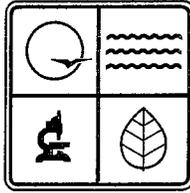


DEPARTMENT OF NATURAL RESOURCES

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: **08 2007 - 006** Project Number: **2006-12-063**
 Owner: **ASA Asphalt, Inc.** **207-0001**
 Owner's Address: **P.O. Box 159, Advance, MO 63730**
 Installation Name: **ASA Asphalt, Inc.**
 Installation Address: **20025 ASA Drive, Advance, MO 63730**
 Location Information: **Stoddard County, S12, T28N, R10E**

Application for Authority to Construct was made for:

Replacement of an existing asphalt plant with a new Batch Mix plant with maximum hourly design rate (MHDR) of 240 tons per hour (tph) and application of Best Management Practices. This review was conducted in accordance with Section (5), 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.

AUG - 6 2007

EFFECTIVE DATE

James Kavanaugh
 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.

Page No.	2
Permit No.	
Project No.	2006-12-063

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. Best Management Practices (BMPs)
ASA Asphalt, Inc. (herein referred to as ASA Asphalt) shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing BMPs, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)
 - A. The plant shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The plant is permitted to operate under the following scenarios:
 - *Solitary (Attachment A-1)* – Operations when the plant is located at this site by itself. The plant must track its own daily PM₁₀ ambient impact to ensure compliance with NAAQS.
 - *Concurrent, Same Owners (Attachment A-1)* – Operations when other asphalt, concrete, rock-crushing, or rock-screening plants owned by ASA Asphalt are located at this site. The plant shall track the daily PM₁₀ ambient impact of all plants at the site to ensure compliance with NAAQS.
 - *Concurrent, Separate Owners (Attachment A-2)* – Operations when other asphalt, concrete, rock-crushing, or rock-screening plants owned by other companies are located at this site.
 - *Concurrent, Same and Separate Owners (Attachment A-2)* – Operations when other asphalt, concrete, rock-crushing, or rock-screening plants owned by other companies are located at this site at the same time as such plants owned by ASA Asphalt.
 - C. To demonstrate compliance, the plant shall maintain a daily record of material processed. Attachments A-1 and A-2, *Daily Ambient PM₁₀ Impact Tracking Record*, or other equivalent forms, will be used for this purpose.
3. Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)
 - A. The operator(s) shall ensure that ASA Asphalt's asphalt plant emits less than 15 tons of PM₁₀ into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a monthly record of material processed and PM₁₀ emission. Attachment B, *Monthly PM₁₀ Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. Baghouse(s) Control System Requirements
 - A. ASA Asphalt shall install and operate baghouse(s) to restrict the emission of particulate matter. The baghouse(s) must be used whenever these units are in operation. The baghouse(s) shall be installed on the following units: drum dryer, pugmill, and triple deck screen.
 - B. The ASA Asphalt shall install instruments to monitor the operating pressure drop across the baghouse. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's preventive maintenance recommendations. The operator(s) shall check and record the pressure drop across the baghouse filter once per operating day during silo loading. The baghouse operating pressure drop shall be maintained according to manufacturer's specifications.
 - C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the baghouse for structural component failures, for leaks and wear, and for the cleaning sequence of the baghouse. Replacement bags shall be kept on hand at all times to replace defective bags (The bags shall be made of fibers appropriate for the operating conditions expected to occur). All inspections, corrective

Page No.	3
Permit No.	
Project No.	2006-12-063

SPECIAL CONDITIONS:

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

actions, and instrument calibrations shall be recorded.

5. Performance Testing for New Source Performance Standards (NSPS)
 - A. ASA Asphalt shall conduct performance testing to demonstrate compliance with 40 CFR Part 60, Subpart I.
 - B. ASA Asphalt shall complete and submit the enclosed test plan form to the Enforcement section of the Air Pollution Control Program. ASA Asphalt shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. Testing shall be performed at no less than 90% of the maximum production rate. The performance test results shall be submitted to the Enforcement section no later than 30 days after completion of any required testing.
6. Prohibition Against Concurrent Operations Without Further Review
The asphalt plant (207-0001) is prohibited from operating whenever any other plant(s) are located at this site.
7. Restriction on Minimum Distance to Nearest Property Boundary
The primary emission point of the asphalt plant, which is the stack of the drum mix dryer, shall be located at least 178 feet from the nearest property boundary whenever it is operating at this site.
8. 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.
9. 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.
10. Superseding Condition
The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (1195-002) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT/INSTALLATION DESCRIPTION

- The purpose of this project is to replace the existing hot mix asphalt (HMA) batch plant with a new HMA batch plant.
- The emission points and associated equipment are listed in the attached spreadsheet summary.
- This installation is classified under the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2, Item 27].
- The installation is located in Stoddard County, an attainment area for all criteria air pollutants.

Other factors:

- No generators are used as equipment is powered off of the electric grid.
- BMPs are used.
- This permit allows the four operating scenarios for concurrently-operating rock-crushing, asphalt, or concrete batch plants:
 1. Solitary operation – The plant operates by itself at this site.
 2. Concurrent, same owners operation – The plant operates while other plants owned by ASA Asphalt are at this site.
 3. Concurrent, separate owners operation – The plant operates while other plants not owned by ASA Asphalt are at this site.
 4. Concurrent, same and separate owners operation – The plant operates while other plants owned by ASA Asphalt are at this site, and plants not owned by ASA Asphalt are at this site.

Other construction permits issued for this plant are listed in the table below.

Table 1. Other Permits Issued for 207-0001

Permit Number	Completed	Description
1089-007	1989	Sect. 5/6
0594-010	1994	Sect. 5/6
1195-002	1995	Sect. 5/6
1195-002A	1997	Correction/Amendment: Reporting discrepancies

EMISSIONS EVALUATION

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 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 de minimis source under 10 CSR 10-6.060 section (5). The asphalt plant has an annual emission limit of less than 15 tons of PM₁₀ in any 12-month period. A composite PM₁₀ emission factor was developed for the asphalt plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment B. If the conditioned potential emissions of PM₁₀ were 15 tons per year or greater, then the owner would be required to comply with increment standards.

Table 2: Emissions Summary (tons per year)

Air Pollutant	Regulatory De Minimis Levels	*Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	**New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	10.66	0.88	78.87	<15	0.0722
SO _x	40.0	7.12	2.13	59.92	11.40	N/A
NO _x	40.0	3.58	2.91	58.69	11.15	N/A
VOC	40.0	10.28	1.05	33.65	6.39	N/A
CO	100.0	3.72	9.69	136.88	26.01	N/A
HAPs	10.0/25.0	N/D	N/A	9.15	1.74	N/A

Note: N/A = Not Applicable; N/D = Not Determined

* Existing potential emissions taken from permit # 1195-002

** Conditioned potential based on voluntary limit. Other pollutants proportionately reduced.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 178 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the asphalt plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A.

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/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM₁₀ at or beyond the nearest property boundary.

Table 3: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

Operation	Attachment for Record Keeping	Ambient Impact Factor (µg/m ³ /ton)	Modeled Impact (µg/m ³)	*Background (µg/m ³)	NAAQS (µg/m ³)	Daily Production Limit (tons)
1. Solitary	A-1	0.0473	130.0	20.0	150.0	2,748
2. Concurrent – Same Owners	A-1	0.0473	130.0	20.0	150.0	**
3. Concurrent – Separate Owners	A-2	0.0484	60.0	90.0	150.0	1,240
4. Concurrent – Same and Separate Owners	A-2	0.0484	60.0	90.0	150.0	**

* Background PM₁₀ from haul roads, stockpiles, and (if applicable) other installations.

** Daily production must be balanced among the plants owned and operated by the same company. Other ambient impact factors are to be listed in attachment A-1.

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
- An Operating Permit application is required for this installation within 30 days of equipment startup.
- *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 I, *Standards of Performance for Hot Mix Asphalt Facilities*, 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 (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Jeannie Kozak
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating ASA Asphalt, Inc. 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., Orlemann, et al.1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Southeast 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 Emissions¹” 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.

¹ 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. Roger Poythress
President
ASA Asphalt, Inc.
P.O. Box 159
Advance, MO 63730

RE: New Source Review Permit - Project Number: 2006-12-063

Dear Mr. Poythress:

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, the New Source Review application submitted for project 2006-12-063, and, once issued, your amended operating permit, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your asphalt plant, including any special conditions from your New Source Review permit.

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 Jeannie Kozak at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

KBH:jkl

Enclosures

c: Southeast Regional Office
PAMS File: 2006-12-063
Permit Number: