



INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2011-007
Expiration Date: FEB 24 2016
Installation ID: 163-0008
Project Number: 2010-01-065

Installation Name and Address

Wayne B. Smith, Inc.
Hwy 79 South
Louisiana, MO 63353
Pike County
S20, T54N, R1W

Parent Company's Name and Address

Wayne B. Smith, Inc.
P.O. Box 474
Louisiana, MO 63353

Installation Description:

Wayne B. Smith, Inc. consists of a limestone quarry and crushing plant on the west side of Highway 79 just south of Louisiana, Missouri; barge loading and unloading docks, rock storage, bauxite and fertilizer (urea and ammonium nitrate) processing; and sand dredging and storage operations east of the highway. The installation is a synthetic minor source of Particulate Matter ≤ 10 microns (PM₁₀).

FEB 25 2011

Effective Date



Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
II. PLANT WIDE EMISSION LIMITATIONS.....	7
PERMIT CONDITION PW001	7
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	7
PERMIT CONDITION PW002	7
10 CSR 10-6.060 Construction Permits Required.....	7
Construction Permit 1292-007	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	8
PERMIT CONDITION 001	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 1292-007 - Production Limitations	8
PERMIT CONDITION 002	9
10 CSR 10-6.060 Construction Permits Required.....	9
Construction Permit 1292-007 – Haul Roads	9
PERMIT CONDITION 003	11
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – New Sources	11
PERMIT CONDITION 004	13
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Existing Sources.....	13
PERMIT CONDITION 005	14
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Haul Roads	14
PERMIT CONDITION 006	15
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Stockpiles.....	15
PERMIT CONDITION 007	16
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	16
PERMIT CONDITION 008	18
10 CSR 10-6.060 Construction Permits Required.....	18
Construction Permit 1292-007 – Controls	18
PERMIT CONDITION 009	19
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	19
40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.....	19
IV. CORE PERMIT REQUIREMENTS	22
V. GENERAL PERMIT REQUIREMENTS.....	29
VI. ATTACHMENTS	33
ATTACHMENT A	34
Fugitive Emission Observations	34
ATTACHMENT B	35
Opacity Emission Observations	35
ATTACHMENT C	36
Method 9 Opacity Observations	36
ATTACHMENT D	37
Inspection/Maintenance/Repair/Malfunction Log	37
ATTACHMENT E	38
Plantwide PM ₁₀ Compliance Worksheet.....	38
ATTACHMENT F	39
Production Tracking Sheet.....	39

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Wayne B. Smith, Inc. consists of a limestone quarry and crushing plant on the west side of Highway 79 just south of Louisiana, Missouri; barge loading and unloading docks, rock storage, bauxite and fertilizer (urea and ammonium nitrate) processing; and sand dredging and storage operations east of the highway. The installation is a synthetic minor source of Particulate Matter ≤ 10 microns (PM₁₀).

Reported Air Pollutant Emissions, tons per year						
Year	Particulate Matter \leq Ten Microns (PM ₁₀)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Particulate Matter \leq 2.5 Microns (PM _{2.5})
2009	8.05	0.0001	0.03	0.05	0.003	0.15
2008	9.27	0.005	0.29	0.37	0.03	0.29
2007	6.07	0.001	0.49	0.07	0.05	0.30
2006	4.77	0.05	0.65	0.11	0.14	0.01
2005	5.61	0.16	0.69	0.05	0.14	0.02

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment and activities at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit No. Description of Emission Unit

Process No. 1 - Barge Unloading of Bauxite and Urea	
2	Material Fed Into Surge Bin And Crusher From Barges Via E Crane
3A	McClanahan Primary Roll Crusher – Process Emissions
3B	McClanahan Primary Roll Crusher – Combustion Emissions
4A, 4B, 4C, 4D, 4E, & 4F	Conveyors
5A & 5B	Conveyors
6A, 6B, & 6C	Load Out Belts
6D & 6E	Front Load Out Of Storage Buildings

Process No. 2 - Bauxite Crushing and Screening	
7A, 7B, 7C, 7D, & 7E	Conveyors
8	Cedar Rapids 22x45 Jaw Crusher
9	Hopper Fed By FEL At Bauxite Plant
11	#2 System Crushing Plant Screen Deck
11A	Drop To Storage Bin #6 At #2 System Crushing Plant
12	Crushing Plant Load Out Belt From Storage Bin
13	Crushing Plant Cone Crushers
21	Material Dumped Into Hopper
42	Bauxite Crushing Plant Conveyor To Vertical Screen
43	Bauxite Crushing Plant Vertical Screen
44	Bauxite Crushing Plant Bulk Loading -Drop To Surge Bin
45	Bauxite Crushing Plant 2 Load Out Belts From Surge Bin

Process No. 3 - Barge Unloading	
15	Unloaded Material Fed To Bin From Mobile Crane
16	Load Out Belt To Truck

Process No. 4 - Barge Loading	
17	Material Dumped Onto Conveyor
18	Conveyor And Conveyor Drive
19	Conveyor Discharge Into Barge

Process No. 5 - Barge Unloading, Conveying, and Bulk Bagging for Bauxite and Ammonium Nitrate	
22	Radial Stacker Conveyor
22A	Conveyor Into Bin #7
22B	Load Out Bin Via Chutes
23	Load Out Belt

Process No. 7 - Bauxite Drying	
25	Material Dumped From Truck Into Hopper For Material Drying System
26A & 26B	Conveyor Transfer Points From Hopper To Dryer Drum
27	Dryer Drum
27A	Conveyor To Bins
28	Material Drying System Load Out Belt From Dryer Bin To Truck

Process No. 8 - Rip-Rap (Large Limestone Rock) Sizing	
29	Material Dumped From Truck To Hopper At The Rip Rap Plant
29A	Grizzly
29B	Load From Oversize Stockpile At The Rip Rap Plant
30A	Rip Rap Plant Screen
30B	Rip Rap Plant Drop From Screen To Bin
30C	Rip Rap Plant Conveyor - Grizzly to Screen
30D	Rip Rap Plant Conveyor - Screen to Stockpile
30E	Rip Rap Plant Conveyor - Bin to Stockpile

Process No. 9 - Limestone Crushing	
31	Material Dumped From Truck To Hopper At Crushing Plant
31A	Limestone Plant Primary Crusher
31B	Limestone Plant Secondary Crushers
32	Conveyors At Limestone Plant
33	Conveyor To Screen
34	Limestone Crushing Plant Screens
35	Limestone Plant Bin Feed And Discharge Conveyors
36	Conveyor To Stockpile
37	Material Discharge Onto Screen Of Limestone Plant
38	Material Discharge Into Stockpile

Haul Roads	
HR 1-5	Haul Roads Located On The Site

Stockpiles	
SP 1-10	Stockpiles

Gasoline Storage Tank	
Tank 17	Gasoline Storage Tank

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment and activities, which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Fuel Storage Tanks	
Tk 1-19,24	Storage Tanks

Process No. 6 - Sand Processing	
24	Exhaust on Mobile Crane
-	Sand Dredging, Barge Unloading, and Storage Bin

Process No. 10 - Drilling and Blasting in Limestone Quarry	
46	Limestone Quarry Drilling
47	Limestone Quarry Blasting

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of Particulate Matter less than or equal to 10 microns in diameter (PM₁₀) per consecutive 12-month period from the entire installation.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of monthly throughput for all PM₁₀ emission units.
2. The monthly emissions of PM₁₀ for each emission unit shall be calculated, using the monthly throughput and emission factor. Attachment E or an equivalent form generated by the permittee may be used.
3. The permittee shall calculate their annual emission of PM₁₀ by summing the monthly emissions of each emission unit for the last twelve months. The annual emissions will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 1292-007

Operational Limitation:

Special Condition 8: If the presence of PM₁₀ in the ambient air is detected in quantity and duration that directly or approximately causes or contributes to injury to human, plant or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or use of property, or is a violation of a state rule, then the permittee shall immediately undertake a program that will correct the problem.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION 001	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1292-007 - Production Limitations	
Emission Unit	Description
Process No. 1 - Barge Unloading of Bauxite and Urea	
2	Material Fed Into Surge Bin And Crusher From Barges Via E Crane
3A & 3B	McClanahan Primary Roll Crusher
4A, 4B, 4C, 4D, 4E, & 4F	Conveyors
5A & 5B	Conveyors
6A, 6B, & 6C	Load Out Belts
6D & 6E	Front Load Out Of Storage Buildings
Process No. 2 - Bauxite Crushing and Screening	
43	Bauxite Crushing Plant Vertical Screen
Process No. 5 - Barge Unloading, Conveying, and Bulk Bagging for Bauxite and Ammonium Nitrate	
22	Radial Stacker Conveyor
22A	Conveyor Into Bin #7
22B	Load Out Bin Via Chutes
23	Load Out Belt

Operational Limitations:

1. Special Condition 1: Production processing of bauxite in Process No. 1, Process No. 5, and the new vertical screen of Process No. 2 shall not exceed 175,000 tons per consecutive 12-month period.
2. Special Condition 2: Production processing of urea in Process No. 1, Process No. 5, and the new vertical screen of Process No. 2 shall not exceed 16,000 tons per consecutive 12-month period.
3. Special Condition 3: Production processing of ammonium nitrate in Process No. 1, Process No. 5, and the new vertical screen of Process No. 2 shall not exceed 55,000 tons per consecutive 12-month period.

Monitoring/Recordkeeping:

Special Condition 4: Monthly production logs shall be kept on site at all times and will include data for the previous 60 month period. The permittee may use Attachment F or an equivalent form generated by the permittee for this purpose. The permittee shall calculate their annual production by summing the monthly productions for the last twelve months. The annual production will be calculated each month using the most recent twelve months worth of monthly emission totals. This information shall be made available immediately for inspection to the Department of Natural Resources' personnel upon verbal request.

Reporting:

1. Special Condition 5: If at any time the yearly production limits should be exceeded the permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1292-007 – Haul Roads	
Emission Unit	Description
HR 1-5	Haul Roads Located On The Site

Operational Limitation:

1. Special Condition 6: Haul roads shall be watered whenever the vehicular traffic on the road is capable of producing visible emissions off the haul road.
2. The permittee is not required to water haul roads when the ground is frozen, during freezing conditions, or any other similar meteorological or other condition in which watering would impact traffic safety.

Monitoring:

1. The permittee shall conduct opacity readings on the haul roads using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the haul road is in use and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
4. For emission units with visible emissions, the source representative would then control fugitive emissions from the haul roads at this site through the use of watering:
 - a) The source representative shall maintain a log documenting the operational hours of the equipment used to control the fugitive emissions. In this log, the source representative shall estimate the amount of water applied based on the operational time of the equipment or by some other reasonable method. The application rate of the equipment shall be determined by a time study conducted by the source representative or by counting the number of tanks emptied of a known volume during the time period of the water operation.
 - b) The source representative shall record if precipitation of any kind, (e.g. rainfall, sleet, snow, and/or freeze/thaw conditions) occur which is sufficient in amount and/or duration to achieve control of the fugitive emissions before the source representative can mobilize, or is mobilizing watering equipment.

- c) A follow up U.S. EPA Method 22 shall be conducted in order to confirm control of fugitive emissions.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment B, or an equivalent form generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of all documentation required by the above monitoring requirements.
3. The permittee shall maintain records of purchases of dust suppressants and/or applications of pavement technologies which may reduce watering requirements.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 003	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – New Sources	
Process No. 1 - Barge Unloading of Bauxite and Urea	
2	Material Fed Into Surge Bin And Crusher From Barges Via E Crane
3A	McClanahan Primary Roll Crusher – Process Emissions
4A, 4B, 4C, 4D, 4E, & 4F	Conveyor
6A, 6B, & 6C	Load Out Belts
6D & 6E	Front Load Out Of Storage Buildings
Process No. 2 - Bauxite Crushing and Screening	
7A, 7C, 7D, & 7E	Conveyors
9	Hopper Fed By FEL At Bauxite Plant*
11	#2 System Crushing Plant Screen Deck
11A	Drop To Storage Bin #6 At #2 System Crushing Plant
12	Crushing Plant Load Out Belt From Storage Bin
13	Crushing Plant Cone Crushers
21	Material Dumped Into Hopper
44	Bauxite Crushing Plant Bulk Loading -Drop To Surge Bin
45	Bauxite Crushing Plant 2 Load Out Belts From Surge Bin
15 & 16	Process No. 3 - Barge Unloading
17, 18, & 19	Process No. 4 - Barge Loading
22, 22A, 22B, & 23	Process No. 5 - Barge Unloading, Conveying, and Bulk Bagging for Bauxite and Ammonium Nitrate
Process No. 7 - Bauxite Drying	
26B	Conveyor Transfer Points From Hopper To Dryer Drum
27A	Conveyor To Bins
28	Material Drying System Load Out Belt From Dryer Bin To Truck
Process No. 8 - Rip-Rap (Large Limestone Rock) Sizing	
29A	Grizzly
29B	Load From Oversize Stockpile At The Rip Rap Plant
30B	Rip Rap Plant Drop From Screen To Bin
30D	Rip Rap Plant Conveyor - Screen to Stockpile
30E	Rip Rap Plant Conveyor - Bin to Stockpile
31A, 31B, 32, 33, 34, 35, 36, 37, & 38	Process No. 9 - Limestone Crushing

*Emission Unit 9 Hopper Fed by FEL at Bauxite Plant is only subject to this regulation while crushing Bauxite. Crushing of gravel, limestone, and other nonmetallic minerals are exempt per 10 CSR 10-6.220(1)(G).

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions, using Attachment D or an equivalent form generated by the permittee.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 004	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Existing Sources	
Emission Unit(s)	Description
Process No. 1 - Barge Unloading of Bauxite and Urea	
5A & 5B	Conveyors
6E	Front Load Out Of Storage Buildings
Process No. 2 - Bauxite Crushing and Screening	
7B	Conveyor
8	Cedar Rapids 22x45 Jaw Crusher
42	Bauxite Crushing Plant Conveyor To Vertical Screen
43	Bauxite Crushing Plant Vertical Screen
Process No. 7 - Bauxite Drying	
25	Material Dumped From Truck Into Hopper For Material Drying System
26A	Conveyor Transfer Points From Hopper To Dryer Drum
27	Dryer Drum
Process No. 8 - Rip-Rap (Large Limestone Rock) Sizing	
30A	Rip Rap Plant Screen
30C	Rip Rap Plant Conveyor - Grizzly to Screen

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 40%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions, using Attachment D or an equivalent form generated by the permittee.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 005	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Haul Roads	
Emission Unit(s)	Description
HR 1-5	Haul Roads Located On The Site

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 40%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring/Recordkeeping/Reporting:

The monitoring/recordkeeping/reporting requirements of Permit Condition 002 are sufficient to demonstrate compliance with this regulation.

PERMIT CONDITION 006	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Stockpiles	
Emission Unit(s)	Description
SP 1-10	Stockpiles

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 40%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
4. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then control fugitive emissions from the stockpiles at this site:
 - a) The permittee is not required to water stockpiles when the ground is frozen, during freezing conditions, or any other similar meteorological or other condition in which watering would impact traffic (or other) safety.
 - b) The method used to control the fugitive emissions shall be recorded.
 - c) The source representative shall record if precipitation of any kind (e.g. rainfall, sleet, snow, and/or freeze/thaw conditions) occurs which is sufficient in amount and/or duration to achieve control of the fugitive emissions before the source representative can mobilize or is mobilizing watering (or other) equipment.
 - d) A follow up U.S. EPA Method 22 shall be conducted in order to confirm control of fugitive emissions.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of all documentation required by the above monitoring requirements.
3. The permittee shall maintain records of purchases of dust suppressants and/or applications of pavement technologies which may reduce watering requirements.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 007	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
3B	McClanahan Primary Roll Crusher – Combustion Emissions
8	Cedar Rapids 22x45 Jaw Crusher
18	Conveyor And Conveyor Drive
24	Exhaust On Mobile Crane
27	Dryer Drum

Emission Limitations:

1. No person shall cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three (3)-hour time period.

2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation:

The emission units shall be limited to fuel with a sulfur content of no more than 0.5% sulfur by weight.

Monitoring/Record Keeping:

1. The permittee shall maintain fuel purchase receipts indicating the sulfur content of the fuel is below the limit.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 008	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1292-007 – Controls	
Process No. 1 - Barge Unloading of Bauxite and Urea	
2	Material Fed Into Surge Bin And Crusher From Barges Via E Crane
4A, 4B, 4C, 4D, 4E, & 4F	Conveyors
5A & 5B	Conveyors
Process No. 2 - Bauxite Crushing and Screening	
7A, 7B, 7C, 7D, & 7E	Conveyors
11A	Drop To Storage Bin #6 At #2 System Crushing Plant
12	Crushing Plant Load Out Belt From Storage Bin
Process No. 5 - Barge Unloading, Conveying, and Bulk Bagging for Bauxite and Ammonium Nitrate	
22A	Conveyor Into Bin #7
23	Load Out Belt

Operational Limitations:

1. Special Condition 7: All emission controls proposed in this permit application shall be well maintained and used at any time this facility is in operation.
2. The emission controls included within the permit application are:
 - a) Process No. 1:
 - i) Enclosure and/or water spray at transfer points along EP-2 Material Fed into Surge Bin and Crusher from Barges via E Crane, EP-4A, 4B, 4C, 4D, 4E, & 4F Conveyors, and EP-5 Conveyor.
 - b) Process No. 2:
 - i) Water spray on EP-7A, 7B, 7C, 7D, and 7E Conveyors.
 - ii) A fabric filter on EP-11A Drop to Storage Bin #6 at #2 System Crushing Plant.
 - iii) Enclosure of the transfer point between Storage Bin #6 and EP-12 Crushing Plant Load Out Belt from Storage Bin.
 - c) Process No. 5:
 - i) Enclosure of the transfer point between Storage Bin #7 and EP-22A Conveyor Into Bin #7.
 - ii) Enclosure of transfer points along EP-23 Load Out Belt.
3. The fabric filter associated with EP-11A Drop to Storage Bin #6 shall be operated and maintained in accordance with standard operating procedures developed according to best engineering practices. The filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. This gauge or meter shall be located such that the Department of Natural Resources' employees may easily observe it. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the fabric filter at least once a week while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

2. The permittee shall maintain an operating and maintenance log for the fabric filter using Attachment D or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records must be maintained for five (5) years.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 009	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
Emission Unit	Description
Tank 17	Gasoline Storage Tank

Applicability:

1. This subpart establishes national management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF). This subpart also establishes requirements to demonstrate compliance with the management practices. [§63.11110]
2. The affected source to which this subpart applies is each GDF that is located at an area source.
 - a) The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. [§63.11111(a)]
 - b) If the installation's GDF has a monthly throughput of less than 10,000 gallons of gasoline, the permittee shall comply with the requirements in §63.11116. [§63.11111(b)]
 - c) An affected source shall, upon request by the Administrator, demonstrate that their average monthly throughput is less than 10,000-gallons. [§63.11111(e)]
3. The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at existing GDF that meet the criteria specified in §63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart. [§63.11112(a)]
4. Existing affected sources, shall comply with the standards in this subpart no later than January 10, 2011. [§63.11113(b)]

Definitions: [§63.11132]

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act (CAA), or in Subparts A and BBBBBB of this part. For purposes of this subpart, definitions in this section supersede definitions in other parts or subparts.

1. *Gasoline cargo tank* means a delivery tank truck or railcar which is loading gasoline or which has loaded gasoline on the immediately previous load.
2. *Gasoline dispensing facility* (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle.
3. *Monthly throughput* means the total volume of gasoline that is loaded into all gasoline storage tanks during a month, as calculated on a rolling 30-day average.

Management Practices:

1. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]
2. The permittee is not required to submit notifications or reports, but the permittee shall have records available within 24 hours of a request by the Administrator to document the installation’s gasoline throughput. [§63.11116(b)]
3. The permittee shall comply with the requirements of this subpart by the applicable dates specified in §63.11113. [§63.11116(c)]

General Provisions:

Table 3 to this subpart shows which parts of the General Provisions are applicable to the installation. [§63.11130]

Table 3 to Subpart CCCCCC of Part 63 — Applicable General Provisions

Applicable General Provision	Applicable General Provision	Applicable General Provision
§63.1 ¹	§63.7(c) – (d)	§63.9(i) – (j)
§63.2 ²	§63.7(e)(1) – (3)	§63.10(a)
§63.3 - §63.5	§63.7(f) – (h)	§63.10(b)(1)
§63.6(a)	§63.8(a)(1) – (2)	§63.10(b)(2)(xii)
§63.6(b)(1) - (5)	§63.8(a)(4)	§63.10(b)(2)(xiii)
§63.6(e)(1)	§63.8(b)(1)	§63.10(b)(2)(xiv)
§63.6(f)(2) - (3)	§63.9(a)	§63.10(b)(3)
§63.6(g)(1) - (3)	§63.9(b)(1) - (2)	§63.10(d)(1) – (2)
§63.6(i)(1) - (14)	§63.9(b)(4) - (5)	§63.10(d)(4) – (5)
§63.6(j)	§63.9(c) – (e)	§63.10(e)(3)(i)–(iii)
§63.7(a)(2) - (3)	§63.9(g) ³	§63.10(f)
§63.7(b)(1) - (2)	§63.9(h)(1)–(6) ³	§63.12 - §63.15

¹Specific requirements given in §63.11111.

²Additional definitions in §63.11132.

³This is applicable; however, there are no opacity standards.

Recordkeeping:

1. The installation shall maintain records of the monthly gasoline throughput of Tank 17.
2. The permittee shall maintain an operating and maintenance log for the tank using Attachment D or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records must be maintained for five (5) years.

Reporting:

The permittee shall report any deviations from the applicability, definitions, management practices, general provisions, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - (B) Yard waste.
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Wayne B. Smith, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Wayne B. Smith, Inc. fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

Where installation activities occur within 500 feet of the property line, the permittee shall conduct inspections sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 Operating Permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Michael T. Stevinson, Engineer/Supervisor. In a letter dated June 11, 2010, the Air Pollution Control Program was informed that Gerald W. Smith, Vice President is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation

until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment C
 Method 9 Opacity Observations

Company						Observer		
Location						Observer Certification Date		
Date						Emission Unit		
Time						Control Device		
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

 YES NO Signature of Observer

ATTACHMENT E
Plantwide PM₁₀ Compliance Worksheet

PM₁₀ Emission Rate (tons/month) = Usage x PM₁₀ Emission Factor x 0.0005 tons/lb

Emission Unit	Description	Monthly Usage (tons)	PM ₁₀ Emission Factor (lbs/ton)	PM ₁₀ Emission Rate (tons/month)
2, 3A, 4A, 4B, 4C, 4D, 4E, 4F, 5A, 5B, 6A, 6B, 6C, 6D, 6E	Process No. 1 – Barge Unloading of Bauxite and Urea		0.084*	
7A, 7B, 7C, 7D, 7E, 8, 9, 11, 11A, 12, 13, 21, 42, 43, 44, 45	Process No. 2 – Bauxite Crushing and Screening		0.044*	
15, 16	Process No. 3 – Barge Unloading		0.00012*	
17, 18, 19	Process No. 4 – Barge Loading		0.041*	
22, 22A, 22B, 23	Process No. 5 - Barge Unloading, Conveying, and Bulk Bagging for Bauxite and Ammonium Nitrate		0.061*	
25, 26A, 26B, 27, 27A, 28	Process No. 7 - Bauxite Drying		2.0*	
29, 29A, 29B, 30A, 30B, 30C, 30D, 30E	Process No. 8 - Rip-Rap (Large Limestone Rock) Sizing		0.015*	
31, 31A, 31B, 32, 33, 34, 35, 36, 37, 38	Process No. 9 - Limestone Crushing		0.025*	
46, 47	Process No. 10 - Drilling and Blasting in Limestone Quarry		0.000096*	
		(1000 gal)	(lbs/1000 gal)	(tons/month)
3B, 8, 18, 24	Diesel Combustion		42.5	
27	Drum Dryer Combustion		1	

Monthly PM₁₀ Emissions (tons/month) = The sum of the PM₁₀ Emission Rates (tons/month)

Annual PM₁₀ Emissions (tons/yr) = The sum of the last 12 months Monthly PM₁₀ Emissions (tons/month)

Month and Year	Annual Emission for the last 12 months (tons/yr)**	Month and Year	Annual Emission for the last 12 months (tons/yr)**

*This is a composite emission factor for multiple emission units.
**An Annual Emission of less than 100 tons demonstrates compliance.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 Operating Permit. It is the permittee's responsibility to monitor emission levels and apply for a Part 70 Operating Permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a Part 70 Operating Permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit OP2007-002, Issued January 22, 2007
- 2) Intermediate Operating Permit Amendment Application, Received June 25, 2009
- 3) 2008 Emissions Inventory Questionnaire
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 5) Construction Permit 1292-007, Issued December 7, 1992

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits* is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* is not applicable to the installation. All of the emission units at the installation are PM emission sources, except for the tanks. The following emission units are exempt per 10 CSR 10-6.400(1)(B)12 because they emit less than 0.5 lbs of PM per hour:

Emission Unit	Description
3A	McClanahan Primary Roll Crusher – Process Emissions
5A & 5B	Conveyors
6A, 6B, & 6C	Load Out Belts
6D & 6E	Front Load Out Of Storage Buildings
8	Cedar Rapids 22x45 Jaw Crusher
9	Hopper Fed By FEL At Bauxite Plant
11A	Drop To Storage Bin #6 At #2 System Crushing Plant
12	Crushing Plant Load Out Belt From Storage Bin
15	Unloaded Material Fed To Bin From Mobile Crane
16	Load Out Belt To Truck
18	Conveyor And Conveyor Drive
21	Material Dumped Into Hopper
25	Material Dumped From Truck Into Hopper For Material Drying System
26A & 26B	Conveyor Transfer Points From Hopper To Dryer Drum
27	Dryer Drum
27A	Conveyor To Bins
28	Material Drying System Load Out Belt From Dryer Bin To Truck
29	Material Dumped From Truck To Hopper At The Rip Rap Plant
29A	Grizzly
29B	Load From Oversize Stockpile At The Rip Rap Plant
30A	Rip Rap Plant Screen
30B	Rip Rap Plant Drop From Screen To Bin
30C	Rip Rap Plant Conveyor - Grizzly to Screen
30D	Rip Rap Plant Conveyor - Screen to Stockpile
30E	Rip Rap Plant Conveyor - Bin to Stockpile
31	Material Dumped From Truck To Hopper At Crushing Plant
31A	Limestone Plant Primary Crusher
31B	Limestone Plant Secondary Crushers
32	Conveyors At Limestone Plant
33	Conveyor To Screen
35	Limestone Plant Bin Feed And Discharge Conveyors
36	Conveyor To Stockpile
37	Material Discharge Onto Screen Of Limestone Plant
38	Material Discharge Into Stockpile
42	Bauxite Crushing Plant Conveyor To Vertical Screen
43	Bauxite Crushing Plant Vertical Screen
44	Bauxite Crushing Plant Bulk Loading -Drop To Surge Bin
45	Bauxite Crushing Plant 2 Load Out Belts From Surge Bin
46	Limestone Quarry Drilling
47	Limestone Quarry Blasting

The following emissions units are exempt per 10 CSR 10-6.400(1)(B)7 because they are fugitive emission sources:

Emission Unit	Description
2	Material Fed Into Surge Bin And Crusher From Barges Via E Crane
4A, 4B, 4C, 4D, 4E, & 4F	Conveyors
7A, 7B, 7C, 7D, & 7E	Conveyors
11	#2 System Crushing Plant Screen Deck
13	Crushing Plant Cone Crushers
17	Material Dumped Onto Conveyor
19	Conveyor Discharge Into Barge
22	Radial Stacker Conveyor
22A	Conveyor Into Bin #7
22B	Load Out Bin Via Chutes
23	Load Out Belt
34	Limestone Crushing Plant Screens
HR 1-5	Haul Roads Located On The Site
SP 1-10	Stockpiles

Emission Units 3B McClanahan Primary Roll Crusher – Combustion Emissions and 24 Exhaust on Mobile Crane are exempt from this regulation as diesel (a liquid fuel) is excluded within the definition of process weight at 10 CSR 10-6.400(2)(A).

Construction Permits

Construction Permit No. 1292-007, Issued December 7, 1992:

Construction Permit No. 1292-007A, Issued November 26, 2008:

- This construction permit is for the replacement of an existing impact crusher and the installation of a barge unloading, bauxite and urea processing facility (Process No. 1); a barge unloading and bulk bagging facility (Process No. 5); and a totally enclosed rotating vertical screen (Process No. 2).
- This construction permit contains eight special conditions.
- Amendment A modifies the wording of Special Conditions 1 – 3 for clarity.
- Special Conditions 1-5 have been applied within this permit (see Permit Condition 001).
- Special Condition No. 6 has been applied within this permit (see Permit Condition 002).
- Special Condition No. 7 has been applied within this permit (see Permit Condition 008).
- Special Condition No. 8 has been applied within this permit (see Permit Condition PW002).

Construction Permit No. 0695-028, Issued June 15, 1995:

- This construction permit is for the installation of three conveyors and a double compartment bin to Process No. 1 and four conveyors and a triple compartment bin to Process No. 6.
- This construction permit does not contain any special conditions.

No Construction Permit Required, Issued August 21, 2000:

- This no construction permit required letter is for the like-kind replacement of an existing diesel-powered crane.

No Construction Permit Required, Issued September 8, 2000:

- This no construction permit required letter is for the like-kind replacement of two short conveyor belts with one longer conveyor belt.

Temporary Construction Permit No. 122010-007, Issued December 10, 2010:

- This temporary construction permit is for the operation of a 300 ton per hour portable rock crusher.
- This temporary construction permit expires June 30, 2011. The installation may not operate the portable rock crusher past the expiration date. The installation may apply for a construction permit to permanently operate the equipment or the installation may apply for an extension of the temporary construction permit if continued operation of the portable rock crusher past June 30, 2011 is necessary.
- The portable rock crusher was not included within this operating permit. Title V permits are for stationary sources.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts K, Ka, and Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)* is not applicable to the installation. All of the storage tanks are below the 19,800 gallon threshold except for Tank 24; however, Tank 24 contains diesel which has a true vapor pressure below the 15.0 kPa threshold.

40 CFR Part 60, Subpart LL – *Standards of Performance for Metallic Mineral Processing Plants* is not applicable to the installation. The installation does handle ore, but the installation does not concentrate the ore it handles and is, therefore, not subject.

40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* is not applicable to the installation. The installation has not commenced construction, reconstruction, or modification since the August 31, 1983 compliance date.

Maximum Achievable Control Technology (MACT) Applicability

The installation is an area source for HAPs.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. This installation does have a number of reciprocating internal combustion engines (RICE); however, all of the installation's RICE have wheels and are moved about the installation at least once annually. As wheeled RICE this engines are considered portable and do not meet the definition of stationary RICE under §63.6675.

40 CFR Part 63, Subpart CCCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities* is applicable to the installation and has been applied within this permit (see Permit Condition 009) . Affected sources are each gasoline cargo tank used to deliver gasoline and each storage tank.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*:

- Emission Units 3B McClanahan Primary Roll Crusher – Combustion Emissions and 24 Exhaust on Mobile Crane are exempt from this regulation per 10 CSR 10-6.220(1)(A).
- This regulation is applicable to Process No. 6 - Sand Processing, but has not been applied within permit. The potential PM emissions from the sand dredging, barge unloading, and storage bin associated with the sand processing are considered negligible due to their inherent moisture content (see AP-42 11.19.1.2) and can be assumed to be in compliance with this regulation at all times. The MO DNR Air Pollution Control Program may require monitoring, recordkeeping, and reporting requirements at any point in time if opacity becomes an issue from this process.
- Emission Units 29 Material Dumped From Truck To Hopper At The Rip Rap Plant and 31 Material Dumped From Truck To Hopper At Crushing Plant are exempt from this regulation per 10 CSR 10-6.220(1)(G).

An update Potential to Emit for the installation is shown the following table:

Pollutant	Potential to Emit (tons/yr)*
CO	18.19
CO ₂ e	39,761.20
NO _x	79.43
PM ₁₀	369.25
SO _x	3.50
VOC	4.72
HAP	0.12
PM _{2.5}	33.78

*All emission units were evaluated at 8760 hours of uncontrolled annual operation unless otherwise noted. The haul roads HR 1-5 and stockpiles SP 1-10 were evaluated with a 50% watering control efficiency for PM₁₀. Emission Unit 11A Drop To Storage Bin #6 was given an 89.5% PM₁₀ control efficiency for a fabric filter required by Construction Permit No. 1292-007. Emission Units 2 Material Fed Into Surge Bin And Crusher From Barges Via E Crane, 4A, 4B, 4C, 4D, 4D, & 4F Conveyors, 5A & 5B Conveyors, 7A, 7B, 7C, 7D, & 7E Conveyors, 12 Crushing Plant Load Out Belt From Storage Bin, 22A Conveyor Into Bin #7, and 23 Load Out Belt were given a 3.75% PM₁₀ control efficiency for enclosure/water spray as required by Construction Permit No. 1292-007.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer