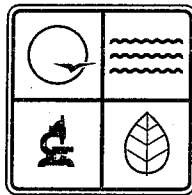


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION



PERMIT TO CONSTRUCT

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

Permit Number: **01 2008 - 001** Project Number: **2007-09-063**
071-0202
Owner: **Mid-Missouri Asphalt, LLC**
Owner's Address: **11745 Rear Lackland Rd., St. Louis, MO 63146**
Installation Name: **Mid-Missouri Asphalt, LLC**
Installation Address: **831 Gravois Ave., St. Clair, MO 63077**
Location Information: **Franklin County, S34, T42N, R1W**

PERMIT BOOK

Application for Authority to Construct was made for:

The modification of an existing batch mix asphalt plant to add Best Management Practices, a 40-ton-per-hour recycled asphalt product (RAP) screen, and concurrent operation with other plants. The asphalt plant has a maximum hourly design rate (MHDR) of 275 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.

JAN 2 2008

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES *for JLC*

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.	2007-09-063

SPECIAL CONDITIONS:

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

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

1. **Best Management Practices**
Mid-Missouri Asphalt, LLC 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 Mid-Missouri Asphalt, LLC's asphalt plant (071-0202) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The plant is allowed solitary operation and concurrent operation with other plants that have been permitted so as not to exceed the NAAQS for PM₁₀ while operating at this site.
 - C. For solitary operation, no record keeping is required. For concurrent operation with other plants, whether or not they are owned by Mid-Missouri Asphalt, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM₁₀ Impact Tracking Record*, or other equivalent form(s), will be used for this purpose.
3. **Annual Emission Limit of Carbon Monoxide (CO)**
 - A. The operator(s) shall ensure that Mid-Missouri Asphalt, LLC's asphalt plant emits less than 100 tons of CO into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a monthly record of material processed and CO. Attachment B, *Monthly Carbon Monoxide (CO) Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Moisture Content Testing of Storage Piles Requirement**
 - A. The moisture content of the stockpiled rock will reduce particulate emissions. Mid-Missouri Asphalt, LLC claimed the moisture content of the stored 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.
 - C. The operator may obtain a copy of the test results of the inherent moisture content from the supplier(s) of the aggregate. Otherwise, the operator shall obtain test samples from each source of untested aggregate. 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 either on-site or at Mid-Missouri Asphalt, LLC's main office.
 - D. If the 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.%, Mid-Missouri Asphalt, LLC shall apply for a new construction permit to account for the revised information and install wet spray devices on the affected units.
5. **Performance Testing for New Source Performance Standards (NSPS)**
 - A. Mid-Missouri Asphalt, LLC shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program for all equipment applicable to NSPS Subpart "I". Mid-Missouri Asphalt,

Page No.	3
Permit No.	
Project No.	2007-09-063

SPECIAL CONDITIONS:

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

LLC shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date.

- B. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. Testing shall be performed at no less than 90% of the maximum production rate. The performance test results shall be submitted to the Enforcement section no later than 30 days after completion of any required testing.

6. **Restriction on Minimum Distance to Nearest Property Boundary**
The primary emission point of the asphalt plant, which is the stack of the dryer, shall be located at least 175 feet from the nearest property boundary whenever it is operating at this site.
7. **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.
8. **Reporting Requirement**
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
9. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (022002-013) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

This project allows increased production due to the use of BMPs, the addition of a RAP screen, and operations under the following scenarios:

1. Solitary operation (no record keeping required)
2. Concurrent operation with other Mid-Missouri Asphalt plants
3. Concurrent operation with plants owned by other companies
4. Concurrent operation with Mid-Missouri Asphalt plants and plants owned by other companies

The Ambient Air Quality Impact Analysis section and record keeping sheets contain specific operational limits and record keeping requirements.

This installation is a batch mix plant that mixes and dries its raw materials, which include non-metallic aggregate, RAP, sand, mineral filler, and blends them with liquid asphaltic cement to product Hot Mix Asphalt (HMA), which 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], and located in Franklin County, an attainment area for all criteria air pollutants.

Table 1. Other Permits Issued for Site 071-0202

Permit/Project Number	Completed	Description
022002-013	2/22/2002	New plant
2007-09-068	9/24/2007	General OP-Asphalt

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is CO. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a *de minimis* source under 10 CSR 10-6.060 section (5).

The asphalt plant has an annual emission limit of less than 100 tons of CO in any 12-month period. A composite CO emission factor was developed for the asphalt plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment B. If the conditioned potential emissions of CO were 100 tons per year or greater, then the operation would be considered a major source under 10 CSR 10-6.060 section (7) or (8).

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 Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	N/D	2.13	49.21	10.29	N/A
SO _x	40.0	N/D	4.57	76.73	16.17	N/A
NO _x	40.0	N/D	5.83	146.78	30.66	N/A
VOC	40.0	N/D	1.66	43.38	9.03	N/A
CO	100.0	N/D	18.48	482.36	<100	0.400
HAPs	10.0/25.0	N/D	N/A	9.28	1.89	N/A

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

* Conditioned potential based on voluntary limit to de minimis levels. 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 175 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an

ambient impact factor for the asphalt plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A. An ambient background level of PM₁₀ from the operation(s) of other plants is included in Attachment A.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM₁₀ at or beyond the nearest property boundary.

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

Operation	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	0.0080	52.72	20.00	150.00	N/A
2. Concurrent, Same Owner	0.0080	52.72	20.00	150.00	**
3. Concurrent, Separate Owners	0.0080	52.72	97.28	150.00	N/A
4. Concurrent, Same and Separate Owners	0.0080	52.72	97.28	150.00	**

* Background PM₁₀ level of 20.00 µg/m³ from haul roads and stockpiles and 77.28 µg/m³ from the operation of plants owned by companies other than Mid-Missouri Asphalt.

** 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 are listed in Attachment A.

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
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- 40 CFR Part 60 Subpart "I", *Standards of Performance for Hot Mix Asphalt Facilities*, of the New Source Performance Standards (NSPS)
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Jeannie Kozak
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

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

**Attachment A: Daily Ambient PM₁₀ Impact Tracking Record
Mid-Missouri Asphalt, LLC, 071-0202 – Asphalt Plant**

Project Number: 2007-09-063
 County, CSTR: Franklin County (S34, T42N, R1W)
 Primary Unit Size: 275 tph
 Distance to Nearest Property Boundary: 175 feet

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

Date	Mid Missouri Asphalt Plant Name: Mid-Missouri Asphalt, LLC Plant ID: 071-0202 Project # 2007-09-063			Mid Missouri Asphalt Plant Name: Plant ID: Permit #:			Mid Missouri Asphalt Plant Name: Plant ID: Permit #:			² Back-ground from other plants (µg/m ³)	³ Back-ground from BMPs (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)	Daily Production (tons)	Ambient Impact Factor (µg/m ³ /ton)	¹ Daily PM ₁₀ Impact (µg/m ³)	Daily Production (tons)	Ambient Impact Factor (µg/m ³ /ton)	¹ Daily PM ₁₀ Impact (µg/m ³)			
Example 1	6,600	0.0080	52.80	10,000	0.0045	45.00	5,000	0.0064	32.00	77.28	20.00	150
Example 2	6,600	0.0080	52.80	N/A	N/A	N/A	N/A	N/A	N/A	77.28	20.00	150
Example 3	3,000	0.0080	24.00	1000	0.0045	4.50	800	0.0064	5.12	77.28	20.00	131
		0.0080								77.28	20.00	
		0.0080								77.28	20.00	
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		0.0080								77.28	20.00	

Note 1: The Daily PM₁₀ Impact (µg/m³) for each plant owned by Mid-Missouri Asphalt is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
 Note 2: Background PM₁₀ Level (20.00 µg/m³) is from Haul Roads and Stockpiles due to BMP usage and should always be included in the TOTAL.
 Note 3: Background PM₁₀ Level (77.28 µg/m³) is from plants owned by companies other than Mid-Missouri Asphalt. Whenever any such plants are colocated, enter 77.28, otherwise enter N/A. (Plants owned by other companies are only allowed at this site when their combined modeled impact on their permits does not exceed 77.28 µg/m³ for concurrent operations.)
 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: Monthly Carbon Monoxide (CO) Emissions Tracking Record
Mid-Missouri Asphalt, LLC, 071-0202 – Asphalt Plant**

Project Number: 2007-09-063
 County, CSTR: Franklin County (S34, T42N, R1W)
 Primary Unit Size: 275 tph
 Distance to Nearest Property Boundary: 175 feet

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

Month	Monthly Production (tons)	Composite CO Emission Factor (lbs/ton)	¹ Monthly CO Emissions (lbs)	² Monthly CO Emissions (tons)	³ 12-Month CO Emissions (tons/year)
<i>Example</i>	16,137	0.4000	6454.8	3.23	51.64
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- 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 **100** 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.

Mr. Brian Goggins
Member
Mid-Missouri Asphalt, LLC
11745 Rear Lackland Rd.
St. Louis, MO 63146

RE: New Source Review Permit - Project Number: 2007-09-063

Dear Mr. Goggins:

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 2007-09-063 and your amended operating permit is necessary for continued compliance. Please review your future amended operating permit, as it will contain all applicable requirements for your asphalt plant, including any special conditions from your New Source Review permit.

The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Jeannie Kozak at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by phone (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:jkl

Enclosures

c: St. Louis Regional Office
PAMS File: 2007-09-063
Permit Number: