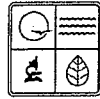


STATE OF MISSOURI

PERMIT BOOK

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: **082008-001** Project Number: 2008-04-078  
091-0083

Parent Company: Pace Construction Company, LLC

Parent Company Address: 1620 Woodson Rd., St. Louis, MO 63114

Installation Name: Pace Construction Company, West Plains Plant

Installation Address: 2516 County Road 4300, West Plains, MO 65776

Location Information: Howell County, S7, T24N, R8W

The installation of a new stationary asphalt plant. Asphalt is produced through a Drum Mix Dryer. The asphalt plant has a maximum hourly design rate (MHDR) of 350 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 (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 are applicable to this permit.

AUG - 4 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/18 months 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/18 months 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.

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:

Project Number: 2008-04-078  
091-0083

Parent Company: Pace Construction Company, LLC

Parent Company Address: 1620 Woodson Rd., St. Louis, MO 63114

Installation Name: Pace Construction Company, West Plains Plant

Installation Address: 2516 County Road 4300, West Plains, MO 65776

Location Information: Howell County, S7, T24N, R8W

The installation of a new stationary asphalt plant. Asphalt is produced through a Drum Mix Dryer. The asphalt plant has a maximum hourly design rate (MHDR) of 350 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 (5), 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.

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EFFECTIVE DATE

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DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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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.

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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.

Page No.	3
Permit No.	
Project No.	2008-04-078

**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**  
Pace Construction Company, West Plains Plant shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) for Pace Construction Company, West Plains asphalt plant (091-0083) 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 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. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, Daily Ambient PM<sub>10</sub> Impact Tracking Record, or other equivalent form(s), will be used for this purpose.
3. **Annual Emission Limit of Sulfur Oxides (SO<sub>x</sub>)**
  - A. The operator(s) shall ensure that Pace Construction Company, West Plains asphalt plant emits less than 40 tons of SO<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 SO<sub>x</sub>. Attachment B, *Monthly Sulfur Oxides (SO<sub>x</sub>) 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. Pace Construction Company, West Plains Plant 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. The initial test shall be conducted no later than 45 days after startup. Tests shall be conducted once per year between the months of May through September
  - 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 shipment 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 on-site or at the Pace Construction Company 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.%, Pace Construction Company, West Plains Plant shall apply for a new construction permit to account for the revised information and install wet spray devices on the affected units.

Page No.	4
Permit No.	
Project No.	2008-04-078

**SPECIAL CONDITIONS:**

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

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5. Baghouse(s) Control System Requirements
  - A. Pace Construction Company, West Plains Plant 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.
  - B. The Pace Construction Company, West Plains Plant shall install instruments to monitor the operating pressure drop across the baghouse. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's preventive maintenance recommendations. The operator(s) shall check and record the pressure drop across the baghouse filter once per operating day during silo loading. The baghouse operating pressure drop shall be maintained according to manufacturer's specifications.
  - C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the baghouse for structural component failures, for leaks and wear, and for the cleaning sequence of the baghouse. Replacement bags shall be kept on hand at all times to replace defective bags (The bags shall be made of fibers appropriate for the operating conditions expected to occur). All inspections, corrective actions, and instrument calibrations shall be recorded.
  
6. Prohibition Against Concurrent Operations Without Further APCP Review

The asphalt plant (091-0083) is prohibited from operating whenever any other plant(s) are located at this site, except for the following plant(s):

  - A. Doss Harper (Permit # 012001-016A & Project #2002-06-110).
  
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 300 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. Restriction on Sulfur Content of Fuels
  - A. The sulfur content of any fuel used in the drum dryer shall not exceed 2.0 percent by weight.
  - B. Pace Construction Company, West Plains Plant shall demonstrate compliance with Special Condition 10.A. through one of the following methods.
    - 1.) Pace Construction Company, West Plains Plant can obtain records of sulfur content from the supplier(s) of the fuels. The records shall be kept onsite with the plant.
    - 2.) Pace Construction Company, West Plains Plant 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.
  
10. Reporting Requirement

The operator(s) shall report to the Air Pollution Control Program (APCP) Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## PROJECT DESCRIPTION

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. 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 Howell County, an attainment area for all criteria air pollutants.

The installation voluntarily requested 40 tons per year limit for SO<sub>x</sub> in order to be *de minimis* source under 10 CSR 10-6.060 section (5) in order to avoid dispersion modeling and increment analysis.

**Pace Construction company will be responsible for controlling the haul roads and stockpiles that it is using in accordance to BMPs guidelines**

## EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutants of concern are SO<sub>x</sub>, PM<sub>10</sub>, CO, VOC and NO<sub>x</sub>. 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 40 tons of Sulfur Oxides (SO<sub>x</sub>) in any 12-month period. A composite SO<sub>x</sub> 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 SO<sub>x</sub> were 40 tons per year or greater, then the applicant would be required to demonstrate compliance with air quality requirements of section (6).

**Table 2: 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 <sub>10</sub>	15.0	N/A	N/A	22.79	6.84	N/A
SO <sub>x</sub>	40.0	N/A	N/A	547.99	<40	0.357
NO <sub>x</sub>	40.0	N/A	N/A	84.94	6.2	N/A
VOC	40.0	N/A	N/A	49.06	3.58	N/A
CO	100.0	N/A	N/A	199.45	14.55	N/A
HAPs	10.0/25.0	N/A	N/A	15.33	1.12	N/A

Note: N/A = Not Applicable

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

## AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 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/m<sup>3</sup> of PM<sub>10</sub> at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the asphalt plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/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.

**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> )	*Background (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Daily Production Limit (tons)
1. Concurrent, Separate Owners	0.0044	20.88	129.12	150.00	4,725

Background PM<sub>10</sub> level of 20.00 µg/m<sup>3</sup> from haul roads and stockpiles, 97.12 µg/m<sup>3</sup> from the operation of Doss Harper (Permit # 012001-016A & Project #2002-06-110) and 12 µg/m<sup>3</sup> is not being consumed

**APPLICABLE REQUIREMENTS**

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- No Operating Permit is required for this asphalt plant.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of 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 (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Samer Al-Shoukhi  
Environmental Engineer

\_\_\_\_\_  
Date

**PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Pace Construction Company 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. 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



**Attachment A: Daily Ambient PM<sub>10</sub> Impact Tracking Record**  
**Pace Construction Company, West Plains Plant, 091-0083 – Asphalt Plant**

Project Number: 2008-04-078  
 County, CSTR: Howell County (S7, T24N, R8W)  
 Primary Unit Size: 350 tph  
 Distance to Nearest Property Boundary: 300 feet

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

Date	Pace Construction Company, West Plains Plant 091-0083 Project # 2008-04-078			Plant Name: Plant ID: Permit #:			Plant Name: Plant ID: Permit #:			Plant Name: Plant ID: Permit #:			<sup>2</sup> Back-ground PM <sub>10</sub> Level (µg/m <sup>3</sup> )	<sup>3</sup> TOTAL PM <sub>10</sub> Level (µg/m <sup>3</sup> )
	Daily Production (tons)	Ambient Impact Factor (µg/m <sup>3</sup> /ton)	<sup>1</sup> Daily PM <sub>10</sub> Impact (µg/m <sup>3</sup> )	Daily Production (tons)	Ambient Impact Factor (µg/m <sup>3</sup> /ton)	<sup>1</sup> Daily PM <sub>10</sub> Impact (µg/m <sup>3</sup> )	Daily Production (tons)	Ambient Impact Factor (µg/m <sup>3</sup> /ton)	<sup>1</sup> Daily PM <sub>10</sub> Impact (µg/m <sup>3</sup> )	Daily Production (tons)	Ambient Impact Factor (µg/m <sup>3</sup> /ton)	<sup>1</sup> Daily PM <sub>10</sub> Impact (µg/m <sup>3</sup> )		
<i>Example</i>	4725	0.0044	20.79	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	129.12	149.91
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

Note 1: The Daily PM<sub>10</sub> Impact (µg/m<sup>3</sup>) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.  
 Note 2: Background PM<sub>10</sub> Level (µg/m<sup>3</sup>) is Background PM<sub>10</sub> level of 20.00 µg/m<sup>3</sup> from haul roads and stockpiles, 97.12 µg/m<sup>3</sup> from the operation of Doss Harper (Permit # 012001-016A & Project #2002-06-110) and 12 µg/m<sup>3</sup> is not being consumed.  
 Note 3: The TOTAL PM<sub>10</sub> Level (µg/m<sup>3</sup>) is calculated by summing the Daily PM<sub>10</sub> Ambient Impact(s) and the Background PM<sub>10</sub> Level. A TOTAL PM<sub>10</sub> Level of less than 150 µg/m<sup>3</sup> in any 24-hour period indicates compliance.

**Attachment B: Monthly Sulfur Oxides (SO<sub>x</sub>) Emissions Tracking Record  
Pace Construction Company, West Plains Plant, 091-0083 – Asphalt Plant**

Project Number: 2008-04-078  
 County, CSTR: Howell County (S7, T24N, R8W)  
 Primary Unit Size: 350 tph  
 Distance to Nearest Property Boundary: 300 feet

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

Month	Monthly Production (tons)	Composite SO <sub>x</sub> Emission Factor (lbs/ton)	<sup>1</sup> Monthly SO <sub>x</sub> Emissions (lbs)	<sup>2</sup> Monthly SO <sub>x</sub> Emissions (tons)	<sup>3</sup> 12-Month SO <sub>x</sub> Emissions (tons/year)
<i>Example</i>	50,000	0.357	17850	8.925	8.925
<i>Example</i>	60,000	0.357	21420	10.71	19.635

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 40 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 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 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.

<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.)

**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. Joe Reichmuth  
Safety Manager  
Pace Construction Company, LLC  
1620 Woodson Rd.  
St. Louis, MO 63114

RE: New Source Review Permit - Project Number: 2008-04-078

Dear Mr. Reichmuth:

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 2008-04-078, 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 contact Samer Al-Shouki, at the departments' 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:sal

Enclosures

c: Southeast Regional Office  
PAMS File: 2008-04-078  
Permit Number: