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: 102007-003  Project Number: 2006-11-065 PORT-0578
Owner: Curry Ready Mix
Owner’s Address: 21149 Route 4, Carlinville, IL 62626
Installation Name: Curry Ready Mix Portable Plant
Installation Address: 9699 Highway 168, Hannibal, MO 63401
Location Information: Marion County, S18, T57N, R4W

Application for Authority to Construct was made for:

The installation of a new portable concrete plant. Concrete is produced through a Truck Mix process. The portable concrete plant has a maximum hourly design rate (MHDR) of 208 tons per hour (tph). 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.

EFFECTIVE DATE: OCT 4, 2007

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 permitting. 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.
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. Portable Equipment Identification Requirement
   To assure that each component is properly identified as being a part of this portable concrete plant, (PORT-0578) Curry Ready Mix Portable Plant 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 Air Pollution Control Program no later than 15 days after start-up of the portable concrete plant.

2. Relocation of Portable Concrete Plant
   A. The portable concrete 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 concrete plant.
      1.) If the portable concrete 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 concrete 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.

3. 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 to any Missouri Department of Natural Resources’ personnel upon request.

4. Power Generation
   The portable plant is powered by a 180-horsepower diesel engine that shall not run for purposes other than producing concrete.
SITE-SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

Site Name: Hannibal
Site Address: 9699 Highway 168, Hannibal, MO 63401
Site County: Marion County, S18, T57N, R4W

1. Best Management Practices
   Curry Ready Mix Portable Plant 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. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in
   Diameter (PM$_{10}$)
   A. The operator(s) for Curry Ready Mix Portable Plant's portable concrete plant (PORT-0578) shall
      ensure, while operating at this site, that the ambient impact of PM$_{10}$ at or beyond the nearest property
      boundary does not exceed 150 µg/m$^3$ in any 24-hour period, in accordance with the Federal NAAQS
      requirements (40 CFR 50.6).
   B. The total daily ambient impact of PM$_{10}$ at this site shall include the combined impact of the portable
      concrete plant and any ambient background concentration from installations or equipment located on
      the same site as the portable concrete plant.
   C. To demonstrate compliance with special condition 2A, the operator(s) shall maintain a daily record of
      material processed.
      1.) During solitary operation, use Attachment A-1, or other equivalent form(s), for this purpose.
      2.) During concurrent, same owner operations, also use Attachment A-1, or other equivalent
         form(s), for this purpose.
      3.) During concurrent, separate owners operations, use Attachment A-2, or other equivalent
         form(s), for this purpose.
      4.) During concurrent, same and separate owners operations, also use Attachment A-2, or other
         equivalent form(s), for this purpose.

3. Baghouse(s)/Dust Collector(s) Control System Requirements
   A. Curry Ready Mix Portable Plant shall install and operate baghouse(s)/dust collector(s) to restrict the
      emission of particulate matter. The baghouse(s)/dust collector(s) must be used whenever these units
      are in operation. The baghouse(s)/dust collector(s) shall be installed on the following units: Cement
      Unloading to Elevated Silo (EU 3) and Truck Loading (EU 6).
   B. Curry Ready Mix Portable Plant shall install instruments to monitor the operating pressure drop
      across the baghouse(s). 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 operating pressure drop shall be maintained within the design conditions
      specified by the manufacturer's performance warranty. Dust collectors do not require pressure drop
      instrumentation.
   C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the
      baghouse(s)/dust collector(s) for structural component failures, for leaks and wear, and for the
      cleaning sequence of the baghouse(s)/dust collector(s). Replacement bags shall be kept on hand at
      all times to replace defective bags/filters (The bags/filters shall be made of fibers appropriate for the
      operating conditions expected to occur). All inspections, corrective actions, and instrument
      calibrations shall be recorded.

4. Restriction on Minimum Distance to Nearest Property Boundary
   The primary emission point of the portable concrete plant, which is the truck loading (EU 6), shall be located
   at least 300 feet from the nearest property boundary whenever it is operating at this site.

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 to any Missouri Department of Natural Resources' personnel upon request.
SITE-SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

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.
TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT/INSTALLATION DESCRIPTION

This is a new installation and so no other construction permits have been issued for this plant. Concrete is composed of water, cement, sand (fine aggregate), and non-metallic course aggregate rock. These materials are processed either in mixer trucks or in a central mix drum. Processed concrete is delivered as sellable product. 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 located in Marion County, an attainment area for all criteria air pollutants.

The Ross Super 100 Portable Concrete Batch Plant is relocating from Tennessee, Illinois to Hannibal, Missouri in order to produce Portland ready mixed concrete in the State of Missouri. This is the initial site in the State of Missouri for this installation. The plant layout for the initial site in Missouri (Hannibal) will generally reflect the basic layout at future sites in Missouri with the exception of haul road lengths and storage pile sizes and location. Future relocations within the State of Missouri can therefore be expected to fall under Section (4), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

The process by which this plant produces concrete will remain the same at future sites. The possibility of using fly ash has been discussed but has not yet been implemented. The Permitting Workbook generated for this project does not include the use of fly ash. The concrete mixture composition will therefore need to be modified in future projects if fly ash is to be incorporated. As reflected in the Permitting Workbook for this project, the following processes are used at the initial site for this portable plant in Missouri. Sand and aggregate are brought onto the site by dump trailers pulled by Mack tractor trailers, and the cement, by Mack pneumatic tankers. The sand and aggregate are stored in two segregated conical storage piles. The cement is stored in a silo attached to the portable plant. The cement is emptied from the tanker and is pneumatically loaded into the cement silo. The silo has a bag house to help reduce emissions during the loading and unloading of the silo. To capture fugitive emissions, the truck loading operation uses a shroud that is vented to a dust collector. The baghouse and dust collector are assumed to have the same control and capture efficiencies.

Front-end loaders are used to transfer the sand and aggregate from the storage piles to the bin hoppers. The aggregate and sand drop from the holding bin into the weigh hopper once truck loading begins. The cement follows the same procedure. After weighing, the material is deposited onto the material belt. From there the aggregate, sand and cement is dumped into a mixer truck. The plant is powered by a 460-volt, 180-horsepower Caterpillar diesel generator that is used only for the purpose of producing concrete. Diesel fuel will be stored on-site in a 1000-gallon storage tank, which is sufficiently small (less than 19,813 gallons) to be omitted from the Permitting Workbook calculations. Haul roads are paved with gravel and will be no more than one half mile in length. The fugitive emissions from all haul roads and storage pile vehicular activity areas are controlled with Best Management Practices.

The portable plant is permitted to operate under the following four (4) scenarios.

- Solitary Operation: No other plants can operate at the site.
- Concurrent, Same Owner Operations: The plant can operate with other asphalt, concrete, or rock-crushing plants owned by Curry Ready Mix.
- Concurrent, Separate Owners Operations: The plant can operate with other asphalt, concrete, or rock-crushing plants owned by other companies.
- Concurrent, Same AND Separate Owners Operations: The plant can operate with other asphalt, concrete, or rock-crushing plants owned by Curry Ready Mix at the same time as asphalt, concrete, or rock-crushing plants owned by other companies.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM_{10}. 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 minor source under 10 CSR 10-6.060 section (6).
### Table 1: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>15.0</td>
<td>N/A</td>
<td>N/A</td>
<td>26.0</td>
<td>15.7</td>
<td>N/A</td>
</tr>
<tr>
<td>Sox</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>1.66</td>
<td>1.01</td>
<td>N/A</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>25.27</td>
<td>15.31</td>
<td>N/A</td>
</tr>
<tr>
<td>VOCs</td>
<td>40.0</td>
<td>N/A</td>
<td>N/A</td>
<td>2.06</td>
<td>1.25</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/A</td>
<td>N/A</td>
<td>5.44</td>
<td>3.30</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>N/A</td>
<td>N/A</td>
<td>0.02</td>
<td>0.01</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Note: N/A = Not Applicable  
* Conditioned potential based on daily production limit from ambient impact analysis. 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 300 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 ambient impact factors for the portable concrete plant, which are listed in Table 3, below, as well as in the daily record keeping tables, Attachments A-1 and A-2.

Since this installation opted to use Best Management Practices, as defined in Attachment AA, haul roads and stockpiles were not modeled with screening tools. Instead, they were 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 2: Ambient Air Quality Impact Analysis of PM10, 24-Hour Averaging Time

<table>
<thead>
<tr>
<th>Operation</th>
<th>Ambient Impact Factor (µg/m³/ton)</th>
<th>Modeled Impact (µg/m³)</th>
<th>*Background (µg/m³)</th>
<th>NAAQS (µg/m³)</th>
<th>Daily Production Limit (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Solitary</td>
<td>0.0430</td>
<td>130.00</td>
<td>20.00</td>
<td>150.00</td>
<td>3016</td>
</tr>
<tr>
<td>2. Concurrent, Same Owner</td>
<td>0.0430</td>
<td>130.00</td>
<td>20.00</td>
<td>150.00</td>
<td>**</td>
</tr>
<tr>
<td>3. Concurrent, Separate Owners</td>
<td>0.0323</td>
<td>70.00</td>
<td>80.00</td>
<td>150.00</td>
<td>2167</td>
</tr>
<tr>
<td>4. Concurrent, Same and Separate Owners</td>
<td>0.0323</td>
<td>70.00</td>
<td>80.00</td>
<td>150.00</td>
<td>**</td>
</tr>
</tbody>
</table>

* Background PM10 level of 20.00 µg/m³ from haul roads and stockpiles and 60.00 µg/m³ from the operation of asphalt, concrete, or rock-crushing plants.

** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded. Other ambient impact factors may be listed in Attachments A-1 and A-2.

### 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
- No Operating Permit is required for this portable concrete plant.
- 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 Sulfur Compounds, 10 CSR 10-6.260
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The National Emission Standards for Hazardous Air Pollutants and the currently promulgated Maximum Achievable Control Technology 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.

Jeannie Kozak
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Curry Ready Mix 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.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Northeast Regional Office Site Survey.
- Best Management Practices.
Attachment A-1: Daily Ambient PM$_{10}$ Impact Tracking Record
Curry Ready Mix Portable Plant, PORT-0578 – Portable Concrete Plant
For Use During Solitary Operations and Concurrent, Same Owner Operations

Project Number: 2006-11-065
County, CSTR: Marion County (S18, T57N, R4W)
Primary Unit Size: 208 tph
Distance to Nearest Property Boundary: 300 feet

This sheet covers the period from ______________ to ______________ (Month, Day, Year)
(Copy this sheet as needed.)

<table>
<thead>
<tr>
<th>Date</th>
<th>Curry Ready Mix Portable Plant PORT-0578 Project # 2006-11-065</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>#Back-ground PM$_{10}$ Level (µg/m$^3$)</th>
<th>#TOTAL PM$_{10}$ Level (µg/m$^3$)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Daily Production (tons)</td>
<td>Ambient Impact Factor (µg/m$^3$/ton)</td>
<td>*Daily PM$_{10}$ Impact (µg/m$^3$)</td>
<td>Daily Production (tons)</td>
<td>Ambient Impact Factor (µg/m$^3$/ton)</td>
<td>*Daily PM$_{10}$ Impact (µg/m$^3$)</td>
</tr>
<tr>
<td>Example</td>
<td>1,200</td>
<td>0.0321</td>
<td>38.52</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.0430</td>
<td>20.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note 1: The *Daily PM$_{10}$ Impact (µg/m$^3$) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.

Note 2: Background PM$_{10}$ Level (µg/m$^3$) is from Haul Roads and Stockpiles.

Note 3: The **TOTAL PM$_{10}$ Level (µg/m$^3$) is calculated by summing the *Daily PM$_{10}$ Ambient Impact(s) and the Background PM$_{10}$ Level. A TOTAL PM$_{10}$ Level of less than 150 µg/m$^3$ in any 24-hour period indicates compliance.
**Attachment A-2: Daily Ambient PM\textsubscript{10} Impact Tracking Record**

**Curry Ready Mix Portable Plant, PORT-0578 – Portable Concrete Plant**

For Use During Concurrent, Separate Owner Operations and Concurrent, Same and Separate Owner Operations

Project Number: 2006-11-065  
County, CSTR: Marion County (S18, T57N, R4W)  
Primary Unit Size: 208 tph  
Distance to Nearest Property Boundary: 300 feet

This sheet covers the period from _______________ to _______________ (Month, Day, Year)  
(Copy this sheet as needed.)

<table>
<thead>
<tr>
<th>Date</th>
<th>Curry Ready Mix Portable Plant Name: PORT-0578 Project # 2006-11-065</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>Curry Ready Mix Plant Name: Plant ID: Permit #:</th>
<th>¹Daily PM\textsubscript{10} Impact (µg/m\textsuperscript{3}ton)</th>
<th>³TOTAL PM\textsubscript{10} Level (µg/m\textsuperscript{3})</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>1,200</td>
<td>0.0321</td>
<td>38.52</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.0323</td>
<td></td>
</tr>
</tbody>
</table>

Note 1: The Daily PM\textsubscript{10} Impact (µg/m\textsuperscript{3}) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.

Note 2: Background PM\textsubscript{10} Level (µg/m\textsuperscript{3}) is from Haul Roads and Stockpiles and from the operations of other concrete, asphalt, and rock-crushing plants.

Note 3: The TOTAL PM\textsubscript{10} Level (µg/m\textsuperscript{3}) is calculated by summing the Daily PM\textsubscript{10} Ambient Impact(s) and the Background PM\textsubscript{10} Level. A TOTAL PM\textsubscript{10} Level of less than 150 µg/m3 in any 24-hour period indicates compliance.
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”
   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. Jimmy Curry  
Chief Operations Officer  
Curry Ready Mix  
21149 Route 4  
Carlinville, IL 62626  

RE: New Source Review Permit - Project Number: 2006-11-065  

Dear Mr. Curry:  

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions and requirements in your permit. Operation in accordance with the conditions and requirements in your permit and with the New Source Review application submitted for project 2006-11-065 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, contact Jeannie Kozak at the Department of Natural Resources’ Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and attention to this matter.  

Sincerely,  

AIR POLLUTION CONTROL PROGRAM  

Kendall B. Hale  
New Source Review Unit Chief  

KBH: jkk  

Enclosures  

PAMS File: 2006-11-065  
Permit Number: