

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: **07 2019 - 001**

Project Number: 2019-04-043
Installation ID: PORT-0790

Parent Company: A.E. Simpson Construction

Parent Company Address: 51 County Highway 316, Scott City, MO 63780

Installation Name: A.E. Simpson Construction Company

Installation Address: East Outer Road, Scott City, MO 63780

Location Information: Scott County, S36 T30N R13E

Application for Authority to Construct was made for:
Portable rock crusher. 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.



Director or Designee
Department of Natural Resources

JUL 01 2019

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/>

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 to 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 (3)(E). "Conditions required by permitting authority."

1. **Equipment Identification Requirement**
A.E. Simpson Construction Company shall maintain 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.

2. **Relocation of Portable Rock Crushing Plant**
 - A. A.E. Simpson Construction Company shall not be operated at any location longer than 24 consecutive months.

 - 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 crushing plant.
 - 1) If the portable rock crushing plant is moving to a site previously permitted, and if the circumstances at the site have not changed, then the application must be received by the Air Pollution Control Program at least seven days prior to the relocation.
 - 2) If the portable rock crushing plant is moving to a new site, or if circumstances at the site have changed, then the application must be received by the Air Pollution Control Program at least 21 days prior to the relocation. The application must include written notification of any concurrently operating plants.

3. **Record Keeping Requirement**
A.E. Simpson Construction Company shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.

4. **Reporting Requirement**
A.E. Simpson Construction Company shall report to the Air Pollution Control Program, Compliance / Enforcement Section by mail to P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after any exceedances of the limitations imposed by this permit.

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 (3)(E). "Conditions required by permitting authority."

PORT ID Number: PORT-0790

Site Name: East Outer Road Site

Site Address: East Outer Road, Scott City, MO 63780

Site County: Scott S36 T30N R13E

1. Annual Emission Limit
 - A. A.E. Simpson Construction Company shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation which consists of the equipment and activities listed in Table 1. The SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions* shall be included in the limit.
 - B. A.E. Simpson Construction Company shall demonstrate compliance with Special Condition 1.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
2. Best Management Practices (BMPs) Requirement
A.E. Simpson Construction Company shall control fugitive emissions from all of the haul roads at this site by performing Best Management Practices as defined in Attachment AA.
3. Undocumented Watering Requirement
A.E. Simpson Construction Company shall apply a water spray on all vehicular activity areas whenever conditions exist that would allow visible emissions from these sources to leave the property.
4. Primary Equipment Requirement
A.E. Simpson Construction Company shall process all rock through the primary crusher (EP-02). Bypassing the primary crusher is prohibited.
5. Nonroad Engine Requirement
A.E. Simpson Construction Company's engine shall not remain at one location within this site longer than 12 consecutive months in order for the engine (NT 855 Cummins 400 HP #11724797) to meet the definition of a nonroad engine as stated in 40 CFR 89.2. These engines shall be moved with its associated equipment at least once every 12 consecutive months at this site.

SITE SPECIFIC SPECIAL CONDITIONS:

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

6. **Record Keeping Requirement**
A.E. Simpson Construction Company 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.

7. **Reporting Requirement**
A.E. Simpson Construction Company shall report to the Air Pollution Control Program, Compliance / Enforcement Section by mail to P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after any exceedances of the limitations imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2019-04-043
Installation ID Number: PORT-0790

Permit Number: **072019-001**

A.E. Simpson Construction Company:
East Outer Road
Scott City, MO 63780

Complete: April 22, 2019

Parent Company:
A.E. Simpson Construction
51 County Highway 316
Scott City, MO 63780

Scott County, S36 T30N R13E

PROJECT DESCRIPTION

A.E. Simpson Construction plans to crush stone near Pave Stone in Scott City, Missouri in Scott County. The portable Eagle Model 1000, S/N 11061 is rated at 150 tons per hour and consisting of a screen, two conveyors and two stackers (see Table 1). It will be powered by a NT 855 Cummins 400 HP #11724797 diesel engine plant and meets the definition of non-road engine as defined in 40 CFR 89.2 (1)(i). Therefore, the emissions of the engine were not included. Although a portable plant is allowed to operate at a site for 24 consecutive months, the diesel engine is only allowed to operate at this site for 12 consecutive months in order for the diesel engine to be classified as a non-road engine.

Table 1: Equipment List

Emission Point	Equipment List	MHDR
EP-01	Loading into Grizzly	150 tph
EP-02	Primary Crusher Eagle 1000	150 tph
EP-03	Underconveyor	150 tph
EP-04	Conveyor	150 tph
EP-05	Screen	150 tph
EP-06	Stackers (2 total)	150 tph
EP-07a	Load-In Stockpile	150 tph
EP-07b	Load-out Stockpile	150 tph
EP-07c	Vehicular Activity (unpaved 1,800 feet)	7.2 VMT/hr
EP-07d	Wind Erosion	18.0 acres
EP-08	Haul Roads to highway (paved 1,200 feet)	4.1 VMT/hr

This installation is located in Scott County, attainment/unclassified area for all criteria pollutants.

This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

No permits have been issued to A.E. Simpson Construction Company from the Air Pollution Control Program.

TABLES

The table below summarizes the emissions of this project. The potential emissions of the process equipment, which excluded emissions from haul roads and wind erosion, are not site specific and should not vary from site to site. There are no existing actual emissions since this is a new portable plant. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). Conditioned potential emissions account for the voluntary de minimis PM₁₀ annual emission limit.

Table 1: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	^a Potential Emissions from Process Equipment	Existing Actual Emissions (New Plant)	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	25.89	N/A	398.14	47.05
PM ₁₀	15.0	9.46	N/A	126.94	<15.0
PM _{2.5}	10.0	1.29	N/A	16.84	1.99
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
Total HAPs	25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

^aExcludes site specific storage pile emissions and haul roads

^bIncludes site specific haul road and storage pile emissions

EMISSIONS CALCULATIONS

Emissions for the project were calculated as described below and using emission factors found in the United States EPA document AP-42 *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition (AP-42).

Emissions from the rock-crushing equipment:

- Calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004.
- The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5 % by weight.

Emissions from aggregate handling:

- Calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004.
- The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5% by weight.

Emissions from haul roads and vehicular activity areas:

- Calculated using the predictive equation from AP-42 Section 13.2.2 "Unpaved Roads," November 2006 for vehicular activity area.
- A 50% control efficiency for PM and PM₁₀ and a 41% control efficiency for PM_{2.5} were applied to the emission calculations for the use of undocumented watering for vehicular activity area.
- Calculated using the predictive equation from AP-42 Section 13.2.1 "Paved Roads," January 2011 for shipping haul road.

Emissions from storage piles:

- Load-in and load-out of storage piles were calculated using the predictive equation from AP-42 Section 13.2.4.
- The moisture content of the aggregate is less than 1.5% by weight.
- Emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program's Emissions Inventory Questionnaire Form 2.8 "Storage Pile Worksheet."

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels. Potential emissions of PM are above de minimis levels but remain below major levels.

APPLICABLE REQUIREMENTS

A.E. Simpson Construction Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110.
- An Operating Permit is not required because this is a portable 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 10-6.165

SPECIFIC REQUIREMENTS

- 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" does not apply to the equipment because it is rated at 150 tph and therefore exempt as stated in §60.670(c)(2) in Subpart OOO.
- 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 (5), 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 April 22, 2019, received April 22, 2019, designating A.E. Simpson Construction as the owner and operator of the installation.

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.

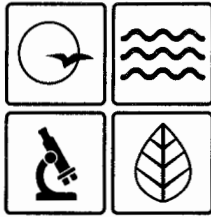
2. **Application of Chemical Dust Suppressants**
 - A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
 - B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with 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.

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		



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JUL 01 2019

Mr. Earl Simpson
Owner
A.E. Simpson Construction Company
51 County Highway 316
Scott City, MO 63780

RE: New Source Review Permit - Project Number: 2019-04-043;
Installation Number: PORT-0790

Dear Mr. Simpson:

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 are necessary for continued compliance. In addition, please note that A.E. Simpson Construction Company cannot operate with any other plants that have ambient impact limits based on the Air Pollution Control Program's nomographs. Please refer to the permits of any plant that you are operating with to see if their respective permits contain an ambient impact limit. 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



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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.

If you have any questions, please do not hesitate to contact Kathy Kolb, 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:kk

Enclosures

c: Southeast Regional Office
PAMS File: 2019-04-043

Permit Number: **072019-001**