



Missouri Department of Natural Resources
Air Pollution Control Program

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: OP2014-008
Expiration Date: MAY 15 2019
Installation ID: 189-1249 & 189-1250
Project Number: 2012-08-076

Installation Name and Address

Fred Weber, Inc. - North Asphalt (H&B & Barber-Green Plants)
2305 Creve Coeur Mill Road
Maryland Heights, MO 63043
St. Louis County

Parent Company's Name and Address

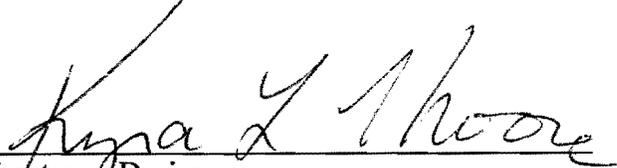
Fred Weber, Inc.
2320 Creve Coeur Mill Road
Maryland Heights, MO 63043

Installation Description:

Fred Weber, Inc. operates two asphalt plants, H&B (189-1249) and Barber-Green (189-1250), in Maryland Heights, Missouri. The installation is a synthetic minor source of CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e}.

MAY 16 2014

Effective Date


Director of Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Fred Weber, Inc. operates two asphalt plants, H&B (189-1249) and Barber-Green (189-1250), in St. Louis county. St. Louis county is a currently designated nonattainment area for the 1997 PM_{2.5} NAAQS and the 1997 and 2008 eight-hour ozone NAAQS. The installation is a synthetic minor source of CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e}.

The facility receives cold aggregate by truck. The cold aggregate is stored in cold feed bins. The cold aggregate is conveyed from the bins to one of two dryers. Hot aggregate from the dryers drops into a bucket elevator and is transferred to a set of vibrating screens which classify the hot aggregate by size. The classified hot aggregate is dropped into individual hot storage bins. To control aggregate size distribution in the final asphalt batch mix, the operator opens various hot bins over a weigh hopper until the desired mix and weight are obtained. Concurrent with the hot aggregate being weighed, liquid asphalt cement is pumped from a heated storage tank to an asphalt bucket, where it is weighed to achieve the desired aggregate-to-asphalt cement ratio in the final mix. The hot aggregate from the weigh hopper is dropped into the mixer and dry-mixed for six to ten seconds. The liquid asphalt cement is then dropped into the mixer where it is mixed for an additional period of time. Total mixing time usually is less than 60 seconds. Then the hot mix is conveyed to a hot storage silo or is dropped directly into a truck and hauled to the job site.

The installation is on the List of Named Installations found at 10 CSR 10-6.020(3)(B) Table 2. The installation is classified as item number 27 – “Any other stationary source category which, as of August 7, 1980, is being regulated under §111 or §112 of the Clean Air Act”, specifically, 40 CFR Part 60, Subpart I. NSPS I is only applicable to Barber-Green (189-1250). NSPS I is not applicable to H&B (189-1249) as it was constructed prior to June 11, 1973. As a named installation, fugitive emissions from the installation are counted toward major source applicability. Fugitive emissions at the installation include haul roads.

189-1249 H&B Reported Air Pollutant Emissions (tpy)					
Pollutants	2012	2011	2010	2009	2008
PM ₁₀	2.01	2.01	2.33	2.33	2.79
PM _{2.5}	-	-	0.53	0.53	0.62
SO _x	0.82	0.82	0.73	0.73	0.88
NO _x	4.64	4.64	9.46	9.46	9.19
VOC	1.48	1.48	1.36	1.36	1.64
CO	33.57	33.57	31.15	31.15	37.15
HAP	1.35	1.35	1.44	1.44	1.44
Xylene (1330-20-7)	0.48	0.48	0.52	0.52	0.52
Ethylbenzene (100-41-4)	0.39	0.39	0.42	0.42	0.42
Toluene (108-88-3)	0.18	0.18	0.19	0.19	0.19
Formaldehyde (50-00-0)	0.13	0.13	0.14	0.14	0.14
Acetaldehyde (75-07-0)	0.06	0.06	0.06	0.06	0.06
Benzene (71-43-2)	0.05	0.05	0.05	0.05	0.05
Quinone (106-51-4)	0.05	0.05	0.05	0.05	0.05
Naphthalene (91-20-3)	0.01	0.01	0.01	0.01	0.01
Manganese Compounds (20-12-2)	0.001	0.001	-	-	-

189-1250 Barber-Green Reported Air Pollutant Emissions (tpy)					
Pollutants	2012	2011	2010	2009	2008
PM ₁₀	0.64	0.64	0.23	0.23	0.44
SO _x	0.17	0.17	0.23	0.23	0.43
NO _x	1.18	1.18	1.24	1.24	2.34
VOC	0.005	0.005	0.41	0.41	0.77
CO	15.01	15.01	25.62	25.62	37.42
HAP	0.27	0.27	0.60	0.60	0.60
Xylene (1330-20-7)	0.10	0.10	0.21	0.21	0.21
Ethylbenzene (100-41-4)	0.08	0.08	0.17	0.17	0.17
Toluene (108-88-3)	0.04	0.04	0.08	0.08	0.08
Formaldehyde (50-00-0)	0.03	0.03	0.06	0.06	0.06
Acetaldehyde (75-07-0)	0.01	0.01	0.03	0.03	0.03
Benzene (71-43-2)	0.01	0.01	0.02	0.02	0.02
Quinone (106-51-4)	0.01	0.01	0.02	0.02	0.02
Manganese Compounds (20-12-2)	0.002	0.002	-	-	-
Naphthalene (91-20-3)	0.001	0.001	0.003	0.003	0.003
Nickel Compounds (20-14-4)	0.001	0.001	-	-	-

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the emission sources at this installation which emit air pollutants and are identified as having emission source-specific emission limitations. These emission sources are also subject to the plantwide emission limitations.

Plant ID	Emission Source	Description	MHDR	Applicable Requirements
189-1249	EP1	Cold Aggregate Handling	420 tph	§6.220 & §6.400
	EP2	Stack #1 (natural gas-fired dryer, hot screens, & mixer)	420 tph, 120 MMBtu/hr	§6.220
189-1250	EP1	Cold Aggregate Handling	300 tph	§6.220 & §6.400
	EP2 ¹	Stack #2 (natural gas-fired/landfill gas-fired dryer, hot screens, & mixer)	300 tph, 85 MMBtu/hr	NSPS I & §6.220
	WASH-1	Parts Washer	-	§5.300

¹The dryer at Barber-Green (189-1250) can be operated on either natural gas or landfill gas. The installation has previously failed to report emissions from the combustion of landfill gas in the dryer in their EIQ. The installation is required to report landfill gas emissions from Stack #2 in their 2014 EIQ.

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the emission sources at the installation which do not have emission source-specific limitations at the time of permit issuance. These emission sources are subject to the plantwide emission limitations.

Plant ID	Emission Source	Description	MHDR
189-1249	EP3 ¹	Asphalt Heater (natural gas)	5 MMBtu/hr
189-1249	EP4 ¹	Asphalt Heater (landfill gas)	5 MMBtu/hr
189-1250	EP3	Asphalt Heater (natural gas)	2.8 MMBtu/hr
-	-	336 foot Paved Aggregate Haul Road	3.458 VMT/hr
-	-	1,438 One-way Paved Product Haul Road	8.5257 VMT/hr
-	-	(6) 30,000 gallon heated asphalt cement storage tanks	-
-	-	15,000 gallon diesel storage tank	-
-	-	15,000 gallon storage tank contains a mix of asphalt cement and diesel	-

¹The asphalt heater at H&B (189-1249) can be operated on either natural gas or landfill gas, while combusting natural gas emissions are reported under EP3, while combusting landfill gas emissions are reported under EP4.

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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.

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100.0 tons of CO from the entire installation (both plants 189-1249 and 189-1250 combined) in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain records of their monthly and 12-month rolling total CO emissions.
2. The permittee shall retain calculations to support their monthly and 12-month rolling total CO emissions which shall include the monthly throughput of each CO emission source. The calculations shall use the following emission factors:
 - a) H&B (189-1249)
 - i) 0.1871 lb CO/ton for EP2 Stack #1 (natural gas-fired dryer, hot screens, & mixer) obtained from the installation's September 1992 stack test.
 - ii) 35 lb CO/MMscf for EP3 Asphalt Heater (natural gas) obtained from FIRE for Process SCC 30600105.
 - iii) 7 lb CO/MMscf for EP4 Asphalt Heater (landfill gas) obtained from AP-42 Table 2.4-4 for Process SCC 50100423 (October 2008 draft).
 - b) Barber-Green (189-1250)
 - i) 0.40 lb CO/ton for EP2 Stack #2 (natural gas-fired dryer, hot screens, & mixer) obtained from AP-42 Table 11.1-5 for Process SCC 30500245 (April 2004).
 - ii) 0.51 lb CO/ton for EP2 Stack #2 (landfill gas-fired dryer) obtained from the installation's June 2009 stack test.
 - iii) 35 lb CO/MMscf for EP3 Asphalt Heater (natural gas) obtained from FIRE for Process SCC 30600105.
 - c) The permittee may replace any emission factor with an emission factor obtained from site-specific stack testing, provided the stack testing results were reviewed and approved by the Air Pollution Control Program.
 - d) If any of the emission factors obtained from FIRE for the Process SCCs listed are revised, the permittee shall use the revised emission factor for the Process SCC listed. The permittee can access FIRE at: <http://cfpub.epa.gov/webfire/index.cfm?action=fire.SearchEmissionFactors>.
 - e) If any of the emission factors obtained from AP-42 for the Process SCCs listed are revised, the permittee shall use the revised emission factor for the Process SCC listed. The permittee can access AP-42 at: <http://www.epa.gov/ttn/chief/ap42/>.
 - f) The permittee does not operate any CO control devices and shall not use any control efficiencies in their monthly or 12-month rolling total CO emissions calculations.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which 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 monitoring report and 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 CFR and 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.

PERMIT CONDITION 001		
10 CSR 10-5.300 Control Of Emissions From Solvent Metal Cleaning		
Plant ID	Emission Source ID	Description
189-1250	WASH-1	Parts Washer

Equipment Specifications:

1. The permittee shall not use, sell, or offer for sale for use within the City of St. Louis and St. Charles, St. Louis, Jefferson and Franklin Counties a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F) unless used for carburetor cleaning. [§5.300(3)(A)1.A]
2. 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. [§5.300(3)(A)1.C]
3. When one 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 ft², this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems): [§5.300(3)(A)1.E]
 - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C (100°F); [§5.300(3)(A)1.E(I)]
 - b) The solvent is agitated; or [§5.300(3)(A)1.E(II)]
 - c) The solvent is heated. [§5.300(3)(A)1.E(III)]
4. Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [§5.300(3)(A)1.F]
5. If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [§5.300(3)(A)1.G]
6. Solvent sprays, if used, 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. [§5.300(3)(A)1.H]
7. 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. [§5.300(3)(A)1.I]
8. Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or heated above 48.9°C (120°F) shall use one of the following control devices: [§5.300(3)(A)1.J]
 - a) A freeboard ratio of at least 0.75; [§5.300(3)(A)1.J(I)]
 - b) Water cover (solvent shall be insoluble in and heavier than water); or [§5.300(3)(A)1.J(II)]
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems shall receive approval from the director and EPA prior to their use. [§5.300(3)(A)1.J(III)]

Operating Procedure Requirements:

1. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent shall drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [§5.300(3)(B)1.A]
2. Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [§5.300(3)(B)1.B]
3. Whenever a cold cleaner fails to perform within the operating requirements of 10 CSR 10-5.300, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the operating requirements. [§5.300(3)(B)1.C]
4. Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired. [§5.300(3)(B)1.D]
5. Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the director and EPA: [§5.300(3)(B)1.E]
 - a) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or [§5.300(3)(B)1.E(I)]
 - b) Stored in closed containers for transfer to— [§5.300(3)(B)1.E(II)]
 - i) A contract reclamation service; or [§5.300(3)(B)1.E(II)(a)]
 - ii) A disposal facility approved by the director and EPA. [§5.300(3)(B)1.E(II)(b)]
6. Waste solvent shall be stored in closed containers only. [§5.300(3)(B)1.F]

Operator and Supervisor Training:

1. Only persons trained in at least the operational and equipment requirements specified in 10 CSR 10-5.300 for the particular solvent metal cleaning process shall be permitted to operate the equipment. [§5.300(3)(C)1]
2. The person who supervises any person who operates solvent cleaning equipment regulated by 10 CSR 10-5.300 shall receive equal or greater operational training than the operator. [§5.300(3)(C)2]
3. A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months. [§5.300(3)(C)3]
4. Training records shall be maintained per §5.300(4)(D) and (E). [§5.300(3)(C)4]

Reporting and Recordkeeping:

1. The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the cold solvent cleaner and any associated control equipment. 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. [§5.300(4)(A)]
2. If the permittee uses any solvent subject to the requirements of §5.300(3)(A)1.A, the permittee shall maintain records which include for each purchase of cold cleaning solvent: [§5.300(4)(B)]
 - a) The name and address of the solvent supplier; [§5.300(4)(A)1]
 - b) The date of purchase; [§5.300(4)(A)2]
 - c) The type of solvent; and [§5.300(4)(A)3]
 - d) The vapor pressure of the solvent in mmHg at 20°C (68°F). [§5.300(4)(A)4]
3. If the permittee sells or offer for sale any solvent subject to the requirements of §5.300(3)(A)1.A, the permittee shall maintain records which include for each sale of cold cleaning solvent: [§5.300(4)(C)]

- a) The name and address of the solvent purchaser; [§5.300(4)(C)1]
- b) The date of sale; [§5.300(4)(C)2]
- c) The type of solvent; [§5.300(4)(C)3]
- d) The unit volume of solvent; [§5.300(4)(C)4]
- e) The total volume of solvent; and [§5.300(4)(C)5]
- f) The vapor pressure of the solvent measured in mmHg at 20°C (68°F). [§5.300(4)(C)6]
4. A record shall be kept of solvent metal cleaning training required by §5.300(3)(C). [§5.300(4)(D)]
5. All records required under §5.300(4)(A) through (D) shall be retained for five years and shall be made available to the director upon request. [§5.300(4)(E)]
6. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
7. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002		
10 CSR 10-6.070 New Source Performance Regulations		
40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities		
Plant ID	Emission Source ID	Description
189-1250	EP2	Stack #2 (natural gas-fired/landfill gas-fired dryer, hot screens, & mixer)

Emission Limitation:

1. On and after the date on which the performance test required to be conducted by §60.8 is completed, the permittee shall not discharge or cause the discharge into the atmosphere from any affected facility any gases which: [§60.92(a)]
 - a) Contain PM in excess of 90 mg/dscm (0.04 gr/dscf). [§60.92(a)(1)]
 - b) Exhibit 20 percent opacity, or greater. [§60.92(a)(2)]

Test Methods and Procedures:

The permittee shall refer to §60.93 for test methods and procedures applicable under 40 CFR Part 60, Subpart I.

Reporting and Recordkeeping:

1. The permittee shall retain records of their most recent performance tests.
2. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
3. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Plant ID	Emission Source ID	Description
189-1249	EP1	Cold Aggregate Handling
189-1250	EP1	Cold Aggregate Handling

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.

2. Exceptions:

- a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than 25 lb/hr of PM shall be limited to 40 percent opacity.
- b) The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible emissions are observed using Method 22, then no further observations would be required. For emission units with visible emissions, the permittee representative would then conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions and maintenance using Attachment D.
3. The permittee shall maintain records of any Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants 10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)		
Plant ID	Emission Source ID	Description
189-1249	EP2	Stack #1 (natural gas-fired dryer, hot screens, & mixer)

Emission Limitations:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.
2. Exceptions:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than 25 lb/hr of PM shall be limited to 40 percent opacity.
 - b) The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Operational Limitation:

1. The permittee shall control emissions from the asphalt dryer, hot screen, and mixer using a baghouse as specified in the application.
2. The baghouse shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources’ employees may easily observe them.
3. Replacement bags shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours while the emission sources are in operation. The operating pressure drop shall be maintained within the design conditions specified in the manufacturer’s operation and maintenance manual.
2. The permittee shall maintain a copy of the manufacturer’s operation and maintenance manual onsite.
3. The permittee shall maintain an operating and maintenance log for the baghouse using Attachment D or an equivalent form approved by the Air Pollution Control Program 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. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
5. All records must be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the

terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

- The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005		
10 CSR 10-6.400 Restriction of Emission of PM From Industrial Processes		
Plant ID	Emission Source ID	Description
189-1249	EP1	Cold Aggregate Handling
189-1250	EP1	Cold Aggregate Handling

Emission Limitation:

The permittee shall not emit PM in excess of the limits given in the following table:

Plant ID	Emission Source ID	Description	PM Emission Limit (lb/hr)
189-1249	EP1	Cold Aggregate Handling	63.00
189-1250	EP1	Cold Aggregate Handling	66.89

Compliance Demonstration:

The following table demonstrates that the emission sources are in compliance with the regulation:

Plant ID	Emission Unit	MHDR (tph)	PM Emission Factor (lb/ton)	Emission Factor Source	Potential Uncontrolled PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
189-1249	EP1	300	0.009032	AP-42 Table 11.19-2-2 ¹	2.71	63.00
189-1250	EP1	420	0.009032		3.79	66.89

¹The emission factor for the cold aggregate handling is a composite emission factor including 0.000032 lb/ton from truck unloading and three conveyor drop points, 0.003 lb/ton each.

Monitoring/Recordkeeping/Reporting:

The compliance demonstration shows that the emission sources are in compliance with this regulation without the aid of a control device; therefore, no additional monitoring, recordkeeping, or reporting is required at this time.

PERMIT CONDITION 006		
10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)		
Plant ID	Emission Source ID	Description
189-1250	EP2	Stack #2 (natural gas-fired dryer, hot screens, & mixer)

Operational Limitation:

- The permittee shall control emissions from the asphalt dryer, hot screens, and mixers using a baghouse as specified in the application.
- The baghouse shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources’ employees may easily observe them.

3. Replacement bags shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours while the emission sources are in operation. The operating pressure drop shall be maintained within the design conditions specified in the manufacturer's operations and maintenance manual.
2. The permittee shall maintain a copy of the manufacturer's operations and maintenance manual onsite.
3. The permittee shall maintain an operating and maintenance log for the baghouse using Attachment D or an equivalent form approved by the Air Pollution Control Program 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. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and 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 CFR, 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 is only an excerpt from the regulation or code, and is 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. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
 - i) The open burning of household refuse is prohibited.
 - b) Yard waste, with the following exception:
 - i) The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed 16 ft². Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities.
3. 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 permittee fails to comply with the conditions or any provisions of the permit.
4. Fred Weber, Inc. - North Asphalt (H&B & Barber-Green Plants) may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Fred Weber, Inc. - North Asphalt (H&B & Barber-Green Plants) fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)11, the director shall not issue an open burning permit unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of NSPS CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS CCCC, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by NSPS Appendix A – Test Methods, Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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) Best 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 list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under §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 §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 §§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 18 months.

[§6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [§6.065(5)(C)(1) and (6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

[§6.065(5)(C)(1) and (6)(C)3.B]

10 CSR 10-6.080 Emission Standards for HAP and 40 CFR Part 61 Subpart M - National Emission Standard for Asbestos

1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M - *National Emission Standard for Asbestos*.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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. The permittee shall 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 Submission of Emission Data, Emission Fees and Process Information

1. The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on EIQ paper forms on the frequency specified in this rule and in accordance with the requirements outlined in 10 CSR 10-6.110. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. The permittee may be required by the director to file additional reports.
3. 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.
4. The permittee shall submit a full EIQ for the 2014, 2017, and 2020 reporting years. 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.
5. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060(5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
6. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
7. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director.

The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

8. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
9. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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 10-6.170 Restriction of PM 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 installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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:

1. 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.
2. The permittee shall maintain the following monitoring schedule:

- a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
- b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two weeks for a period of eight weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

1. The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether equipment malfunctions contributed to an exceedance.
 - c) Any violations and any corrective actions undertaken to correct the violation.

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment 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. 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 (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.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

1. The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
 - a) Areas in which there are one or more existing sources and/or proposed new sources of PM in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2,000 tpy or 500 lb/hr.
 - b) Areas in which there are one or more existing sources and/or proposed new sources of SO₂ in any circular area with a diameter of two miles from which the sum of SO₂ emissions from these sources allowed by regulations of general application are or would be greater than 1,000 tons for any consecutive three months or 1,000 lb/hr.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. Individuals who work in asbestos abatement projects shall be certified by the Air Pollution Control Program. Training providers who offer training for asbestos abatement occupations shall be accredited by the Air Pollution Control Program. Persons who hold exemption status from certain requirements of this rule shall allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects shall first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations shall first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status shall allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

This requirement is not state enforceable.

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 §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §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 40 CFR Part 82, Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - *Servicing of MVACs*. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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*.

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 by a permittee:
 - 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, “NSPS”;
 - 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.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR and 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)(E)2 and (6)(C)1.B 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.

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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - 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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 10 CSR 10-6.065(6)(C)7 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, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- 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 §112(r)

- 1. The permittee shall comply with the requirements of 40 CFR Part 68 - *Accidental Release Prevention Requirements*. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by §68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) The date on which a regulated substance is first present above a threshold quantity in a process.

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, (6)(C)3.D, (5)(C)3, (6)(C)3.E(I) – (III), and (6)(C)3.E(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's 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.A 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. 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)39 Responsible Official

The application utilized in the preparation of this permit was signed by Douglas K. Weible, Chief Executive Officer. On November 19, 2013, the Air Pollution Control Program was informed that the following persons have been designated responsible officials:

- ◆ Douglas Weible – Chairman, CEO
- ◆ Dale Hoette – President & CFO
- ◆ Tom Hayes – President Midwest Region
- ◆ Roger Gagliano – President of Operations & COO
- ◆ Chris Gottman – President Texas Region
- ◆ Konn Wilson – President Business Development
- ◆ Wendy Alexander – Senior Vice President Financial Management
- ◆ Dave Rogers – Senior Vice President Estimating
- ◆ Julie Shields – Senior Vice President Human Resources
- ◆ Chris Wilmes – Senior Vice President Special Projects

- ◆ Jason Bish – Vice President Safety/Risk Management
- ◆ Debbie Puyear – Vice President Corporate Services & Treasurer
- ◆ Paul Robinson – Vice President Material Services

If these persons terminate employment, or are reassigned different duties such that different persons becomes the responsible persons to represent and bind the installation in environmental permitting affairs, the permittee 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 persons assigned by permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible persons 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

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources 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,
 - b) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - c) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(5)(E)1.A and (6)(E)1.C Statement of Basis

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 E contains a list of abbreviations and acronyms used throughout this permit.

Attachment C

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

Attachment E Abbreviations and Acronyms

°Cdegrees Celsius	µg/m³ micrograms per cubic meter
°Fdegrees Fahrenheit	m/s meters per second
AAQIAambient air quality impact analysis	mgmilligrams
acfmactual cubic feet per minute	Mgal 1,000 gallons
BACTBest Available Control Technology	MW megawatt
BMPsBest Management Practices	MHDR maximum hourly design rate
BtuBritish thermal unit	MMBtu Million British thermal units
CAMCompliance Assurance Monitoring	mmHgmillimeters mercury
CASChemical Abstracts Service	MMscf Million standard cubic feet
CEMSContinuous Emission Monitor System	MSDS Material Safety Data Sheet
CFRCode of Federal Regulations	NAAQS National Ambient Air Quality Standards
COcarbon monoxide	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CO₂carbon dioxide	NO_x nitrogen oxides
CO_{2e}carbon dioxide equivalent	NSPS New Source Performance Standards
COMSContinuous Opacity Monitoring System	NSR New Source Review
CSRCode of State Regulations	PM particulate matter
dscfdry standard cubic feet	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
dscmdry standard cubic meter	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
EIQEmission Inventory Questionnaire	ppm parts per million
EPEmission Point	PSD Prevention of Significant Deterioration
EPAEnvironmental Protection Agency	psipounds per square inch
EUEmission Unit	PTE potential to emit
FGDflue gas desulfurization	RACT Reasonable Available Control Technology
FIREEPA’s Factor Information Retrieval System	RAL Risk Assessment Level
fpsfeet per second	SCC Source Classification Code
ftfeet	scfm standard cubic feet per minute
GACTGenerally Available Control Technology	SCR selective catalytic reduction
GHGGreenhouse Gas	SIC Standard Industrial Classification
gpmgallons per minute	SIP State Implementation Plan
grgrains	SMAL Screening Model Action Levels
GWPGlobal Warming Potential	SO_x sulfur oxides
HAPHazardous Air Pollutant	SO₂ sulfur dioxide
hrhour	tph tons per hour
HPhorsepower	tpy tons per year
lbpound	VMT vehicle miles traveled
lb/hrpounds per hour	VOC Volatile Organic Compound
MACTMaximum Achievable Control Technology	

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.

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 August 31, 2012
- 2) 2012, 2011, 2010, 2009, and 2008 EIQs
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) FIRE: <http://cfpub.epa.gov/webfire/index.cfm?action=fire.SearchEmissionFactors>

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading, and Transfer* is not applicable to the installation and has not been applied within this permit. The installation does operate two 15,000 gallon petroleum storage tanks, one holds diesel and the other a mix of diesel and asphalt cement; however, diesel has a maximum true vapor pressure of less than 27.6 kPa at 90°F and is exempt per §5.220(1)(C)1.B.

10 CSR 10-5.310 *Liquefied Cutback Asphalt Paving Restricted* is not applicable to the installation and has not been applied within this permit. The installation does not use, produce, or supply liquefied cutback asphalt.

10 CSR 10-5.500 *Control of Emissions From Volatile Organic Liquid Storage* is not applicable to the installation and has not been applied within this permit. The installation does not operate any tanks with a capacity of 40,000 gallons or greater.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The only source of sulfur compounds at the installation is from the combustion of natural gas in the asphalt dryers and heaters; however, sources exclusively combusting pipeline grade natural gas are exempt from this regulation per §6.260(1)(A)2. Note: the installation does also combustion landfill gas; however, AP-42 indicates the combustion of methane does not result in any emission of sulfur compounds.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation and has not been applied within this permit. The installation is exempt from this regulation per §6.405(1)(E) as they are fueled only by landfill gas (methane) and natural gas.

Construction Permits

The installation is a grandfathered source. The Air Pollution Control Program has not issued any construction permits to this installation at this time.

NSPS Applicability

40 CFR Part 60, Subpart I – *Standards of Performance for Hot Mix Asphalt Facilities* is applicable to Barber-Green (189-1250) EP2 Stack #2 (natural gas-fired/landfill gas-fired dryer, hot screens, & mixer) and has been applied within this permit (see Permit Condition 002). The hot mix asphalt facility at H&B (189-1249) is not subject to this regulation as it was constructed prior to June 11, 1973. The installation has since replaced the hot screens associated with the hot mix asphalt facility, but the replacement did not constitute a *modification* as defined at §60.2 as the replacement of the hot screens did not increase emissions or cause a new pollutant to be emitted.

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984* is not applicable to the installation and has not been applied within this permit. The installation does operate six 30,000 gallon (113.56 m³) storage tanks; however, these tanks were constructed to hold asphalt cement which has a maximum true vapor pressure below 15.0 kPa.

40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants* is not applicable to the installation and has not been applied within this permit. The installation does not operate any crushers or grinding mills as they do not process reclaimed asphalt pavement (RAP). The permittee receives raw aggregate by truck from an off-site location.

MACT Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. WASH-1 Parts Washer is a batch cold solvent cleaning machine; however, the emission source does not use any solvents containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3).

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for HAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit. The installation does include two process heaters: H&B (189-1249) EP2 & EP3 Asphalt Heater and Barber-Green (189-1250) EP3 Asphalt Heater; however, the installation is not a major source of HAP.

40 CFR Part 63, Subparts LLLLL and AAAAAA – *National Emission Standards for HAP: Asphalt Processing and Asphalt Roofing and Manufacturing* is not applicable to the installation and has not been

applied within this permit. The installation does not meet the definition of *asphalt processing facility* at §63.8698 and §63.11566.

National Emission Standards for HAP Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Installation’s PTE¹

Pollutant	Major Source Level (tpy)	Unconditioned PTE ² (tpy)	Conditioned PTE ³ (tpy)
CO ₂ e	100,000	132,971.62	27,148.17
PM	n/a	1,160.19	202.25
CO	100	1,015.50	100.00
PM ₁₀	100	292.87	53.14
NO _x	100	146.57	45.69
PM _{2.5}	100	118.52	23.27
SO _x	100	12.32	2.46
VOC	100	25.95	4.45
HAP	25	24.07	4.11
Xylene	10	4.84	1.43
Ethylbenzene	10	4.18	1.17
Hexane	10	1.63	0.33
Toluene	10	2.44	0.53
Formaldehyde	10	1.19	0.39
Acetaldehyde	10	1.01	0.17
Quinone	10	0.85	0.14
Benzene	10	1.32	0.28

¹The following emission units were not included in PTE calculations: (6) 30,000 gallon heated asphalt cement storage tanks, 15,000 gallon diesel storage tank, 15,000 gallon mixed asphalt cement and diesel storage tanks, WASH-1 Parts Washer

²The Unconditioned PTE (tpy) is based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- H&B EP3 and EP4 report natural gas and landfill gas emissions from the same asphalt heater; therefore, only the worst-case fuel was evaluated for each pollutant.
- H&B EP2’s stack is fitted with a high efficiency cyclone and a baghouse. The PM, PM₁₀, and PM_{2.5} emission factors used were fabric filter controlled emission factors; therefore, no additional control efficiency was applied. The baghouse is required by Permit Condition 004.
- Barber-Green EP2’s stack is fitted with a high efficiency cyclone and a baghouse. The PM, PM₁₀, and PM_{2.5} emission factors used were fabric filter controlled emission factors; therefore, no additional control efficiency was applied. The baghouse is required by Permit Condition 006.
- Unconditioned the installation would be a major source of CO, PM₁₀, NO_x, PM_{2.5}, and CO₂e.

³The Conditioned PTE (tpy) includes the 100.0 tpy synthetic minor CO limit of Permit Condition PW001. The 100.0 tpy CO emission limitation restricts the processing rate of Fred Weber, Inc. – North Asphalt. At the restricted processing rate the emissions of PM₁₀, NO_x, PM_{2.5}, and CO₂e are below their respective major source levels; therefore, no additional plantwide synthetic minor limits were included.

Other Regulatory Determinations

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Conditions 003 and 004). The asphalt heaters at both plants are subject to this regulation; however, they combust natural gas or landfill gas and each have potential PM emissions below 0.5 lb/hr. The asphalt heaters are expected to be in compliance with this regulation while being properly maintained and operated; therefore, no monitoring, recordkeeping, or reporting is required for the asphalt heaters at this time. Barber-Green is exempt from this regulation as they are subject to NSPS I.

10 CSR 10-6.400 *Restriction of Emission of PM From Industrial Processes* is applicable to the installation and has been applied within this permit (see Permit Condition 005). The asphalt heaters are exempt from this regulation per §6.400(1)(B)12 as they have potential PM emissions below 0.5 lb/hr. Stacks #1 and #2 (dryers, hot screens, & mixers) are exempt from this regulation per §6.400(1)(B)15 as Permit Conditions 004 and 006 requires them to operate a federally enforceable control device which achieves at least 90 percent PM control.

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen, P.E.
Environmental Engineer III

RESPONSE TO COMMENTS

The draft Intermediate Operating Permit for Fred Weber, Inc. – North Asphalt (189-1249 & 189-1250) was placed on public notice as of March 28, 2014, 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://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Friday, March 28, 2014.

On April 15, 2014, the Air Pollution Control Program received comments from EPA Region 7's R. L. Cheever, Air Permitting and Compliance Branch Environmental Engineer, the comments are addressed below.

EPA Comment:

The Installation Description included in the draft operating permit indicates that Fred Weber, Inc. – North Asphalt “is a synthetic minor source of CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e}.” Permit Condition PW001 establishes a “voluntary emission limitation of less than 100.0 tons of CO from the entire installation (both plants 189-1249 and 189-1250) in any consecutive 12-month period” and appears to be the only permit condition which establishes the “synthetic minor” voluntary limit. This establishment of the “voluntary Limit” is the customary approach taken by MDNR to restrict emissions to below “major source” levels.

PW001, as written, directly restricts CO but does not directly restrict PM₁₀, NO_x, PM_{2.5}, and CO_{2e}. However, there is a footnote included in the installation's PTE table, included in the Statement of Basis which states “the 100.0 tpy CO emission limitation restricts the processing rate of Fred Weber, Inc. – North Asphalt. At the restricted processing rate the emissions of PM₁₀, NO_x, PM_{2.5}, and CO_{2e} are below their respective major source levels; therefore, no additional plantwide synthetic minor emission limitations were included.” However; there is no processing rate restriction included in Permit Condition PW001. Additionally, there is no explanation which shows how a CO limit of less than 100 tpy restricts the other pollutants (PM₁₀, NO_x, PM_{2.5}, and CO_{2e}) to less than 100 tpy.

Finally, it is MDNR's customary practice to attach recordkeeping documentation to the permit which provides for the opportunity for the public to review and MDNR approve the method and approach the permittee uses to certify compliance with their “voluntary limit(s).” The Fred Weber, Inc. – North Asphalt draft operating permit currently out for public review has no such recordkeeping form for CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e}.

Therefore, EPA strongly recommends that MDNR modify the operating permit to include:

- The maximum processing rate used to establish the CO limit;
- Detailed discussion as to how the limits on CO effectively limit the PM₁₀, NO_x, PM_{2.5}, and CO_{2e} limits.
- Attach a detailed recordkeeping form that verifies the methodology Fred Weber, Inc. – North Asphalt is using to indicate compliance will all voluntary CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e} limits.

Missouri Air Pollution Control Program Response to Comment:

Maximum Processing Rate:

The installation has a maximum processing rate of 720 tons per hour – 420 tons per hour from 189-1249 and 300 tons per hour from 189-1250. At the maximum processing rate, potential emissions are:

Pollutant	Unconditioned PTE (tpy)
CO _{2e}	132,971.62
PM	1,160.19
CO	1,015.50
PM ₁₀	292.87
NO _x	146.57
PM _{2.5}	118.52
SO _x	12.32
VOC	25.95
HAP	24.07
Xylene	4.84
Ethylbenzene	4.18
Hexane	1.63
Toluene	2.44
Formaldehyde	1.19
Acetaldehyde	1.01
Quinone	0.85
Benzene	1.32

These unconditioned PTE values are already included in the installation’s PTE table on SB-3; therefore, no modifications were made to the permit.

CO limit indirectly limits PM₁₀, NO_x, PM_{2.5}, and CO_{2e}:

The unconditioned PTE for CO, PM₁₀, NO_x, PM_{2.5}, and CO_{2e} are listed in the table above. The CO limit in Permit Condition PW001 restricts CO emissions to 100.0 tons per year. Conditioned potential emissions are based upon 1,062,500 tons per year of production combined from 189-1249 EP1 and EP2 and 189-1250 EP1 and EP2 and from the shared aggregate and product haul roads. The asphalt heaters were evaluated at 8,760 hours of operation in the conditioned PTE as continuous operation is required to ensure the asphalt can be moved. Conditioned potential emissions are:

Pollutant	Conditioned PTE (tpy)
CO _{2e}	27,148.17
PM	202.25
CO	100.00
PM ₁₀	53.14
NO _x	45.69
PM _{2.5}	23.27
SO _x	2.46
VOC	4.45
HAP	4.11
Xylene	1.43
Ethylbenzene	1.17
Hexane	0.33
Toluene	0.53
Formaldehyde	0.39
Acetaldehyde	0.17
Quinone	0.14
Benzene	0.28

These conditioned PTE values are already included in the installation’s PTE table on SB-3; therefore, no modifications were made to the permit.

Calculation Methodology

The installation maintains their records electronically; therefore, a recordkeeping attachment was deemed unnecessary. Permit Condition PW001 lists the approved emission factors for each source of CO at the installation, clarifies that no control efficiencies shall be employed in calculations, and contains language stating how the installation should calculate monthly and 12-month rolling total CO emissions. As Permit Condition PW001 clearly delineates the approved calculation methodology there is no need for a paper attachment which the installation will never use.

Calculation methodologies for PM₁₀, NO_x, PM_{2.5}, and CO_{2e} were not included in the permit as actual emissions of CO would exceed the 100 tpy CO limit long before actual emissions of PM₁₀, NO_x, PM_{2.5}, and CO_{2e} would exceed their major source thresholds:

Pollutant	Major Source Thresholds (tpy)	Emission Rate (tpy)					
		1	2	3	4	5	6
CO	100.0	100.00	188.06	231.67	515.91	648.15	1,015.50
PM ₁₀	100.0	53.14	100.00	123.20	214.93	244.01	292.87
NO _x	100.0	45.69	82.01	100.00	127.07	134.34	146.57
CO _{2e}	100,000.0	27,148.17	47,630.26	57,774.48	100,000.0	112,293.36	132,971.62
PM _{2.5}	100.0	23.27	43.67	53.77	88.98	100.00	118.52
Production Rate (tpy):	N/A	1,062,500 ¹	2,003,800	2,470,000	4,534,800	5,196,000	6,307,200 ²

¹Conditioned PTE (tpy).

²Unconditioned PTE (tpy).

The CO emission limitation and recordkeeping detailed in Permit Condition PW001 are sufficient to demonstrate that the installation is a synthetic minor source; therefore, no modifications were made to the permit.

ALR/kjc