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: 102010-007 Project Number: 2010-07-017
Installation Number: 097-0094

Parent Company: TAMKO Building Products, Inc.
Parent Company Address: P.O. Box 1404, Joplin, MO 64801
Installation Name: TAMKO Building Products, Inc.-Rangeline Plant
Installation Address: 3001 Newman Rd., Joplin, MO 64801
Location Information: Jasper County, S31, T28N, R32W

Application for Authority to Construct was made for:
Installation of two new 25.2 MMBtu/hr natural gas fired boilers, which will replace three existing boilers, and the replacement of three tank heater burners. 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.

EFFECTIVE DATE: OCT 15 2010
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 devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). 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 this (these) air contaminant source(s).

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.
REVIEW SUMMARY

• TAMKO Building Products, Inc.-Rangeline Plant has applied for authority to construct two new 25.2 MMBtu/hr natural gas fired boilers, which will replace three existing boilers, and replace three tank heater burners.

• Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs are emitted as products of combustion and are below their applicable screen modeling action levels.

• 40 CFR 60 Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" applies to the equipment.

• None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.

• No air pollution control equipment is being used in association with the new equipment.

• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis levels.

• This installation is located in Jasper County, an attainment area for all criteria pollutants.

• This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
• Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

• Emissions testing are not required for the equipment.

• A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.

• Approval of this permit is recommended without special conditions.

INSTALLATION DESCRIPTION

TAMKO Building Products, Inc.-Rangeline Plant is a minor source that manufactures roofing products and includes such processes and products as felt mat, glass mat, asphalt coatings and saturates. The operations at the installation include four main manufacturing operations: refinery operations, fiberglass mat manufacturing operations, felt mill no. 1 operations and felt mill no. 2 operations.

The following construction permits have been issued to TAMKO Building Products, Inc.-Rangeline Plant from the Air Pollution Control Program. TAMKO Building Products, Inc.-Rangeline Plant has also received multiple “no permit required” letters from the Air Pollution Control Program. For more information on these determinations consult the Part 70 operating permit OP2009-002.

Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>0393-012</td>
<td>Replace blow still tanks</td>
</tr>
<tr>
<td>0594-032</td>
<td>Modifications to the fiberglass mat line</td>
</tr>
<tr>
<td>0496-004</td>
<td>25.2 MMBtu/hr natural gas fired boiler</td>
</tr>
<tr>
<td>112000-012</td>
<td>RTO installation</td>
</tr>
<tr>
<td>062001-004</td>
<td>Replace thermal oxidizer</td>
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<tr>
<td>052010-008</td>
<td>Refinery process change</td>
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</tbody>
</table>

PROJECT DESCRIPTION

TAMKO Building Products, Inc.-Rangeline Plant has applied for authority to construct two new 25.2 MMBtu/hr natural gas fired boilers. These boilers will replace the existing units: boiler #1 (EU0010); boiler #2 (EU0020); and boiler #4 (EU0030). TAMKO Building Products, Inc.-Rangeline Plant has also applied for authority to replace the burners in three asphalt storage tanks: asphalt storage tank heater #1 (EU0240, EP 3-08); asphalt storage tank heater #2 (EU0250, EP 3-09); and asphalt storage tank heater #7 (EU0280, EP 3-05). The burners are the same capacity as the existing burners, so their replacement is considered like-kind and excluded from permitting. Since the replaced units are excluded, the project emissions are the emissions from the new boilers.
EMISSIONS/CONTROLS EVALUATION

Emissions of SO\textsubscript{X} were calculated using a mass balance approach based on the maximum sulfur content of the natural gas. Emissions of all other pollutants were calculated using emission factors from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 4, “Natural Gas Combustion,” July 1998. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>PM\textsubscript{10}</td>
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<tr>
<td>CO</td>
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<td>77.15</td>
<td>18.54</td>
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<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>&lt; 250</td>
<td>N/D</td>
<td>0.42</td>
</tr>
</tbody>
</table>

N/D = Not Determined

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 of all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

TAMKO Building Products, Inc.-Rangeline 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
  The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
• 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 10-3.090

SPECIFIC REQUIREMENTS

• New Source Performance Regulations, 10 CSR 10-6.070 – New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc

• Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-3.060

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 out special conditions.

________________________________________________________________________

Michael Mittermeyer Date
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

• The Application for Authority to Construct form, dated June 28, 2010, received July 1, 2010, designating TAMKO Building Products, Inc. as the owner and operator of the installation.


• Southwest Regional Office Site Survey, dated Month Day, Year.