



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor Mark N. Templeton, Director

www.dnr.mo.gov

MAR - 9 2009

Mr. Tom Lennon
10107 Highway 79 South
Hannibal, MO 63401

RE: **New Source Review Temporary Permit Application**
Project Number: 2008-09-065, Installation ID Number: 173-0001
Temporary Permit Number: 032009-002
Expiration Date: November 22, 2010

Dear Mr. Lennon:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your application to install a temporary clinker storage pile at your facility in Ralls County. The Air Pollution Control Program is hereby granting your request to construct the temporary storage pile at your installation.

According to the information provided in your application, your facility started a new cement kiln system in early August. This includes a new roller press system that grinds clinker into cement. This grinding system is not yet fully operational and more clinker is being produced than can be ground into cement. Therefore, a temporary storage area would be needed for the overflow of the clinker being produced. This storage area will be located in the Valentec Quarry south of the shale quarry.

The clinker will be transported to the storage pile with haul trucks using a 1.1 mile long haul road. The emissions of particulate matter less than ten (10) microns in diameter (PM₁₀) from this haul road were calculated using equations from Environmental Protection Agency document AP-42, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, fifth edition, chapter 13.2.2, *Unpaved Roads*. PM₁₀ emissions from vehicular activity were also calculated using haul road equations from chapter 13.2.2. Documented watering, chemical dust suppressants or paving shall be used on the haul roads and vehicular activity areas to control fugitive PM₁₀ emissions. A 90% control efficiency was given for the use of these methods.

PM₁₀ emissions from the unloading and loading of the storage pile were calculated using drop point equations from AP-42, Chapter 13.2.4, *Aggregate Handling and Storage Piles*. The temporary storage pile will be covered so PM₁₀ emissions from wind erosion should be negligible. Your installation is allowed in its current Permit: 072007-008, Project. 2006-06-059 to produce no more than 3,500 tons per day of clinker, but your facility is also currently in the

Mr. Tom Lennon

Page Two

process of amending this permit to allow for the production of 3,700 tons per day of clinker (Project 2008-01-07). The PM₁₀ calculations were performed assuming 3,700 tons per day of clinker produced for 365 days a year.

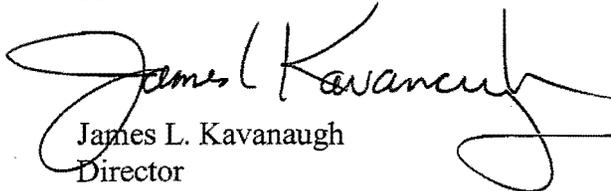
The total PM₁₀ emissions were calculated to be approximately 30.32 tons per year, which is less than the 100 tons per year limit for temporary installations. Once the roller press system becomes fully operational, your company shall not add any more clinker to the temporary storage pile. The clinker in this storage pile shall be reclaimed slowly over time until the temporary pile is exhausted. Since there is no specific date by which the installation can predict that the roller press system will become fully operational, the expiration date for this permit is set for two years after the issuance of this permit, the maximum time allowed for a temporary installation. Continental Cement shall notify the Air Pollution Control Program and the Northeast Regional Office of the date that the roller press system becomes fully operational no later than ten days after this date.

Please be aware that you are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules or any other applicable federal, state or local agency regulations. Specifically, you should avoid violating 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* and 10 CSR 10-3.090, *Restriction of Emission of Odors*.

A copy of this letter should be kept on-site and be made available to any Department of Natural Resources' personnel upon request. If the conditions surrounding this approval should change, such as by substantiated citizen complaints, approval for the temporary storage pile may be revoked. If you have any questions regarding this temporary permit, please contact Chia-Wei Young with the department's 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 consideration.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



James L. Kavanaugh
Director

JLK:cwyl

- c. Mr. Steve Feeler, Compliance/Enforcement Section
Northeast Regional Office
PAMS File: 2008-09-065