PERMIT BOOK

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: 042009-008 Project Number: 2008-09-034

Parent Company: Lead Belt Materials Co., Inc.

Parent Company Address: P.O. Box 607, Park Hills, MO 63601

Installation Name: Lead Belt Materials Co., Inc.

Installation Address: 600 Mill Street, Park Hills, MO 63601

Location Information: St. Francois County, S12, T36N, R4E

Application for Authority to Construct was made for:
The modification of an existing installation that contains two rock crushing plants, one asphalt plant, and one pugmill. Lead Belt Materials Co., Inc. will add new equipment to an existing rock crushing plant. Also some equipment has been unaccounted for in the previous permit and will be added to this permit as well. 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.

APR 15 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.

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. Furthermore, one or more of the Subparts of 40 CFR Part 60, New Source Performance Standards (NSPS), applies to this installation.

1. Best Management Practices
   Lead Belt Materials Co., Inc. shall control fugitive emissions from all of the haul roads and stockpiles at this site 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 Lead Belt Materials Co., Inc.'s rock crushing, asphalt, and pugmill plants - 187-0001 (herein after be referred to as "installation") shall ensure, while operating at this site, that the ambient impact of PM_{10} at or beyond the nearest property boundary does not exceed 150 $\mu g/m^3$ 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 this site shall include the combined impact of the installation and any ambient background concentration from plants or equipment located on the same site as the installation.
   C. This installation is permitted to operate under the following four conditions:

      1) **Solitary Operation:**
      Solitary Operation is defined as operation when no other installations are present on the property. During Solitary Operation, the plant must record its daily production to insure that the National Ambient Air Quality Standard (NAAQS) is not exceeded.

      2) **Concurrent Same-Owner Operation:**
      Concurrent Same-Owner Operation is defined as operation when other plants owned by Lead Belt Material Co., Inc. are located on the property. During Concurrent Same-Owner Operation, Lead Belt Material Co., Inc. may balance and record the daily production from all plants such that the NAAQS is not exceeded.

      3) **Concurrent Separate-Owner Operation:**
      Concurrent Separate-Owner Operation is defined as operation when other plants not owned by parent company are located on the property. During Concurrent Separate-Owner Operation, the plant must reduce its ambient impact to address the impact for the non-owned plants.

      4) **Concurrent Same-and-Separate-Owner Operation:**
      Concurrent Same-and-Separate-Owner Operation is defined as operation when plants owned by Lead Belt Material Co., Inc. and plants not owned by Lead Belt Material Co., Inc. are located on the property. During Concurrent Same-and-Separate-Owner Operation, Lead Belt Material Co., Inc. may balance the daily production from all owned plants with a reduced impact to account for the impact from the non-owned plants to insure that the NAAQS is not exceeded.

   D. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A and B, *Daily Ambient PM_{10} Impact Tracking Record,* or other equivalent form(s), will be used for this purpose.

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

3. Annual Emission Limit of Nitrous Oxides (NO_x)
   A. The operator(s) shall ensure that Lead Belt Materials Co., Inc.'s two diesel engines on rock crushing plants #1 and #2 emit less than 40.0 tons of NO_x into the atmosphere in any 12 month period from:
      1) EP-30A – Diesel Engine (Rock Crushing Plant #1)
      2) EP-12E – Diesel Engine (Rock Crushing Plant #2)

4. Annual Emission Limit of Carbon Monoxide (CO)
   A. The installation shall emit into the atmosphere less than 100.0 tons of Carbon Monoxide (CO) from the four plants at this site in any 12-month period.

5. Standard of Performance for New Stationary Sources (NSPS) Requirement
   Lead Belt Materials Co. shall comply with all appropriate monitoring, testing, reporting, and record keeping requirements of 40 CPR Part 60, Subpart OOO---*Standards of Performance for Nonmetallic Mineral Processing Plants*

6. Restriction on Minimum Distance to Nearest Property Boundary
   The distance to the nearest property boundary must at least:

Table 1: Distance to Nearest Property Line

Plant Name	MHDR	Min. Distance
Rock Crushing Plant #1	350 tph	400 ft
Rock Crushing Plant #2	350 tph	500 ft
Asphalt Plant	170 tph	640 ft
Pugmill	450 tph	500 ft

7. 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 immediately to any Missouri Department of Natural Resources' personnel upon request.

8. 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.

9. Superseding Condition
   The conditions of this permit supersede the special conditions listed below found in the previously issued construction permit(s) (082005-023) from the Air Pollution Control Program.
   A. Scenario 1 (SC1)
      1) SC1 1
      2) SC1 2
      3) SC1 3
      4) SC1 4
      5) SC1 5
      6) SC1 10
      7) SC1 11
   B. Scenario 2 (SC2)
      1) SC2 1
      2) SC1 2
      3) SC2 3
      4) SC2 4
      5) SC2 5
      6) SC2 10
      7) SC2 11

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

10. Prohibition Against Improper Use of Contaminated Nonmetallic Minerals.
Lead Belt Materials shall only use uncontaminated nonmetallic minerals as the source material. The operator(s) shall keep records indicating the source material used at this site was only nonmetallic minerals and shall make these records available to Department of Natural Resources' personnel upon request.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

INSTALLATION DESCRIPTION

Lead Belt Materials Company, Inc. is a large plant located in Park Hills, Missouri, consisting of two rock crushing plants, one asphalt plant, and one pugmill. The installation currently has a 100 ton limit on PM_{10} emissions and is operating under a section (6) construction permit. It is located in St. Francois County, an attainment area for all criteria air pollutants.

The following permits have been issued to Lead Belt Materials Company, Inc. from the Air Pollution Control Program.

Table 1: Other Permits Issued for Site 187-0001

Permit Number	Completed	Description
082005-023	8/30/2005	Amend for co-located concrete plant
122002-005	12/12/2002	Replace Crusher
OP2007-007	2/20/2007	Asphalt Intermediate Operating permit
0295-002	1/12/1995	Section 5 permit issued

PROJECT DESCRIPTION

Lead Belt Materials Company, Inc. has requested to add equipment to there current installation (Facility ID# 187-0001) and also implement BMPs for the entire site. The equipment to be added to rock crushing plant # 1includes one impact crusher, one grizzly feeder, one screen, and 5 conveyors. Along with this new equipment it was discovered that one diesel engine and one conveyor located on rock crushing plant # 2 and three conveyors located on rock crushing plant # 1 are not accounted for in the current permit (082005-023). This equipment also will be added to this permit. Listed below are all the new emission points being added.

Table 2: New Emission Points Summary:

Emission Point No.	Description	Equipment Information	MHDR or Capacity	Year of Manufacture
EP-11A	Conveyor	Jaw Underconveyor	350 tph	N/A
EP-12A	Conveyor	Finish Screen Cross Conveyor	350 tph	N/A
EP-20A	Conveyor	Clean Material Conveyor	250 tph	N/A
EP-23A	Conveyor	Underconveyor to Screen	250 tph	N/A
EP-25A	Conveyor	42” return conveyor	250 tph	N/A
EP-26A	Conveyor	42” underconveyor	250 tph	N/A
EP-27A	Conveyor	42” underscreen conveyor	250 tph	N/A
EP-28A	Conveyor	42” cross conveyor	250 tph	N/A
EP-29A	Conveyor	Eagle 30” x 50’	250 tph	1999
EP-12E	Diesel Engine	475 hp	0.0252 Mgal/hr	N/A
EP-30A	Impact Crusher Diesel Engine	325 hp	0.0172 Mgal/hr	N/A
EP-21A	Impact Crusher Grizzly	18’ x 45.5” feeder	250 tph	N/A
EP-22A	Secondary Impact Crusher	Eagle Ultramax Model UM25	250 tph	2008
EP-24A	Impact Crusher Screen	5’ x 16’ screen	250 tph	N/A

The addition of the new equipment and BMPs will increase the production of all the plants on site. The old permit had an, installation wide, 100 ton annual PM_{10} limit. This permit supersedes that PM_{10} limit based on the worst case scenario at which PM_{10} emission will never exceed 100.0 tons. A new 40.0 ton NO_x limit on the diesel engines is being added and a new 100.0 ton CO limit on the entire installation is being added based on the worst case scenario of the asphalt running 24 a day. This permit does NOT supersede all the conditions of Permit# 082005-023 and Lead Belt Materials Co., Inc must comply with both.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from the new equipment. The main air pollutants of concern are PM_{10} and NO_x. 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, this project is considered *de minimis* under 10 CSR 10-6.060 section (5). The new equipment has an annual emission limit of less than and 40.0 tons of NO_x in any 12-month period. The new equipment at its max daily production will never exceed the De Minimus level for PM_{10}. A composite NO_x emission factor was developed for the rock crushing plant. The composite emission factor has been incorporated into the monthly record keeping table, Attachment C. If the conditioned potential emissions of NO_x were 40.0 tons per year or greater, then the owner would be required to submit dispersion modeling results.

Table 3: Emissions Summary (tons per year)

Air Pollutant	Regulatory *De Minimis* Levels	*Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	**Project Conditioned Potential	***New Installation Conditioned Potential
PM_{10}	15.0	257.19	16.50	9.87	6.66	N/A
SOx	40.0	2.17	0.45	7.38	2.63	N/A
NOx	40.0	74.97	7.31	112.19	<40.0	N/A
VOC	40.0	20.14	0.79	9.16	3.27	N/A
CO	100.0	216.87	13.42	24.17	8.62	<100.0
HAPs	10.0/25.0	4.14	0.00	0.10	0.04	N/A

Note: N/A = Not Applicable

* Existing potential emissions does not consider any limits found in previous permits

** Conditioned potential based on voluntary limit. Other pollutants excluding PM_{10} were proportionately reduced. PM_{10} emissions based on daily limit

*** New installation conditioned based on a voluntary limit. All other pollutants will stay below 100.0 tons as a result of this.

Table 4: Plant Specific - Conditioned Emissions Summary (tons per year)

Air Pollutant	Asphalt Plant		Rock Crushing Plant# 1		Rock Crushing Plant# 2		Pugmill	
	Existing Conditioned PTE	*Conditioned PTE	Existing Conditioned PTE	*Conditioned PTE	Existing Conditioned PTE	*Conditioned PTE	Existing Conditioned PTE	*Conditioned PTE
PM_{10}	100	N/A	68.20	50.13	72.93	77.62	39.31	39.31
SOx	3.14	N/A	N/A	2.03	N/A	4.38	N/A	N/A
NOx	89.55	N/A	N/A	30.93	N/A	66.68	N/A	N/A
VOC	21.34	N/A	N/A	2.52	N/A	5.44	N/A	N/A
CO	220.02	<100.0	N/A	6.66	N/A	14.36	N/A	N/A
HAPs	4.15	N/A	N/A	0.03	N/A	0.06	N/A	N/A

Note: N/A = Not Applicable

* Base on each individual plant operating at max production with no other plant operating concurrently.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The listed existing potential emissions are the summation of the existing condition emissions with out any limits taken into consideration and the project conditioned potential is proportioned based on the new 40 ton NO_x limit. The new installation conditioned potential is the new 100.0 ton CO that was determined using worst case scenario. The ambient impact was evaluated at the distances given in Special Condition (5). The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 $\mu g/m^3$ of PM_{10} at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for each plant on the site. This ambient impact factor is incorporated into the daily record keeping tables, Attachment A and B, which cover all four conditions. An ambient background level of 22.5 $\mu g/m^3$ of PM_{10} from operation(s) not owned by Lead Belt Materials Company, Inc. is included in Attachment B.

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 µg/m^3 of PM_{10}. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m^3 of PM_{10} at or beyond the nearest property boundary.

Table 5: Ambient Air Quality Impact Analysis of PM_{10}, 24-Hour Averaging Time (Scenario 1 and 2)

Operation	Ambient Impact Factor (µg/m^3ton)	Modeled Impact (µg/m^3)	*Background (µg/m^3)	NAAQS (µg/m^3)	**Daily Production Limit (tons)
1. Rock Crushing Plant #1	0.0228	130.00	20.00	150.00	5694
2. Rock Crushing Plant #2	0.0135	114.00	36.00	150.00	8400
3. Asphalt Plant	0.0435	130.00	20.00	150.00	2989
4. Pugmill	0.0005	5.95	124.05	150.00	10800

* Background PM_{10} level of 20.00 µg/m3 from haul roads and stockpiles.
** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded.

Table 6: Ambient Air Quality Impact Analysis of PM_{10}, 24-Hour Averaging Time (Scenario 3 and 4)

Operation	Ambient Impact Factor (µg/m^3ton)	Modeled Impact (µg/m^3)	*Background (µg/m^3)	NAAQS (µg/m^3)	**Daily Production Limit (tons)
1. Rock Crushing Plant #1	0.0216	107.50	42.50	150.00	4988
2. Rock Crushing Plant #2	0.0133	107.50	42.50	150.00	8077
3. Asphalt Plant	0.0429	107.50	42.50	150.00	2503
4. Pugmill	0.0005	5.95	124.05	150.00	10800

* Background PM_{10} level of 20.00 µg/m3 from haul roads and stockpiles and 22.50 µg/m3 from the operation of plants not owned by Lead Belt Materials Company, Inc.
** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded.

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
- *Operating Permits*, 10 CSR 10-6.065
- An Operating Permit application is required for this installation within 30 days of equipment startup.
- *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
- 40 CFR Part 60 Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, of the New Source Performance Standards (NSPS)
- 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.
- 40 CFR Part 60 Subpart "I", *Standards of Performance for Hot Mix Asphalt Facilities*, of the New Source Performance Standards (NSPS)

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.

Gerad Fox
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Lead Belt Materials Co., Inc. 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.*
- Noyes Data Corp. book, Orlemann, et al.1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Southeast Regional Office Site Survey.
- Best Management Practices

Attachment A: Daily Ambient PM_{10} Impact Tracking Record
Lead Belt Materials Co., Inc., 187-0001, (Solitary and Concurrent Same-Owner Operations)

Project Number: 2008-09-034
County, CSTR: St. Francois County (S12, T36N, R4E)
Primary Unit Size: 350 tph
Distance to Nearest Property Boundary: Varies Between Plants

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

Date	Plant Name: Rock Crushing Plant #1 Plant ID: 187-0001 Project # 2008-09-034			Plant Name: : Rock Crushing Plant #2 Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Asphalt Plant Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Pugmill Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Permit #:	[2]Back-ground PM_{10} Level ($\mu g/m^3$)	[3]TOTAL PM_{10} Level ($\mu g/m^3$)
	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	[4]Daily PM_{10} Impact		
Example	1,200	0.0228	38.52	N/A	0.0135	N/A	N/A	0.0435	N/A	N/A	0.0005	N/A		20.00	58.52
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	
		0.0228			0.0135			0.0435			0.0005			20.00	

Note 1: The Daily PM_{10} Impact (µg/m3) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
Note 2: Background PM_{10} Level (µg/m3) is from Haul Roads and Stockpiles
Note 3: The TOTAL PM_{10} Level (µg/m3) is calculated by summing the Daily PM_{10} Ambient Impact(s) and the Background PM10 Level. A TOTAL PM_{10} Level of less than 150 µg/m3 in any 24-hour period indicates compliance.
Note 4: This Daily PM_{10} Impact column is for any additional, same owner, plants that locate on this site.

Attachment B: Daily Ambient PM_{10} Impact Tracking Record
Lead Belt Materials Co., Inc., 187-0001, (Concurrent Separate-Owner and Same-and-Separate-Owner Operations)

Project Number: 2008-09-034
County, CSTR: St. Francois County (S12, T36N, R4E)
Primary Unit Size: 350 tph
Distance to Nearest Property Boundary: Varies Between Plants

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

Date	Plant Name: Rock Crushing Plant #1 Plant ID: 187-0001 Project # 2008-09-034			Plant Name: : Rock Crushing Plant #2 Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Asphalt Plant Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Pugmill Plant ID: 187-0001 Project # 2008-09-034			Plant Name: Permit #:	[2]Back-ground PM_{10} Level ($\mu g/m^3$)	[3]TOTAL PM_{10} Level ($\mu g/m^3$)
	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	Daily Production (tons)	Ambient Impact Factor ($\mu g/m^3$ton)	[1]Daily PM_{10} Impact ($\mu g/m^3$)	[4]Daily PM_{10} Impact		
Example	1,200	0.0228	38.52	N/A	0.0135	N/A	N/A	0.0435	N/A	N/A	0.0005	N/A	N/A	42.50	81.02
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	
		0.0228			0.0135			0.0435			0.0005			42.50	

Note 1: The Daily PM_{10} Impact (µg/m3) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
Note 2: Background PM_{10} Level (µg/m3) is from Haul Roads and Stockpiles **AND** from other plants not owned by Lead Belt Materials Company, Inc.
Note 3: The TOTAL PM_{10} Level (µg/m3) is calculated by summing the Daily PM_{10} Ambient Impact(s) and the Background PM10 Level. A TOTAL PM_{10} Level of less than 150 µg/m3 in any 24-hour period indicates compliance.
Note 4: This Daily PM_{10} Impact column is for any additional, same or separate owner, plants that locate on this site.

Attachment C: Monthly NO_x Emissions Tracking Record
Lead Belt Materials Co., Inc., 187-0001 – New Equipment

Project Number: 2008-09-034
County, CSTR: St. Francois County (S12, T36N, R4E)
Primary Unit Size: 350 tph
Distance to Nearest Property Boundary: Varies Between Plants

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

Month	[4]Monthly Production (1000 gal)	Composite NO_x Emission Factor (lbs/1000 gal)	[1]Monthly NO_x Emissions (lbs)	[2]Monthly NO_x Emissions (tons)	[3]12-Month NO_x Emissions (tons/year)
Example	7	640.17	4481.19	2.24	9.08
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		640.17			

Note 1: The Monthly Emissions (lbs) are calculated by multiplying the Monthly Production (tons) by the Composite Emission Factor (lbs/ton).
Note 2: The Monthly Emissions (tons) are calculated by dividing the Monthly Emissions (lbs) by 2,000.
Note 3: The 12-Month Emissions (tons/year) are a rolling total calculated by adding the Month's Emissions (tons) to the Monthly Emissions (tons) of the previous eleven (11) months. A total of less than **40.0** tons in any consecutive 12-month period indicates compliance.
Note 4 Only the diesel fuel from EP-12E and EP-30A should be tracked on this tracking sheet

Attachment D: Monthly CO Emissions Tracking Record
Lead Belt Materials Co., Inc., 187-0001 – New and Existing Equipment

Project Number: 2008-09-034
County, CSTR: St. Francois County (S12, T36N, R4E)
Primary Unit Size: 350 tph
Distance to Nearest Property Boundary: Varies Between Plants

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

Column A	Column B	Column C	Column D	Column E	Column F
Unit	**Amount Used**	**Units**	**Emission Factor**	**Units**	**Total CO Emitted for the Month (tons) (Note 1)**
Asphalt Plant		Hours	69.72	lbs. (CO)/ Hour	
Rock Crushing Plant 1		Hours	2.24	lbs. (CO)/ Hour	
Rock Crushing Plant 2		Hours	3.28	lbs. (CO)/ Hour	
Total Monthly CO emissions in tons (Note 2)					
12-Month CO emissions total from previous month's worksheet (Note 3)					
Monthly CO emissions total from previous year's worksheet (Note 4)					
Current 12-Month total CO emissions (Note 5)					

Note: This worksheet is for tracking both CO. This is a monthly worksheet and one sheet must be completed for each month and kept on record for at least five years.

Note 1: Column F = [(Column B • Column D)/2000
Note 2: Sum of Column F
Note 3: Running 12-Month total of CO emissions from previous month's worksheet
Note 4: CO emissions reported for this month in the last calendar year
Note 5: Amount reported for Note 4 minus amount reported for Note 5 plus amount reported for Note 3, not to exceed 100 tons of CO for any consecutive 12-month period
Note 6: The Pugmill located on site187-0001 does not have any CO emissions associated with it.

Attachment AA: Best Management Practices (BMPs)- Construction Industry Fugitive Emissions

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[1]" 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.

[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. Josh Baker
Estimator/Quality Control Manager
Lead Belt Materials Co., Inc.
P.O. Box 607
Park Hills, MO 63601

RE: New Source Review Permit - Project Number: 2008-09-034

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, the New Source Review application submitted for project 2008-09-034, and your amended operating permit, if required, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your rock crushing plant, including any special conditions from your New Source Review permit.

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 Gerad Fox at the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale, P.E.
New Source Review Unit Chief

KBH:gfk

Enclosures

c: Southeast Regional Office
PAMS File: 2008-09-034
Permit Number: