

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

MAY 16 2011

Mr. Shannon Lenker  
General Manufacturing Manager  
TAMKO Building Products, Inc.  
601 N High St.  
Joplin, MO 64801

RE: New Source Review Temporary Permit  
Installation ID: 097-0013, Expiration Date: May 1, 2013  
Temporary Permit Number: 052011-008

Dear Mr. Lenker:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your September 20, 2010 request to conduct a feasibility study of tall oil pitch as a substitute raw material for a portion of the coating asphalt used to make roofing products at the High Street Plant. 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 Installations and Pilot Plants Permits*. The tall oil pitch study shall not go beyond May 1, 2013.

According to 10 CSR 10-6.060(3), temporary permits may be issued for projects that have the potential to emit less than 100 tons per year for each pollutant, and TAMKO Building Products, Inc. has indicated that they do not expect an increase in emissions due to the use of the tall oil pitch. An emission increase is not expected because the tall oil pitch has similar properties to the coating asphalt.

Given that the potential emissions are expected to be below 100 tons for each pollutant, and the ambient air quality standards are expected to be maintained; the proposed temporary permit is granted according to the provisions of Missouri State Rule 10 CSR 10-6.060(3). The following conditions apply to this temporary activity:

1. TAMKO Building Products, Inc. is authorized to conduct initial feasibility trials using tall oil pitch as a substitute raw material utilizing no more than 4,000 pounds of tall oil pitch.
2. If TAMKO Building Products, Inc. chooses to proceed with tall oil pitch as a substitute raw material, they are authorized to conduct additional trials. If more than 4,000 pounds of tall oil pitch are used TAMKO Building Products, Inc. shall submit a project report to the Air Pollution Control Program's New Source Review Unit no later than 90 days following the expiration of this permit.

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3. The report shall contain the following
  - A. The start date, start time, and duration of each trial.
  - B. The quantity each tall oil pitch used for each trial.
  - C. A table of emission factors for all regulated New Source Review pollutants developed for the tall oil pitch.
  - D. A comparison of the emission factors developed for tall oil pitch and those for coating asphalt.
  - E. The emission factors shall be reported in units of pounds pollutant per ton of roofing product produced.
  - F. A summary and discussion of the methods used to develop the emission factors.

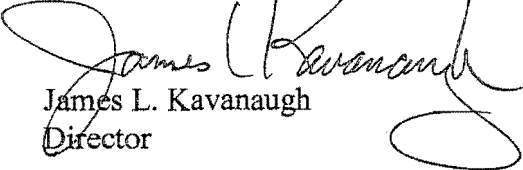
This temporary permit does not give TAMKO Building Products, Inc. the authority to exclude any emissions associated with this temporary activity from any applicable emission limit. Additionally, TAMKO Building Products, Inc. is still obligated to meet all other applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you shall not violate:

- 10 CSR 10-6.165, *Restriction of Emission of Odors*
- 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*
- 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
- 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

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 Mike Mittermeyer with 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:mml

c: Southwest Regional Office  
PAMS File: 2011-05-011