



DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION
PERMIT TO CONSTRUCT


Permit Number: 11 2 0 0 8 - 0 0 7 Project Number: 2008-09-013
Parent Company: Fred Weber, Inc.
Parent Company Address: 2320 Creve Coeur Mill Road, Maryland Heights, MO
63043
Installation Name: Fred Weber, Inc. – Portable Screening Plant
Installation Address: Route 1, Box 112, Annapolis, MO 63620
Location Information: Reynolds County, S15, T33N, R2E

The installation of a new portable rock screening plant. Rock is processed through screens, conveyors and stackers. The portable rock screening plant has a maximum hourly design rate (MHDR) of 600 tons per hour (tph). Best Management Practices will be used to control fugitive emissions from haul roads and storage piles. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

NOV 17 2008

EFFECTIVE DATE



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. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments' 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 to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and 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 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 Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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GENERAL SPECIAL CONDITIONS:

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

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

1. **Portable Equipment Identification Requirement**
To assure that each component is properly identified as being a part of this portable rock screening plant, PORT-0624, Fred Weber, Inc. 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 rock screening plant.
2. **Relocation of Portable Rock Screening Plant**
 - A. The portable rock screening 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 rock screening plant.
 - 1.) If the portable rock screening 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 rock screening 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. **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.
4. **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.

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SITE-SPECIFIC SPECIAL CONDITIONS:

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

Site ID No.: 179-0032
Site Name: Fred Weber, Inc.
Site Address: Route 1, Box 112, Annapolis, MO 63620
Site County: Reynolds County, S15, T33N, R2E

1. **Best Management Practices**
Fred Weber, 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 (PM₁₀)**
 - A. The operator(s) for Fred Weber, Inc.'s portable rock screening plant (PORT-0624) 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 portable plant, PORT-0624, is permitted to operate under four (4) scenarios: Solitary, concurrent (same owners), concurrent (separate owners) and concurrent (same **and** separate owners) operations. The total daily ambient impact of PM₁₀ at this site shall include the combined impact of the portable rock screening plant and any ambient background concentration from installations or equipment located on the same site as the portable rock screening plant.
 - C. To demonstrate compliance during concurrent (same owner) and concurrent (same **and** separate owner) operations, the operator(s) shall maintain a daily record of material processed. Attachment A, or other equivalent form(s), shall be used for this purpose during concurrent (same owner) operations, and Attachment B, or other equivalent form(s), shall be used for this purpose during concurrent (same **and** separate owners) operations.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)**
 - A. The operator(s) shall ensure that Fred Weber, Inc. portable rock screening plant emits less than 50 tons of PM₁₀ into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM₁₀. Attachment C, *Annual PM₁₀ Emissions Tracking Record*, or other equivalent form(s), shall be used for this purpose.
4. **Moisture Content Testing Requirement for Inherent Moisture Content**
 - A. The inherent moisture content of the rock will reduce particulate emissions. Fred Weber, Inc. claimed the inherent moisture content of the processed rock to be greater than or equal to 1.5 wt.%, which shall be verified by testing.
 - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director. The first test shall be no later than 45 days after startup. Testing shall be conducted at least once every two years after the initial test, during the months of June through September, while the portable rock screening plant is active at this site.
 - C. Test samples shall be obtained after processing (anywhere after processing by the last stacker). During the sample processing run only, any spray devices shall be turned off during the processing from which test samples are obtained. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be filed on-site or at Fred Weber, Inc.'s main office.
 - D. If the inherent moisture content result of the first test is less than 1.5 wt.%, a second test must be performed within 30 days. If the result of the second test is less than 1.5 wt.%, Fred Weber, Inc. shall apply for a new construction permit to account for the revised information.

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SITE-SPECIFIC SPECIAL CONDITIONS:

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

5. **Restriction on Process Configuration of Primary Emission Point(s)**
The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). Fred Weber, Inc. has designated the following unit(s) as the primary emission point(s) of the portable rock screening plant: Primary Screen. Bypassing the primary emission point(s) for processing is prohibited.

6. **Restriction on Minimum Distance to Nearest Property Boundary**
The primary emission point of the portable rock screening plant, which is the primary screen, shall be located at least 1,300 feet from the nearest property boundary whenever it is operating at this site.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

The installation is a portable screening plant (PORT-0624) with a maximum hourly design rate of 600 tons per hour. The portable plant will be used to screen rock for the purpose of rebuilding the Taum Sauk upper reservoir. Five other plants are currently permitted to operate at this site.

1. AmerenUE Portable crushing plant, PORT-0584, Permit #032008-012, Project #2008-01-030
2. AmerenUE Portable Roller Compacted Concrete (RCC) plant, PORT-0585, Permit #042007-003, Project #2007-04-074
3. AmerenUE Portable RCC plant, PORT-0586, Permit #042007-004, Project #2007-04-075
4. Fred Weber Portable concrete plant, PORT-0587, Permit #102007-013, Project #2008-06-042
5. AmerenUE Portable concrete plant, PORT-0621, Permit #092008-007, Project #2008-07-080

Equipment for this plant will be powered by electrical line power. If the company decides to switch to diesel engines, a new permit review will be required. 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 Reynolds County, an attainment area for all criteria air pollutants.

This portable plant is permitted to operate under four (4) separate scenarios.

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

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM₁₀. 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).

The portable rock screening plant has an annual emission limit of less than 50 tons of PM₁₀ in any 12-month period. A composite PM₁₀ emission factor was developed for the portable rock screening plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment C. If the conditioned potential emissions of PM₁₀ were 50 tons per year or greater, then the owner would be required to submit dispersion modeling results.

Table 1: Emissions Summary (tons per year)

Air Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	N/A	N/A	99.29	<50.00	0.03778
SO _x	40.0	N/A	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A	N/A

Note: N/A = Not Applicable * Conditioned potential based on voluntary limit.

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 1,300 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. 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.

During solitary and concurrent (separate owner) operations, the portable plant can operate for twenty-four (24) hours without violating the NAAQS. Therefore, no record keeping is necessary to show compliance. During concurrent (same owner) operations, the portable plant shall track its own daily PM₁₀ ambient impact and the ambient impact of other plants at the site to ensure compliance with NAAQS. Attachment A, or equivalent forms, shall be used for this purpose. During concurrent (same **and** separate owner) operations, plants owned by Fred Weber, Inc. are permitted for 45 µg/m³ of PM₁₀ ambient impact while plants owned by other companies are permitted for 85 µg/m³ of PM₁₀. The portable plant shall track its own daily PM₁₀ ambient impact and the daily PM₁₀ ambient impacts of other plants owned by Fred Weber to ensure the combined daily PM₁₀ ambient impact from these plants does not exceed 45 µg/m³ of PM₁₀. Attachment B, or equivalent forms, shall be used for this purpose.

Table 2: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

Operation	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	0.00105	15.09	20.00	150.00	14,400
2. Concurrent (Same Owner)	0.00105	**	20.00	150.00	**
3. Concurrent (Separate Owners)	0.00105	15.09	134.91	150.00	14,400
4. Concurrent (Same and Separate Owners)	0.00105	**	105.00	150.00	**

* Background PM₁₀ level of 20.00 µg/m³ from haul roads and stockpiles, 114.91 µg/m³ from the operation of plants not owned by Fred Weber, Inc. during concurrent (separate owner) operations and 85.00 µg/m³ from the operation of plants not owned by Fred Weber, Inc. during concurrent (same **and** separate owners) operations.

** The operator(s) must balance production among concurrently operating plants, with the ambient impacts for each, such that NAAQS is not exceeded. Ambient impacts for other plants owned by Fred Weber 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
- *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
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

STAFF RECOMMENDATION

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

Chia-Wei Young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Fred Weber, 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.
- Best Management Practices

**Attachment A: Daily Ambient PM₁₀ Impact Tracking Record
 Fred Weber, Inc., PORT-0624 – Portable Rock Screening Plant
 For Concurrent (Same Owner) Operations**

Project Number: 2008-09-013
 County, CSTR: Reynolds County (S15, T33N, R2E)
 Primary Unit Size: 600 tph
 Distance to Nearest Property Boundary: 1,300 feet

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

Date	Fred Weber, Inc. PORT-0624 Project # 2008-09-013		Plant Name: Plant ID: Permit #:	Plant Name: Plant ID: Permit #:	Plant Name: Plant ID: Permit #:	³ Back-ground PM ₁₀ Level (µg/m ³)	⁴ TOTAL PM ₁₀ Level (µg/m ³)
	Daily Production (tons)	Ambient Impact Factor (µg/m ³ /ton)	¹ Daily PM ₁₀ Impact (µg/m ³)	² Daily PM ₁₀ Impact (µg/m ³)	² Daily PM ₁₀ Impact (µg/m ³)		
		0.00105				20.00	
		0.00105				20.00	
		0.00105				20.00	
		0.00105				20.00	
		0.00105				20.00	
		0.00105				20.00	
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		0.00105				20.00	
		0.00105				20.00	

Note 1: The Daily PM₁₀ Impact (µg/m³) for PORT-0624 is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
 Note 2: The Daily PM₁₀ Impact (µg/m³) for other plants owned by Fred Weber, Inc. can be obtained from the operators of these plants.
 Note 3: Background PM₁₀ Level (µg/m³) is from Haul Roads and Stockpiles.
 Note 4: The TOTAL PM₁₀ Level (µg/m³) is calculated by summing the Daily PM₁₀ Ambient Impact(s) and the Background PM₁₀ Level. A TOTAL PM₁₀ Level of less than 150 µg/m³ in any 24-hour period indicates compliance.

**Attachment B: Daily Ambient PM₁₀ Impact Tracking Record
Fred Weber, Inc., PORT-0624 – Portable Rock Screening Plant
For Concurrent (Same and Separate Owner) Operations**

Project Number: 2008-09-013
 County, CSTR: Reynolds County (S15, T33N, R2E)
 Primary Unit Size: 600 tph
 Distance to Nearest Property Boundary: 1,300 feet

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

Date	Fred Weber, Inc. PORT-0624 Project # 2008-09-013			Plant Name: Plant ID: Permit #:	Plant Name: Plant ID: Permit #:	Plant Name: Plant ID: Permit #:	³ Back-ground PM ₁₀ Level (µg/m ³)	⁴ TOTAL PM ₁₀ Level (µg/m ³)
	Daily Production (tons)	Ambient Impact Factor (µg/m ³ /ton)	¹ Daily PM ₁₀ Impact (µg/m ³)	² Daily PM ₁₀ Impact (µg/m ³)	² Daily PM ₁₀ Impact (µg/m ³)	² Daily PM ₁₀ Impact (µg/m ³)		
		0.00105					105.00	
		0.00105					105.00	
		0.00105					105.00	
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Note 1: The Daily PM₁₀ Impact (µg/m³) for PORT-0624 is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
 Note 2: The Daily PM₁₀ Impact (µg/m³) for other plants owned by Fred Weber, Inc. can be obtained from the operators of these plants.
 Note 3: Background PM₁₀ Level (µg/m³) is from Haul Roads and Stockpiles and operations of plants owned other companies.
 Note 4: The TOTAL PM₁₀ Level (µg/m³) is calculated by summing the Daily PM₁₀ Ambient Impact(s) and the Background PM₁₀ Level. A TOTAL PM₁₀ Level of less than 150 µg/m³ in any 24-hour period indicates compliance.

Attachment C: Annual PM₁₀ Emissions Tracking Record
Fred Weber, Inc., PORT-0624 – Portable Rock Screening Plant

Project Number: 2008-09-013
 County, CSTR: Reynolds County (S15, T33N, R2E)
 Primary Unit Size: 600 tph
 Distance to Nearest Property Boundary: 1,300 feet

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

Month	Monthly Production (tons)	Composite PM ₁₀ Emission Factor (lbs/ton)	¹ Monthly PM ₁₀ Emissions (lbs)	² Monthly PM ₁₀ Emissions (tons)	³ 12-Month PM ₁₀ Emissions (tons/year)
		0.03778			
		0.03778			
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		0.03778			

Note 1: The Monthly Emissions (lbs) are calculated by multiplying the Monthly Production (tons) by the Composite Emission Factor (lbs/ton).
 Note 2: The Monthly Emissions (tons) are calculated by dividing the Monthly Emissions (lbs) by 2,000.
 Note 3: The 12-Month Emissions (tons/year) are a rolling total calculated by adding the Month's Emissions (tons) to the Monthly Emissions (tons) of the previous eleven (11) months. A total of less than **50** tons in any consecutive 12-month 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 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.

Ms. Genevieve Bodnar
Environmental Manager
Fred Weber, Inc.
2320 Creve Coeur Mill Road
Maryland Heights, MO 63043

RE: New Source Review Permit - Project Number: 2008-09-013

Dear Ms. Bodnar:

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

Operation in accordance with the conditions and requirements in your permit and the New Source Review application submitted for project 2008-09-013 is necessary for continued compliance. The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:cwyl

Enclosures

c: Southeast Regional Office
PAMS File: 2008-09-013
Permit Number: