



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

**NOV 20 2017**

Mr. Steven Kidwell  
Director of Public Affairs  
Audubon Materials, LLC  
15100 East Courtney-Atherton Road  
Sugar Creek, MO 64058

RE: New Source Review Permit Amendment – Permit Number: 0897-019H  
Project Number: 2016-12-039; Installation Number: 095-0030

Dear Mr. Kidwell:

On December 22, 2016 the Air Pollution Control Program received your request to amend Construction Permit No. 0897-019G. Audubon Materials, LLC (dba Central Plains Cement Co., LLC) had previously requested to terminate participation in their Consent Decree (Civil Action No. 3:10-cv-00044-JPG-CJP) with the United States Department of Justice, in regards to NO<sub>x</sub>/SO<sub>2</sub> reductions. On November 9, 2012 the Air Pollution Control Program was issued Construction Permit No. 0897-019G, which amended Construction Permit No. 0897-019F in order to add the new approved limit of 2.43 pounds of NO<sub>x</sub> per ton of clinker and to establish continuous emission monitoring system requirements pursuant to the decree; however, in order to complete the termination, the Department of Justice has required the addition of a special condition specifying continued use of the selective non-catalytic reduction (SNCR) system. Therefore, Special Conditions 31 and 32 of Construction Permit No. 0897-019G are being amended to include SNCR system operating parameters, utilizing language recommended by the EPA.

Your Part 70 Operating Permit (OP2014-005) must also be amended to include the special conditions imposed in this construction permit amendment. Submittal of an operating permit amendment application is required within 1 year of the issuance date of this construction permit amendment.

A copy of Construction Permit No. 0897-019 and all its amendments shall be kept onsite and be made available to Department of Natural Resources' employees upon request. Operation in accordance with all active special conditions, including the amended special conditions of this project, is necessary for continued compliance. You are still required to meet all applicable Air Pollution Control rules, Department of Natural Resources' rules, and any other applicable federal, state, or local agency regulations.



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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 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Ryan Schott at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:rsj

Enclosures

c: Kansas City Regional Office  
PAMS File: 2016-12-039

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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."*

Audubon Materials, LLC  
Jackson County (S13, T50N, R32W)

1. **Superseding Condition**  
The Conditions of this permit supersede Special Conditions 31 and 32 in Construction Permit No. 0897-019G, previously issued by the Air Pollution Control Program.
2. **Selective Non-Catalytic Reduction (SNCR) System Requirements**
  - A. Audubon Materials, LLC shall emit less than 2.43 pounds of NO<sub>x</sub> per ton of clinker from the raw mill and preheater/precalciner rotary kiln system (EP-77) on a 30-day rolling average.
  - B. Audubon Materials, LLC shall continuously operate the SNCR system located at the preheater/precalciner rotary kiln system (EP-77) at all times during kiln operation.
  - C. Audubon Materials, LLC shall maintain an operating and maintenance log for the SNCR, which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions (tons), duration of event, probable cause, and corrective actions; and
    - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. **Continuous Emission Monitoring (CEM) System Requirements**
  - A. Audubon Materials, LLC shall install, certify, operate, calibrate, test, and maintain a CEM system for SO<sub>2</sub> and any necessary auxiliary monitoring equipment in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply.
  - B. Audubon Materials, LLC shall operate a data acquisition and handling system for the NO<sub>x</sub> and SO<sub>2</sub> CEM system to calculate emissions in terms of the limitations specified in Construction Permit No. 0897-019G.

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**SPECIAL CONDITIONS:**

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

- C. Compliance with the NO<sub>x</sub> emission limit given in Special Condition 2 for the raw mill and preheater/precalciner rotary kiln system (EP-77) shall be demonstrated through the use of the required CEM system. Monthly records shall be kept providing the 30-day rolling average totals of pounds of NO<sub>x</sub> emitted per ton of clinker to verify compliance with the emission limitation of Special Condition 2.
  - D. Compliance with the SO<sub>2</sub> emission limit given in Special Condition 16 of Construction Permit 0897-019G (477.3 pounds per hour, 3-hour average) for the raw mill and preheater/precalciner rotary kiln system (EP-77) shall be demonstrated through the use of the required CEM system. Monthly records shall be kept providing the 3-hour average totals to verify compliance with the emission limitation.
  - E. CEM certification protocols shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section at least 30 days prior to the certification date.
4. Record Keeping and Reporting Requirements
- A. Audubon Materials, LLC 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.
  - B. Audubon Materials, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at [aircompliancereporting@dnr.mo.gov](mailto:aircompliancereporting@dnr.mo.gov), no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.