

PERMIT BOOK

STATE OF MISSOURI



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: 102007 - 015 Project Number: 2007-03-082

Parent Company: Alpha Foundry Company

Parent Company Address: 60 Cooperative Way, Wright City, MO 63390

Installation Name: Alpha Foundry Company

Installation Address: 60 Cooperative Way, Wright City, MO 63390

Location Information: Warren County, S22, T47N, R1W

Application for Authority to Construct was made for:

An aluminum foundry that uses shell and silica sand in its core making process. They have been in the current location in Wright City since 2000. Recent analysis of the installation emissions indicated a construction permit was required. In addition to the primary aluminum melt/pour operation and core manufacturing processes, Alpha Foundry, has machine shops to machine their own castings and produce their own molding patterns. This review was conducted in accordance with Section (6), 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.

OCT 25 2007

EFFECTIVE DATE



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 department's 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 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 Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days, but at least 30 days in advance of this date. Also, you must notify the regional office of the Department of Natural Resources' regional office responsible for the area you are located in 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, Missouri 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 source(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, Missouri 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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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 source(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.

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Page No.	3
Permit No.	
Project No.	2007-03-082

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."

Alpha Foundry Company
Warren County, S22, T47N, R1W

1. PM₁₀ Emission Limitation
 - A. Alpha Foundry Company shall emit less than 15 tons of particulate matter less than ten microns in diameter (PM₁₀) in any consecutive 12 month period from the entire installation.
 - B. Alpha Foundry Company shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the entire installation. Attachment A or an equivalent form shall be used for this purpose. Alpha Foundry Company 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.
 - C. Alpha Foundry Company shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition Number 1.B. indicate that the source exceeds the limitation of Special Condition Number 1.A..
2. Hazardous Air Pollution (HAP) Emission Limitation
 - A. Alpha Foundry Company shall emit less than 0.1 tons of phenol (CAS # 108-95-2) a HAPs from Aluminum Pouring/Casting shell core sand throughput (EP-07B) in any consecutive 12-month period.
 - B. Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.. Alpha Foundry Company 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. These records shall include Material Safety Data Sheets (MSDS) for all materials used in the shell core sand.

Page No.	4
Permit No.	
Project No.	2007-03-082

SPECIAL CONDITIONS:

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

- C. Alpha Foundry Company shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition Number 2.B. indicate that the source exceeds the limitation of Special Conditions Number 2.A..
3. Baghouse Operations
- A. Alpha Foundry Company shall control emissions from the EP-14 Abrasive Blasting using a baghouse as specified in the permit application. 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 the Department of Natural Resources' personnel may easily observe them. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - B. Alpha Foundry Company shall monitor and record the operating pressure drop across the cartridge filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. The site requested, because of cost and storage limitations, that the replacement filters for the baghouse not be kept on hand at all times. However, this equipment cannot be operated when the pressure drops out side of the manufacture's operating range. This operating range is to be posted next to the gauge on the equipment and electrical lock out applied when not in operating range.
 - C. Alpha Foundry Company shall maintain an operating and maintenance log for the baghouse 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, lock out times etc.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2007-03-082
Installation ID Number: 219-0050
Permit Number:

Alpha Foundry Company
60 Cooperative Way
Wright City, MO 63390

Complete: May 02, 2007
Reviewed: August 27, 2007

Parent Company:
Alpha Foundry Company
60 Cooperative Way
Wright City, MO 63390

Warren County, S22, T47N, R1W

REVIEW SUMMARY

- Alpha Foundry Company has applied for authority to obtain a new source review permit for an aluminum foundry that uses shell and silica sand in its core making process. In addition, to the primary aluminum melt/pour operation and core manufacturing processes, the facility has machine shops to machine their own castings and produce their own molding patterns. They have been in the current location in Wright City since 2000. Recent analysis of the installation emissions indicated that a construction permit was required.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are phenol and formaldehyde.
- None of the New Source Performance Standards apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants or currently promulgated Maximum Achievable Control Technology regulations apply to the proposed equipment.
- A bag house is being used to control the particulate emissions from the equipment in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, "*Construction Permits Required.*" Potential Emission of Volatile Organic Compounds (VOC) are above de minimis levels. Potential emissions of PM₁₀ are above de minimis levels but conditioned to de minimis. The potential emissions of phenol which is limited to its Screen Modeling Action Level (SMAL) of 0.1 tons per year

- This installation is located in Warren County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of PM₁₀ and HAPs are conditioned to below de minimis levels. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions and ambient air quality modeling for VOCs was not performed for this review.
- Emissions testing is not required for the equipment.
- A 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

Alpha Foundry is a minor source because of VOC potential emissions. They have taken limits for PM₁₀ and HAP to below de minimis levels to avoid modeling requirements. They have submitted an intermediate operating permit. Alpha Foundry is a producer of small, close tolerance aluminum sand casting utilizing the Alpha Process. This process is a variation of a commonly used foundry practice known as the shell molding process. It uses a special resin-coated sand that becomes hard and rigid when injected and baked in a heated core or mold pattern. The resulting core mold has design characteristics for producing high quality castings. The rigidity of the baked shell sand provides consistent casting surface finish and dimensional accuracy, however this material is expensive and difficult to remove from the poured casting. The alpha process takes advantage of these characteristics while utilizing less shell sand and creating a mold/core that is less expensive, easier to remove and produces better venting of mold gasses while pouring. A typical shell process core mold can be faster and use less material in the Alpha process. The result is a casting that has dimensional and physical properties that are superior to typical sand cast processes (green sand).

The following permits have been issued to Alpha Foundry Company from the Air Pollution Control Program.

Table 1: Permits Issues to Alpha Foundry (219-0050)

Permit Number	Description
OP	Intermediate Operating Permit expires 03/25/2012

PROJECT DESCRIPTION

Alpha Foundry is seeking an original construction permit post the fabrication of a facility in Warren County. The primary pollutants of concern are PM₁₀, VOCs and HAPs. Table 2 lists the emission points associate with the plant and the Maximum Hourly Design Rate..

Table 2: Emission Sources at Alpha Foundry (219-0050)

Emission Point	Description	Maximum Hourly Design Rate
EP-01	Vehicle unloading to 3 shell sand silos	0.875 tons/hr
EP-02	Conveyor (shell sand to core machines EP-03)	0.875 tons/hr
EP-03	3 shell sand core machines	0.875 tons/hr
EP-04	Vehicle unloading to 2 new silica sand silos	6.75 tons/hr
EP-05	Conveyor (silica sand to core machines EP-06)	6.75 tons/hr
EP-06	3 silica sand core machines	6.75 tons/hr
EP-07A	Aluminum pouring and casting (metal throughput)	0.15 tons/hr
EP-07B	Aluminum pouring and casting (shell core sand throughput)	0.875 tons/hr
EP-08	Casting shake out	0.60 tons/hr
EP-09	Conveyor from shakeout to Vibra mill	0.60 tons/hr
EP-10	Vibra Mill	0.60 tons/hr
EP-11	Conveyor from vibra mill to mixers for reused shell sand	0.60 tons/hr
EP-12	Zircon core wash dip tank	23 Lbs/hr
EP-13	Grinding (band saw & belt grinder)	0.15 tons/hr
EP-14	Abrasive blasting (wheelabrator)	0.12 tons/hr
EP-15	Maching Centers	0.60 tons/hr
EP-16	Maching Centers coolant usage	0.04 gal/hr
EP-17	Parts washer	0.009 gall/hr
EP-18	Natural gas usage	5.357 MBTU/hr

Alpha Foundry primary pouring alloys are 356 Aluminum and ZA-12 Zinc/AL. They specialize in relatively small castings (under 1 pound) and are able to hold consistent surface finishes with moderate volumes. They have several industrial machine capabilities from equipment such as a Brother TC-324 High Speed drilling /tapping center, Haas VF-3 Vertical Machining Center, Okuma Cadet CNC lathe and a Bridgeport Milling machine. The majority of their tooling is done in-house.

This installation claims building enclosure as a control device for particulate matter. Other control equipment operated is a cartage filter dust collector.

Table 3 Control Devices at Alpha Foundry.

Emission Point	Description	Control Device	Capture Efficiency
EP-02	conveyor	Building enclosure	12%
EP-03	Core Machine	Building enclosure	12%
EP-05	conveyor	Building enclosure	12%
EP-06	Core Mixers	Building enclosure	12%
EP-07A	Pouring Casting	Cartridge Filter	Not in service
EP-08	Casting Shakeout	Building enclosure	12%
EP-09	Conveyor	Building enclosure	12%
EP-10	Vibra Mill	Tarped	None
EP-11	Conveyor	Building enclosure	12%
EP-13	Grinding	Building enclosure	12%
EP-14	Abrasive Blasting of metal parts	Cartridge Filter and building enclosure	95.6%
EP-15	Machining	Building enclosure	12%
EP-18	Natural Gas Usage	Building enclosure	12%

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.6 , Abrasive Blasting, 1997. The shell Core sand MSDS and the information contained in the American Foundrymen's Society "Form R, Reporting of Binder Chemicals Used in Foundries," second edition, 1998 established the emission rates of the VOC, Phenol and Formaldehyde. 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 4: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	**Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	N/D	83.76	<15
SO _x	40.0	N/A	N/D	0.03	N/A
NO _x	40.0	N/A	N/D	4.16	N/A
VOC	40.0	N/A	N/D	49.55	N/A
CO	100.0	N/A	N/D	1.87	N/A
HAPs	10.0/25.0	N/A	N/D	1.53	N/A
Phenol	10.0	N/A	N/D	0.76	<0.1
Formaldehyde	10.0	N/A	N/D	0.76	N/A

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

**No record of an Emission Inventory Questionnaire (EIQ) having been submitted.

For the HAP, phenol, the Screen Modeling Action Level, for which modeling is required, is 0.1 tons per year. To avoid modeling, an installation can set a limit that is less than the Screen Modeling Action Level value. In addition, the amount of PM₁₀ emissions can be limited at less than the de minimis level and will not require modeling.

This installation claims building enclosure as a control device for particulate matter. This was allowed a collection efficiency of 12% based on engineering judgement as building controls such as keeping doors closed, windows closed and no exhaust fans in building are in use. Other control equipment operated is a cartage filter dust collector. A Donaldson DF-12 (down flow cartridge filter) was allowed a collection efficiency of 95.6%

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, "*Construction Permits Required.*" Potential emissions of PM₁₀ and Phenol a HAP is conditioned to below de minimis levels. The amount of VOCs emitted is above de minimis levels. The uncontrolled Potential to Emit is 0.76 tons per year for phenol which is over the 0.1 tons per year de minimis levels for phenol, from 10 CSR 10-6.020 (3) (A) "*Definitions and Common Reference Tables*" Table 1 –De Minimis Emission Levels.

APPLICABLE REQUIREMENTS

Alpha Foundry Company 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
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 is required April 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

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was not performed since potential emissions of HAPs and PM₁₀ are conditioned to below de minimis levels. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions and no ambient air quality modeling was not performed for the VOC in this review.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Timothy Paul Hines
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 1, 2007, received March 26, 2007, designating Alpha Foundry Company as the owner and operator of the installation.
- U.S. Environmental Protection Agency document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Saint Louis Regional Office Site Survey, dated April 19, 2007.

Attachment A – PM₁₀ Compliance Worksheet

Alpha Foundry Company
 Warren County, S22, T47N, R1W
 Project Number: 2007-03-082
 Installation ID Number: 219-0050

This sheet covers the month of _____ in the year _____.
 Copy this sheet as needed

Column 1	Column 2	Column 3	Column 4	Column 5
Equipment	Amount of Material Processed (tons)	Emission Factor (lbs. PM ₁₀ / ton of material processed)	Collection Removal Efficiency	PM ₁₀ Emissions (Tons) (A)
EP-01 shell sand received (vehicle unload)		0.54	None	
EP-02 shell sand transported on conveyor		0.54	0.12	
EP-03 core machine shell sand usage (vehicle unload)		0.54	None	
EP-04 Silica Sand unloaded		0.54	0.12	
EP-05 Silica sand Transported on conveyor		0.02	0.12	
EP-06 Core mixers Silica Sand usage		0.54	0.12	
EP-15 Machining Centers(Aluminum Chip Sources)		1.7	0.12	
PM ₁₀ from Natural gas is calculated by taking the cubic feet of natural gas used in the entire plant times 7.6 (pounds of PM ₁₀ per Million Cubic Feet) times (1- 0.12) times 0.005 = total PM ₁₀ tons emitted from natural gas consumption. Place this total in column 5				
(B) Total PM ₁₀ Emissions from sand handling and natural gas consumption calculated for this Month in Tons:				
(C) 12-Month PM ₁₀ Emissions Total from Previous Years Month Attachment A in Tons				
(D) 12-Month PM ₁₀ emissions from last month's Attachment A, in Tons				
(E) Current 12-month Total of PM ₁₀ Emissions in Tons: [(D) - (C) + (B)]				

INSTRUCTIONS:

- (A):[Column 2] x [Column 3] x [1-Column 4] x [0.0005] = [Column 5];
- (B):Summation of [Column 5] for PM₁₀ emissions in Tons;
- (C):12-Month PM₁₀ Emissions Total from Previous Years Month Attachment A in Tons;
- (D): 12-Month PM₁₀ emissions from last month's Attachment A, in Tons;
- (E): **A 12-Month PM₁₀ emissions total (E) of less than 15.0 tons indicates compliance.**

Mr. Ryan Barron
General Manager
Alpha Foundry Company
60 Cooperative Way
Wright City, MO 63390

RE: New Source Review Permit - Project Number: 2007-03-082

Dear Mr. Barron:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, 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 have any questions regarding this permit, please do not hesitate to contact Mr. Tim Hines at (573) 751-4817, or you may write to him at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:thn

Enclosure

c: St. Louis Regional Office
PAMS File 2007-03-082
Permit Number: