Dear Mr. Gagliano:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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 http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC 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 AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) 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.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:abj

Enclosures

c: PAMS File: 2015-09-054
INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Intermediate Operating Permit Number: OP2018-105
Expiration Date: DEC 12 2023
Installation ID: 183-0004
Project Number: 2015-09-054

Installation Name and Address
Fred Weber, Inc. - O'Fallon Asphalt
1440 Terra Lane West
O'Fallon, MO 63366
St. Charles County

Parent Company's Name and Address
Fred Weber, Inc.
2320 Creve Coeur Mill Rd.
Maryland Heights, MO 63043

Installation Description:
Fred Weber, Inc. - O'Fallon Asphalt is a hot mix asphalt plant located in the St. Louis metropolitan area. When operating in batch mode, cold aggregate is transferred and dried, mixed with heated asphalt oil and loaded out to trucks. When operating as a drum mix plant, asphalt oil, and sometimes Reclaimed Asphalt Pavement (RAP), is added to the rotary mixer; hot asphalt is then conveyed to silos, then loaded out to trucks. The installation has the potential to exceed the Part 70 permitting threshold for Carbon Monoxide (CO), but has accepted a 100 ton/year voluntary limit to remain below that threshold. The installation is a Named Source and is located in a nonattainment area for ozone. 40 CFR Part 60, Subpart I - Standards of Performance for Hot Mix Asphalt Facilities applies to this installation.

DEC 12 2018
Effective Date

Director or Designee
Department of Natural Resources
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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS
The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP2</td>
<td>Hot Elevator, Screens, Bins, &amp; Mixers</td>
</tr>
<tr>
<td></td>
<td>- Hot elevator</td>
</tr>
<tr>
<td></td>
<td>- Slat conveyor</td>
</tr>
<tr>
<td></td>
<td>- Screen</td>
</tr>
<tr>
<td></td>
<td>- Bins</td>
</tr>
<tr>
<td></td>
<td>- Mixers</td>
</tr>
<tr>
<td></td>
<td>- Natural gas rotary dryer</td>
</tr>
<tr>
<td>WASH-1</td>
<td>Parts Washer</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Cold Aggregate Handling</td>
</tr>
<tr>
<td></td>
<td>- Aggregate bins with feeders (10)</td>
</tr>
<tr>
<td></td>
<td>- RAP bins with feeders (2)</td>
</tr>
<tr>
<td></td>
<td>- Collector belts</td>
</tr>
<tr>
<td></td>
<td>- Conveying</td>
</tr>
<tr>
<td></td>
<td>- Scalping screens (2)</td>
</tr>
<tr>
<td></td>
<td>- Truck unloading</td>
</tr>
<tr>
<td>EP3</td>
<td>AC Heater</td>
</tr>
<tr>
<td>EP4</td>
<td>Haul Roads</td>
</tr>
<tr>
<td></td>
<td>HMA Silos</td>
</tr>
<tr>
<td></td>
<td>Truck Loadout</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without specific Limitations.

<table>
<thead>
<tr>
<th>PERMIT CONDITION CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065 Operating Permits - Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The permittee shall emit less than 100.0 tons of Carbon Monoxide (CO) from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**
1) The permittee shall record the CO emissions on a monthly and consecutive 12-month basis.
2) The permittee shall use Attachment D, or similar recordkeeping, to demonstrate compliance with this permit condition.
3) These records shall be kept for five (5) years and made available for inspection by the Department of Natural Resources’ personnel upon request.

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten days after the records indicate an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification required by Section V of this permit.
PERMIT CONDITION 6.170

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

**Emission Limitation:**

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial facility without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
      i) The permittee may observe once per month.
      ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
**Recordkeeping:**
The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to a violation.
3) Any corrective actions undertaken to correct the violation.

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation is recorded according to the monitoring schedule.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification required by Section V of this permit.
III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>WASH-I Parts Washer</td>
<td></td>
</tr>
</tbody>
</table>

**PERMIT CONDITION 5.300**

10 CSR 10-5.300 Control of Emission From Solvent Metal Cleaning

**Operational Limitation/Equipment Specification:**

1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)). [10 CSR 10-5.300(3)(A)1.A]

2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements of subparagraph (3)(A)1.A of 10 CSR 10-5.300. The director and the U.S. Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

3) Equipment specifications [10 CSR 10-5.300(3)(A)1]:
   a) Each cold cleaner shall have a cover, which prevents the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir, which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]
   b) When one (1) or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
      i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F). [10 CSR 10-5.300(3)(A)1.E(I)]
      ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
      iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
   c) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(A)1.F]
   d) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
   e) Solvent sprays shall be a solid fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [10 CSR 10-5.300(3)(A)1.H]
   f) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-5.300(3)(A)1.I]
   g) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty
degrees Fahrenheit (120°F) must use one (1) of the following control devices:
[10 CSR 10-5.300(3)(A)1.J]
i) A freeboard ratio of at least 0.75; [10 CSR 10-5.300(3)(A)1.J(I)]
ii) Water cover (solvent must be insoluble in and heavier than water); or
[10 CSR 10-5.300(3)(A)1.J(II)]
iii) Other control system that has a mass balance demonstrated overall VOC emission reduction
    efficiency of at least sixty-five percent (65%) and is approved by the Director and EPA prior
to use. [10 CSR 10-5.300(3)(A)1.J(III)]

4) Operating procedures: [10 CSR 10-5.300(3)(B)1]
a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or
   solvent must drain into an enclosed reservoir except when performing maintenance or collecting
   solvent samples. [10 CSR 10-5.300(3)(B)1.A].
b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until
   dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]
c) Whenever a cold cleaner fails to perform within the operating parameters established by
   10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is
   restored to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks
   are repaired. [10 CSR 10-5.300(3)(B)1.D]
e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed
   below or equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]
i) Reduction of the waste material to less than twenty percent (20%) VOC solvent by
   distillation and proper disposal of the still bottom waste; or [10 CSR 10-5.300(3)(B)1.E.(I)]
   (1) A contract reclamation service; or [10 CSR 10-5.300(3)(B)1.E.(II)(a)]
   (2) A disposal facility approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E.(II)(b)]
f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]

5) Operator and Supervisor Training: [10 CSR 10-5.300(3)(C)]
a) Persons who operate a cold cleaner shall be trained in the operational and equipment
   requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning
   process. [10 CSR 10-5.300(3)(C)1]
b) The supervisor of any person who operates a cold cleaner shall receive equal or greater
   operational training than the operator. [10 CSR 10-5.300(3)(C)2]
c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve
   (12) months. [10 CSR 10-5.300(3)(C)3]
**Monitoring/ Recordkeeping:**

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent using Attachment E (Purchase Records for Cold Cleaning Solvent) or an equivalent:

- a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]
- b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
- c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
- d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]

2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises using Attachment E (Solvent Containing Waste Transfer Log) or an equivalent. The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment. The permittee shall use Attachment E (Maintenance Log) or equivalent for this purpose. These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with 10 CSR 10-5.300. [10 CSR 10-5.300(4)(A)]

3) The permittee shall keep records of solvent metal cleaning training using Attachment E (Employee Solvent Metal Cleaning Training Log) or an equivalent form as required by 10 CSR 10-5.300(3)(C) [10 CSR 10-5.300(4)(D)].

4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)E]

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.
PERMIT CONDITION Controls
10 CSR 10-6.065 Operating Permits - Voluntary Limitation(s)
10 CSR 10-6.400 Conditional Exemption

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP2</td>
<td>Dryer, Hot Elevator, Screens, Bins, &amp; Mixer</td>
</tr>
</tbody>
</table>

Operational Limitations:
1) The permittee shall capture and control particulate emissions from the above emission points using a baghouse with a control efficiency of at least 90%.
2) The baghouse shall be operated and maintained in accordance with the manufacturer’s specifications.
3) Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions excepted to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
4) The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauges or meters shall be located such that Department of Natural Resources’ employees may easily observe them.

Monitoring/Recordkeeping:
1) The pressure drop shall be measured and recorded at least once every 24 hours while operations are occurring using Attachment F or equivalent form. The pressure drop shall be maintained within the design conditions specified by the filter manufacturer’s performance specifications.
2) The permittee shall maintain a copy of the baghouse manufacturer’s specification onsite.
3) The permittee shall maintain an operating and maintenance log (using Attachment C or equivalent) for the baghouse which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities with inspection schedule, repair, actions, and replacements, etc.
4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources’ personnel upon request.

Reporting:
The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification required by Section V of this permit.
PERMIT CONDITION NSPS I
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart I Standards of Performance for Hot Mix Asphalt Facilities

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP2</td>
<td>Dryer, Hot Elevator, Screens, Bins, &amp; Mixer</td>
</tr>
</tbody>
</table>

Emission Limitations:
1) The permittee shall not discharge or cause the discharge into the atmosphere from the asphalt plant drum dryer any gases which: [§60.92(a)]
   a) Contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf). [§60.92(a)(1)]
   b) Exhibit 20% opacity, or greater. [§60.92(a)(2)]

Performance Testing Requirements:
1) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR Part 60 or other methods and procedures as specified in §60.93, except as provided in §60.8(b). [§60.93(a)]
2) The permittee shall determine compliance with the particulate matter standards in §60.92 as follows: [§60.93(b)]
   a) Method 5 shall be used to determine the particulate matter concentration. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf). [§60.93(b)(1)]
   b) Method 9 and the procedures in §60.11 shall be used to determine opacity. [§60.93(b)(2)]

Monitoring:
1) For the particulate matter limitation, the permittee shall monitor the emission unit as described in Permit Condition 6.170 to demonstrate compliance.
2) For the opacity limitation, the permittee shall have a certified Method 9 observer conduct U.S. EPA Test Method 9 opacity observations. The total time of observations shall be six minutes (one 6-minute average) to demonstrate compliance with the 20% opacity standard.
3) Method 9 Monitoring Schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
         (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
   b) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the weekly monitoring schedule.
4) Observations are only required when the emission units are operating and when the weather conditions allow.
5) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule; if the permittee is currently conducting observations once per month upon issuance of this permit, they shall continue to conduct observations once per month unless a violation is noted reverting the schedule back to requirement 3)b).
**Recordkeeping:**
1) The permittee shall maintain records of all observation results for each emission unit using Attachment B or equivalent forms.
2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources’ personnel upon request.
3) The permittee shall retain all records for five years.

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification required by Section V of this permit.
IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.100 Alternate Emission Limits
Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall submit full EIQ’s per the schedule in the rule. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation’s emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
10 CSR 10-6.150  Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165  Restriction of Emission of Odors
This is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.180  Measurement of Emissions of Air Contaminants
1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280  Compliance Monitoring Usage
1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

**10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements**

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(5)(C)1.A General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

### 10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and

c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

### 10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Roger Gagliano, President of Operations & COO. In addition, the following individuals were designated responsible officials with authority to bind the installation in environmental permitting affairs in the application:

- Douglas Weible – Chairman, CEO
- Dale Hoette – President & CFO
- Roger Gagliano – President of Operations & COO
- Konn Wilson – President Business Development
- Wendy Alexander – Senior Vice President Financial Management
- Julie Shields, - Sr. VP Human Resources
- Debbie Puyear – Vice President Corporate Services & Treasurer
- Paul Robinson – Vice President Material Services
- Dale Lickenbrock – VP Safety & Health
- Tom Bindbeutel – VP Asphalt Operations
If changes to this list occur, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire;
   or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.


This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.
Attachment A
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>If There Are Visible Emissions Beyond the Property Boundary</th>
<th>Cause/Equipment Malfunction</th>
<th>Corrective Action</th>
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# Attachment B

## Method 9 Opacity Observations

### Fred Weber, Inc.

**Facility Name**
- O'Fallon Asphalt

**Location**
- 1440 Terra Lane West
- O'Fallon, MO 63366

### Test Requirement

**Permit Condition NSPS I**

**Process Equipment Observed**
- TPH
- Hot mix asphalt facility

**Control Measure**
- Cyclone & baghouse

**Source Tested**
- EP2 Stack:
  - natural gas rotary dryer
  - hot elevator, screens, hot bins and mixers

### Date Start End Time

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**Test Average**

% Limit =

### Observer Name:

**Signature:**

**VE Certification Date**

(Certification Attached):

### Source Layout Sketch

- **Source Layout Sketch**
- **Ht =**
- **Dt =**
- **Ws =**
- **Tmp =**
- **Hu =**
- **Observer’s **

![Sun Location Reference Line](image)
# Attachment C

**Inspection/Maintenance/Repair/Malfunction Log**

Emission Unit #

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction</th>
<th>Impact</th>
<th>Duration</th>
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**Attachment D**

Monthly Carbon Monoxide Emission Tracking Record

This sheet covers the month of _________ in the year _________.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Throughput</th>
<th>Unit</th>
<th>Emission Factor (lb/Unit)</th>
<th>CO Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP2</td>
<td>Hot Elevator, Screens, Bins, &amp; Mixer (including Rotary Dryer)</td>
<td>tons of asphalt produced</td>
<td></td>
<td>0.3096(^1)</td>
<td></td>
</tr>
<tr>
<td>EP3</td>
<td>AC Heater</td>
<td>MMCF</td>
<td></td>
<td>84(^2)</td>
<td></td>
</tr>
</tbody>
</table>

**INSTRUCTIONS:**

a. \( CO \text{ Emissions (tons)} = Throughput \text{ (unit)} \times Emission Factor \left( \frac{lb}{unit} \right) \times 0.0005 \left( \frac{ton}{lb} \right) \)

b. Sum of CO Emissions from each Emission Point.

c. As reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050.

d. 12-month Rolling Total CO Emissions (tons) = the sum of this month’s Monthly CO Emissions (tons) + the previous 11 months’ Monthly CO Emissions (tons).

A 12-month CO Emissions total less than 100.0 tpy demonstrates compliance with plantwide Permit Condition CO.

---


\(^2\) Emission factor obtained from AP-42 Table 1.4-1.
**Attachment E**

10 CSR 10-5.300 Compliance Demonstration

**Solvent Containing Waste Transfer Log**

<table>
<thead>
<tr>
<th>Date</th>
<th>Amount of Total Solvent Transferred (gallons)</th>
<th>Amount of Solvent Transferred to a Contract Reclamation Service (gallons)</th>
<th>Amount of Solvent Transferred to a Disposal Facility (gallons)</th>
<th>Amount of Solvent Distilled on the Premises (gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
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</tr>
</tbody>
</table>

**Purchase Records for Cold Cleaning Solvent**

<table>
<thead>
<tr>
<th>Purchase Date</th>
<th>Solvent Supplier Name</th>
<th>Solvent Supplier Address</th>
<th>Type of Solvent</th>
<th>Solvent Vapor Pressure in mmHg at 20°C (68°F)</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Employee Solvent Metal Cleaning Training Log**

<table>
<thead>
<tr>
<th>Date</th>
<th>Title of Solvent Metal Cleaning Training Course</th>
<th>Instructor</th>
<th>Trainee (Name of Employee Taking the Training Course)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

**Maintenance Log**

<table>
<thead>
<tr>
<th>Date</th>
<th>Maintenance Activity/Description</th>
<th>Repair Activity/Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

## Attachment F
Pressure Drop Monitoring

<table>
<thead>
<tr>
<th>Date</th>
<th>Emission Point / Control Device</th>
<th>Pressure Drop (w.c.)</th>
<th>Manufacturer's Recommended Value (w.c.)</th>
<th>Within Specifications? (Yes / No)</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>
STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

INSTALLATION DESCRIPTION
Fred Weber, Inc. – O’Fallon Asphalt is a hot mix asphalt plant located in the St. Louis metropolitan area. When operating in batch mode, cold aggregate is transferred and dried, mixed with heated asphalt oil and loaded out to trucks. When operating as a drum mix plant, asphalt oil, and sometimes RAP, is added to the rotary mixer; hot asphalt is then conveyed to silos, then loaded out to trucks. The facility has the potential to exceed the Part 70 permitting threshold for Carbon Monoxide (CO), but has accepted a 100 ton/year voluntary limit to remain below that threshold. The facility is a Named Source and is located in a nonattainment area for ozone. 40 CFR Part 60, Subpart I applies to this facility.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Potential Emissions</th>
<th>Reported Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM₁₀)²</td>
<td>26.62</td>
<td>2.00</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM₂.₅)²</td>
<td>9.14</td>
<td>0.25</td>
</tr>
<tr>
<td>Sulfur Oxides (SO₃)</td>
<td>1.16</td>
<td>0.36</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>7.87</td>
<td>1.96</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>8.06</td>
<td>0.64</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>&lt; 100.0</td>
<td>31.35</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>1.92</td>
<td>0.00</td>
</tr>
</tbody>
</table>

³ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. CO is limited by voluntary plant wide emission limit to less than 100 tons/year. PM₁₀ and PM₂.₅ for EP2 were calculated using a 99.5% control efficiency for operating a baghouse as required in Permit Condition Controls.
Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received September 22, 2015;
2) 2017 Emissions Inventory Questionnaire, received March 26, 2018;
4) WebFIRE;
5) Source Emissions Testing Report Fred Weber, Inc., prepared October 12, 2000; and
6) All documents listed under Construction Permit History section.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

  - *National Emission Standard for Asbestos*
  - This rule does not apply as the facility does not conduct the applicable activities subject to this rule.

- **10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants**
  - This rule does not apply to this facility. Equipment under EP1 and EP4 are considered fugitive and meet exemption (1)(K). EP2 is subject to 40 CFR Part 60, Subpart I and meets exemption (1)(F). The rotary dryer (EP2) and AC heater (EP3) combust natural gas and meet exemption (1)(L).

- **10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**
  - This rule does not apply as the facility does not conduct the applicable activities subject to this rule.

- **10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds**
  - This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation was considered for this operating permit as it is contained in Missouri's SIP and is a federal only requirement. This rule does not apply to the rotary dryer (EP2) or the AC heater (EP3) as both emission units exclusively combust pipeline grade natural gas meeting exemption (1)(A).2.

- **10 CSR 10-6.261, Control of Sulfur Dioxide Emissions**
  - This rule does not apply to the rotary dryer (EP2) or the AC heater (EP3) as both emission units exclusively combust natural gas meeting exemption (1)(A).
10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This rule does not apply to this facility. Equipment under EP1 and EP4 are considered fugitive and meet exemption (1)(B)7. EP2 is required to operate a baghouse that controls at least ninety percent particulate matter emissions and meets exemption (1)(B)15. The AC heater (EP3) is an indirect heating source and meets exemption (1)(B)6.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*
The facility meets exemption (1)(E) as all applicable units at this facility combust natural gas.

**Construction Permit History**
The following construction permits were issued to this installation:

Construction Permit 012000-006, Issued January 8, 2000
- Permit to construct a rotary mixer, aggregate conveyor with scalping screen, slat conveyor, three (3) storage silos, two (2) secondary conveyors and replacement of a rotary drum dryer and burner.
- Special Condition 1. limited CO emissions from the new aggregate dryer (EP-2) to 100.0 tons per year in any consecutive 12-month period. This Special Condition has been superseded by plantwide Permit Condition CO from this permit. Permit Condition CO is more stringent as it limits CO emissions from the entire installation to 100.0 tons per year in any consecutive 12-month period.

No Permit Required Letter 2002-04-193, Issued May 29, 2002
- Permit determination to install a 50-ton capacity mineral filler silo. Particulate emissions were expected to be under the 0.5 lb/hr threshold for requiring a construction permit.

No Permit Required Letter 2002-07-033, Issued July 30, 2002
- Permit determination to install a mechanical belt feeder and conveyor belt to introduce recycled asphalt product into the asphalt plant. Particulate emissions were expected to be under the 0.5 lb/hr threshold for requiring a construction permit.

No Permit Required Letter 2007-10-066, Issued December 14, 2007
- Permit determination to move the asphalt plant to a new location at the site. The new location is further from the property boundary than the previous location. The haul roads were lengthened to accommodate this new location.
- The installation also made the following modifications to the plant:
  - Added a cyclone between the dryer and baghouse.
  - Replaced the four existing horizontal asphaltic cement storage tanks with three new vertical storage tanks.
  - Replaced the 2.1 MMBtu/hr natural gas fired heater with a 1.5 MMBtu/hr natural gas fired heater.
  - Added two new cold aggregate bins.
  - Added a 500-barrel mineral filler silo.
- Potential emissions for the project were all below significant levels and therefore did not require a construction permit.
New Source Performance Standards (NSPS) Applicability
40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities
This rule applies to each hot mix asphalt facility and is applied to EP2 in this permit in Permit Condition Subpart I. The facility was required to perform an emission performance test by Construction Permit 012000-006 to determine compliance with this subpart. The testing was conducted on September 12 & 13, 2000 and results showed the facility was in compliance with this subpart at the time. The asphalt plant emitted gases with an average particulate concentration of 0.0066 gr/dscf.

This rule applies to crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent equipment up to the first storage silo or bin. This facility does not have crushing or grinding equipment and is therefore not subject to this rule.

40 CFR Part 60, Subpart UU – Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture
This subpart is not applicable because it only applies to “asphalt roofing plants” (plants which produce asphalt roofing products), “asphalt processing plants” (plants which blow asphalt for use in the manufacture of asphalt products), and petroleum refineries and this facility does not meet the definitions of any of these in 40 CFR 60.471.

Maximum Achievable Control Technology (MACT) Applicability
This facility is not subject to these subparts because it does not meet the definition of an “asphalt processing facility” or “asphalt roofing manufacturing facility” in 40 CFR 63.8698 and 40 CFR 63.115599(c).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation’s operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.
Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
None.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.
1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

The draft Intermediate Operating Permit for Fred Weber, Inc. - O'Fallon Asphalt (189-0004) was placed on public notice as of October 19, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: http://dnr.mo.gov/env/apecp/permit-public-notices.htm.

No Comments were received.