

STATE OF MISSOURI

2013-06-04



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: 082013-004

Project Number: 2013-06-040
Installation ID: PORT-0700

Parent Company: Fred Weber, Inc.

Parent Company Address: 2320 Creve Coeur Mill Road, Maryland Heights, MO 63043

Installation Name: Fred Weber Inc.

Installation Address: 1600 Terra Lane West, O'Fallon, MO 63366

Location Information: St. Charles County, S17, T47N, R2E/3E

Application for Authority to Construct was made for:
Installation of a new portable rock-crushing plant (PC #11). This review was conducted in accordance with Section (6), 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.

AUG 8 2013

EFFECTIVE DATE

Kyra L Moore
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 Department's Air Pollution Control Program of the anticipated date of startup of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual startup 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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Project No.	2013-06-040

GENERAL SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

1. **Equipment Identification Requirement**
Fred Weber Inc. shall maintain easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable rock crushing plant.
2. **Relocation of Portable Rock Crushing Plant**
 - A. Fred Weber Inc. shall not be operated at any location longer than 24 consecutive months except if the Site Specific Special Conditions of this portable plant, PORT-0700, contain a nonroad engine requirement limiting the portable plant at the site specific location to 12 consecutive months.
 - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable rock crushing plant.
 - 1) If the portable rock crushing plant is moving to a site previously permitted, and if the circumstances at the site have not changed, then the application must be received by the Air Pollution Control Program at least seven days prior to the relocation.
 - 2) If the portable rock crushing plant is moving to a new site, or if circumstances at the site have changed (e.g. the site was only permitted for solitary operation and now another plant is located at the site), then the application must be received by the Air Pollution Control Program at least 21 days prior to the relocation. The application must include written notification of any concurrently operating plants.
3. **Annual Emission Limit**
 - A. Fred Weber Inc. shall emit less than 100.0 tons of PM in any 12-month period from the entire installation.
 - B. Fred Weber Inc. shall demonstrate compliance with Special Condition 3.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

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Project No.	2013-06-040

GENERAL SPECIAL CONDITIONS:

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

4. Record Keeping Requirement
Fred Weber Inc. shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.

5. Reporting Requirement
Fred Weber Inc. shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.

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Project No.	2013-06-040

SITE SPECIFIC SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

PORT ID Number: PORT-0700

Site ID Number: 183-0007

Site Name: O'Fallon Quarry

Site Address: 1600 Terra Lane West, O'Fallon, MO 63366

Site County: St. Charles County S17, T47N, R2E/3E

1. **Best Management Practices Requirement**
Fred Weber Inc. shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.
2. **Ambient Air Impact Limitation**
 - A. Fred Weber Inc. shall not cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM₁₀) of 150.0 µg/m³ 24-hour average in ambient air.
 - B. Fred Weber Inc. shall demonstrate compliance with Special Condition 2.A using Attachment B or another equivalent form that has been approved by the Air Pollution Control Program, including electronic forms. Fred Weber Inc. shall account for the impacts from other sources of PM₁₀ as instructed in the attachment.
3. **Minimum Distance to Property Boundary Requirement**
The primary emission point shall be located at least 550 feet from the nearest property boundary.
4. **Primary Equipment Requirement**
Fred Weber Inc. shall process all rock through the primary crusher (EU-3). Bypassing the primary crusher is prohibited.
5. **Non-road Engine Requirement**
Fred Weber Inc. cannot operate at this site longer than 12 consecutive months in order to avoid recordkeeping showing the movement of the engine. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, the engine cannot remain in one physical location for longer than 12 months.

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Project No.	2013-06-040

SITE SPECIFIC SPECIAL CONDITIONS:

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

6. Record Keeping Requirement

Fred Weber Inc. shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources personnel upon request.

7. Reporting Requirement

Fred Weber Inc. shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.

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Project No.	2013-06-040

SITE SPECIFIC SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

PORT ID Number: PORT-0700

Site ID Number: 099-0008

Site Name: Festus Quarry

Site Address: 838 VFW Drive, Festus, MO 63028

Site County: Jefferson County, S16, T4S, R6E

1. **Best Management Practices Requirement**
Fred Weber Inc. shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.
2. **Ambient Air Impact Limitation**
 - A. Fred Weber Inc. shall not cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM₁₀) of 150.0 µg/m³ 24-hour average in ambient air.
 - B. Fred Weber Inc. shall demonstrate compliance with Special Condition 2.A using Attachment C, Attachment D, or other equivalent forms that have been approved by the Air Pollution Control Program, including electronic forms. Fred Weber Inc. shall account for the impacts from other sources of PM₁₀ as instructed in the attachments.
3. **Minimum Distance to Property Boundary Requirement**
The primary emission point shall be located at least 1100 feet from the nearest property boundary.
4. **Primary Equipment Requirement**
Fred Weber Inc. shall process all rock through the primary crusher (EU-3). Bypassing the primary crusher is prohibited.
5. **Non-road Engine Requirement**
Fred Weber Inc. cannot operate at this site longer than 12 consecutive months in order to avoid recordkeeping showing the movement of the engine. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, the engine cannot remain in one physical location for longer than 12 months.

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SITE SPECIFIC SPECIAL CONDITIONS:

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

6. Paved Roads
Fred Weber Inc. shall pave Haul Road #3 (Paved Sales Haul Road) which is approximately 1,175 feet long.
7. Record Keeping Requirement
Fred Weber Inc. shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources personnel upon request.
8. Reporting Requirement
Fred Weber Inc. shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2013-06-040
Installation ID Number: PORT-0700
Permit Number:

O'Fallon Quarry
Fred Weber Inc.
1600 Terra Lane West
O'Fallon, MO 63366
St. Charles County, S17, T47N, R2E/3E

Complete: June 18, 2013

Festus Quarry
Fred Weber Inc.
838 VFW Drive
Festus, MO 63028
Jefferson County, S16, T4S, R6E

Parent Company:
Fred Weber, Inc.
2320 Creve Coeur Mill Road
Maryland Heights, MO 63043

PROJECT DESCRIPTION

Fred Weber Inc. has proposed the installation of a portable rock-crushing (PORT-0700) plant at two locations. The equipment will be operated at Fred Weber Inc. owned quarries located in Festus and O'Fallon, Missouri. The portable rock-crushing plant will operate concurrently with same and separate owner plants at the Festus quarry. The plant will operate concurrently with same owner plants at the O'Fallon quarry. The portable rock-crushing plant is capable of crushing up to 450.0 tons of aggregate per hour. Fred Weber Inc. owns a pool of generators and will choose one based on availability at the time of plant relocation.

The plant will be powered by a diesel engine, however it meets the definition of non-road engine as defined in 40 CFR 89.2 (1)(i). Therefore, the emissions of the engine were not included. Portable plants are allowed to operate at a site for 24 consecutive months. However, Fred Weber, Inc. has requested a voluntary 12 month operation limit at each site to ensure the non-road engine status of the diesel engine without record keeping.

The applicant is using one of the methods described in Attachment AA, "Best Management Practices," to control emissions from haul roads and vehicular activity areas at both sites.

The rock-crushing plant will locate in St. Charles County and Jefferson County, nonattainment areas for the 8-hour ozone standard and the PM_{2.5} standard and attainment areas for all other criteria pollutants.

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

No permits have been issued to Fred Weber Inc. PORT-0700 from the Air Pollution Control Program.

TABLES

The tables below summarize the emissions of this project. Table 1 and Table 2 refer to operation at the O'Fallon Quarry. Table 3 and Table 4 refer to operation at the Festus Quarry. The potential emissions of the process equipment, which excluded emissions from haul roads and wind erosion, are not site specific and should not vary from site to site. The existing actual emissions are unavailable because this is a new plant. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions are based on a mandatory PM emission limit for portable plants based on requirements found in 10 CSR 10-6.060 Section (4).

Table 1: Emissions Summary for the O'Fallon Quarry (tons per year)

Air Pollutant	De Minimis Level	^a Potential Emissions of Process Equipment	Existing Actual Emissions (2012 EIQ)	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	107.35	N/A	290.28	<100.0
PM ₁₀	15.0	39.29	N/A	111.29	38.43
PM _{2.5}	10.0	6.97	N/A	28.62	9.84
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
GHG (CO ₂ e)	100,000	N/A	N/A	N/A	N/A
GHG (mass)	0.0 / 100.0	N/A	N/A	N/A	N/A
Total HAPs	25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

^aPotential Emissions of Process Equipment

^bIncludes site specific haul road and storage pile emissions

Table 2: O'Fallon Quarry Ambient Air Quality Impact Analysis

Pollutant	^a NAAQS (µg/m ³)	Averaging Time	^b Maximum Modeled Impact (µg/m ³)	Limited Impact (µg/m ³)	Background (µg/m ³)	^c Daily Limit (tons/day)
^d PM ₁₀ (same)	150.0	24-hour	593.9	130.0	20.0	4,342

^aNational Ambient Air Quality Standards (NAAQS)

^bModeled impact at maximum capacity with controls

^cIndirect limit based on compliance with NAAQS.

^dFred Weber Inc. can operate solitarily or with other plants owned by Fred Weber Inc.

Table 3: Emissions Summary for the Festus Quarry (tons per year)

Air Pollutant	De Minimis Level	^a Potential Emissions of Process Equipment	Existing Actual Emissions (2012 EIQ)	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	107.35	N/A	382.74	<100.0
PM ₁₀	15.0	39.29	N/A	128.21	33.53
PM _{2.5}	10.0	6.97	N/A	31.11	8.13
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
GHG (CO ₂ e)	100,000	N/A	N/A	N/A	N/A
GHG (mass)	0.0 / 100.0	N/A	N/A	N/A	N/A
Total HAPs	25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

^aPotential Emissions of Process Equipment

^bIncludes site specific haul road and storage pile emissions

Table 4: Festus Quarry Ambient Air Quality Impact Analysis

Pollutant	^a NAAQS (µg/m ³)	Averaging Time	^b Maximum Modeled Impact (µg/m ³)	Limited Impact (µg/m ³)	Background (µg/m ³)	^c Daily Limit (tons/day)
^d PM ₁₀ (same)	150.0	24-hour	203.36	130.0	20.0	7,102
^e PM ₁₀ (separate)	150.0	24-hour	203.36	104.68	^f 45.32	5,720

^aNational Ambient Air Quality Standards (NAAQS)

^bModeled impact at maximum capacity with controls

^cIndirect limit based on compliance with NAAQS.

^dFred Weber Inc. operating solitarily or with other plants owned by Fred Weber Inc.

^eFred Weber Inc. operating with plants that are not owned by Fred Weber Inc.

^fAccounts for background ambient air impact and the allowed separate owner impact

EMISSIONS CALCULATIONS

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

Emissions from the rock-crushing equipment were calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004. The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5 percent (%) by weight.

The engine emissions were not evaluated for this review as the diesel engine at this site is classified as a non-road engine. 40 CFR 63 Subpart ZZZZ, "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" do not apply. However, if the plant were to remain in one location for longer than 12 consecutive months, it would not be in compliance with this permit because engine emissions were not evaluated. It may also not be in compliance with 40 CFR 63 Subpart ZZZZ or 40 CFR 60 Subpart IIII if the plant were to remain in one location for longer than 12 consecutive months.

Emissions from unpaved haul roads and vehicular activity areas were calculated using the predictive equations from AP-42 Section 13.2.2 "Unpaved Roads," November 2006. A 90% control efficiency for PM and PM₁₀ and a 40% control efficiency for PM_{2.5} are applied to the emission calculations for the use of BMPs. Emissions from the paved haul road (Haul Road #3) were calculated using the predictive equations from AP-42 Section 13.2.1 "Paved Roads," January 2011. Emissions from load-in and load-out of storage piles were calculated using the predictive equation from AP-42 Section 13.2.4. The moisture content of the aggregate is by default 0.7% by weight. Emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program's Emissions Inventory Questionnaire Form 2.8 "Storage Pile Worksheet."

AMBIENT AIR QUALITY IMPACT ANALYSIS

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of the pollutants listed in Tables 2 and 4. The Air Pollution Control Program requires an AAQIA of PM₁₀ for all asphalt, concrete and rock-crushing plants regardless of the level of PM₁₀ emissions if a permit is required. An AAQIA is required for other pollutants if their emissions exceed their respective de minimis or screening model action level (SMAL). The AAQIA was performed using the Air Pollution Control Program's generic nomographs. For each pollutant that was modeled, the maximum concentration that occurs at or beyond the site boundary was compared to the National Ambient Air Quality Standard (NAAQS) or Risk Assessment Level (RAL) for the pollutant. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS or RAL, the plant's production is limited to ensure compliance with the standard. This plant uses BMPs to control emissions from haul roads and vehicular activity areas, so emissions from these sources were not included in the AAQIA. Instead they were addressed as a background concentration of 20 µg/m³ of PM₁₀ in accordance with the Air Pollution Control Program's BMPs interim policy.

OPERATING SCENARIOS-O'Fallon Quarry

The plant is permitted to operate with other plants that are owned by Fred Weber Inc. located at the site as long as the NAAQS is not exceeded. The following scenarios explain how Fred Weber Inc. shall demonstrate compliance with the NAAQS.

- When no other plants are located at this site, Fred Weber, Inc. must calculate the daily impact of PORT-0700 and limit the total impact of the plant to not exceed the NAAQS using Attachment B.
- When plants that are owned by Fred Weber, Inc., which are referred to as same owner plants, are located at the site, Fred Weber, Inc. must calculate the daily impact of each plant and limit the total impact of all plants to not exceed the NAAQS using Attachment B.
- Fred Weber Inc. PORT-0700 is not permitted to operate when plants that are not owned by Fred Weber, Inc., which are referred to as separate owner plants, are located at this site.

OPERATING SCENARIOS-Festus Quarry

The plant is permitted to operate with other plants located at the site as long as the NAAQS is not exceeded. The following scenarios explain how Fred Weber Inc. shall demonstrate compliance with the NAAQS.

- When no other plants are located at this site Fred Weber, Inc. must calculate the daily impact of PORT-0700 and limit the total impact of the plant to not exceed the NAAQS using Attachment C.
- When plants that are owned by Fred Weber, Inc., which are referred to as same owner plants, are located at the site, Fred Weber, Inc. must calculate the daily impact of each plant and limit the total impact of all plants to not exceed the NAAQS using Attachment C.
- When plants that are not owned by Fred Weber, Inc., which are referred to as separate owner plants, are located at the site, Fred Weber, Inc. must account for the impacts of these plants as a background concentration and add it to the total impact of all plants owned by Fred Weber, Inc. that are operating at the site using Attachment D. This total is limited below the NAAQS. Fred Weber, Inc. will limit the total impact of all plants they own and operate at the site to $104.68 \mu\text{g}/\text{m}^3$ when any plants they do not own are located at the site. Fred Weber Inc. is not permitted to operate with any plant that is not owned by Fred Weber, Inc. that has a separate owner background greater than $25.32 \mu\text{g}/\text{m}^3$.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM are above de minimis levels.

APPLICABLE REQUIREMENTS

Fred Weber Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110.
- No Operating Permit is required for this portable 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 10-6.165

SPECIFIC REQUIREMENTS

- 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" applies to the equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) apply to the proposed equipment.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

J Luebbert
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 17, 2013, received June 18, 2013, designating Fred Weber, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Attachment AA: Best Management Practices

Haul roads and vehicular activity areas shall be maintained in accordance with at least one of the following options when the portable plant is operating.

1. Pavement
 - A. The operator shall pave the area with materials such as asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions¹ while the plant is operating.
 - B. Maintenance and 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 shall periodically wash or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Application of Chemical Dust Suppressants
 - A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
 - B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with the manufacturer's recommendation (if available) and in sufficient quantities to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator 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 shall keep these records with the plant for not less than five (5) years and make these records available to Department of Natural Resources personnel upon request.

3. Application of Water-Documented Daily
 - A. The operator shall apply water to unpaved areas. Water shall be applied at a rate of 100 gallons per day per 1,000 square feet of unpaved or untreated surface area while the plant is operating.
 - B. Precipitation may be substituted for watering if the precipitation is greater than one quarter of one inch and is sufficient to control fugitive emissions.
 - C. 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.
 - D. The operator shall record the date, volume of water application and total surface area of active haul roads or the amount of precipitation that day. The operators shall also record the rationale for not watering (e.g. freezing conditions or not operating).
 - E. The operator shall keep these records with the plant for not less than five (5) years, and the operator shall make these records available to Department of Natural Resources personnel upon request.

¹For 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.)

Ms. Lina Klein
Environmental Director
Fred Weber Inc.
2320 Creve Coeur Mill Road
Maryland Heights, MO 63043

RE: New Source Review Permit - Project Number: 2013-06-040

Dear Ms. Klein:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. 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 J Luebbert, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:jlk

Enclosures

c: St. Louis Regional Office
PAMS File: 2013-06-040

Permit Number: