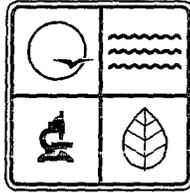


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION



**PERMIT BOOK**

## 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: **11 2007 - 004**      Project Number: **2007-08-085**  
**207-0070**

Owner: **Delta Companies, Inc.**

Owner's Address: **P. O. Box 880, Cape Girardeau, MO 63702**

Installation Name: **Delta Asphalt, Inc.**

Installation Address: **15498 Old Bloomfield Road, Dexter, MO 63841**

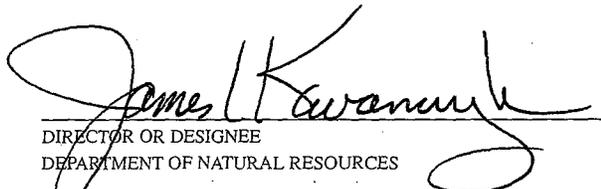
Location Information: **Stoddard County, S1, T25N, R10E**

Application for Authority to Construct was made for:

The modification of an existing asphalt plant to add Best Management Practices (BMP) for the control of fugitive emissions from haul roads and storage piles and to allow concurrent operations with other plants. Asphalt is produced through a Drum Mix Dryer. The asphalt plant has a maximum hourly design rate (MHDR) of 300 tons per hour (tph). 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.

EFFECTIVE DATE **NOV - 6 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 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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Permit No.	
Project No.	2007-08-085

**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**  
Delta Asphalt, Inc. 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<sub>10</sub>)**
  - A. The operator(s) for Delta Asphalt, Inc.'s asphalt plant (207-0070) 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. The portable plant is permitted to operate under four (4) scenarios: Solitary, concurrent (same owner), concurrent (separate owners), and concurrent (same **and** separate owners) operations. The total daily ambient impact of PM<sub>10</sub> at this site shall include the combined impact of the asphalt plant and any ambient background concentration from installations or equipment located on the same site as the asphalt plant.
  - C. During concurrent (same owner) and concurrent (same **and** separate owners) operations, the operator(s) shall maintain a daily record of material processed and the resulting daily PM<sub>10</sub> ambient impact to demonstrate compliance with special condition 2A. Attachment A-1, or other equivalent form(s), shall be used for this purpose during concurrent (same owner) operations, and Attachment A-2, or other equivalent form(s), shall be used for this purpose during concurrent (same **and** separate owners) operations.
  - D. During solitary and concurrent (separate owner) operations, no record keeping is needed to demonstrate compliance with special condition 2A.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that Delta Asphalt, Inc.'s asphalt plant emits less than 15 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*, or other equivalent form(s), will be used for this purpose.
4. **Annual Emission Limit of Nitrogen Oxides (NO<sub>x</sub>)**
  - A. The operator(s) shall ensure that Delta Asphalt, Inc.'s asphalt plant emits less than 40 tons of NO<sub>x</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 NO<sub>x</sub>. Attachment C, *Monthly Nitrogen Oxides (NO<sub>x</sub>) Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
5. **Baghouse(s) Control System Requirements**
  - A. Delta Asphalt, Inc. 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 and Mineral Filler Silo.
  - B. Delta Asphalt, Inc. 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

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**SPECIAL CONDITIONS:**

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

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check and record the pressure drop across the baghouse filter once per day while plant is in operation. 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 actions, and instrument calibrations shall be recorded.

6. Restriction on Sulfur Content of Fuels

- A. The sulfur content of any fuel used in the drum dryer, asphalt heater, and the diesel engine shall not exceed 0.50 percent by weight.
- B. Delta Asphalt, Inc. shall demonstrate compliance with Special Condition 6.A. through one of the following methods.
- 1.) Delta Asphalt, Inc. can obtain records of sulfur content from the supplier(s) of the fuels. The records shall be kept onsite with the plant.
  - 2.) Delta Asphalt, Inc. can determine the sulfur content by use of *American Society of Testing and Materials Method D 2622-98, Standard Test Method for Sulfur in Petroleum Products by Wavelength Dispersive X-ray Fluorescence Spectrometry*. The test results shall be kept onsite with the plant.

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 750 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) (0685-002) from the Air Pollution Control Program.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## INSTALLATION/PROJECT DESCRIPTION

The installation started operations in 1985 as a portable asphalt plant (PORT-0010, Permit #0685-002). In 2006, the installation applied for and received a basic operating permit (Project #2006-09-059) while it was operating at the site in Stoddard County (S1, T25N, R10E) to change the plant to a stationary plant. The installation would now like to modify this permit to include the use of Best Management Practices (BMPs) for the control of fugitive emissions from haul roads and storage piles and to allow the installation to operate concurrently at this site with other plants.

Hot Mix Asphalt (HMA) is composed of non-metallic aggregate, sand, mineral filler and other materials with liquid asphaltic cement. These materials are mixed and heated/dried in the drum dryer. . Plant equipment are powered with diesel engines. Processed HMA is delivered as sellable product. The emission points 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.

The installation is permitted to operate under four (4) scenarios.

- Solitary Operations: Operations when the installation is the only plant operating at the site.
- Concurrent (Same Owner) Operations: Operations when the installation is located at this site at the same time as other plants owned Delta Companies, Inc..
- Concurrent (Separate Owner) Operations: Operations when the installation is located at this site at the same time as other plants owned by other companies.
- Concurrent (Separate Owners) Operations: Operations when the installation is located at this site at the same time as other plants owned by Delta Companies, Inc. **and** other plants owned by other companies.

Delta Companies, Inc. owns other plants operating under different names (such as Brown Sand & Gravel). If there are other plants owned by Delta Companies, Inc. operating under a different name located at this site, it shall be considered same owner operations.

The emissions evaluation and the PM<sub>10</sub> ambient impact analysis were performed assuming that the diesel engine operates only for the purpose of producing asphalt and that the asphalt heater operates for twenty-four (24) hours per day. If the company decides, in the future, that it would like to use the diesel engine for any other purpose, a new permit review will be required.

**Table 1. Other Permits Issued for Site 207-0070**

Permit Number	Completed	Description
0685-002	6/28/1985	New asphalt plant.

No notices of violations (NOVs) have been issued to the plant.

## EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutants of concern are PM<sub>10</sub> and NO<sub>x</sub>. The potential PM<sub>10</sub> emissions from the drum dryer were taken from the results of a stack test performed in 1993. Other 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". In order to avoid having to perform increment analysis, the installation has agreed to hold all of its emissions under *de minimis* levels so the operation can be 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 PM<sub>10</sub> and less than 40 tons of nitrogen oxides (NO<sub>x</sub>) in any 12-month period. A composite PM<sub>10</sub> emission factor was developed for the asphalt plant and is incorporated into the monthly record keeping table, Attachment B. A composite NO<sub>x</sub> emission factor was developed for the asphalt plant and is incorporated into the monthly record keeping table, Attachment C.

**Table 2: Emissions Summary (tons per year)**

Air Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Installation	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	N/D	0.04	56.43	<15.00	0.0421
SO <sub>x</sub>	40.0	N/D	0.13	83.20	27.26	N/A
NO <sub>x</sub>	40.0	N/D	1.10	130.75	<40.00	0.0995
VOC	40.0	N/D	0.37	43.53	13.12	N/A
CO	100.0	N/D	1.58	186.34	56.28	N/A
HAPs	10.0/25.0	N/D	0.01	11.46	3.45	N/A

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

\* PM<sub>10</sub> and NO<sub>x</sub> conditioned potential based on limits in permit conditions. Other pollutants proportionately reduced based on NO<sub>x</sub> conditioned potential.

## **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 750 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/m<sup>3</sup> of PM<sub>10</sub> at or beyond the nearest property boundary in any single 24-hour period. 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.

During the four (4) operating scenarios, the following record keeping procedure shall be used to ensure compliance with NAAQS.

- Solitary Operations: The asphalt plant is expected to have a daily PM<sub>10</sub> ambient impact of 55.73 µg/m<sup>3</sup> at the nearest property boundary if operating for the entire day (twenty-four hours). No record keeping is necessary to show compliance with NAAQS.
- Concurrent (Same Owner) Operations. All plants at the site shall have a combined daily PM<sub>10</sub> ambient impact less than 130 µg/m<sup>3</sup>. The stationary asphalt plant shall track its own daily PM<sub>10</sub> ambient impact **and** the daily PM<sub>10</sub> ambient impact of all other plants at the site to ensure compliance with this limit. Attachment A-1, or equivalent forms, shall be used for this purpose.
- Concurrent (Separate Owner) Operations: The asphalt plant is permitted for 55.34 µg/m<sup>3</sup> of PM<sub>10</sub> while plants owned by other companies are permitted for a combined 74.66 µg/m<sup>3</sup> of PM<sub>10</sub>. No record keeping is necessary.
- Concurrent (Same **and** Separate Owners) Operations: The asphalt plant and other plants owned by the Delta Companies, Inc. are limited to a daily PM<sub>10</sub> ambient impact of 80.00 µg/m<sup>3</sup>. Plants owned by other companies are limited to a daily PM<sub>10</sub> ambient impact of 50.00 µg/m<sup>3</sup> of PM<sub>10</sub>. The asphalt plant shall keep track of its own daily PM<sub>10</sub> ambient impact **and** the daily PM<sub>10</sub> ambient impact of all other plants owned by the same company to ensure that the limit of 80.00 µg/m<sup>3</sup> is not exceeded. Attachment A-2, or equivalent forms, shall be used for this purpose.

**Table 3: 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> )	*Asphalt Heater Impact (µg/m <sup>3</sup> )	**Background (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Daily Production Limit (tons)
1. Solitary	0.0077	54.07	1.27	20.00	150.00	7,200
2. Concurrent (Same Owner)	0.0077	***	1.27	20.00	150.00	***
3. Concurrent (Separate Owners)	0.0077	54.07	1.27	94.66	150.00	7,200
4. Concurrent (Same and Separate Owners)	0.0077	***	1.27	70.00	150.00	***

\*Asphalt Heater Impact (µg/m<sup>3</sup>) from the twenty-four (24) hours per day operation of the asphalt heater.

\*\* Background PM<sub>10</sub> level of 20.00 µg/m<sup>3</sup> from haul roads and stockpiles, 74.66 µg/m<sup>3</sup> from plants owned by other companies during concurrent (separate owners) operations, and 50.00 µg/m<sup>3</sup> from plants owned by other companies during concurrent (same and separate owners) operations.

\*\*\* The operator(s) must balance production among concurrently operating plants such that NAAQS is not exceeded. Ambient impact of other plants owned by Delta Companies, Inc. can be obtained from the operators of these plants.

**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.

\_\_\_\_\_  
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 Delta Companies, 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. 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.
- Southeast Regional Office Site Survey.
- Best Management Practices
- Stack testing results from June 2, 1993.









**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

<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.)

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.

**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. Jerry Neels  
Safety /Environmental Manager  
Delta Companies, Inc.  
P. O. Box 880  
Cape Girardeau, MO 63702

RE: New Source Review Permit - Project Number: 2007-08-085

Dear Mr. Neels:

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 2007-08-085, and your amended operating permit, if required, 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 Chia-Wei Young at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (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:cwyl

Enclosures

c: Southeast Regional Office  
PAMS File: 2007-08-085