

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: 082016-008 Project Number: 2016-01-016
Installation Number: 021-0133

Parent Company: City of St. Joseph, Missouri

Parent Company Address: 1100 Frederick Ave., St. Joseph, MO 64501

Installation Name: St. Joseph Water Protection Facility - Biosolids Dryer

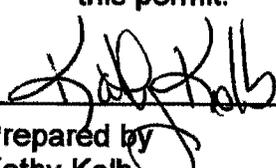
Installation Address: 3500 759 Highway, St. Joseph, MO 64504

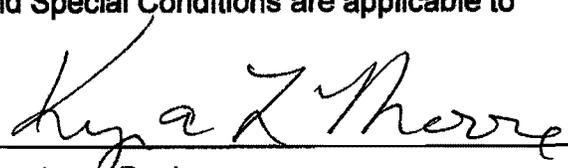
Location Information: Buchanan County, S30, T75N, R35W

Application for Authority to Construct was made for: Installation of a biosolids dryer. 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.


Prepared by
Kathy Kolb
New Source Review Unit


Director or Designee
Department of Natural Resources

AUG 23 2016

Effective Date

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 Enforcement and Compliance Section of the 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 that 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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, MO 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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."

St. Joseph Water Protection Facility - Biosolids Dryer
Buchanan County, S30, T75N, R35W

1. Control Device Requirement – Wet Venturi Scrubber with Mist Eliminator
 - A. St. Joseph Water Protection Facility - Biosolids Dryer shall enclose and control emissions from the dried handling equipment using a wet venturi scrubber with a mist eliminator CD-02. The scrubber shall be operated and maintained in accordance with the manufacturer's specifications. Each scrubber shall be equipped with gauges that indicate the scrubbing liquid flow and air pressure drop. These gauges shall be located in such a way they may be easily observed by Department of Natural Resources' employees.
 - B. St. Joseph Water Protection Facility - Biosolids Dryer shall monitor and record the scrubbing liquid flow and air pressure drop through the scrubber at least once every 24 hours of operation. The flow rate and pressure drop shall be maintained within the operating limits specified by Special Condition 2.A. If the scrubber was not required to be performance tested, the above parameters shall be specified by the manufacturer's performance warranty. The operating limits shall be kept on site. St. Joseph Water Protection Facility – Biosolids Dryer shall be operated and maintained in accordance with the manufacturer's specifications and with the Standard Operating Procedures report from the stack test. A copy of the manufacturer's specifications shall be kept on site.
 - C. St. Joseph Water Protection Facility - Biosolids Dryer shall maintain an operating and maintenance log for the scrubbers 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, etc.
2. Control Device Requirement – Condenser
 - A. St. Joseph Water Protection Facility - Biosolids Dryer shall enclose and control emissions from the dryer (including combustion emissions of natural gas) using a condenser.
 - B. St. Joseph Water Protection Facility - Biosolids Dryer shall be equipped with temperature meters at the inlet and outlet of the condenser per manufacturer's specifications. St. Joseph Water Protection Facility – Biosolids Dryer shall be operated and maintained in accordance with the manufacturer's specifications and

SPECIAL CONDITIONS:

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

with the Standard Operating Procedures report from the stack test. A copy of the manufacturer's specifications shall be kept on site.

- C. St. Joseph Water Protection Facility - Biosolids Dryer shall maintain appropriate turbulent air flow and residence time according to manufacturing specifications. St. Joseph Water Protection Facility – Biosolids Dryer shall be operated and maintained in accordance with the manufacturer's specifications and with the Standard Operating Procedures report from the stack test. A copy of the manufacturer's specifications shall be kept on site.
3. Performance Testing
- A. St. Joseph Water Protection Facility - Biosolids Dryer shall conduct performance tests on the condenser (CD01) and scrubber (CD02) simultaneously sufficient to verify the emission rates of Particulate Matter (PM, PM₁₀, and PM_{2.5}) as listed in Table 2. PM, PM₁₀, and PM_{2.5} emission rates shall be calculated in units of pounds per hour.
 - B. St. Joseph Water Protection Facility - Biosolids Dryer shall conduct performance tests on the condenser (CD01) sufficient to verify the emission rates of Volatile Organic Compounds (VOCs) without methane (CH₄) as listed in Table 2 by performing EPA preapproved test method by the Air Pollution Control Program's Emission Testing Unit, on the new condenser systems while the plant is fully operational. A pre-survey of the condenser (CD01) using method 18, method 207, or other preapproved test method, will be required in order to ensure the ratio of the known VOC peak area to the total VOC peak area is at least 95%. This test shall be conducted within 10% of the maximum hourly production rate (15.2 tons per day). The results from the stack tests shall be used to calculate actual and potential HAP and VOC emissions as mass. VOC and HAP emissions rates shall be calculated in units of pounds per hour.
 - C. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up for commercial operation and shall be conducted in accordance with the proposed stack test plan outlined in this special condition and the proposed test plan.
 - D. Testing shall be conducted during periods of representative conditions at the maximum process/production rates, not to include periods of startup, shutdown, or malfunction. Testing shall be performed at the maximum capacity, 15.2 tons per day. If it is impractical to test at maximum capacity, emission units may be tested at less than the maximum capacity; in this case, subsequent operation of the emission unit(s) is limited to 110 percent of the test rate until a new test is conducted. Once the emission units are so limited, operation at higher capacities is allowed for no more than 15 total days for the purpose of additional compliance testing to regain the authority to operate at the maximum capacity.

SPECIAL CONDITIONS:

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

- E. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- F. One electronic and one paper copy of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- G. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations.
- H. A Standard Operations Procedure (SOP) shall be developed which includes the ranges for the following:
 - 1) Scrubber pressure drop
 - 2) Liquid flow rate
 - 3) Temperature
 - 4) Condenser inlet and outlet temperature
- I. Actual conditions under which performance testing is conducted shall be recorded throughout each of the test runs. These conditions are to include all relevant process/production parameters, including parameters relating to the status of emission controls. This data is to be included in the emissions test report. In addition, the report shall include emission factors for PM, PM₁₀, PM_{2.5} and VOCs which shall be determined using emission rates and recorded drying rates that have occurred during testing. No maintenance or upgrade of emission control efficiency shall be undertaken during emission testing.
- J. Emission testing results, in “mass of pollutant/volume of air,” shall be reported for the pollution source airstream, free from any extraneous source of dilution air. Potential dilution air streams shall either be sealed off prior to testing or else be measured by appropriate EPA test methods and subtracted from the total airflow at the sampling location. Failure to account for dilution air can lead to cancellation of testing and/or a violation notice for circumvention.
- K. St. Joseph Water Protection Facility - Biosolids Dryer shall receive approval from the Air Pollution Control Program prior to any changes in the process or throughput allowed at this installation other than that which is tested at the time of performance test.

SPECIAL CONDITIONS:

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

4. St. Joseph Water Protection Facility - Biosolids Dryer shall submit an amendment to this permit if stack test result exceed the emissions stated in this permit. The only HAPS reported in this permit are from the combustion of natural gas of the dryer. If HAPs are detected in the stack test, these emissions shall be included in the amendment. This amendment shall be submitted within 180 days upon completion of the stack test report.
5. Record Keeping and Reporting Requirements
 - A. St. Joseph Water Protection Facility - Biosolids Dryer 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 SDS for all materials used.
 - B. St. Joseph Water Protection Facility - Biosolids Dryer 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.

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

Project Number: 2016-01-016
Installation ID Number: 021-0133
Permit Number:

Installation Address:

St. Joseph Water Protection Facility - Biosolids
Dryer
3500 759 Highway
St. Joseph, MO 64504

Parent Company:

City of St. Joseph, Missouri

1100 Frederick Ave.
St. Joseph, MO 64501

Buchanan County, S30, T75N, R35W

REVIEW SUMMARY

- St. Joseph Water Protection Facility - Biosolids Dryer has applied for authority to install a biosolids dryer.
- The application was deemed complete on January 12, 2016.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are from the combustion of the natural gas fired dryer. HAPS may be emitted from the biosolids and will be tested.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Condenser and scrubber are being used to control the PM, PM₁₀, PM_{2.5} 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 emissions of VOC are above de minimis levels but below the major threshold of 250 tons.
- This installation is located in Buchanan County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential VOC emissions of the

application are above de minimis levels but there is no modeling standard for VOCs.

- Emissions testing is required for the equipment.
- An 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

The St. Joseph Water Protection Facility (WPF) is a secondary treatment wastewater facility with a permitted (Water Protection Program Operating Permit MO-0023043) average design flow of 27 million gallons per day (MGD), actual flow of 19 MGD and design sludge production of 10,000 dry tons per year. The WPF receives and treats domestic, commercial and industrial flows. Industrial flows make up approximately 25% of the plant influent flow.

A biosolids dryer will be added to the existing solids process as part of the improvements. The following is a description of the existing solids process:

Industrial primary sludge, industrial scum, primary sludge, scum, and thickened WAS are conveyed to an existing thermophilic digester. Digested sludge from the thermophilic digester is conveyed to four existing mesophilic digesters. Two of the mesophilic digesters were constructed in 1965 and the other two in 1979, and the thermophilic digester was added as part of a later improvement project.

Digested sludge from the mesophilic digesters is conveyed to a sludge holding tank and then to two existing belt filter presses. Pressed sludge ($\pm 23\%$ solids) is then transported to land application or landfill.

No permits have been issued to St. Joseph Water Protection Facility - Biosolids Dryer from the Air Pollution Control Program.

PROJECT DESCRIPTION

This application is for the Biosolids Dryer improvements. The thickened sludge from the belt filter presses will be conveyed to a cake bin located within the Belt Filter Press Building.

The mixing screw will be used to mix the thickened sludge with recycled finished dried biosolids (the final product.) The recycled biosolids will be conveyed to a crusher upstream of the mixing screw with a screw conveyer. Dust from the conveyance and crushing of the recycled dried biosolids will be conveyed to a wet scrubber.

The mixed biosolids will be conveyed from the mixing screw to the belt dryer with a screw conveyer. The dry product rate is 15.2 tons per day (0.63 lbs/hr). A natural gas furnace will be

used to heat the belt dryer process air. The furnace will operate on 100% natural gas. The furnace has a total of four flue gas safety vents that will be vented to a safe location. The safety vents will not be used during normal operation. During normal operation, all furnace emissions will be combined with the belt dryer process air and recycled from the belt dryer back to the furnace. The portion of the process air that does not get recycled will be conveyed to a condenser prior to exhausting to the atmosphere.

A screw conveyer and tube conveyer will be used to convey the finished dried biosolids from the belt dryer to recycle bin. Dust from the screen will be conveyed to the wet scrubber.

The finished dried biosolids will be conveyed from the screen to a product cooler. Ambient air will be used to cool the dried biosolids in the product cooler. Exhaust from the product cooler will be conveyed to the wet scrubber.

The finished dried biosolids will be conveyed to a vacuum pickup hopper from the product cooler. A vacuum conveyance system will be used to convey the dried biosolids to the Finished Dried Biosolids Conveyance and Storage Structure.

The new biosolids dryer will have exhaust air from the following two sources:

1. Condenser (CD-01) – ANDRITZ condenser is vertical flow unit where the gas stream enters at the bottom of the unit and exits from the top. Counter current up flow design includes two sieve trays and chevron type mist eliminator. Water flows down over two sieve trays (in series) and is drained via gravity out of the unit. Chevron type mist eliminators include cleaning spray lance.
2. Scrubber (CD-02) – Monroe Environmental 3,700 CFM Dual Throat Air Venturi Scrubber including adjustable venturi.

The finished dried biosolids (final product) are pellets that are approximately 92% solids. The finished dried biosolids are conveyed to receivers located at the Finished Dried Biosolids and Storage Structure. The finished dried biosolids are then discharged to storage piles. There are three bays for the storage of the finished dried biosolids within the structure.

The dried biosolids will be transported from the storage piles to a loadout hopper or directly to hauling trucks using a skid loader. A conveyor will be used to convey the dried biosolids from the loadout hopper to a hauling truck. Hauling trucks will then be used to haul the dried biosolids to the final destination.

These are the following potential emission sources from the Finished Dried Biosolids and Storage Structure:

Table 1: List of emission points

Emission Unit	Emission Point	Description	MHDR
EU-1100 Dryer	CD-01	Condenser	0.63 lbs/hr, 9.0 MMBTU/hr input
NPW Strainer System			
EU-9140 Crusher	CD-02	Scrubber	0.63 lbs/hr
EU-1620 Recycle Bin			
EU-9135 Screen			
EU-1631 Product Cooler			
EU-01 Load in finished product into storage pile	EP-01	Load-in storage piles	0.63 lbs/hr
EU-02 Load in Truck from pile	EP-02	Load in trucks	0.63 lbs/hr
EU-03 Haul Roads	EP-03	Haul Roads (including vehicular activity)	0.63 lbs/hr

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were submitted by St. Joseph Water Protection Facility (WPF) that were based on ANDRITZ emission calculations stack testing on similar equipment in the Town of Leesburg, Virginia conducted December 19-20, 2001 and the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4 *Natural Gas Combustion*, July 1998. The data provided from the test at Leesburg did not meet all the criteria to demonstrate a successful Method 5 particulate matter test. The VOC test did not provide throughput information and the calibration gas for the VOC testing was inappropriate. As a result, performance testing is required to verify emissions are below the estimated levels.

The exhaust flow of the condenser at St. Joseph, Missouri is 12,541 dscfm. Only PM emission factor was provided from the ANDRITZ Model and the results were 0.00429 grains/dsf. It is assumed that all PM₁₀ and PM_{2.5} is equal to PM. St. Joseph Water Protection Facility (WPF) may have to amend this permit to reflect the results of the test if emission rates are higher than what is stated in this permit.

Emissions were calculated using equations obtained from AP-42 Chapter 13.2.1 Paved Roads.

The following table provides an emissions summary for this project. This is a new facility and there are no existing potential emissions and therefore existing actual emissions from the installation's EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Dryer NG	Condenser CD-01	Scrubber CD-02	Loading into pile/truck EP-01	Haul Road EP- 02	Total Emissions
PM	25.0	0.07	2.42	6.07	0.0023	0.1399	8.71
PM ₁₀	15.0	0.29	2.42	6.07	0.0022	0.0280	8.82
PM _{2.5}	10.0	0.29	2.42	6.07	0.0003	0.0069	8.80
SO _x	40.0	0.02	N/A	N/A	N/A	N/A	0.02
NO _x	40.0	3.86	N/A	N/A	N/A	N/A	3.86
VOC	40.0	0.21	53.34	N/A	N/A	N/A	53.56
CO	100.0	3.25	N/A	N/A	N/A	N/A	3.25
CO ₂		4,637.65	N/A	N/A	N/A	N/A	4,637.65
CH ₄		0.09	N/A	N/A	N/A	N/A	0.09
GHG (CO ₂ e)	75,000 / 100,000	4,665.21	N/A	N/A	N/A	N/A	4,665.21
GHG (mass)	0.0 / 100.0 / 250.0	4,637.82	N/A	N/A	N/A	N/A	4,637.82
HAPs	10.0/25.0	0.07	N/A	N/A	N/A	N/A	0.07

N/A = Not Applicable;

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 VOC are above de minimis levels but below the major threshold of 250 tons.

APPLICABLE REQUIREMENTS

St. Joseph Water Protection Facility - Biosolids Dryer 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation. Does not apply if DemPAL.
- *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 10-6.165

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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 6, 2016, received January 12, 2016, designating City of St. Joseph, Missouri as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Mr. Don Gilpin
Superintendent
St. Joseph Water Protection Facility - Biosolids Dryer
3500 759 Highway
St. Joseph, MO 64504

RE: New Source Review Permit - Project Number: 2016-01-016

Dear Mr. Gilpin:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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.

Mr. Don Gilpin
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If you have any questions regarding this permit, please do not hesitate to contact Kathy Kolb, at the Department of Natural Resources' 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

Susan Heckenkamp
New Source Review Unit Chief

SH:kkj

Enclosures

c: Kansas City Regional Office
PAMS File: 2016-01-016

Permit Number: