



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

DEPARTMENT OF NATURAL RESOURCES

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AUG 12 2013

Mr. Jonathan Kennedy
Environmental & Regulatory Affairs Manager
Mississippi Lime Company
16147 U.S. Highway 61
Ste. Genevieve, MO 63670

RE: New Source Review Temporary Permit Request - Project Number: 2013-06-024

Installation ID Number: 186-0026

Temporary Permit Number: **082013-007**

Expiration Date: September 1, 2013

Dear Mr. Kennedy:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request for temporary barge loading at the Port of New Bourbon located on Cotton Woods Road near Ste. Genevieve. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3). Mississippi Lime Company requested confidentiality under 10 CSR 10-6.210 *Confidential Information*. This is the public permit. A confidential permit will be issued under project 2013-07-007.

According to your request, barge loading of lime and limestone products at the previously permitted Little Rock Landing Terminal (ID 186-0026) has been affected by high river levels. Approximately [REDACTED] tons of material need to be loaded at the alternate site. Due to timing issues and using the Air Pollution Control Program's Compliance/Enforcement Section discretion, some material has been barge-loaded at the alternate site before this permit's issuance. This material shall be included towards the limit in Special Condition 1. Normal operation at the existing site will resume once river levels drop. For this temporary permit, both the Mississippi Lime Company operations at the Port of New Bourbon and the Little Rock Landing Terminal will have the same site ID, 186-0026. Emission unit designations are a continuation of the designations from the existing site.

Lime will be delivered to the site by semi-truck and unloaded into a storage pile. A front-end loader will maintain the pile and load-out from the pile to a hopper.

Lime will fall from the hopper to a conveyor, and from the conveyor to barges. Emission units associated with the Port of New Bourbon location are provided in Table 1.

Table 1: Emission Units

Emission Unit	Description
EU-7	Receiving unpaved haul road
EU-8a	Storage pile load-in
EU-8b	Storage pile load-out
EU-8c	Storage pile wind erosion
EU-8d	Storage pile vehicular activity
EU-9	Drop point – hopper to conveyor
EU-10	Drop point – conveyor to barge

Potential emissions from the lime handling were calculated using emission factors obtained from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.4, *Aggregate Handling and Storage Piles*, November 2006. Mean wind speed of [REDACTED] miles per hour for the closest site, St. Louis, MO, was obtained from the National Climatic Data Center, updated August 20, 2008. Lime was assumed [REDACTED] moisture, selected from Table 13.2.4-1. Lime handling emissions are uncontrolled.

Potential emissions from the unpaved haul road and storage pile vehicular activity were calculated using AP-42 Section 13.2.2 *Unpaved Roads*, November 2006. Haul road emissions are uncontrolled. Potential emissions of the project are summarized in Table 2. Only particulate matter emissions are expected. Potential emissions are based upon [REDACTED] tons of lime throughput, not the conveyor rating of [REDACTED] tons per hour. Conditioned potential emissions based upon the lime throughput are less than the respective de minimis level. Unconditioned potential emissions based upon the conveyor rating at 8,760 hours per year would exceed the respective de minimis level.

Table 2: Emissions Summary (tpy)

Pollutant	De Minimis Level	Conditioned Potential Emissions of the Project
PM	25.0	16.94
PM ₁₀	15.0	7.27
PM _{2.5}	10.0	1.33

The Little Rock Landing Terminal controls emissions from lime handling emission units using filters or baghouses. Similar emission units (EU-8b, EU-9, and EU-10) are uncontrolled at the Port of New Bourbon, but are not fugitive as they could be controlled. As no other exemptions apply, these emission units are subject to 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes*. The emission units are in compliance using 10 CSR 10-6.400(3)(A)1. for process weight rates above 60,000 pounds per hour. The calculated PM limit is 58.5 pounds per hour. The respective potential emissions are less at 27.8 pounds per hour.

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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 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*.

A copy of this letter should be kept at the installation and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact David Little at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 75 1-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "Kyra L. Moore".

Kyra L. Moore
Director

KLM:dll

c: PAMS File: 2013-06-024
Southeast Regional Office

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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."

Mississippi Lime Company
Ste. Genevieve County, LG 10021

1. Throughput Limitation
 - A. Mississippi Lime Company's barge-loaded lime and limestone products (not to include the finest grades of lime) shall not exceed [REDACTED] tons by this permit's expiration date. Loading of other materials is prohibited.
 - B. Any lime and limestone product barge-loaded under the discretion of the Air Pollution Control Program's Compliance/Enforcement Section before this permit's issuance date shall be included towards the limit in Special Condition 1.A.
 - C. Mississippi Lime Company shall demonstrate compliance with Special Condition 1.A. by recording the total loaded amount once daily. Days of non-loading shall be indicated.
2. Record Keeping and Reporting Requirements
 - A. Mississippi Lime 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 MSDS for all materials used.
 - B. Mississippi Lime Company shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, 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.