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: 122015-016

Parent Company: Ideker, Inc.

Parent Company Address: PO Box 7140, St. Joseph, MO 64507

Installation Name: Ideker, Inc.

Installation Address: NW of Cameron Road & Hwy 69, Mosby, MO 64073

Location Information: Clay County, S8 T52N R30W

Application for Authority to Construct was made for:
Adding equipment to existing stationary plant. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

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

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

Dec 29, 2015

EFFECTIVE DATE

DIR. 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 start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources’ regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources’ personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.
SITE SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

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

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued construction permit #022015-011 from the Air Pollution Control Program.

2. Best Management Practices Requirement
   Ideker, Inc. shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing BMPs as defined in Attachment AA.

3. Annual Emission Limit
   A. Ideker, Inc. shall emit less than 15.0 tons of PM$_{10}$ in any 12-month period from the entire installation.
   B. Ideker, Inc. shall demonstrate compliance with Special Condition 3.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

4. Moisture Content Testing Requirement
   A. Ideker, Inc. shall verify that the moisture content of the processed rock is greater than or equal to 1.5 percent by weight.
   B. Testing shall be conducted according to the method prescribed by the American Society for Testing Materials (ASTM) D-2216, C-566 or another method approved by the Director.
   C. The initial test shall be conducted no later than 45 days after the start of operation. A second test shall be performed the calendar year following the initial test during the months of July or August.
   D. The test samples shall be taken from rock that has been processed by the plant or from each source of aggregate (e.g. quarry).
   E. The written analytical report shall include the raw data and moisture content of each sample, the test date and the original signature of the individual performing the test. The report shall be filed on-site or at the Ideker, Inc. main office within 30 days of completion of the required test.
SITE SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

F. If the moisture content of either of the two tests is less than the moisture content in Special Condition 4.A, another test may be performed within 15 days of the noncompliant test. If the results of that test is less than the moisture content in Special Condition 4.A, Ideker, Inc. shall either:
   1) Apply for a new permit to account for the revised information, or
   2) Submit a plan for the installation of wet spray devices to the Compliance/Enforcement Section of the Air Pollution Control Program within 10 days of the second noncompliant test. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.

G. In lieu of testing, Ideker, Inc. may obtain test results that demonstrate compliance with the moisture content in Special Condition 4.A from the supplier of the aggregate.

5. Minimum Distance to Property Boundary Requirement
   The primary emission point shall be located at least 1,100 feet from the nearest property boundary.

6. Concurrent Operation Restriction
   Ideker, Inc. is prohibited from operating whenever other plants are located at the site.

7. Primary Equipment Requirement
   Ideker, Inc. shall process all rock through the primary crusher (EP-03). Bypassing the primary crusher is prohibited.

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

9. Reporting Requirement
   Ideker, Inc. shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedances of the limitations imposed by this permit.
PROJECT DESCRIPTION

In permit 022015-011 Ideker, Inc. combined two portable plants, PORT 0672 & 0677 to create a new stationary plant at the North Quarry, near Mosby, Missouri. The plant is located NW of Cameron Rd and Hwy 69 and operating 1,100 feet from the property line. The MHDR for the stationary plant is 550 tons per hour. This project is to add a secondary crusher, a screen and associated conveyors. Additionally, the existing 2006 Caterpillar (1,500 HP) engine (S/N SYC00725) will be replaced with a 2010 MTU Detroit Diesel (2,680 HP) engine, Model 744RSL4058 (S/N 5272010164). As part of the expansion, the storage pile (EP35) will increase in size from 2 acres to 2.5 acres.

The following table lists the emission points at the plant. EP38-EP52 represents the new equipment being added under the review of this project.

Table 1: Ideker, Inc. Equipment List

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description of Unit</th>
<th>MHDR (tph)</th>
<th>Control Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Feeder</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP02</td>
<td>Feeder Belt</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP03</td>
<td>Primary Crusher 100</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP04</td>
<td>Belt 100-2</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP05</td>
<td>Screen 200</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP06</td>
<td>Belt 200-2</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP07</td>
<td>Belt 200-1</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP08</td>
<td>Belt 300-1</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP09</td>
<td>Surge Bin 300</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP10</td>
<td>Belt 300-2</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP11</td>
<td>Screen 400</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP12</td>
<td>Belt 400-1</td>
<td>550</td>
<td>Moisture =&gt; 1.5%</td>
</tr>
<tr>
<td>EP</td>
<td>Description</td>
<td>Model</td>
<td>Moisture</td>
</tr>
<tr>
<td>-----</td>
<td>------------------------------</td>
<td>-------</td>
<td>----------</td>
</tr>
<tr>
<td>13</td>
<td>Secondary Crusher 500</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>14</td>
<td>Screen 600</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>15</td>
<td>Belt 600-1, 600-2, 600-3</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>16</td>
<td>Belt 700-1</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>17</td>
<td>Belt 700-2</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>18</td>
<td>Belt 770-3</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>19</td>
<td>Belt 700-4</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>20</td>
<td>Belt 700-5</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>21</td>
<td>Belt 700-6</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>22</td>
<td>Belt 700-7</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>23</td>
<td>Belt 700-8</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>24</td>
<td>Belt 700-9</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>25</td>
<td>Belt 700-10</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>26</td>
<td>Belt 700-11</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>27</td>
<td>Belt 700-12</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>28</td>
<td>Belt 700-13</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>29</td>
<td>Belt 700-14</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>30</td>
<td>Belt 700-15</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>31</td>
<td>Belt 700-16</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>32</td>
<td>Belt 700-17</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>33*</td>
<td>Detroit Diesel 2,680 HP Engine</td>
<td>2,680 HP</td>
<td>none</td>
</tr>
<tr>
<td>34</td>
<td>105 HP Diesel Generator</td>
<td>105</td>
<td>HP</td>
</tr>
<tr>
<td>35*</td>
<td>Stockpiles 2.5 Acres</td>
<td>550</td>
<td>BMPs</td>
</tr>
<tr>
<td>36</td>
<td>Haul Road Pit to Crusher</td>
<td>4.96</td>
<td>VMT BMPs</td>
</tr>
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<td>37</td>
<td>Haul Road Sales</td>
<td>14.88</td>
<td>VMT BMPs</td>
</tr>
<tr>
<td>38</td>
<td>Belt 700-18</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<td>39</td>
<td>Secondary Crusher 800</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<td>40</td>
<td>Belt 800-1</td>
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<td>=&gt; 1.5%</td>
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<td>41</td>
<td>Belt 700-19</td>
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<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>42</td>
<td>Screen 900</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>43</td>
<td>Belt 900-1</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>44</td>
<td>Belt 900-2</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>45</td>
<td>Belt 900-3</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<tr>
<td>46</td>
<td>Belt 900-4</td>
<td>550</td>
<td>=&gt; 1.5%</td>
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<td>47</td>
<td>Belt 900-5</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>48</td>
<td>Belt 900-6</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>49</td>
<td>Belt 700-20</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>50</td>
<td>Screen 1000</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>51</td>
<td>Belt 1000-1</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
<tr>
<td>52</td>
<td>Belt 700-21</td>
<td>550</td>
<td>=&gt; 1.5%</td>
</tr>
</tbody>
</table>

*EP33 and EP35 have been modified as part of this project

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

This installation is located in Clay County, a maintenance area for ozone and an attainment area for all other criteria pollutants.
This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation’s major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

TABLES

The following permits have been issued to Ideker, Inc. for this stationary plant from the Air Pollution Control Program.

Table 2: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>022015-11</td>
<td>New stationary rock crushing plant</td>
</tr>
</tbody>
</table>

The table below summarizes the emissions of this project. This is a new facility that has been first permitted this year and there are no existing actual emissions. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with the annual emission limit for PM$_{10}$.

Table 3: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th>Air Pollutant</th>
<th>De Minimis Level/SMAL</th>
<th>Potential Emissions of Process Equipment</th>
<th>Existing Actual Emissions</th>
<th>(^{a})Potential Emissions of the Installation</th>
<th>Installation Conditioned Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>54.10</td>
<td>N/D</td>
<td>174.75</td>
<td>37.52</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>25.91</td>
<td>N/D</td>
<td>69.87</td>
<td>&lt; 15.0</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>10.0</td>
<td>5.92</td>
<td>N/D</td>
<td>22.94</td>
<td>4.92</td>
</tr>
<tr>
<td>SO$_{X}$</td>
<td>40.0</td>
<td>1.08</td>
<td>N/D</td>
<td>1.08</td>
<td>0.23</td>
</tr>
<tr>
<td>NO$_{X}$</td>
<td>40.0</td>
<td>126.58</td>
<td>N/D</td>
<td>126.58</td>
<td>27.18</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>7.99</td>
<td>N/D</td>
<td>7.99</td>
<td>1.72</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>71.35</td>
<td>N/D</td>
<td>71.35</td>
<td>15.32</td>
</tr>
<tr>
<td>GHG (CO$_{2}$e)</td>
<td>75,000 / 100,000</td>
<td>14,534</td>
<td>N/D</td>
<td>14,534</td>
<td>3,121</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>0.0 / 100.0 / 250.0</td>
<td>14,353</td>
<td>N/D</td>
<td>14,353</td>
<td>3,082</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>0.14</td>
<td>N/D</td>
<td>0.14</td>
<td>0.03</td>
</tr>
</tbody>
</table>

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

\(^{a}\)Includes site specific haul road and storage pile emissions

Table 4 summarizes the ambient air quality impact analysis. The maximum modeled impact is the impact of each pollutant when the plant is operating continuously.
Table 4: Ambient Air Quality Impact Analysis

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>NAAQS/ RAL (µg/m³)</th>
<th>Averaging Time</th>
<th>aMaximum Modeled Impact (µg/m³)</th>
<th>Limited Impact (µg/m³)</th>
<th>Background (µg/m³)</th>
<th>Daily Limit (tons/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM₁₀ (solitary)</td>
<td>150.0</td>
<td>24-hour</td>
<td>127.53</td>
<td>N/A</td>
<td>20.0</td>
<td>N/A</td>
</tr>
</tbody>
</table>

aModeled impact at maximum capacity with controls
bSolitary operation

EMISSIONS CALCULATIONS

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

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

Emissions from the 2,680 HP diesel engines were calculated using emission factors from AP-42 Section 3.4 “Large Stationary Diesel and All Stationary Dual-fuel Engines,” October 1996 and 40 CFR 89. The 105 HP diesel engine was calculated using the emission factors from AP-42 Section 3.3 “Gasoline and Diesel Industrial Engines,” October 1996.

Emissions from haul roads and vehicular activity areas were calculated using the predictive equation from AP-42 Section 13.2.2 “Unpaved Roads,” November 2006. A 90% control efficiency for PM and PM₁₀ and a 40% control efficiency for PM₂.₅ were applied to the emission calculations for the use of BMPs. Emissions from load-in and load-out of storage piles were calculated using the predictive equation from AP-42 Section 13.2.4. The moisture content of the aggregate is 1.5% by weight. Emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program’s Emissions Inventory Questionnaire Form 2.8 “Storage Pile Worksheet.”

AMBIENT AIR QUALITY IMPACT ANALYSIS

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of the pollutants listed in Table 3. The Air Pollution Control Program requires an AAQIA of PM₁₀ for all asphalt, concrete and rock-crushing plants regardless of the level of PM₁₀ emissions if a permit is required. An AAQIA is required for other pollutants if their emissions exceed their respective de minimis or screening model action level (SMAL). The AAQIA was performed using the Air Pollution Control Program’s generic nomographs and when appropriate the EPA modeling software AERSCREEN. For
each pollutant that was modeled, the maximum concentration that occurs at or beyond the site boundary was compared to the NAAQS or RAL for the pollutant. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS or RAL, the plant’s production is limited to ensure compliance with the standard.

This plant uses BMPs to control emissions from haul roads and vehicular activity areas, so emissions from these sources were not included in the AAQIA. Instead they were addressed as a background concentration of 20 µg/m³ of PM₁₀ in accordance with the Air Pollution Control Program’s BMPs interim policy.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM₁₀ are conditioned below de minimis and no refined modeling is required. Potential emissions of PM are above de minimis but below major source levels. There are no modeling requirements for PM.

APPLICABLE REQUIREMENTS

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

- An amendment to the Basic Operating Permit application is required for this installation within 30 days of commencement of operations.

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

- Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220

- Restriction of Emission of Odors, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

• 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" applies to the diesel engines on the equipment list that were manufactured after 04/01/2006 or modified/reconstructed after 7/11/2005.


• *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260

**STAFF RECOMMENDATION**

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

________________________________________________________________________

Chad Stephenson  
New Source Review Unit

________________________________________________________________________

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

• The Application for Authority to Construct form, dated July 12, 2015, received July 17, 2015, designating Ideker, Inc. as the owner and operator of the installation.
This sheet covers the period from ________________ to ________________ (Copy as needed)

<table>
<thead>
<tr>
<th>Month</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions¹ (lbs)</th>
<th>Monthly Emissions² (tons)</th>
<th>12-Month Total Emissions³ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>75,000</td>
<td>0.0290</td>
<td>2,175</td>
<td>1.09</td>
<td>13.05</td>
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¹Multiply the monthly production by the emission factor.
²Divide the monthly emissions (lbs) by 2000.
³Add the monthly emissions (tons) to the sum of the monthly emissions from the previous eleven months. A total of less than 15.0 tons of PM₁₀ is necessary for compliance.
Haul roads and vehicular activity areas shall be maintained in accordance with at least one of the following options when the plant is operating.

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

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

3. **Application of Water-Documented Daily**
   A. The operator shall apply water to unpaved areas. Water shall be applied at a rate of 100 gallons per day per 1,000 square feet of unpaved or untreated surface area while the plant is operating.
   B. Precipitation may be substituted for watering if the precipitation is greater than one quarter of one inch and is sufficient to control fugitive emissions.
   C. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads.
   D. The operator shall record the date, volume of water application and total surface area of active haul roads or the amount of precipitation that day. The operators shall also record the rational for not watering (e.g. freezing conditions or not operating).
   E. The operator shall keep these records with the plant for not less than five (5) years, and the operator shall make these records available to Department of Natural Resources’ personnel upon request.
APPENDIX A

Abbreviations and Acronyms

% ............ percent
°F .......... degrees Fahrenheit
acfm ......... actual cubic feet per minute
BACT ....... Best Available Control Technology
BMPs ....... Best Management Practices
Btu.......... British thermal unit
CAM ........ Compliance Assurance Monitoring
CAS .......... Chemical Abstracts Service
CEMS ....... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e ....... carbon dioxide equivalent
COMS ....... ContinuousOpacity Monitoring System
CSR .......... Code of State Regulations
dscf ........ dry standard cubic feet
EIQ .......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA .......... Environmental Protection Agency
EU .......... Emission Unit
fps ........ feet per second
ft .......... feet
GACT ....... Generally Available Control Technology
GHG .......... Greenhouse Gas
gpm ........ gallons per minute
gr .......... grains
GWP .......... Global Warming Potential
HAP .......... Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ........ pounds per hour
MACT ....... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ........ 1,000 gallons
MW .......... megawatt
MHDR ....... maximum hourly design rate

MMBtu.... Million British thermal units
MMCF ....... million cubic feet
MSDS ....... Material Safety Data Sheet
NAAQS ....... National Ambient Air Quality Standards
NESHAPs .... National Emissions Standards for Hazardous Air Pollutants
NOₓ ......... nitrogen oxides
NSPS ....... New Source Performance Standards
NSR .......... New Source Review
PM .......... particulate matter
PM₂.₅ ....... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm .......... parts per million
PSD ......... Prevention of Significant Deterioration
PTE .......... potential to emit
RACT ...... Reasonable Available Control Technology
RAL .......... Risk Assessment Level
SCC .......... Source Classification Code
scfm ........ standard cubic feet per minute
SDS .......... Safety Data Sheet
SIC .......... Standard Industrial Classification
SIP .......... State Implementation Plan
SMAL ...... Screening Model Action Levels
SOₓ ........ sulfur oxides
SO₂ .......... sulfur dioxide
tph .......... tons per hour
tpy .......... tons per year
VMT .......... vehicle miles traveled
VOC .......... Volatile Organic Compound
Mr. Ken Ideker  
Project Manager  
Ideker, Inc.  
PO Box 7140  
St. Joseph, MO 64507  

RE: New Source Review Permit - Project Number: 2015-07-028  

Dear Mr. Ideker:  

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. 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 amended 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 were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the Administrative Hearing Commission, Truman State Office Building, www.oa.mo.gov/ahc. If you have questions regarding this permit contact Chad Stephenson, at the 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:cs1  

Enclosures  

c: Kansas City Regional Office  
PAMS File: 2015-07-028  
Permit Number: