



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

MAR 13 2020

Shawn Woodsmall
Environmental Manager
Emery Sapp & Sons, Inc. PORT-0811
2301 Interstate 70 Dr. NW
Columbia, MO 65202

RE: New Source Review Permit - Project Number: 2020-02-036

Dear Shawn Woodsmall:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. In addition, please note that Emery Sapp & Sons, Inc. PORT-0811 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 mail, it will be deemed filed on the date it is received by the administrative hearing commission,



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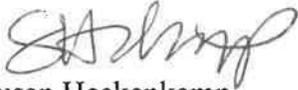
Shawn Woodsmall
Page Two

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.ao.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Jared Rhodes, 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



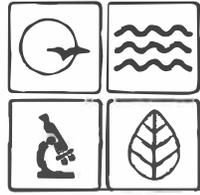
Susan Heckenkamp
New Source Review Unit Chief

SH:jara

Enclosures

c: Northeast Regional Office
PAMS File: 2020-02-036

Permit Number: **032020-003**



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: **032020-003**

Project Number: 2020-02-036
Installation ID: PORT-0811

Parent Company: Emery Sapp & Sons, Inc.

Parent Company Address: 2301 Interstate 70 Dr. NW, Columbia, MO 65202

Installation Name: Emery Sapp & Sons, Inc. PORT-0811

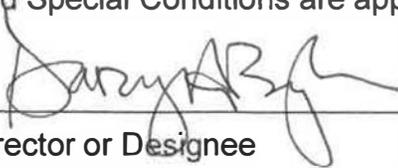
Installation Address: 530 East Maple St., Shelbina, MO 63468

Location Information: Shelby County, S33 T57N R10W

Application for Authority to Construct was made for:
Installation of a new portable asphalt plant. 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

MAR 13 2020

Effective Date



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:

Project Number: 2020-02-036

Installation ID: PORT-0811

Parent Company: Emery Sapp & Sons, Inc.

Parent Company Address: 2301 Interstate 70 Dr. NW, Columbia, MO 65202

Installation Name: Emery Sapp & Sons, Inc. PORT-0811

Installation Address: 530 East Maple St., Shelbina, MO 63468

Location Information: Shelby County, S33 T57N R10W

Application for Authority to Construct was made for:
Installation of a new portable asphalt plant. 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

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. Relocation of Portable Asphalt Plant
 - A. Emery Sapp & Sons, Inc. PORT-0811 shall not be operated at any location longer than 24 consecutive months except if the Site Specific Special Conditions of this portable plant, PORT-0811, contain a nonroad engine requirement limiting the portable plant at the site specific location to 12 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 asphalt plant.
 - 1) If the portable asphalt 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 asphalt plant is moving to a new site, or if circumstances at the site have changed (e.g. the site was only permitted for solitary operation and now another plant is located at the site), 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.
2. Concurrent Operation Restriction
Emery Sapp & Sons, Inc. PORT-0811 is prohibited from operating whenever located at the same site as other plants that have ambient impact limits based on the Air Pollution Control Program's nomographs.
3. Record Keeping Requirement
Emery Sapp & Sons, Inc. PORT-0811 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
Emery Sapp & Sons, Inc. PORT-0811 shall report to the Air Pollution Control Program Compliance/Enforcement Section by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov, no later than 10 days after 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-0811

Site ID Number: 2020-02-036

Site Name: Emery Sapp & Sons, Inc.

Site Address: 530 East Maple St., Shelbina, MO 63468

Site County: Shelby S33 T57N R10W

1. Annual Emission Limit
 - A. Emery Sapp & Sons, Inc. PORT-0811 shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation which consists of the equipment listed in Table 1. 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. Emery Sapp & Sons, Inc. PORT-0811 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. Undocumented Watering Requirement
Emery Sapp & Sons, Inc. PORT-0811 shall apply a water spray on all haul roads and vehicular activity areas whenever conditions exist that would allow visible emissions from these sources to leave the property.
3. Moisture Content Testing Requirement
 - A. Emery Sapp & Sons, Inc. PORT-0811 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).

SITE SPECIFIC SPECIAL CONDITIONS:

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

- 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 Emery Sapp & Sons, Inc. PORT-0811 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 3.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 3.A, Emery Sapp & Sons, Inc. PORT-0811 shall either:
 - 1) Apply for a new permit to account for the revised information, or
 - 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 or by email at aircompliancereporting@dnr.mo.gov. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.
 - G. In lieu of testing, Emery Sapp & Sons, Inc. PORT-0811 may obtain test results that demonstrate compliance with the moisture content in Special Condition 3.A from the supplier of the aggregate.
4. Control Device Requirement-Baghouse
- A. Emery Sapp & Sons, Inc. PORT-0811 shall control emissions from the rotary kiln EP-04 using a baghouse as specified in the permit application.
 - B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Emery Sapp & Sons, Inc. PORT-0811 shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours when the associated equipment is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Emery Sapp & Sons, Inc. PORT-0811 shall maintain a copy of the baghouse manufacturer's performance warranty on site.

SITE SPECIFIC SPECIAL CONDITIONS:

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

- F. Emery Sapp & Sons, Inc. PORT-0811 shall maintain an operating and maintenance log for the baghouse which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

- 5. Fuel Requirement
 - A. Emery Sapp & Sons, Inc. PORT-0811 shall burn exclusively fuel oil, waste oil, or a blend of fuel oil and waste oil, with a fuel sulfur content less than or equal to 0.5% by weight in their rotary kiln (EP-04).

 - B. Emery Sapp & Sons, Inc. PORT-0811 shall burn exclusively fuel oil with a sulfur content less than or equal to 0.05% by weight in their asphalt heater (EP-07).

 - C. Emery Sapp & Sons, Inc. PORT-0811 shall demonstrate compliance with Special Condition 5.A. and 5.B. by obtaining records of the fuel's sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040 Reference Methods.

 - D. Emery Sapp & Sons, Inc. PORT-0811 shall keep the records required by Special Condition 5.C. with the unit and make them available for Department of Natural Resources' employees upon request.

- 6. Nonroad Engine Requirements
Emery Sapp & Sons, Inc. PORT-0811 cannot operate at this site longer than 12 consecutive months in order to avoid recordkeeping showing the movement of the diesel engines. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, the diesel engines cannot remain in one physical location for longer than 12 consecutive months.

- 7. Record Keeping Requirement
Emery Sapp & Sons, Inc. PORT-0811 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.

- 8. Reporting Requirement
Emery Sapp & Sons, Inc. PORT-0811 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: 2020-02-036

Installation ID Number: PORT-0811

Permit Number:

Emery Sapp & Sons, Inc. PORT-0811:
530 East Maple St.
Shelbina, MO 63468

Complete: March 5, 2020

Parent Company:
Emery Sapp & Sons, Inc.
2301 Interstate 70 Dr. NW
Columbia, MO 65202

Shelby County, S33 T57N R10W

PROJECT DESCRIPTION

Emery Sapp & Sons, Inc. is purchasing an Astec Portable 8' x 38' Double Barrel Drum Mix Asphalt Plant to be initially located at Site ID 2020-02-036 in Shelbina, MO in Shelby County. The asphalt plant is rated at 400 ton per hour. The asphalt rotary kiln has a 120 MMBtu/hr Hauck StarJet SJ-4580 Gas/Oil Burner with a heavy oil kit fired with Distillate Fuel Oil #2 and Waste Oil. The liquid asphalt storage tank has a Heatec HC-120 oil heater rated at 1.2 MMBtu/hr fired with Distillate Fuel Oil #2. There are various conveyors and vibrating screens totaling 8 drop points. Electric power will be provided by diesel generators meeting the definition of nonroad engines as stated in 40 CFR 89.2.

The applicant is using undocumented watering to control particulate matter emissions from haul roads and vehicular activity areas.

This installation is located in Shelby County, an attainment/unclassifiable area for all criteria pollutants.

This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. Hot mix asphalt plants fall under Category 27. Fugitive emissions are counted toward major source applicability. However, Category 27 does not apply to the 100 tons per year major source level thresholds for construction permits. Therefore, the major source threshold for this asphalt plant is 250 tons per year.

No permits have been issued to Emery Sapp & Sons, Inc. PORT-0811 from the Air Pollution Control Program.

TABLES

The following table lists the equipment and emission sources for PORT-0811.

Table 1: Equipment Summary

Emission point	Description	MDHR
EP-01	Aggregate/RAP Handling Bins	380 (tons/hr)
EP-02	Aggregate Handling Conveyors	3040 (tons/hr)
EP-03	Vibrating Screen	380 (tons/hr)
EP-04	Rotary Kiln (120 mmBTU/hr)	400 (tons/hr)
EP-05	Plant Loadout	400 (tons/hr)
EP-06	Silo Loading	400 (tons/hr)
EP-07	Asphalt Heater (1.2 mmBTU/hr)	400 (tons/hr)
EP-08a	Aggregate Storage Pile Load In	185 (tons/hr)
EP-08b	Aggregate Storage Pile Load Out	185 (tons/hr)
EP-08c	Vehicular Activity	5.01 (VMT/hr)
EP-08d	Wind Erosion	0.5 (acres)
EP-09a	RAP Storage Pile Load In	195 (tons/hr)
EP-09b	RAP Storage Pile Load Out	195 (tons/hr)
EP-09c	Vehicular Activity	5.27 (VMT/hr)
EP-09d	Wind Erosion	0.5 (acres)
EP-10	Shipping Haul Road (0.15 mi, unpaved)	6 (VMT/hr)
EP-11	Receiving Haul Road (0.15 mi, unpaved)	6 (VMT/hr)

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. The existing actual emissions are not applicable since this is a new installation. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with their annual emission limit. A voluntary limit of PM₁₀ was taken to avoid the dispersion modeling requirements found in 10 CSR 10-6.060 Section (5).

Table 2: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	^a Potential Emissions of Process Equipment	Existing Actual Emissions (EIQ)	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	67.1	N/A	597.9	43.7
PM ₁₀	15.0	45.7	N/A	205.2	<15.0
PM _{2.5}	10.0	42.3	N/A	61.6	4.5
SO _x	40.0	137.9	N/A	137.9	10.1
NO _x	40.0	165.6	N/A	165.6	12.1
VOC	40.0	105.6	N/A	105.6	7.7
CO	100.0	29.5	N/A	29.5	2.2
Formaldehyde	10.0/2.0 ^c	5.73	N/A	5.73	0.42

2-methylnaphthalene ^d	10.0/0.01 ^c	0.32	N/A	0.32	0.02
Lead Compounds	10.0/0.01 ^c	0.03	N/A	0.03	0.002
Total HAPs	25.0	18.3	N/A	18.3	1.34

N/A = Not Applicable; N/D = Not Determined

^a Excludes haul road and storage pile emissions

^b Includes site specific haul road and storage pile emissions

^c SMAL

^d 2-methylnaphthalene is a member of the Polycyclic Organic Matter (POM) HAP group.

The following table summarizes the ambient air quality impact analysis. The maximum modeled impact is the impact of each pollutant when the plant is operating continuously.

Table 3: Ambient Air Quality Impact Analysis

Pollutant	RAL ($\mu\text{g}/\text{m}^3$)	Averaging Time	^a Maximum Modeled Impact ($\mu\text{g}/\text{m}^3$)
2-methylnaphthalene	23	24-hour	0.60
2-methylnaphthalene ^b	2.3	Annual	0.0073

^a Modeled impact at maximum capacity with controls

^b 2-methylnaphthalene is a member of the polycyclic organic matter (POM) HAP group.

The plant's rotary kiln EP-04 was modeled using the AERSCREEN screen modeling software. The stack characteristic entered into the modeled are listed in Table 4.

Table 4: AERSCREEN Input Parameters

Equipment Description	Stack Height (m)	Stack Inside Diameter (m)	Stack Gas Exit Velocity (m/s)	Stack Gas Exit Temperature (K)	Dispersion Coefficient
Rotary Kiln EP-04	6.5	1.3	24.1	388.7	Rural

Ambient Air Quality Impact Analysis

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of the pollutants listed in Table 3. An AAQIA is required for pollutants if their emissions exceed their respective de minimis or screening model action level (SMAL). The AAQIA was performed using the Air Pollution Control Program's generic EPA modeling software AERSCREEN. For each pollutant that was modeled, the maximum concentration that occurs at or beyond the site boundary was compared to the National Ambient Air Quality Standard (NAAQS) or Risk Assessment Level (RAL) for the pollutant. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS or RAL, the plant's production is limited to ensure compliance with the standard.

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 drum mix asphalt plant:

- Calculated using emission factors from AP-42 Section 11.1 “Hot Mix Asphalt Plants,” April 2004.
- SO_x emissions were calculated using the SO₂ and SO₃ emission factors from AP-42 Section 1.3 “Fuel Oil Combustion,” September 1998 and assuming half of the sulfur up to 0.1 pound per ton of product is absorbed into the product.
- The asphalt plant is controlled by a baghouse, so the fabric filter controlled emission factor was used to calculate PM₁₀ emissions.
- Emissions from plant load-out were calculated using predictive equations found in AP-42 Table 11.1-14. Default values were used for asphalt volatility and mix temperature.

Emissions from the asphalt heater:

- Calculated using emission factors from AP-42 Section 1.3. “Fuel Oil Combustion,” September 1998

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 controlled emission factors were used because the inherent moisture content of the crushed rock is greater than 1.5% by weight.

Emissions from the diesel generators:

- Emissions from the diesel generators were not included in the potential emission calculations for PORT-0811 since they meet the definition of nonroad engines as stated in 40 CFR 89.2.

Emissions from haul roads and vehicular activity areas:

- Calculated using the predictive equation from AP-42 Section 13.2.2 “Unpaved Roads,” November 2006.
- 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.

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 “Aggregate Handling and Storage Piles,” November 2006.
- The moisture content of the aggregate is 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 conditioned to de minimis levels. With potential emissions of PM₁₀ conditioned to de minimis levels, emissions of all other criteria pollutants except PM are below de minimis levels. With potential emissions of PM₁₀ conditioned to de minimis levels, potential emissions of PM are above de minimis levels but below major source levels. There are no modeling requirements for PM.

APPLICABLE REQUIREMENTS

Emery Sapp & Sons, Inc. PORT-0811 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.
- No Operating Permit is required for this installation.
- *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 I, "Standards of Performance for Hot Mix Asphalt Facilities" applies to the equipment.
- 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.
- *Control of Sulfur Dioxide Emissions*, 10 CSR 10-6.261

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 February 18, 2020, received February 21, 2020, designating Emery Sapp & Sons, Inc. as the owner and operator of the installation.

