



Eric R. Greitens, Governor • Carol S. Comer, Acting Director

DEPARTMENT OF NATURAL RESOURCES

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FEB 28 2017

Ms. Lina Klein
Env. Director, FWI
Riverview Commerce Park
2320 Creve Coeur Mill Rd.
Maryland Heights, MO 63043

RE: New Source Review Permit Amendment - Permit Number: 062016-012A
Project Number: 2016-09-031; Installation Number: 099-0175

Dear Ms. Klein:

On September 22, 2016, the Air Pollution Control Program received your request to amend Permit # 062016-012. According to your request, Riverview Commerce Park (RCP) is requesting to allow Rail #2 to unload trucks to rail cars. Permit # 062016-012 only addressed unloading of the railcars to the trucks. There is no difference in emissions from trucks to rail or rail to trucks as no new equipment is being introduced. RCP also requested to add a permit requirement for use of the baghouse filter in order to use controlled emission factors. The baghouse is already in place but Rail #2 was permitted as an uncontrolled system in Permit # 062016-012. The last request is to allow maximum flexibility in the type of material being handled by Rail #2.

Special Condition 1 of this amendment is superseding Permit # 062016-012 (PM_{2.5} Emissions limitation) as there is no need to limit RCP potential emissions are below de minimis with the use of the baghouse. Special Condition 2 of this amendment is for the use and operation of the baghouse. This Special Condition makes it possible for RCP to use controlled emission factors for the materials being handled. Since the worst case potential emissions are below de minimis with the use of the baghouse, tracking the emissions is no longer required for Rail #2. Special Condition #3 of this amendment states that RCP may use the listed material as well as any alternative material if project potential to emit (PTE) calculations are less than insignificant levels stated in 10 CSR 6.601 (3) (A)3.A. Originally RCP was only permitted to load soda ash. The PTE from the materials submitted in the application were all less than the de minimis threshold. Emissions for the project were calculated using emission factors found in the United States EPA document AP-42 Compilation of Air Pollutant Emission Factors, Chapter 8 and 11, Fifth Edition (AP-42).

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.oa.mo.gov/ahc.



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Ms. Klein
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If you have any questions regarding this amendment, please do not hesitate to contact Jordan Hull, 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

Kendall B. Hale
Permits Section Chief

KBH;jhj

Enclosures

c: St. Louis Regional Office
PAMS File: 2016-09-031

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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."

Riverview Commerce Park
Jefferson County, S20, 40N, 6E

1. **Superseding Condition**
 - A. The conditions of this permit supersede the following special conditions found in the previously issued construction permit 062016-012 issued by the Air Pollution Control Program.
 - 1.) Special Condition 1 – PM_{2.5} Limitation
2. **Control Device Requirement – Baghouse**
 - A. Riverview Commerce Park shall control emissions from the transfer of materials to/from Rail #2 using a baghouse.
 - B. The baghouse shall be operated and maintained in accordance with the manufacture'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 employees may easily observe them.
 - C. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Riverview Commerce Park shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours of operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Riverview Commerce Park shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - 1.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions.
 - 2.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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SPECIAL CONDITIONS:

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

3. Material Handling

A. Riverview Commerce Park is permitted to handle the following materials with Rail #2:

- 1.) Soda Ash
- 2.) Low Moisture Ore
- 3.) Crushed Talc
- 4.) Ground Talc
- 5.) Cement
- 6.) Cement Supplement

B. For alternative materials, RCP shall calculate the PTE of the project. If the PTE is greater than the insignificant levels in 10 CSR 6.601 (3) (A) 3.A, then RCP shall seek approval from the Air Pollution Control Program before the use of the alternative material. If PTE is less than insignificant levels, RCP shall retain calculations on site and make available upon request