



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

November 12, 2020

Chris Thiltgen
Regulatory Compliance Manager
Capital Materials, LLC - Palo Quarry
PO Box 104868
Jefferson City, MO 65110

RE: New Source Review Permit Amendment - Permit Number: 022006-007D
Project Number: 2020-10-006; Installation Number: 015-0024

Dear Chris Thiltgen:

In an application dated October 6, 2020, Air Pollution Control Program received your request to amend Permit 022006-007 by changing Special Condition 3 from usage of wet suppression system on the equipment to a moisture content of 1.5% by weight of the aggregate.

Capital Materials purchased the Palo Quarry from Smasal Aggregates and Asphalt, LLC in November 2018. All crushers and screens in the system are required to have wet spray devices and the carryover from these was sufficient to reduce the emissions from all conveyors. The plant has been reconfigured to allow the wet spray devices on the primary crushing and sizing components to suppress emissions from the conveyors. After further discussion with Capital Materials, Capital Materials agreed to turn off all wet spray devices temporarily in order to conduct a moisture test of the aggregate. On August 20, 2020, Aggregate Moisture Test ASTM D 2216 was conducted on clean rock and shot rock resulting in a moisture content by weight of 2.6% and 2.8% respectively. Therefore Capital Materials is requesting that the Special Condition 3 of Permit 022006-007 be superseded and replaced with a Special Condition requiring moisture content of 1.5% by weight without the operation of spray devices on the equipment. The controlled emission factors are used to calculate emissions for both scenarios. There will not be an increase in emissions with this change.

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



Chris Thiltgen
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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.ao.mo.gov/ahc.

If you have any questions regarding this amendment, 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

A handwritten signature in blue ink that reads "Kendall B. Hale". The signature is written in a cursive style.

Kendall B. Hale
Permits Section Chief

KBH:kka

Enclosures

c: Kansas City Regional Office
PAMS File: 2020-10-006

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Permit No.	022006-007D
Project No.	2020-10-006

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."

Capital Materials, LLC - Palo Quarry
Benton County, S34, T42N, R23W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 3 found in the previously issued Construction Permit 022006-007 issued by the Air Pollution Control Program.
2. **Moisture Content Testing Requirement**
 - A. The permittee shall verify that the moisture content of the processed rock is greater than or equal to 1.5 percent by weight.
 - B. Testing shall be conducted according to the method prescribed by the American Society for Testing Materials (ASTM) D-2216, C-566 or another method approved by the Director.
 - C. The initial test shall be conducted no later than 45 days after the start of operation. A second test shall be performed the calendar year following the initial test during the months of July or August.
 - D. The test samples shall be taken from rock that has been processed by the plant or from each source of aggregate (e.g. quarry).
 - E. The written analytical report shall include the raw data and moisture content of each sample, the test date and the original signature of the individual performing the test. The report shall be filed on-site or at the permittee main office within 30 days of completion of the required test.
 - F. If the moisture content of either of the two tests is less than the moisture content in Special Condition 2.A, another test may be performed within 15 days of the noncompliant test. If the results of that test is less than the moisture content in Special Condition 2.A, the permittee shall either:
 - 1.) Apply for a new permit to account for the revised information, or

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Permit No.	022006-007D
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SPECIAL CONDITIONS:

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

- 2.) Submit a plan for the installation of wet spray devices to the Compliance/Enforcement Section of the Air Pollution Control Program within 10 days of the second noncompliant test. Plans may be sent by mail to P.O. Box 176, Jefferson City, MO 65102 and by email at aircompliancereporting@dnr.mo.gov. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.