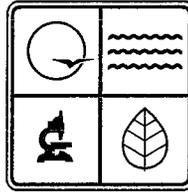


STATE OF MISSOURI

**DEPARTMENT OF NATURAL RESOURCES**

MISSOURI AIR CONSERVATION COMMISSION



**PERMIT TO CONSTRUCT**

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

Permit Number: **032006-003** Project Number: 2006-01-101  
 PORT-0402  
 Owner: APAC-Kansas, Inc., Kansas City Division  
 Owner's Address: P. O. Box 23910, Overland Park, KS 66283  
 Installation Name: APAC-Kansas  
 Installation Address: 2035 Courtney Road, Sugar Creek, MO 64050-6207  
 Location Information: Jackson County, S23, T50N, R32W

Application for Authority to Construct was made for:

The modification of an existing portable rock-crushing plant. The rock-crushing plant is decreasing its maximum hourly design rate (MHDR) from 400 tons per hour (tph) to 250 tph and is approved to operate at two sites: Sugar Creek Quarry in Jackson County, and Harrisonville Quarry in Cass County. The rock-crushing plant is a Generic Plant. Rock is processed through no more than 4 crusher(s), 3 screen(s), 30 conveyor(s)/stacker(s), and 5 bin(s). This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

MAR - 2 2006

EFFECTIVE DATE

*James L. Kavanagh*  
 DIRECTOR OR DESIGNEE  
 DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

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**GENERAL SPECIAL CONDITIONS:**

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

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority"; by 10 CSR 10-6.010 "Ambient Air Quality Standards" and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3. Furthermore, one or more of the Subparts of 40 CFR Part 60, New Source Performance Standards (NSPS), applies to this installation.*

1. Generic Plant Designation and Maximum Combined Hourly Design Rate  
APAC-Kansas's Portable rock-crushing plant (PORT-0402) has been designated to be a Generic Plant Operation. The combined Maximum Hourly Design Rate (MHDR) for the primary unit(s) and each of the following generic equipment types shall not exceed the maximum installation capacities listed below at any time the installation is in operation.

Equipment Type	Maximum Combined Hourly Design Rate	Maximum Number of Units
Primary Unit(s) (Primary Crusher)	250 tons per hour	1
Feeder/Grizzly	250 tons per hour	1
Crusher(s) including primary crusher	1000 tons per hour	4
Conveyor(s), Stacker(s)	8600 tons per hour	30
Screen(s)	1200 tons per hour	3
Pugmill, Storage Bin(s)	250 tons per hour	5
Diesel Engine(s)	1200 horsepower	1

2. Generic Plant Equipment Identification Requirement
  - A. Within fifteen (15) days of actual startup, APAC-Kansas shall submit to the Air Pollution Control Program's (APCP) Permitting Section, and the Kansas City Regional Office, the following information for the generic plant (PORT-0402):
    - 1.) A Master List of all equipment that will be permitted for use with the generic plant (PORT-0402). This master list shall include the following information for each piece of equipment. The manufacturer's name, the model number, the serial number, the actual MHDR, the date of manufacture, any company-assigned equipment number, and any other additional information such as sizes and/or dimensions that is necessary to uniquely identify all of the equipment.
    - 2.) A list of the core equipment that will always be utilized with the generic plant (PORT-0402). The core equipment associated with the generic plant shall include at least one (1) primary unit. Core equipment items are rate-controlling components of the process flow (e.g., primary crusher and/or primary screen). The maximum hourly design rate of the generic plant is defined to be the sum of the MHDR(s) of the core equipment. Any arrangement of the generic plant's equipment must be such that the core equipment is not bypassed in the process flow.
    - 3.) A determination on the applicability of 40 CFR Part 60, Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, for each piece of equipment. APAC-Kansas shall indicate whether or not each piece of equipment is subject to Subpart "OOO" and provide the justification for this applicability determination.
    - 4.) APAC-Kansas shall submit notification to the APCP and the Regional Office if the core equipment is changed and/or if new equipment is added to the supplemental equipment list.
  - B. To assure that each piece of equipment is properly identified as being a part of this generic Portable rock-crushing plant (PORT-0402), APAC-Kansas shall provide and maintain suitable, easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the APCP and the Regional Office no later than fifteen (15) days after start-up of the generic plant.

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**GENERAL SPECIAL CONDITIONS:**

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

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- C. APAC-Kansas shall at all times maintain a list of the specific equipment currently being utilized with the generic Portable rock-crushing plant (PORT-0402). The installation shall immediately make this list of currently used equipment available to any Missouri Department of Natural Resources' personnel upon request.
- 3. Relocation of Portable Plant
    - A. If this portable generic rock-crushing plant moves from the initial site reviewed in this permit (Sugar Creek Site, S23, T50N, R32W), then the portable generic rock-crushing plant shall not be operated at any site location longer than 24 consecutive months without an intervening relocation.
    - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable generic rock-crushing plant.
      - 1) If the portable generic plant is moving to a site previously permitted, and if there are no other new plants at the site, then the application must be received by the Air Pollution Control Program at least seven (7) days prior to the relocation.
      - 2) If the portable generic plant is moving to a new site, or if there are other plants or equipment at the site that have not been evaluated for concurrent operation, then the application must be received by the Air Pollution Control Program at least twenty-one (21) days prior to the relocation. The application must include written notification of any concurrently operating plants.
- 4. Operating Permit Applicability

If this portable generic rock-crushing plant does not move from the initial site (Sugar Creek Site, S23, T50N, R32W) within 24 consecutive months, then APAC-Kansas shall submit an operating permit application. The Air Pollution Control Program must receive this application no later than 30 days after the exceedance of the 24 months.
- 5. Record Keeping Requirement

The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
- 6. Superseding Condition

The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (0791-006, 102005-011) from the Air Pollution Control Program.

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**SPECIAL CONDITIONS:**

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

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Site ID No.: 095-0061  
Site Name: APAC-Kansas (Sugar Creek Site)  
Site Address: 2035 Courtney Road, Sugar Creek, MO 64050-6207  
Site County: Jackson County, S23, T50N, R32W

1. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)
  - A. The operator(s) for APAC-Kansas' rock-crushing plant (PORT-0402) shall ensure, while operating at this site, that the ambient impact of PM<sub>10</sub> at or beyond the nearest property boundary does not exceed 150 µg/m<sup>3</sup> in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM<sub>10</sub> Impact Tracking Record (Sugar Creek)*, or other equivalent form(s), will be used for this purpose.
2. Prohibition Against Concurrent Operations Without Further Air Pollution Control Program Review  
The rock-crushing plant (PORT-0402) is prohibited from operating whenever any other plant(s) are located at this site.
3. Restriction on Process Configuration of Primary Emission Point(s)  
The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). APAC-Kansas has designated the following unit(s) as the primary emission point(s) of the rock-crushing plant: primary crusher. Bypassing the primary emission point(s) for processing is prohibited.
4. Restriction on the Use of Diesel Engines  
The diesel engine shall only run when the plant is operating.
5. Restriction on Minimum Distance to Nearest Property Boundary  
The primary emission point of the rock-crushing plant, which is the primary crusher, shall be located at least 1000 feet from the nearest property boundary whenever it is operating at this site.
6. Reporting Requirement  
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

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**SPECIAL CONDITIONS:**

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

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Site ID No.: 037-0007  
Site Name: APAC-Kansas (Harrisonville)  
Site Address: 19100 East 231<sup>st</sup> Street, Harrisonville, MO 64701  
Site County: Cass County, S17, T45N, R31W

1. **Best Management Practices**  
APAC-Kansas shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that APAC-Kansas's rock-crushing plant (PORT-0402) emits less than 50 tons of PM<sub>10</sub> into the atmosphere in any 12-month period.
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM<sub>10</sub>. Attachment B, *Monthly PM<sub>10</sub> Emissions Tracking Record (Harrisonville)*, or other equivalent form(s), will be used for this purpose.
3. **Moisture Content Testing Requirement for Inherent Moisture Content**
  - A. The inherent moisture content of the rock will reduce particulate emissions. APAC-Kansas claimed the inherent moisture content of the processed rock to be greater than or equal to 1.5 wt%, which shall be verified by testing.
  - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director. The first test shall be no later than 45 days after startup. Testing shall be conducted for three consecutive years during the months of June through September, while the rock-crushing plant is active at this site. If the test results have been consistently greater than 1.5 wt% and there is no reported emission exceedances from the plant, then no further testing is required and this site shall be deemed to have met this condition on all subsequent permits. Verification of the results will be performed during a routine inspection. If the test results have been less than 1.5 wt% and/or there is substantial change in the emissions from the plant, then APAC-Kansas shall apply for a new construction permit to account for the revised information or operate a wet suppression system capable of maintaining visible emissions standards for each unit within 30 days.
  - C. The operator shall obtain test samples before processing (before entering the Primary Crusher) and after processing (prior to load-in to bins and/or storage piles). During the sample processing run only, any spray devices shall be turned off during the processing from which test samples are obtained. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be submitted to the Enforcement section of the Air Pollution Control Program, and a copy shall be sent to the Regional Office.
4. **Restriction on the Use of Diesel Engines**  
The diesel engine shall only run when the plant is operating.
5. **Prohibition Against Concurrent Operations Without Further Air Pollution Control Program Review**  
The rock-crushing plant (PORT-0402) is prohibited from operating whenever any other plant(s) are located at this site, except for the following four (4) plants:
  - A. APAC stationary rock-crushing plant, 037-0007, (Permit #082005-019, Project #2005-04-060)
  - B. APAC stationary asphalt/sand drying plant, 037-0007, (Permit #082005-018, Project #2005-04-061)
  - C. APAC stationary wash plant, 037-0007, (Permit #102005-010, Project #2005-04-062)
  - D. Century stationary concrete plant, 037-0035, (Permit #102005-001, Project #2005-04-064)

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Permit No.	
Project No.	2006-01-101

**SPECIAL CONDITIONS:**

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

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6. **Restriction on Process Configuration of Primary Emission Point(s)**  
The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). APAC-Kansas has designated the following unit(s) as the primary emission point(s) of the rock-crushing plant: primary crusher . Bypassing the primary emission point(s) for processing is prohibited.
7. **Restriction on Minimum Distance to Nearest Property Boundary**  
The primary emission point of the rock-crushing plant, which is the primary crusher, shall be located at least 1200 feet from the nearest property boundary whenever it is operating at this site.
8. **Reporting Requirement**  
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## **PROJECT DESCRIPTION**

Rock, composed of non-metallic minerals, is drilled/blasted, loaded into haul trucks, and transported to processing. Rock is processed through feeder(s), crusher(s), screen(s), conveyor(s), and bin(s). Processing equipment is powered with a 1200 hp diesel engine. The emission points are listed in the attached spreadsheet summary. This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2]. The installation is approved for sites in Jackson County and Cass County, attainment areas for all criteria air pollutants.

### **Sugar Creek Site**

There is an asphalt plant (Permit#072005-022, Project #2005-03-077) currently at this site, but it will be out of operation for approximately a month for refurbishing. PORT-0402 plans to relocate to this site and crush recycled asphalt stockpiled by the asphalt plant while the asphalt plant is not operating. Any operation by the asphalt plant will constitute a violation of the conditions of this permit. The crusher will be set up next to the stockpile and loaded with a front end loader. The crushed asphalt will be stockpiled at the site with a radial stacker. No haul roads will be used for this operation. Controlled emission factors were used in emissions evaluation and ambient air analysis because the asphalt contains oil, and the oil should prevent particulates from being released into the air during the crushing process.

### **Harrisonville Site**

There are four other plants operating at this site: APAC stationary rock-crushing plant, 037-0007, (Permit #082005-019, Project #2005-04-060), APAC stationary asphalt/sand drying plant, 037-0007, (Permit #082005-018, Project #2005-04-061), APAC stationary wash plant, 037-0007, (Permit #102005-010, Project #2005-04-062), and Century stationary concrete plant, 037-0035, (Permit #102005-001, Project #2005-04-064). PORT-0402 will be located at least 2500 feet away from these plants and will be considered a solitary operation for the purpose of evaluating ambient impact.

**Table 1. Other Permits Issued for Site 037-0007**

<b>Permit Number</b>	<b>Completed</b>	<b>Description</b>
082005-019	08/29/2005	Section 6 for a rock-crushing plant.
082005-018	08/29/2005	Section 6 for an asphalt plant.
102005-011	10/18/2005	Section 6 for a portable rock-crushing plant.
102005-010	10/18/2005	Section 6 for a wash plant.

## **EMISSIONS EVALUATION**

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM<sub>10</sub>. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The company will power the equipment using a diesel engine with a maximum horsepower of 1200. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a minor source under 10 CSR 10-6.060 section (6).

**Sugar Creek Site**

**Table 2: Emissions Summary for Sugar Creek Site (tons per year)**

Air Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	34.96	9.18	34.96	34.96	N/A
SO <sub>x</sub>	40.0	15.43	0.10	15.43	15.43	N/A
NO <sub>x</sub>	40.0	122.22	3.17	122.22	122.22	N/A
VOC	40.0	3.13	N/A	3.13	3.13	N/A
CO	100.0	32.46	0.68	32.46	32.46	N/A
HAPs	10.0/25.0	0.06	N/A	0.06	0.06	N/A

Note: N/A = Not Applicable

\* Conditioned potential based on daily limit from ambient air analysis.

**Harrisonville site**

The rock-crushing plant has an annual emission limit of less than 50 tons of PM<sub>10</sub> in any 12-month period at the Harrisonville site. A composite PM<sub>10</sub> emission factor was developed for the rock-crushing plant. The PM<sub>10</sub> composite emission factor is incorporated into the monthly record keeping table, Attachment B. If the conditioned potential emissions of PM<sub>10</sub> were 50 tons per year or greater, then the owner would be required to submit dispersion modeling results.

**Table 3: Emissions Summary for Harrisonville Site (tons per year)**

Air Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	53.32	9.18	53.32	<50	0.04870
SO <sub>x</sub>	40.0	15.43	0.10	15.43	14.47	N/A
NO <sub>x</sub>	40.0	122.22	3.17	122.22	114.61	N/A
VOC	40.0	3.13	N/A	3.13	2.93	N/A
CO	100.0	32.46	0.68	32.46	30.44	N/A
HAPs	10.0/25.0	0.06	N/A	0.06	0.06	N/A

\*PM<sub>10</sub> conditioned potential based on limit in permit conditions. Other pollutants proportionally reduced.

**AMBIENT AIR QUALITY IMPACT ANALYSIS**

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation at both sites. The ambient impact was evaluated at a distance of 1000 feet to the nearest property boundary at the Sugar Creek site and 1200 feet to the nearest property boundary at the Harrisonville site. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m<sup>3</sup> of PM<sub>10</sub> at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop ambient impact factors for the rock-crushing plant at each site.

No control measures will be used at the Sugar Creek Site to control fugitive emissions from haul roads and storage piles. Best Management Practices will be used to control fugitive emissions from haul roads and storage piles at the Harrisonville site. For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/m<sup>3</sup> of PM<sub>10</sub>. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m<sup>3</sup> of PM<sub>10</sub> at or beyond the nearest property boundary.

**Table 4: Ambient Air Quality Impact Analysis of PM<sub>10</sub>, 24-Hour Averaging Time**

Operation	Ambient Impact Factor (µg/m <sup>3</sup> /ton)	Modeled Impact (µg/m <sup>3</sup> )	*Background (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Daily Production Limit (tons)
1. Sugar Creek	0.0290	150.00	N/A	150.00	5180
2. Harrisonville	0.0081	48.62	20.00	150.00	6000

N/A = Not Applicable

\* Background PM<sub>10</sub> level of 20.00 µg/m<sup>3</sup> from haul roads and stockpiles.

Ambient Air Impact Analysis was performed to determine the impact of Nitrogen Oxides (NOx) emitted from a 1200 horsepower diesel engine. Ambient Impact modeling was performed using Screen View, the interface for EPA Screen 3 modeling, and was based on maximum concentration at any distance. The results of this modeling show that the site will be in compliance with limits established NAAQS.

**Table 5: Ambient Air Quality Impact Analysis of NOx**

Modeled Impact (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Averaging Time
19.84	100.00	Annual

**APPLICABLE REQUIREMENTS**

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- If this portable rock-crushing plant remains at the initial site reviewed in this permit longer than 24 consecutive months, then the owner shall submit an Operating Permit Application. The Air Pollution Control Program must receive this application no later than 30 days after the exceedance of 24 months.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- 40 CFR Part 60 Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, of the New Source Performance Standards (NSPS)
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

**STAFF RECOMMENDATION**

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Chia-Wei Young  
Environmental Engineer

\_\_\_\_\_  
Date

**PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating APAC-Kansas, Inc., Kansas City Division as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*.
- Noyes Data Corp. book, Orlemann, et al.1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Kansas City Regional Office Site Survey.
- Best Management Practices.





## Attachment AA: Best Management Practices (BMPs)- Construction Industry Fugitive Emissions

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

### For Haul Roads:

1. Pavement of Road Surfaces –
  - A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions<sup>1</sup>” while the plant is operating.
  - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  
2. Usage of Chemical Dust Suppressants –
  - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
  
3. Usage of Documented Watering –
  - A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
  - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)
  - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
  - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
  - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

<sup>1</sup> For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

**For Vehicle Activity Areas around Open Storage Piles:**

1. Pavement of Stockpile Vehicle Activity Surfaces –
  - A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
  - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  
2. Usage of Chemical Dust Suppressants –
  - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
  
3. Usage of Documented Watering –
  - A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
  - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)
  - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
  - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
  - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

Mr. Paul Campbell  
Environmental Director  
APAC-Kansas, Inc., Kansas City Division  
P. O. Box 23910  
Overland Park, KS 66283

RE: New Source Review Permit - Project Number: 2006-01-101

Dear Mr. Campbell:

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.

Operation in accordance with the conditions and requirements in your permit and the New Source Review application submitted for project 2006-01-101 is necessary for continued compliance. The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall Hale, P.E.  
New Source Review Unit Chief

KH: cwyl

Enclosures

c: Kansas City Regional Office  
PAMS File 2006-01-101  
Permit Number: