

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: **052009-018** Project Number: 2008-12-031

Parent Company: Central Concrete Company, Inc.

Parent Company Address: P.O. Box 1348, Columbia, MO 65205

Installation Name: Central Concrete Company, Inc.

Installation Address: 1811 Paris Road, Columbia, MO 65205

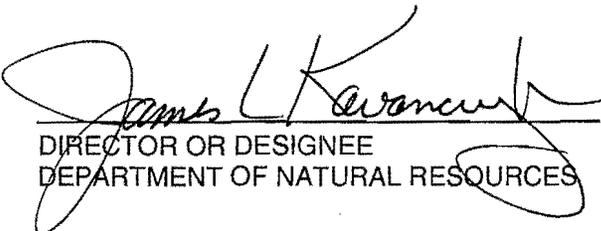
Location Information: Boone County, S06, T48N, R12W

Application for Authority to Construct was made for the modification of an existing concrete installation to add Best Management Practices (BMPs) and to combine two stationary concrete plants into one installation. Concrete is produced through a Central Mix Plant and a Truck Mix Plant. The central mix plant has a maximum hourly design rate (MHDR) of 400 tons per hour (tph) and the truck mix plant has a MHDR of 250 tph. 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.

MAY 28 2009

EFFECTIVE DATE



DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

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Project No.	2008-12-031

SPECIAL CONDITIONS:

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

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.

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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.

1. **Best Management Practices**
Central Concrete Company 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 (PM₁₀)**
 - A. The operator(s) for Central Concrete Company Inc.'s concrete plants (019-0026) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM₁₀ Impact Tracking Record*, or other equivalent form(s), shall be used for this purpose.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)**
 - A. The operator(s) shall ensure that Central Concrete Company Inc.'s concrete plant emits less than 15.0 tons of PM₁₀ into the atmosphere in any 12-month period from the entire installation (i.e. both the truck mix and central mix plants).
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM₁₀. Attachment B, *Monthly PM₁₀ Emissions Tracking Record*, or other equivalent form(s), shall 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. Central Concrete Company Inc. 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.
 - 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 either on-site or at Central Concrete Company Inc.'s 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.%, Central Concrete Company Inc. shall apply for a new construction permit to account for the revised information and install wet spray devices on the affected units.
5. **Baghouse(s) Control System Requirements**
 - A. Central Concrete Company Inc. 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: Cement Unloading (EU3), Cement Supplement (EU4), Truck Loading (EU6), and Mixer Loading (EU7).

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SPECIAL CONDITIONS:

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

- B. Central Concrete Company Inc. shall install instruments to monitor the performance of the baghouse devices.
- 1) Vacuum operated baghouses: The truck mix plant's Truck Loading (EU6) and the central mix plant's Mixer Loading (EU7) and Cement Unloading (EU3) emission units shall use vacuum operated baghouses and instruments to monitor 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
 - i. 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.
 - 2) Pulse jet baghouses: The truck mix plant's Cement Unloading (EU3) and Cement Supplement (EU4) and the central mix plant's Cement Supplement (EU4) emission units shall use pulse jet operated baghouses and be monitored by visible emissions. Visible emissions shall be used as an indicator of the proper operation of the control device. During proper operations, no visible emissions are expected from this emission unit. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions shall be implemented. Observations shall be made using United States Environmental Protection Agency (USEPA) Method 22 trained observer and USEPA method 22 like procedures.
 - i. Frequency of monitoring: Visible emissions from the exhaust shall be monitored on a daily basis when the process is in operation.
 - ii. Duration of each observation: The duration of the observation shall be for a two (2) minute time period.
 - iii. Threshold of each observation: The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions taken.
 - iv. The observation of visible emissions from this emission unit will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the applicable requirement. When the level of excursions exceed three (3) percent of the total number of observations in a six (6) month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with 10 CSR 10-6.400. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source into compliance and to demonstrate that compliance.
6. Prohibition Against Concurrent Operations Without Further Air Pollution Control Program Review
The installation (019-0026) is only allowed to consist of the present truck mix and central mix concrete plants located at this site. Adding another installation on this property, whether owned by Central Concrete Company, Inc. or another company, is prohibited unless the Air Pollution Control Program approves such construction.
7. Restriction on Minimum Distance to Nearest Property Boundary
Because the primary emission points of the concrete plant are the Mixer Loading (EU7) and Truck Loading (EU6), these sources shall be located at following distances from the nearest property boundary whenever it is operating at this site.

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SPECIAL CONDITIONS:

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

- A. Mixer Loading (EU7) shall be 200 feet from nearest property boundary.
 - B. Truck Loading EU6) shall be 150 feet from nearest property boundary.
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. 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.
10. Superseding Condition
The conditions of this permit supersede all special conditions found in the previously issued construction permit numbers 082003-016 (Project # 2003-04-057) and 092003-18 (Project # 2003-07-158) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

Initially, this property consisted of two portable installations—a truck mix plant (formerly PORT-0188) and a central mix batch plant (formerly PORT-0436) owned by Central Concrete Inc. In 2003, permits for both plants were modified and became stationary plants. An application for both plants to implement Best Management Practices (BMPs) has been received to increase production. The Department of Natural Resources' Air Pollution Control Program is considering the two plants, as one installation under Project # 2008-12-031. When combined, both plants' emissions shall be less than 15.0 tons/yr of particulate matter less than 10 microns (PM₁₀) and be less than 130 micrograms per cubic meter (µg/m³) PM₁₀ in a 24-hour period.

The emission points of this property 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]. The installation is located in Boone County, an attainment area for all criteria air pollutants.

Table 1. Other Permits Issued for Site 019-0026

Permit Number	Completed	Description
1094-007	10/10/1994	Sec 5 & 6: <i>De Minimis</i> and Minor
082003-016	8/29/2003	Combines two portables to stationary
092003-018	9/29/2003	Modify plant

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM₁₀. 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 installation has an annual emission limit of less than 15.0 tons of PM₁₀ in any 12-month period. A separate composite PM₁₀ emission factor was developed for each concrete plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment B. If the conditioned potential emissions of PM₁₀ were 15.0 tons per year or greater, then the owner would be required to perform increment modeling.

Table 2: Emissions Summary (tons per year)

Air Pollutant	Regulatory <i>De Minimis</i> Levels	¹ Existing Potential Emissions	² Existing Actual Emissions (EIQ)	³ Potential Emissions of the Application	⁴ New Installation Conditioned Potential
PM ₁₀	15.0	33.4	0.58	32.82	<15.0
SO _x	40.0	0.0031	0.00	0.0031	0.0013
NO _x	40.0	0.52	0.0025	0.5175	0.2088
VOC	40.0	0.03	0.0001	0.0299	0.0115
CO	100.0	0.43	0.0021	0.4279	0.1754
HAPs	10.0/25.0	0.01	0.0021	0.0079	0.0039

Note 1: Existing potential emissions for PM₁₀ are taken from permit #'s 2003-04-057 and 2003-07-158 and summed. Other existing potential pollutants are calculated from Air Pollution Control Program's non-PM₁₀ Potential Emissions spreadsheet.

Note 2: Existing Actual Emissions are taken from the Missouri Emissions Inventory System (MoEIS) for the last reported year.

Note 3: Potential Emission of PM₁₀ are derived from the difference of existing actual emissions and existing potential emissions

Note 4: Conditioned potential of PM₁₀ are based on worst case scenario daily production limit from ambient impact analysis for truck mix plant. 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 150 feet to the nearest property boundary for the Truck Mix Plant and a distance of 200 feet to the nearest property boundary for the Central Mix Plant. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 $\mu\text{g}/\text{m}^3$ of PM_{10} at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factors for the concrete plants. These ambient impact factors are 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 $\mu\text{g}/\text{m}^3$ of PM_{10} . To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 $\mu\text{g}/\text{m}^3$ of PM_{10} at or beyond the nearest property boundary.

Table 3: Ambient Air Quality Impact Analysis of PM_{10} , 24-Hour Averaging Time

Plant	Ambient Impact Factor ($\mu\text{g}/\text{m}^3/\text{ton}$)	Daily Production Limit (tons)	*Modeled Impact ($\mu\text{g}/\text{m}^3$)	**Background ($\mu\text{g}/\text{m}^3$)
1. Central Mix Plant	0.0335	3, 879	130.0	20.0
2. Truck Mix Plant	0.0641	2, 027	130.0	20.0

* The impact of this installation must be balanced between both plants and the sum of each plant's impact shall not exceed 130 $\mu\text{g}/\text{m}^3$.

** Background PM_{10} level is 20.0 $\mu\text{g}/\text{m}^3$ from haul roads and stockpiles and are taken into account of the modeled impact of each plant.

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
- *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 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.

Daronn Williams
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Central Concrete Company 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.
- Northeast Regional Office Site Survey.
- Best Management Practices

**Attachment B: Monthly PM₁₀ Emissions Tracking Record
Central Concrete Company Inc., 019-0026 – Concrete Plant**

Project Number: 2008-12-031
 County, CSTR: Boone County (S06, 48N, 12W)
 Primary Unit Size: 400 and 250 tph
 Distance to Nearest Property Boundary: 150 feet for Truck Mix Plant
 Distance to Nearest Property Boundary: 200 feet for Central Mix Plant

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

Truck Mix Plant					Central Mix Plant				
Month	Monthly Production (tons)	Composite PM ₁₀ Emission Factor (lbs/ton)	¹ Monthly PM ₁₀ Emissions (lbs)	² Monthly PM ₁₀ Emissions (tons)	Monthly Production (tons)	Composite PM ₁₀ Emission Factor (lbs/ton)	¹ Monthly PM ₁₀ Emissions (lbs)	² Monthly PM ₁₀ Emissions (tons)	³ Total 12-Month PM ₁₀ Emissions (tons/year)
<i>Example</i>	44,000	0.0126	1320.0	0.66	44,000	0.0108	475.20	0.2376	0.8976
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			
		0.0126				0.0108			

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 each Monthly PM₁₀ Emissions (tons) horizontally and then add this sum to the Monthly Emissions (tons) of the previous eleven (11) months. A total of less than **15.0** 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 Emissions¹” 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.

¹ 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. Cooper Snyder
General Manager
Central Concrete Company Inc.
P.O. Box 1348
Columbia, MO 65205

RE: New Source Review Permit - Project Number: 2008-12-031

Dear Mr. Snyder:

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 2008-12-031, and your amended operating permit, if required, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your concrete plant, including any special conditions from your New Source Review permit.

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, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall Hale, P.E.
New Source Review Unit Chief

KBH:dll

Enclosures

c: Northeast Regional Office
PAMS File: 2008-12-031
Permit Number: