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: 072009-018  Project Number: 2009-05-028

Parent Company: Lafarge North America

Parent Company Address: 15100 E. Courtney Atherton Road, Sugar Creek, MO 64058

Installation Name: Lafarge North America

Installation Address: 405 Hwy J, Wright City, MO 63390

Location Information: Warren County (S10, T47N, R1W)

Application for Authority to Construct was made for:

The installation of a new portable rock crushing plant. The portable rock crushing plant has a maximum hourly design rate (MHDR) of 300 tons per hour (tph). Best Management Practices will be used to control emissions from haul roads and vehicular activity areas. 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.

JUL 27 2009

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 devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. 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 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.
GENERAL SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10, “Conditions required by permitting authority”; by 10 CSR 10-6.010 “Ambient Air Quality Standards” and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3.

1. Portable Equipment Identification Requirement
To assure that each component is properly identified as being a part of this portable rock screening plant, (PORT-0636) Lafarge North America shall provide and maintain suitable, easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable rock screening plant.

2. Relocation of Portable Rock Screening Plant
A. The portable rock screening plant shall not be operated at any site location longer than 24 consecutive months without an intervening relocation.
B. A complete “Portable Source Relocation Request” application must be submitted to the Air Pollution Control Program prior to any relocation of this portable rock screening plant.
   1.) If the portable rock screening plant is moving to a site previously permitted, and if there are no other new plants at the site, then the application must be received by the Air Pollution Control Program at least seven (7) days prior to the relocation.
   2.) If the portable rock screening plant is moving to a new site, or if there are other plants or equipment at the site that have not been evaluated for concurrent operation, then the application must be received by the Air Pollution Control Program at least twenty-one (21) days prior to the relocation. The application must include written notification of any concurrently operating plants.

3. Record Keeping Requirement
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request.

4. Reporting Requirement
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
SITE-SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate at the sites listed in Table 1 subject to the following special conditions:

Table 1: Approved Sites

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Site Address</th>
<th>Site County (S, T, R)</th>
</tr>
</thead>
<tbody>
<tr>
<td>219-0042</td>
<td>Wright City Quarry</td>
<td>405 Hwy J, Wright City, MO</td>
<td>Warren County (S10, T47N, R1W)</td>
</tr>
<tr>
<td>095-0285</td>
<td>Kentucky Road Quarry</td>
<td>16400 E. Kentucky Road, Independence, MO</td>
<td>Jackson County (S19/24, T50N, R31W)</td>
</tr>
<tr>
<td>195-0007</td>
<td>Marshall Quarry</td>
<td>Route 1, Box 68, Sweet Springs, MO</td>
<td>Saline County (S4, T48N, R21W)</td>
</tr>
</tbody>
</table>

1. Best Management Practices
   Lafarge North America shall control fugitive emissions from all of the haul roads and stockpiles by performing Best Management Practices, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.

2. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM$_{10}$)
   A. The operator(s) for Lafarge North America's portable rock screening plant (PORT-0636) shall ensure, while operating at all three sites, that the ambient impact of PM$_{10}$ at or beyond the nearest property boundary does not exceed 150.00 µg/m$^3$ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
   B. The total daily ambient impact of PM$_{10}$ at the sites shall include the combined impact of the portable rock screening plant and any ambient background concentration from installations or equipment located on the same site as the portable rock screening plant.
   C. To demonstrate compliance with Special Condition 2.A. and 2.B., the following record keeping procedures shall be used at each site.

   At Wright City Quarry: No record keeping is necessary to demonstrate compliance during solitary operations. During concurrent (same owner) operations, Lafarge North America shall record the daily ambient impact of all plants at the site to ensure that their combined daily PM$_{10}$ ambient impact does not exceed the NAAQS requirement of 150.00 µg/m$^3$.

   At Kentucky Road Quarry: During both solitary operations and concurrent (same owner) operations. Lafarge North America shall record the daily ambient impact of all plants at the site to ensure that the NAAQS requirement of 150.00 µg/m$^3$ is not exceeded.

   At Marshall Quarry: No record keeping is necessary to demonstrate compliance during solitary operations. During concurrent (same owner) operations, Lafarge North America shall record the daily ambient impact of all plants at the site to ensure that their combined daily PM$_{10}$ ambient impact does not exceed the NAAQS requirement of 150.00 µg/m$^3$.

   Attachment A, or equivalent forms, shall be used at each site to demonstrate compliance with Special Conditions 2.A. and 2.B.

3. Moisture Content Testing Requirement for Inherent Moisture Content
   A. The inherent moisture content of the rock will reduce particulate emissions. Lafarge North America claimed the inherent moisture content of the processed rock at each site to be greater than or equal to 1.5 wt.%, which shall be verified by testing.
   B. The operator may obtain a copy of the test results of the inherent moisture content from the supplier(s) of the aggregate. Otherwise, testing shall be conducted according to approved methods, such as those prescribed by the American Society for Testing Materials (ASTM D-2216 or C-566), EPA AP-42 Appendix C.2, or other method(s) approved by the Director. The first test at each site shall be no later than 45 days after startup at the site. Testing shall be conducted at least once every year after the initial test, during the months of June through September, while the portable rock screening plant is active at the sites.
SITE-SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate at the sites listed in Table 1 subject to the following special conditions:

C. Test samples shall be obtained before processing (before entering the Primary Screen, EP01) and after processing (prior to load-in to bins and/or storage piles). During the sample processing run only, any spray devices shall be turned off during the processing from which test samples are obtained. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be filed on-site or at the Lafarge North America main office.

D. If the inherent moisture content result of the first test is less than 1.5 wt.%, a second test must be performed within 30 days. If the result of the second test is less than 1.5 wt.%, Lafarge North America shall apply for a new construction permit to account for the revised information.

4. Restriction on Minimum Distance to Nearest Property Boundary
The primary emission point of the portable rock screening plant, which is the primary screen (EP01), shall be located no closer to the nearest property boundary than the distances listed in Table 2.

Table 2: Minimum Distance from the Primary Screen (EP01) to the Nearest Property Boundary

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Distance (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>219-0042</td>
<td>Wright City Quarry</td>
<td>500</td>
</tr>
<tr>
<td>095-0285</td>
<td>Kentucky Road Quarry</td>
<td>227</td>
</tr>
<tr>
<td>195-0007</td>
<td>Marshall Quarry</td>
<td>586</td>
</tr>
</tbody>
</table>
TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

Lafarge North America proposes to operate a screen, four (4) conveyors and a diesel engine. The equipment was previously permitted, in permit 022009-005, to operate at Lafarge North America’s Courtney Ridge site and was considered part of the same installation as the aggregate production plant and the Portland Cement plant located at the site. The company would now like to remove the equipment and relocate it to various sites, while retaining the ability to move the equipment back to the Courtney Ridge site, if necessary. This permit pre-approves the portable plant to operate at three (3) sites: Wright City Quarry in Warren County, Kentucky Road Quarry in Jackson County and Marshall Quarry in Saline County. If the company decides to relocate the equipment back to Courtney Ridge, the screen shall operate under the conditions and limits of the original permit (022009-005) issued for the equipment at the site.

This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2]. The installation is approved to operate in Warren, Jackson and Saline counties, attainment areas for all criteria air pollutants.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM$_{10}$. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section “Permit Documents”. Based on the conditioned potential emissions, the operation is considered a minor source under 10 CSR 10-6.060 section (6).

<table>
<thead>
<tr>
<th>Air Pollutant</th>
<th>Regulatory De Minimis Levels</th>
<th>Sites</th>
<th>*Existing Potential Emissions</th>
<th>Existing Actual Emissions (EIQ)</th>
<th>Potential Emissions of the Application</th>
<th>**New Installation Conditioned Potential</th>
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</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>29.48</td>
<td>29.48</td>
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<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>21.69</td>
<td>20.77</td>
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<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>25.80</td>
<td>25.80</td>
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<td>SOx</td>
<td>40.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>25.41</td>
<td>25.41</td>
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<tr>
<td>NOx</td>
<td>40.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>25.41</td>
<td>24.20</td>
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<tr>
<td>NOx</td>
<td>40.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>25.41</td>
<td>25.41</td>
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<tr>
<td>VOC</td>
<td>40.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>2.07</td>
<td>2.07</td>
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<tr>
<td>VOC</td>
<td>40.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>2.07</td>
<td>1.98</td>
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<tr>
<td>VOC</td>
<td>40.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>2.07</td>
<td>2.07</td>
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<tr>
<td>CO</td>
<td>100.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>5.47</td>
<td>5.47</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>5.47</td>
<td>5.21</td>
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<tr>
<td>CO</td>
<td>100.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>5.47</td>
<td>5.47</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>Wright City</td>
<td>N/D</td>
<td>N/D</td>
<td>0.02</td>
<td>0.02</td>
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<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>Kentucky Road</td>
<td>N/D</td>
<td>N/D</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>Marshall</td>
<td>N/D</td>
<td>N/D</td>
<td>0.02</td>
<td>0.02</td>
</tr>
</tbody>
</table>

Note: N/D = Not Determined
* Existing potential emissions are not determined.
** PM$_{10}$ conditioned potential based on daily production limit from ambient impact analysis. Other pollutants proportionately reduced.
AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation at each site. The ambient impact was evaluated at a distance of 500 feet to the nearest property boundary at Wright City Quarry, 227 feet to the nearest property boundary at Kentucky Road Quarry and 586 feet to the nearest property boundary at Marshall Quarry. The ambient impact at each site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20.00 µg/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130.00 µg/m³ of PM₁₀ at or beyond the nearest property boundary.

Table 2: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time, Wright City Quarry

<table>
<thead>
<tr>
<th>Operation</th>
<th>Site</th>
<th>Ambient Impact Factor (µg/m³/ton)</th>
<th>Modeled Impact (µg/m³)</th>
<th>*Background (µg/m³)</th>
<th>NAAQS (µg/m³)</th>
<th>Daily Production Limit (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Solitary Wright City</td>
<td>Wright City</td>
<td>0.00619</td>
<td>44.59</td>
<td>20.00</td>
<td>150.00</td>
<td>7,200</td>
</tr>
<tr>
<td>2. Concurrent (Same Owner)</td>
<td>Wright City</td>
<td>0.00619</td>
<td>**</td>
<td>20.00</td>
<td>150.00</td>
<td>**</td>
</tr>
<tr>
<td>3. Solitary Kentucky Road</td>
<td>Kentucky Road</td>
<td>0.01895</td>
<td>130.00</td>
<td>20.00</td>
<td>150.00</td>
<td>6,859</td>
</tr>
<tr>
<td>4. Concurrent (Same Owner)</td>
<td>Kentucky Road</td>
<td>0.01895</td>
<td>**</td>
<td>20.00</td>
<td>150.00</td>
<td>**</td>
</tr>
<tr>
<td>5. Solitary Marshall</td>
<td>Marshall</td>
<td>0.00546</td>
<td>39.32</td>
<td>20.00</td>
<td>150.00</td>
<td>7,200</td>
</tr>
<tr>
<td>6. Concurrent (Same Owner)</td>
<td>Marshall</td>
<td>0.00546</td>
<td>**</td>
<td>20.00</td>
<td>150.00</td>
<td>**</td>
</tr>
</tbody>
</table>

*Background PM₁₀ level of 20.00 µg/m³ from haul roads and stockpiles.
**The operator(s) must balance production among concurrently operating plants, with the ambient impacts for each, such that NAAQS is not exceeded. Ambient impacts for other plants owned by Lafarge North America can be obtained from the operators of these plants.

The portable plant is permitted to operate under two (2) scenarios while at the three (3) sites: Solitary operations and concurrent (same owner) operations. Solitary operations are operations when the plant is at the site by itself. During solitary operations, the portable plant can operate for twenty-four (24) hours at Wright City and Marshall Quarry without violating the NAAQS. Therefore, no record keeping is necessary to show compliance with NAAQS. At Kentucky Road Quarry, the portable plant shall track its own daily PM₁₀ ambient impact while at the site to ensure NAAQS compliance. Attachment A, or equivalent forms, shall be used for this purpose.

Concurrent (same owner) operations is operations when the plant is at the site with other plants owned by Lafarge North America. At all three sites during this type of operation, the portable plant shall track its own daily PM₁₀ ambient impact and the daily PM₁₀ ambient impact of other plants at the site to ensure compliance with NAAQS. Attachment A, or equivalent forms, shall be used for this purpose.

This portable plant is not permitted to operate at these sites with any plants that are owned by other companies. If Lafarge North America would like to add this option, a new permit review will be required.

APPLICABLE REQUIREMENTS

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
- No Operating Permit is required for this portable rock screening plant.
- Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170
- Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220
- Restriction of Emission of Odors, 10 CSR 10-3.090
- Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400
- Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.
STAFF RECOMMENDATION

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

Chia-Wei Young                                   Date
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Lafarge North America as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- St. Louis Regional Office Site Survey.
Attachment A: Daily Ambient PM$_{10}$ Impact Tracking Record
Lafarge North America, PORT-0636 – Portable Rock Screening Plant

Project Number: 2009-05-028
County, CSTR: ___________ County (S___, T___, R___)
Primary Unit Size: 300 tph
Distance to Nearest Property Boundary: _____ feet

This sheet covers the period from ____________________ to ____________________ (Month, Day, Year) (Copy this sheet as needed.)

<table>
<thead>
<tr>
<th>Date</th>
<th>Daily Production (tons)</th>
<th>1Ambient Impact Factor (µg/m$^3$ton)</th>
<th>2Daily PM$_{10}$ Impact (µg/m$^3$)</th>
<th>3Daily PM$_{10}$ Impact (µg/m$^3$)</th>
<th>4Daily PM$_{10}$ Impact (µg/m$^3$)</th>
<th>5Daily PM$_{10}$ Impact (µg/m$^3$)</th>
<th>6Back-</th>
<th>7TOTAL</th>
<th>8TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>PM$_{10}$ Level (µg/m$^3$)</td>
<td>PM$_{10}$ Level (µg/m$^3$)</td>
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Note 1: The Daily PM$_{10}$ Ambient Impact Factor is 0.00619 µg/m$^3$ton at Wright City Quarry, 0.01895 µg/m$^3$ton at Kentucky Road Quarry and 0.00546 µg/m$^3$ton at Marshall Quarry.
Note 2: The Daily PM$_{10}$ Impact (µg/m$^3$) for the portable plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor (µg/m$^3$ton).
Note 3: The Daily PM$_{10}$ Impact (µg/m$^3$) of other plants owned by Lafarge North America can be obtained from the operators of these plants. A value of zero (0) should be used if operating under solitary operations.
Note 4: Background PM$_{10}$ Level (µg/m$^3$) is from Haul Roads and Stockpiles.
Note 5: The TOTAL PM$_{10}$ Level (µg/m$^3$) is calculated by summing the Daily PM$_{10}$ Ambient Impact(s) and the Background PM$_{10}$ Level. A TOTAL PM$_{10}$ Level of less than 150.00 µg/m$^3$ in any 24-hour period indicates compliance.
Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

**For Haul Roads:**

1. **Pavement of Road Surfaces** –
   A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions” while the plant is operating.
   B. Maintenance and/or 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(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. **Usage of Chemical Dust Suppressants** –
   A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
   B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) 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(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. **Usage of Documented Watering** –
   A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
   B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)
   C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
   D. 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. The operator(s) shall record a brief description of such events in the same log as the documented watering.
   E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

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1 For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)
For Vehicle Activity Areas around Open Storage Piles:

1. **Pavement of Stockpile Vehicle Activity Surfaces** –
   A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
   B. Maintenance and/or 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(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. **Usage of Chemical Dust Suppressants** –
   A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
   B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) 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(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. **Usage of Documented Watering** –
   A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
   B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)
   C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
   D. 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. The operator(s) shall record a brief description of such events in the same log as the documented watering.
   E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
Mr. Brett Baker  
Lafarge North America  
15100 E. Courtney Atherton Road  
Sugar Creek, Mo 64058  


Dear Mr. Baker:  

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.  

Operation in accordance with the conditions and requirements in your permit and the information submitted in the New Source Review application for project 2009-05-028 is necessary for continued compliance. The section of the permit entitled “Technical Review of Application for Authority to Construct” should not be separated from the main portion of your permit. The entire permit must be retained in your files. 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 Chia-Wei Young at the Department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or you may telephone me at (573) 751-4817. Thank you for your attention to this matter.  

Sincerely,  

AIR POLLUTION CONTROL PROGRAM  

Kendall B. Hale  
New Source Review Unit Chief  

KBH: cwyl  

Enclosures  

c: St. Louis Regional Offices  
PAMS File: 2009-05-028  
Permit Number: