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: 092020-003  Project Number: 2020-08-015
Installation ID: PORT-0822

Parent Company: Emery Sapp & Sons

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

Installation Name: Emery Sapp & Sons PORT-0822

Installation Address: Highway 54, Bowling Green, MO 63334

Location Information: Pike County, S27 T53N R3W

Application for Authority to Construct was made for:
Construction of a new portable concrete 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

______________________________
September 8, 2020
Effective Date
STANDARD CONDITIONS:

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

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department’s Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department’s regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department’s personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
http://dnr.mo.gov/regions/
GENERAL SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). “Conditions required by permitting authority.”

1. Equipment Identification Requirement
   Emery Sapp & Sons PORT-0822 shall maintain easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable concrete plant.

2. Relocation of Portable Concrete Plant
   A. Emery Sapp & Sons PORT-0822 shall not be operated at any location longer than 24 consecutive months except if the Site Specific Special Conditions of this portable plant, PORT-0822, 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 concrete plant.
      1) If the portable concrete 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 concrete 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.

3. Record Keeping Requirement
   Emery Sapp & Sons PORT-0822 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 PORT-0822 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-0822
Site ID Number: 163-0037
Site Name: Bleigh Ready Mix
Site Address: Highway 54, Bowling Green, MO 63334
Site County: Pike S27 T53N R3W

1. Annual Emission Limit
   A. Emery Sapp & Sons PORT-0822 shall emit less than 15.0 tons of PM$_{10}$ in any consecutive 12-month rolling period from the entire installation which consists of the equipment listed in Table 1 in the Table section of this permit. Emery Sapp & Sons PORT-0822 shall include all actual emissions in the limit including SSM emissions as well as any excess 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.

   B. Emery Sapp & Sons PORT-0822 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 PORT-0822 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. Control Device Requirement-Baghouse
   A. Emery Sapp & Sons PORT-0822 shall control emissions from the equipment listed below using a baghouse as specified in the permit application.
      1) Cement Bin
      2) Supplement Bin
      3) Weigh Hopper
      4) Truck Mix Loadout

   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.
SITE SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

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 PORT-0822 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 PORT-0822 shall maintain a copy of the baghouse manufacturer’s performance warranty on site.

F. Emery Sapp & Sons PORT-0822 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.

4. Record Keeping Requirement
   Emery Sapp & Sons PORT-0822 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.

5. Reporting Requirement
   Emery Sapp & Sons PORT-0822 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.
Emery Sapp & Sons PORT-0822: Complete: August 14, 2020
Highway 54
Bowling Green, MO 63334

Parent Company:
Emery Sapp & Sons
2301 Interstate 70 Drive NW
Columbia, MO 65202

Pike County, S27 T53N R3W

PROJECT DESCRIPTION

Emery Sapp & Sons is locating a new portable concrete plant west of Bowling Green, Missouri at the Bleigh Ready Mix location (163-0037) on Hwy 54. The new concrete is an Erie Strayer MC-11C Central Mix Plant. It is rated at 400 cubic yards per hour (811 tons per hour). Particulate matter emissions are control by a CP-2600 Cartridge Pulse Dust Collector.

The Bleigh Ready Mix plant operates a concrete plant also located at this site. It has Construction Permit 1295-023. It does not have a NAAQS limit.

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

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

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation’s major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

No permits have been issued to Emery Sapp & Sons PORT-0822 from the Air Pollution Control Program.
The table below summarizes the emissions of this project. The potential emissions of the process equipment, which excluded emissions from haul roads and wind erosion, are not site specific and should not vary from site to site. There are no existing actual emissions since this is a new portable plant. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with a voluntary PM\textsubscript{10} de minimis annual emission limit to avoid dispersion modeling requirements found in 10 CSR 10-6.060 Section (5).

Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th>Air Pollutant</th>
<th>De Minimis Level/SMAL</th>
<th>\textsuperscript{a}Potential Emissions of Process Equipment</th>
<th>Existing Actual Emissions</th>
<th>\textsuperscript{b}Potential Emissions of the Application</th>
<th>Conditioned Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>48.22</td>
<td>N/A</td>
<td>586.83</td>
<td>44.58</td>
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<tr>
<td>PM\textsubscript{10}</td>
<td>15.0</td>
<td>23.33</td>
<td>N/A</td>
<td>197.47</td>
<td>&lt;15.00</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>10.0</td>
<td>5.48</td>
<td>N/A</td>
<td>27.42</td>
<td>2.08</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>NO\textsubscript{x}</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>N/D</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined
\textsuperscript{a}Excludes site specific haul road and storage pile emissions
\textsuperscript{b}Includes site specific haul road and storage pile emissions
EMISSIONS CALCULATIONS

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

Emissions from the concrete batch plant:
- Calculated using emission factors from AP-42 Section 11.12 “Concrete Batching,” June 2006.
- This section cites Equation (1) in Section 13.2.4 “Aggregate Handling and Storage Piles,” November 2006 for calculating the emissions from aggregate and sand transfer.
- The cement and supplement bins are controlled with a baghouse, so the controlled emission factors were used.

Emissions from the aggregate weigh hopper and truck loading:
- The weigh hopper emissions are controlled by a baghouse so a 99% control factor was applied to the calculation.
- Emissions from mixer loading/mix truck loading are controlled by a baghouse, so the controlled emission factor was used.

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 PM_{10} 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 less than 1.5% by weight.
- Emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program’s Emissions Inventory Questionnaire Form 2.8 “Storage Pile Worksheet.”

PERMIT RULE APPLICABILITY

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

Emery Sapp & Sons PORT-0822 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

- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) apply to the proposed equipment.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 3, 2020, received August 11, 2020, designating Emery Sapp & Sons as the owner and operator of the installation.
### Attachment A: PM$_{10}$ 12-Month Rolling Total Emissions Tracking Sheet

**Emery Sapp & Sons PORT-0822**  
**Project Number:** 2020-08-015  
**Permit Number:** 092020-003

**Site Name:** Emery Sapp & Sons PORT-0822  
**Site Address:** Highway 54, Bowling Green, MO 63334  
**Site County:** Pike, S27 T53N R3W  
This sheet covers the period from ____________________ to ____________________ (Copy as needed)  

<table>
<thead>
<tr>
<th>Month</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions$^1$ (lbs)</th>
<th>Startup, Shutdown and Malfunction PM$_{10}$ Emissions$^2$ (lbs)</th>
<th>Monthly Emissions$^3$ (tons)</th>
<th>12-Month Total Emissions$^4$ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>50,000</td>
<td>0.0556</td>
<td>2,780</td>
<td>0.0</td>
<td>1.4</td>
<td>1.4 + 11 previous months at this site</td>
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<td></td>
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<td>0.0556</td>
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</tbody>
</table>

$^1$Multiply the monthly production by the PM$_{10}$ composite emission factor.  
$^2$Startup, Shutdown and Malfunction (SSM) emissions including any excess emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 for the month.  
$^3$Add the monthly PM$_{10}$ emissions plus the SSM emissions from the same time period and divide by 2000 and  
$^4$Add the monthly emissions (tons) to the sum of the monthly emissions from the previous eleven months. A total of less than 15.0 tons of PM$_{10}$ per consecutive 12 months is necessary for compliance.
September 8, 2020

Shawn Woodsmall  
Environmental Manager  
Emery Sapp & Sons PORT-0822  
2301 Interstate 70 Drive NW  
Columbia, MO 65202

RE: New Source Review Permit - Project Number: 2020-08-015

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 PORT-0822 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, whose contact information is: Administrative Hearing Commission, United States Post Office
Shawn Woodsmall  
Page Two  

Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Kathy Kolb, at the department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:kka  

Enclosures

c: Northeast Regional Office  
PAMS File: 2020-08-015

Permit Number: 092020-003