

STATE OF 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: **07 2 0 0 9 - 0 1 5** Project Number: 2009-05-055

Parent Company: Fischer Concrete Services, Inc.

Parent Company Address: 2300 Clinton Road, Sedalia, MO 65301

Installation Name: Warrensburg Ready Mix

Installation Address: 88 SE 501 Road, Warrensburg, MO 64093

Location Information: Johnson County, S27, T46N, R25W

Application for Authority to Construct was made for:

The modification of an existing concrete plant to add Best Management Practices for the control of emissions from haul roads and vehicular activity areas and to allow concurrent operations with other plants owned by Fischer Concrete Services. 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.

JUL 23 2009

EFFECTIVE DATE


 DIRECTOR OR DESIGNEE
 DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. 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**
Warrensburg Ready Mix 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 Warrensburg Ready Mix's concrete plant (101-0029) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150.00 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The stationary plant is permitted to operate under two (2) scenarios: Solitary and concurrent (same owner) operations. The total daily ambient impact of PM₁₀ at this site shall include the combined impact of the concrete plant and any ambient background concentration from installations or equipment located on the same site as the concrete plant.
 - C. To demonstrate compliance during both operating scenarios, 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. **Baghouse(s) Control System Requirements**
 - A. Warrensburg Ready Mix 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: Mixer Loading, Cement Unloading and Cement Supplement Unloading.
 - B. Warrensburg shall install instruments to monitor the 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 operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - C. 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.
4. **Restriction on Minimum Distance to Nearest Property Boundary**
The primary emission point of the concrete plant, which is the Mixer Loading, shall be located at least 200 feet from the nearest property boundary whenever it is operating at this site.
5. **Record Keeping Requirement**
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
6. **Reporting Requirement**
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

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SPECIAL CONDITIONS:

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

7. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (0391-006, 0991-004 and 0896-018) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

INSTALLATION AND PROJECT DESCRIPTION

Fischer Concrete Services, Inc. operates a stationary concrete plant at this site under the name of Warrensburg Ready Mix. Concrete is composed of water, cement, sand (fine aggregate), and non-metallic coarse aggregate rock. These materials are processed in mixer trucks and the resulting concrete is delivered as a sellable product. The emission points are listed in the attached spreadsheet summary. The installation is located in Johnson County, an attainment area for all criteria air pollutants and is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

Table 1: Other Permits Issued for Site 101-0029

| Permit Number | Completed | Description |
|---------------|-----------|----------------------|
| 0391-006 | 3/19/1991 | New concrete plant. |
| 0991-004 | 9/6/1991 | Increase production. |
| 0896-018 | 8/26/1996 | Increase production. |

The facility would like to add Best Management Practices (BMPs) to control fugitive emissions from haul roads and vehicular activity areas and to allow concurrent operations with other plants owned by Fischer Concrete Services.

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).

Combustion emissions are from the use of a propane-fired boiler rated at 0.0221 Mgal/hr. This boiler is permitted to operate for an entire day (24 hours), but shall be the only combustion source used with the installation. The existing potential emissions were recalculated using updated emission factors and is based on a production limit of 261,780 tons per year (limit from permit no. 0896-018). The potential emissions of the application were calculated by subtracting the average actual emissions of the previous two (2) years from the potential emissions of the installation. The new installation conditioned potential is based on the ambient impact analysis for PM₁₀. Aggregate transfer, sand transfer and the weigh hopper loading occurs in a roofed building with four sides and a 3.70% control efficiency was given for the enclosure.

Table 2: Emissions Summary (tons per year)

| Air Pollutant | Regulatory <i>De Minimis</i> Levels | Existing Potential Emissions | Existing Actual Emissions (2008 EIQ) | Potential Emissions of the Application | *New Installation Conditioned Potential | Emission Factor (lb/ton) |
|------------------|-------------------------------------|------------------------------|--------------------------------------|--|---|--------------------------|
| PM ₁₀ | 15.0 | 6.32 | 1.40 | 20.27 | 9.14 | N/A |
| SOx | 40.0 | 0.00 | N/D | 0.00 | 0.00 | N/A |
| NOx | 40.0 | 0.27 | N/D | 1.26 | 0.53 | N/A |
| VOC | 40.0 | 0.02 | N/D | 0.10 | 0.04 | N/A |
| CO | 100.0 | 0.15 | N/D | 0.73 | 0.31 | N/A |
| HAPs | 10.0/25.0 | 0.00 | N/D | 0.02 | 0.01 | N/A |

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

*PM₁₀ conditioned potential based on daily production limit from ambient impact analysis. 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 200 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools.

Instead, they are addressed as a background level of 20 µg/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM₁₀ at or beyond the nearest property boundary.

The screening tools were used to develop an ambient impact factor for the concrete plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A.

Table 3: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

| Operation | Ambient Impact Factor (µg/m ³ /ton) | Modeled Impact (µg/m ³) | *Boiler Impact (µg/m ³) | **Background (µg/m ³) | NAAQS (µg/m ³) | Daily Production Limit (tons) |
|----------------------------|--|-------------------------------------|-------------------------------------|-----------------------------------|----------------------------|-------------------------------|
| 1. Solitary | 0.0890 | 130.00 | 3.85 | 20.00 | 150.00 | 1,417 |
| 2. Concurrent (Same Owner) | 0.0890 | *** | 3.85 | 20.00 | 150.00 | *** |

*Boiler Impact from twenty-four (24) hours of operation.

** Background PM₁₀ level of 20.00 µg/m³ from haul roads and stockpiles.

***The operator(s) must balance production among concurrently operating plants, with the ambient impacts for each, such that NAAQS is not exceeded. Ambient impacts of other plants owned by Fischer Concrete Services, Inc. can be obtained from the operators of these plants.

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
- *Operating Permits*, 10 CSR 10-6.065
- No Operating Permit is required for this concrete plant.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

STAFF RECOMMENDATION

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

Chia-Wei young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Fischer Concrete Services, 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.
- Kansas City Regional Office Site Survey.
- Best Management Practices

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. Joseph Fischer
President
Fischer Concrete Services, Inc.
2300 Clinton Road
Sedalia, MO 65301

RE: New Source Review Permit - Project Number: 2009-05-55

Dear Mr. Fischer:

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

Operation in accordance with the conditions and requirements in your permit and the New Source Review application submitted for project 2009-05-055 is necessary for continued compliance. The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

KH:cwyk

Enclosures

c: Kansas City Regional Office
PAMS File: 2009-05-55
Permit Number: