

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: **102017-007**

Project Number: 2017-06-007
Installation ID: 187-0082

Parent Company: Zoellner's Hwy. 67 and Berry Rd. LLC

Parent Company Address: P.O. Box 2168, Imperial, MO 63052

Installation Name: AAA Zoellner Materials, Inc.

Installation Address: 9211 Berry Rd., Bonne Terre, MO 63628

Location Information: St. Francois County, S25 T38N R4E

Application for Authority to Construct was made for:
New stationary concrete batch plant. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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


Prepared by
Sam Anzalone
New Source Review Unit


Director or Designee
Department of Natural Resources

OCT 16 2017

Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's 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 the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

SITE SPECIFIC 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) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

1. **Best Management Practices Requirement**
AAA Zoellner Materials, Inc. shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing BMPs as defined in Attachment AA.
2. **PM₁₀ Annual Emission Limit**
 - A. AAA Zoellner Materials, Inc. shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation which consists of the equipment listed in Table 1.
 - B. AAA Zoellner Materials, Inc. shall demonstrate compliance with Special Condition 2.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
3. **Control Device Requirement-Baghouse**
 - A. AAA Zoellner Materials, Inc. shall control emissions from the equipment listed below using baghouses as specified in the permit application.
 - 1) Cement Silo
 - 2) Supplement Silo
 - 3) Truck Mix Loadout (shroud vented to baghouse)
 - B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. AAA Zoellner Materials, Inc. shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours when the associated equipment is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

SITE SPECIFIC SPECIAL CONDITIONS:

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

- E. AAA Zoellner Materials, Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.
- F. AAA Zoellner Materials, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 4. Record Keeping Requirement
AAA Zoellner Materials, Inc. shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources' personnel upon request.
- 5. Reporting Requirement
A. AAA Zoellner Materials, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2017-06-007
Installation ID Number: 187-0082

Permit Number: 102017-007

AAA Zoellner Materials, Inc.:
9211 Berry Rd.
Bonne Terre, MO 63628

Complete: July 5, 2017

Parent Company:
Zoellner's Hwy. 67 and Berry Rd. LLC
P.O. Box 2168
Imperial, MO 63052

St. Francois County, S25 T38N R4E

PROJECT DESCRIPTION

Zollner's Hwy. 67 and Berry Rd. LLC (Zoellner) is constructing a new stationary concrete ready mix plant (Stephens Stallion). The model is capable of a MHDR of 400 tph. The plant is powered by electricity from the local utility and no electrical generating units are operated on site. A propane fired hot water heater will also be operated with a MHDR of 3 MMBtu/hr.

There will be a storage pile for aggregate (0.0573 acres) and a storage pile for sand (0.042 acres). There will also be four haul roads, sand receiving (500 ft, unpaved), aggregate receiving (500 ft, unpaved), cement and supplement receiving (500 ft, unpaved) and the product shipping (500 ft, unpaved). Zoellner will be using one of the methods described in Attachment AA, "Best Management Practices," to control emissions from haul roads and vehicular activity areas.

A list of the emission points can be found in Table 1.

Zoellner was issued construction permit 042008-002, however this concrete plant was never built and the permit is no longer valid.

This installation is located in St. Francois County, an attainment area for all criteria pollutants. This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

Table 1: Project Equipment List

Emission Point	Description	MHDR
EP-1	Aggregate Transfer	185.4 tph
EP-2	Sand Transfer	142 tph
EP-3	Cement Unloading to Silo	48.8 tph
EP-4	Supplement Unloading (Pneumatic)	7.3 tph
EP-5	Weigh Hopper	327.3 tph
EP-6	Truck Loading	56.1 tph
EP-7	Hot Water Heater	3 mmBTU/hr
EP-8a	Aggregate Storage Pile	0.0573 acres
EP-8b	Sand Storage Pile	0.042 acres
EP-9a	Sand Receiving Haul Road	0.846 VMT/hr
EP-9b	Aggregate Receiving Haul Road	0.689 VMT/hr
EP-9c	Cement & Supplement Receiving Haul Road	1.011 VMT/hr
EP-9b	Shipping	6.313 VMT/hr

TABLES

The following permits have been issued to AAA Zoellner Materials, Inc. from the Air Pollution Control Program.

Table 2: Permit History

Permit Number	Description
042008-002	Concrete plant

The table below summarizes the emissions of this project. The potential emissions of the process equipment, exclude emissions from haul roads and wind erosion. There are no existing actual emissions due to the project in permit 042008-002 never being completed. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include a voluntary limit to avoid dispersion modeling requirements found in 10 CSR 10-6.060 Section (6).

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
 - Applies to EP-5
- None of the New Source Performance Standards (NSPS) apply to the installation. 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" does not apply to the equipment because there is no crushing or grinding on site.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) 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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June, 6, 2017, received June, 5, 2017, designating Zoellner's Hwy. 67 and Berry Rd. LLC as the operator and Zoellner's Hwy. 67 and Berry Rd. LLC as the owner of the installation.

Attachment A: PM₁₀ 12-month Rolling Emissions Tracking Sheet

AAA Zoellner Materials, Inc. 187-0082

Project Number: 2017-06-007

Permit Number: 102017-007

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

Month	Monthly Production (tons)	PM ₁₀ Composite Emission Factor (lb/ton)	Monthly PM ₁₀ Emissions ¹ (lbs)	Start up, Shutdown and Malfunction PM ₁₀ Emissions ² (tons)	Monthly PM ₁₀ Emissions ³ (tons)	12-Month Total PM ₁₀ Emissions ⁴ (tons)
<i>Example</i>	76,248	0.0597	4,552	0	2.28	14.46
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¹[Monthly Production] x [PM₁₀ Composite Emission Factor]
²As reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.
³[Monthly PM₁₀ Emissions] x [0.0005]
⁴Add the monthly PM₁₀ emissions (tons) to the sum of the monthly PM₁₀ emissions from the previous eleven months and add SSM PM₁₀ emissions from the same 12 month period as reported to the Air Pollution Control Program in accordance with 10 CSR 10-6.050.
A total of less than 15.0 tons per 12 consecutive months is necessary for compliance.

APPENDIX A

Abbreviations and Acronyms

%	percent	MMBtu	Million British thermal units
°F	degrees Fahrenheit	MMCF	million cubic feet
acfm	actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	NAAQS	National Ambient Air Quality Standards
BMPs	Best Management Practices	NESHAPs ..	National Emissions Standards for Hazardous Air Pollutants
Btu	British thermal unit	NO_x	nitrogen oxides
CAM	Compliance Assurance Monitoring	NSPS	New Source Performance Standards
CAS	Chemical Abstracts Service	NSR	New Source Review
CEMS	Continuous Emission Monitor System	PM	particulate matter
CFR	Code of Federal Regulations	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CO	carbon monoxide	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
CO₂	carbon dioxide	ppm	parts per million
CO_{2e}	carbon dioxide equivalent	PSD	Prevention of Significant Deterioration
COMS	Continuous Opacity Monitoring System	PTE	potential to emit
CSR	Code of State Regulations	RACT	Reasonable Available Control Technology
dscf	dry standard cubic feet	RAL	Risk Assessment Level
EIQ	Emission Inventory Questionnaire	SCC	Source Classification Code
EP	Emission Point	scfm	standard cubic feet per minute
EPA	Environmental Protection Agency	SDS	Safety Data Sheet
EU	Emission Unit	SIC	Standard Industrial Classification
fps	feet per second	SIP	State Implementation Plan
ft	feet	SMAL	Screening Model Action Levels
GACT	Generally Available Control Technology	SO_x	sulfur oxides
GHG	Greenhouse Gas	SO₂	sulfur dioxide
gpm	gallons per minute	SSM	startup, shutdown, malfunction
gr	grains	tph	tons per hour
GWP	Global Warming Potential	tpy	tons per year
HAP	Hazardous Air Pollutant	VMT	vehicle miles traveled
hr	hour	VOC	Volatile Organic Compound
hp	horsepower		
lb	pound		
lbs/hr	pounds per hour		
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		
m/s	meters per second		
Mgal	1,000 gallons		
MW	megawatt		
MHDR	maximum hourly design rate		

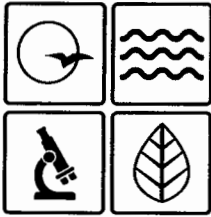
Attachment AA: Best Management Practices

Haul roads and vehicular activity areas shall be maintained in accordance with at least one of the following options when the plant is operating.

1. Pavement
 - A. The operator shall pave the area with materials such as asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions while the plant is operating.
 - B. Maintenance and 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 shall periodically wash or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Application of Chemical Dust Suppressants
 - A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
 - B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with the manufacturer's recommendation (if available) and in sufficient quantities to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator 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 shall keep these records with the plant for not less than five (5) years and make these records available to Department of Natural Resources' personnel upon request.

3. Application of Water-Documented Daily
 - A. The operator shall apply water to unpaved areas. Water shall be applied at a rate of 100 gallons per day per 1,000 square feet of unpaved or untreated surface area while the plant is operating.
 - B. Precipitation may be substituted for watering if the precipitation is greater than one quarter of one inch and is sufficient to control fugitive emissions.
 - C. 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.
 - D. The operator shall record the date, volume of water application and total surface area of active haul roads or the amount of precipitation that day. The operators shall also record the rationale for not watering (e.g. freezing conditions or not operating).
 - E. The operator shall keep these records with the plant for not less than five (5) years, and the operator shall make these records available to Department of Natural Resources' personnel upon request.



Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

OCT 16 2017

Mr. Patrick Zoellner
Vice President
AAA Zoellner Materials, Inc.
P.O. Box 2168
Imperial, MO 63052

RE: New Source Review Permit Number:
Project Number: 2017-06-007; Installation Number: 187-0082

Dear Mr. Zoellner:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.



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Mr. Patrick Zoellner
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If you have any questions, please do not hesitate to contact Sam Anzalone, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Susan Heckenkamp
New Source Review Unit Chief

SH:saj

Enclosures

c: Southeast Regional Office
PAMS File: 2017-06-007

Permit Number: 102017-007