

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **062012-001**

Project Number: 2012-01-108  
Installation Number: 099-0167

Parent Company: Hunt Industrial Service Corporation

Parent Company Address: 2244 Front Street, Pevely, MO 63070

Installation Name: Hunt Industrial Service Corporation

Installation Address: 2244 Front Street, Pevely, MO 63070

Location Information: Jefferson County, S26, T41N, R5E

Application for Authority to Construct was made for:  
Grind asphalt shingles with existing electric grinder. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUN 06 2012

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

You must notify the Department's Air Pollution Control Program of the anticipated date of startup of these air contaminant sources. 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 these air contaminant sources.

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 sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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## SPECIAL CONDITIONS:

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

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) 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."*

Hunt Industrial Service Corporation  
Jefferson County, S26, T41N, R5E

1. Documented Haul Road Watering
  - A. Hunt Industrial Service Corporation shall control dust from all haul roads at this site using water consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary. The following conditions apply to haul road watering:
    - 1) The water application rate shall be 100 gallons per 1000 square feet at least once every day.
    - 2) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application
    - 3) Water application shall not be required when the ground is frozen or when there will be no traffic on the roads.
  - B. Hunt Industrial Service Corporation shall keep the following records on file and available for inspection:
    - 1) A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.
    - 2) Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.
    - 3) Records of watering equipment breakdowns and repairs.
2. Restriction on the Use of Asbestos-Containing Shingles  
Hunt Industrial Service Corporation is not permitted to process any material containing asbestos. Any unidentified shingles shall be rejected. Any material suspected to contain asbestos shall be rejected. All visible material not part of the shingles, including, but not limited to, extra wood, paper, metals and plastics are to be removed before processing and the material must not have been in contact with any hazardous substances.

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**SPECIAL CONDITIONS:**

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

3. **Record Keeping and Reporting Requirements**  
Hunt Industrial Service Corporation shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2012-01-108  
Installation ID Number: 099-0167  
Permit Number:

Hunt Industrial Service Corporation  
2244 Front Street  
Pevely, MO 63070

Complete: January 31, 2012

Parent Company:  
Hunt Industrial Service Corporation  
2244 Front Street  
Pevely, MO 63070

Jefferson County, S26, T41N, R5E

REVIEW SUMMARY

- Hunt Industrial Service Corporation has applied for authority to grind asphalt shingles.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels, but potential emissions exceed the insignificant emission exemption levels in 10 CSR 10-6.061(3)(A)3.A.
- This installation is located in Jefferson County, a nonattainment area for the 8-hour ozone standard and the PM-2.5 standard and an attainment area for all other criteria pollutants. Part of Jefferson County is a nonattainment area for lead. This installation is not located in the Jefferson County lead nonattainment area. The installation's major source level is 100 tons per year for VOC, PM<sub>2.5</sub>, and NO<sub>x</sub> since it is in a nonattainment area for O<sub>3</sub> and PM<sub>2.5</sub>.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- Emissions testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended special conditions.

### INSTALLATION DESCRIPTION

Hunt Industrial Service Corporation recycles unusable wood pallets by grinding them, drying the fiber and selling as landscape mulch. The facility added an electric horizontal wood grinder (EP3) with a maximum hourly design rate (MHDR) of 100 yards (21.6 tons) of wood per hour with Permit 102011-010. Along with their existing grinder, the total design rate of the plant, after issuance of that permit, was 112 yards (24.19 tons) of wood per hour. The output from the new grinder and the old grinder was sent to the same machine for coloring. No control device is used to control emissions at this facility.

The following New Source Review permits have been issued to Hunt Industrial Service Corporation from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
102011-010	Section 5 & 6: DeMinimis and Minor

### PROJECT DESCRIPTION

Hunt Industrial Service Corporation wants to use the electric horizontal grinder (EP3) to grind asphalt roof shingles. The MHDR for shingle grinding would be 32 tons per hour. The shingles would come from residential roof tear offs from local roofing contractors and roofing distributors. The shingles would be delivered to the facility by dump trailers or dump trucks. After being dumped they would be moved to the grinder with a bobcat or front wheel loader. The ground shingle would be stored in a covered holding bin. The ground shingles will be marketed to companies as hot mix asphalt and cold patch mix.

At maximum design capacity, the proposed construction will emit 1.19 pounds of PM<sub>10</sub> per hour (lbs/hr), which is above the insignificant emission exemption level of 1.0 lbs/hr of PM<sub>10</sub> according to 10 CSR 10-6.061(3)(A)3.A. Therefore, a permit is required.

### EMISSIONS/CONTROLS EVALUATION

Emissions from the grinding equipment were calculated using emission factors from the Environmental Protection Agency (EPA) document AP-42 , *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 11.19.2, "Crushed Stoned Processing and Pulverized Mineral Processing," August 2004. The controlled emission factors for the tertiary crusher (SCC 3-05-020-03) and for the conveyor (SCC 3-05-020-06) were used because the oil in the asphalt shingles should limit emissions.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions <sup>1</sup>	Existing Actual Emissions (2011 EIQ) <sup>2</sup>	Potential Emissions of Process Equipment <sup>3</sup>	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	38.95	N/D	0.19	14.57	N/A
PM <sub>10</sub>	15.0	18.1	N/D	0.08	5.22	N/A
PM <sub>2.5</sub>	10.0	10.61	N/D	0.02	2.03	N/A
SOx	40.0	0.06	N/D	N/A	N/A	N/A
NOx	40.0	1.26	N/D	N/A	N/A	N/A
VOC	40.0	57.83	N/D	N/A	N/A	N/A
CO	100.0	1.55	N/D	N/A	N/A	N/A
HAPs	10.0/25.0	0.22	N/D	N/A	N/A	N/A

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

<sup>1</sup>These emissions include wood grinding from the horizontal grinder (EP3)

<sup>2</sup>Hunt Industrial Service Corporation have not submitted a full year Emissions Inventory Questionnaire (EIQ) as of this permit issuance date

<sup>3</sup>Does not include fugitive emissions from haul roads, storage piles and vehicular activity

In actuality, the grinder time will be split between grinding wood pallets for mulch and grinding asphalt shingles for resale to asphalt plants.

#### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.

#### APPLICABLE REQUIREMENTS

Hunt Industrial Service Corporation 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

#### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *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*

#### STAFF RECOMMENDATION

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

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Kathy Kolb  
Environmental Engineer

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Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 26, 2012, received January 30, 2012, designating Hunt Industrial Service Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Ms. Debra Hunt  
Office Manager  
Hunt Industrial Service Corporation  
2244 Front Street  
Pevely, MO 63070

RE: New Source Review Permit - Project Number: 2012-01-108

Dear Ms. Hunt:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your operating permit 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 Kathy Kolb, at the Department of Natural Resources' 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:kk1

Enclosures

c: St. Louis Regional Office  
PAMS File: 2012-01-108

Permit Number: