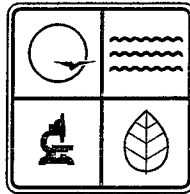


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

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: **042007-014** Project Number: **2006-09-101**  
**PORT-0576**  
Owner: **Bloomsdale Excavating Co., Inc.**  
Owner's Address: **12211 State Route Y, Suite 200, Bloomsdale, MO 63627**  
Installation Name: **Bloomsdale Excavating Co., Inc.**  
Installation Address: **2942 US Highway 61, Bloomsdale, MO 63627**  
Location Information: **Ste. Genevieve County, S14, T38N, R7/8E**

Application for Authority to Construct was made for:

The installation of a new portable rock-screening plant. The portable rock-screening 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 (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 (listed as attachments starting on page 2) are applicable to this permit.

APR 17 2007

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** 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.

2006-09-101  
PORT-0576

Bloomsdale Excavating Co., Inc.

12211 State Route Y, Suite 200, Bloomsdale, MO 63627

Bloomsdale Excavating Co., Inc.

2942 US Highway 61, Bloomsdale, MO 63627

Ste. Genevieve County, S14, T38N, R7/8E

The installation of a new portable rock-screening plant. The portable rock-screening 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 (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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**GENERAL SPECIAL CONDITIONS:**

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

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

1. **Portable Equipment Identification Requirement**  
To assure that each component is properly identified as being a part of this portable rock-screening plant, PORT-0576, Bloomsdale Excavating Co., Inc. shall provide and maintain suitable, easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable rock-screening plant.
2. **Relocation of the Portable Rock-Screening Plant**
  - A. The portable rock-screening plant shall not be operated at any site location longer than 24 consecutive months without an intervening relocation.
  - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable rock-screening plant.
    - 1.) If the portable rock-screening plant is moving to a site previously permitted, and if there are no other new plants at the site, then the application must be received by the Air Pollution Control Program at least seven (7) days prior to the relocation.
    - 2.) If the portable rock-screening plant is moving to a new site, or if there are other plants or equipment at the site that have not been evaluated for concurrent operation, then the application must be received by the Air Pollution Control Program at least twenty-one (21) days prior to the relocation. The application must include written notification of any concurrently operating plants.
3. **Reporting Requirement**  
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
4. **Record Keeping Requirement**  
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.

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Permit No.	
Project No.	2006-09-101

**SITE-SPECIFIC SPECIAL CONDITIONS:**

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

Site ID No.: 186-0044  
Site Name: Holcim Cement – Lee Island  
Site Address: 2942 US Highway 61, Bloomsdale, MO 63627  
Site County: Ste Genevieve County (S14, T38N, R7/ 8E)

1. **Best Management Practices**  
Bloomsdale Excavating Co., Inc. shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) for Bloomsdale Excavating Co., Inc.'s rock-screening plant (PORT-0576) 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 rock-screening plant is permitted to operate under four (4) scenarios: Solitary, concurrent (same owner), concurrent (separate owner), and concurrent (same and separate owner) operations. The total daily ambient impact of PM<sub>10</sub> at this site shall include the combined impact of the rock-screening plant and any ambient background concentration from installations or equipment located on the same site as the rock-screening plant.
  - C. During solitary and concurrent (separate owner) operations, the operators do not need to maintain a record of the plant's daily ambient impact to demonstrate compliance.
  - D. During concurrent (same owner) and concurrent (separate **and** same owner) operations, the operator(s) shall demonstrate compliance by maintaining a daily record of material processed and the resulting daily PM<sub>10</sub> ambient impact.
    - 1.) During concurrent (same owner) operations, use Attachment A, *Daily Ambient PM<sub>10</sub> Impact Tracking Record*, or other equivalent form(s).
    - 2.) During concurrent (separate **and** same owners) operations, use Attachment B, *Daily Ambient PM<sub>10</sub> Impact Tracking Record*, or other equivalent form(s).
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that Bloomsdale Excavating Co., Inc.'s portable rock-screening plant emits less than 50 tons of PM<sub>10</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 PM<sub>10</sub>. Attachment C, *Monthly PM<sub>10</sub> Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Restriction on the Use of Diesel Engine(s)**  
The rock-screening plant shall not use the diesel engine for any purpose other than powering its equipment during production.
5. **Restriction on Process Configuration of Primary Emission Point(s)**  
The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). Bloomsdale Excavating Co., Inc. has designated the following unit(s) as the primary emission point(s) of the portable rock-screening plant: Primary Screen. Bypassing the primary emission point(s) for processing is prohibited.
6. **Restriction on Minimum Distance to Nearest Property Boundary**  
The primary emission point of the portable rock-screening plant, which is the primary screen, shall be located at least 1,900 feet from the nearest property boundary whenever it is operating at this site.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## PROJECT DESCRIPTION

The rock-screening plant was constructed prior to receiving a permit from the Air Pollution Control Program. The rock-screening plant consists of screen(s) and conveyor(s). Processing equipment is powered with a diesel engine rated at 2.42 mmBTU/hr. The emission points are listed in the attached spreadsheet summary. This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2]. This plant is permitted to operate at Ste. Genevieve County, an attainment areas for all criteria air pollutants.

The plant can operate under four separate scenarios at the site.

- Solitary operation: Operations when no other plants are at the site.
- Concurrent (same owner) operations: Operations when other asphalt, concrete, rock-crushing, or rock-screening plants are located at the site.
- Concurrent (separate owner) operations: Operations when asphalt, concrete, rock-crushing, or rock-screening plants owned by other companies are located at the site.
- Concurrent (separate and same owner) operations: Operations when other asphalt, concrete, rock-crushing, or rock-screening plants owned by Bloomsdale Excavating Co., Inc. are located at the site at the same time as other asphalt, concrete, rock-crushing, or rock-screening plants owned by other companies.

## EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM<sub>10</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 minor source under 10 CSR 10-6.060 section (6).

The portable rock-screening plant has an annual emission limit of less than 50 tons of PM<sub>10</sub> in any 12-month period. A composite PM<sub>10</sub> emission factor was developed for the portable rock-screening plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment C. If the conditioned potential emissions of PM<sub>10</sub> were 50 tons per year or greater, then the owner would be required to submit dispersion modeling results.

**Table 1: Emissions Summary (tons per year)**

Air Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	N/A	151.63	<50	0.0989
SO <sub>x</sub>	40.0	N/A	3.07	1.01	N/A
NO <sub>x</sub>	40.0	N/A	46.73	15.41	N/A
VOC	40.0	N/A	3.81	1.26	N/A
CO	100.0	N/A	10.07	3.32	N/A
HAPs	10.0/25.0	N/A	0.04	0.01	N/A

Note: N/A = Not Applicable

\* PM<sub>10</sub> conditioned potential based on limit in permit conditions. Other pollutants proportionately reduced based on PM<sub>10</sub> conditioned potential.

## AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 1,900 feet. The ambient impact at the 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. 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.

The screening tools were used to develop an ambient impact factor for the portable rock-screening plant. These ambient impact factors are incorporated into the daily record keeping tables, Attachment A and Attachment B. An ambient background level of PM<sub>10</sub> from the operations of other asphalt, concrete, rock-crushing, or rock-screening plants owned by other companies is included in Attachment B.

The following daily PM<sub>10</sub> ambient impact record keeping requirements apply to the portable plant at Holcim-Lee Island.

- Solitary operation: No record keeping is needed.
- Concurrent (same owner) operations: The plant must track its own daily PM<sub>10</sub> ambient impact **AND** also that of all other plants at the site to ensure the combined ambient impact of all plants is less than 130 µg/m<sup>3</sup>. Attachment A, or other equivalent forms, can be used for this purpose.
- Concurrent (separate owners) operations: No record keeping is needed.
- Concurrent (same **and** separate owners) operations: The plant must track its own daily PM<sub>10</sub> ambient impact **AND** also that of all other plants owned by Bloomsdale Excavating, Inc.. Attachment B, or other equivalent forms, can be used for this purpose. The combined daily PM<sub>10</sub> ambient impact from all plants owned by Bloomsdale Excavating Inc. shall be less than 74.29 µg/m<sup>3</sup>. 20.00 µg/m<sup>3</sup> are reserved for the use of Best Management Practices. The remaining 55.71 µg/m<sup>3</sup> can be used by plants owned by other companies.

**Table 2: 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. Solitary	0.0088	74.29	<sup>1</sup> 20.00	150.00	8,400
2. Concurrent (Same Owner)	0.0088	*	<sup>1</sup> 20.00	150.00	*
3. Concurrent (Separate Owners)	0.0088	74.29	<sup>1</sup> 75.71	150.00	8,400
4. Concurrent (Same and Separate Owners)	0.0088	*	<sup>1</sup> 75.71	150.00	*

Note 1: Background PM<sub>10</sub> level of 20.00 µg/m<sup>3</sup> from haul roads and stockpiles and 55.71µg/m<sup>3</sup> from the operation of plants owned by other companies.

\*The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded. Ambient impacts from other plants owned by Bloomsdale Excavating can be obtained from the operator(s) of these plant(s).

## **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 portable rock-screening 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
- 40 CFR Part 60 Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, 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 (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Chia-Wei Young  
Environmental Engineer

\_\_\_\_\_  
Date

**PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

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



**Attachment A: Daily Ambient PM<sub>10</sub> Impact Tracking Record**  
**Bloomsdale Excavating Co., Inc., PORT-0576 – Portable Rock-Screening Plant**  
**Concurrent (Same Owner) Operations**

Project Number: 2006-09-101  
 Site Name: Holcim-Lee Island  
 Site ID: 186-0044  
 County, CSTR: Ste. Genevieve County (S14, T38N, R7/8E)  
 Primary Unit Size: 350 tph  
 Distance to Nearest Property Boundary: 1,900 feet

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

Date	Bloomsdale Excavating Co., Inc. PORT-0576 Project # 2006-09-101			Plant Name: Plant ID: Permit #:	Plant Name: Plant ID: Permit #:	<sup>3</sup> Back-ground PM <sub>10</sub> Level ( $\mu\text{g}/\text{m}^3$ )	<sup>4</sup> TOTAL PM <sub>10</sub> Level ( $\mu\text{g}/\text{m}^3$ )
	Daily Production (tons)	Ambient Impact Factor ( $\mu\text{g}/\text{m}^3/\text{ton}$ )	<sup>1</sup> Daily PM <sub>10</sub> Impact ( $\mu\text{g}/\text{m}^3$ )	<sup>2</sup> Daily PM <sub>10</sub> Impact ( $\mu\text{g}/\text{m}^3$ )	<sup>2</sup> Daily PM <sub>10</sub> Impact ( $\mu\text{g}/\text{m}^3$ )		
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
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		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	
		0.0088				20.00	

- Note 1: The Daily PM<sub>10</sub> Ambient Impact ( $\mu\text{g}/\text{m}^3$ ) is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.  
 Note 2: The Daily PM<sub>10</sub> Impact ( $\mu\text{g}/\text{m}^3$ ) for other plants owned by Bloomsdale Excavating Co., Inc. can be obtained from the operator(s) of these plants.  
 Note 3: Background PM<sub>10</sub> Level ( $\mu\text{g}/\text{m}^3$ ) is from haul roads and stockpiles.  
 Note 4: The TOTAL PM<sub>10</sub> Level ( $\mu\text{g}/\text{m}^3$ ) 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  $\mu\text{g}/\text{m}^3$  in any 24-hour 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.

Ms. Rachelle Pinkston  
Compliance Specialist  
Heptacore, Inc.  
12211 State Route Y, Suite 200  
Bloomsdale, MO 63627

RE: New Source Review Permit - Project Number: 2006-09-101

Dear Ms. Pinkston:

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

Operation in accordance with the conditions and requirements in your permit and information submitted in your permit application for project (2006-09-039) is necessary for continued compliance. The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:cwyl

Enclosures

c: Southeast Regional Office  
PAMS File: 2006-09-039  
Permit Number: