<sub>2</sub>e) emissions were determined.

The emission factors used in the analysis of the haul roads (EP-51), and the charcoal load in/load out activity (EP-49) were obtained from the following Sections of AP-42: Section 13.2.2 *Unpaved Roads* (November 2006), Section 13.2.1 *Paved Haul Roads*, (January 2011), and Section 13.2.4 *Aggregate Handling and Storage Piles* (November 2006).

The following table provides an emissions summary for this project. Existing potential emissions taken from Permit 072005-018 listed them only as major. They do not reflect the potential emissions after the stack test was conducted for those 40 new kilns. The spreadsheet from the closing of the Part 70 Operating Permit (Project #2006-12-043) and the issuance of the Basic Operating Permit reflects a more accurate potential to emit with the required afterburners. The potential emission of the packaging process (Permit #1097-019) is conditioned to 15 tons per year for PM<sub>10</sub>. Existing actual

emissions were taken from the installation's 2013 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions <sup>a</sup>	Existing Actual Emissions (2013 EIQ)	Potential Emissions of the Application	New Project Conditioned Potential
PM	25.0	N/D	0.530 (con)	30.42	24.45
PM <sub>10</sub>	15.0	89.15	2.395	13.98	11.23
PM <sub>2.5</sub>	10.0	N/D	N/D	7.18	5.77
SOx	40.0	N/D	0.00	0.00	0.0
NOx	40.0	21.17	12.23	49.76	<40.0
VOC	40.0	0.09	0.0540	1.91	1.53
CO	100.0	1.21	0.6920	0.69	0.56
Methane CH <sub>4</sub>	N/A	N/D	N/D	0.20	0.16
Methanol	N/A	N/D	N/D	0.27	0.22
CO <sub>2</sub>	N/A	N/D	N/D	55,726.00	44,799.30
GHG (CO <sub>2</sub> e)	75,000 / 100,000	N/D	N/D	55,728.51	44,801.32
GHG (mass)	0.0 / 100.0 / 250.0	N/D	N/D	55,726.10	44,799.38
HAPs	10.0/25.0	N/D	0.27	0.27	0.22
HAPs-POM	N/A	N/D	N/D	8.65E-06	6.96E-06

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

<sup>a</sup>Existing potential emissions were taken from the spreadsheet when Craig Industries change in their operating permit from a Part 70 to a Basic (Project #2006-12-043). This includes Kilns #49-52 (Steel), Kilns #53-56, haul roads, storage piles and screening/packaging. It does not include emissions from Kilns #57-60, Kilns #61-64 or the hammermill (that is no longer there as stated in Project #2006-12-043). The new facility wide potential PM<sub>10</sub> will be 89.15 – 1.08 (emissions from Kilns #53-56) + 11.23 = 99.3 tons per year.

## 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 NOx are conditioned below de minimis levels. PM is indirectly conditioned below de minimis by a 40.0 tpy limitation on NOx.

## APPLICABLE REQUIREMENTS

Royal Oak Enterprises, LLC - Summersville Plant 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.

## 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 Emissions From Batch-Type Charcoal Kilns*, 10 CSR 10-6.330

## 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.

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Kathy Kolb  
New Source Review Unit

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Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 30, 2014, received June 4, 2014, designating Royal Oak Enterprises, LLC as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Memo dated September 1, 2005, the Air Pollution Control Program's Testing Oversight Unit



## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....percent	<b>m/s</b> ..... meters per second
<b>°F</b> .....degrees Fahrenheit	<b>Mgal</b> ..... 1,000 gallons
<b>acfm</b> .....actual cubic feet per minute	<b>MW</b> ..... megawatt
<b>BACT</b> ..... Best Available Control Technology	<b>MHDR</b> ..... maximum hourly design rate
<b>BMPs</b> ..... Best Management Practices	<b>MMBtu</b> .... Million British thermal units
<b>Btu</b> ..... British thermal unit	<b>MMCF</b> ..... million cubic feet
<b>CAM</b> ..... Compliance Assurance Monitoring	<b>MSDS</b> ..... Material Safety Data Sheet
<b>CAS</b> ..... Chemical Abstracts Service	<b>NAAQS</b> ... National Ambient Air Quality Standards
<b>CEMS</b> ..... Continuous Emission Monitor System	<b>NESHAPs</b> National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> ..... Code of Federal Regulations	<b>NO<sub>x</sub></b> ..... nitrogen oxides
<b>CO</b> .....carbon monoxide	<b>NSPS</b> ..... New Source Performance Standards
<b>CO<sub>2</sub></b> .....carbon dioxide	<b>NSR</b> ..... New Source Review
<b>CO<sub>2</sub>e</b> .....carbon dioxide equivalent	<b>PM</b> ..... particulate matter
<b>COMS</b> ..... Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> ..... particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> ..... Code of State Regulations	<b>PM<sub>10</sub></b> ..... particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....dry standard cubic feet	<b>ppm</b> ..... parts per million
<b>EQ</b> ..... Emission Inventory Questionnaire	<b>PSD</b> ..... Prevention of Significant Deterioration
<b>EP</b> ..... Emission Point	<b>PTE</b> ..... potential to emit
<b>EPA</b> ..... Environmental Protection Agency	<b>RACT</b> ..... Reasonable Available Control Technology
<b>EU</b> ..... Emission Unit	<b>RAL</b> ..... Risk Assessment Level
<b>fps</b> .....feet per second	<b>SCC</b> ..... Source Classification Code
<b>ft</b> ..... feet	<b>scfm</b> ..... standard cubic feet per minute
<b>GACT</b> ..... Generally Available Control Technology	<b>SDS</b> ..... Safety Data Sheet
<b>GHG</b> ..... Greenhouse Gas	<b>SIC</b> ..... Standard Industrial Classification
<b>gpm</b> ..... gallons per minute	<b>SIP</b> ..... State Implementation Plan
<b>gr</b> ..... grains	<b>SMAL</b> ..... Screening Model Action Levels
<b>GWP</b> ..... Global Warming Potential	<b>SO<sub>x</sub></b> ..... sulfur oxides
<b>HAP</b> ..... Hazardous Air Pollutant	<b>SO<sub>2</sub></b> ..... sulfur dioxide
<b>hr</b> ..... hour	<b>tph</b> ..... tons per hour
<b>hp</b> ..... horsepower	<b>tpy</b> ..... tons per year
<b>lb</b> ..... pound	<b>VMT</b> ..... vehicle miles traveled
<b>lbs/hr</b> ..... pounds per hour	<b>VOC</b> ..... Volatile Organic Compound
<b>MACT</b> ..... Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> .....micrograms per cubic meter	

Mr. Randy Beech  
Vice President  
Royal Oak Enterprises, LLC - Summersville Plant  
1 Royal Oak Avenue  
Roswell, GA 30076

RE: New Source Review Permit - Project Number: 2014-06-018

Dear Mr. Beech:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 of RSMo. If a petition to appeal is sent by registered mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail, it will be deemed filed on the date it is received by the administrative hearing commission. Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, MO 65102, phone: 573-751-2422, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this permit, please do not hesitate to contact the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:kk1

Enclosures

c: Southeast Regional Office  
PAMS File: 2014-06-018  
Permit Number: