



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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JUN 28 2016

Mr. Harold Bono
Secretary/Treasurer
Magruder Limestone Co., Inc.
255 Watson Road
Troy, MO 63379

RE: New Source Review Permit Amendment - Permit Number: 072014-001A
Project Number: 2016-05-073; Installation Number: 131-0038

Dear Mr. Bono:

Magruder Limestone Co., Inc. requested to amend Permit #072014-001 (Project #2014-06-029 to remove Special Condition 2. Special Condition 2 imposed an Ambient Air Impact Limitation and required Magruder Limestone to demonstrate compliance with the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM₁₀) of 150.0 µg/m³ 24-hour average in ambient air. According to Special Condition 2.C of Permit #072014-001 Magruder Limestone was exempt from demonstrating compliance with the NAAQS when no other plants were operating at this site. In this amendment Magruder Limestone has requested that the Ambient Air Impact Limitation be removed and replaced with daily productions, as needed, in accordance with the Air Pollution Control Program's recent policy "Ceasing the Use of Nomographs" dated May 1, 2016. When removing an Ambient Air Impact Limitation for PM₁₀ a daily throughput limitation is required if the maximum modeled impact is above 80.00 µg/m³ when operating with other plants. According to Table 3 of Permit #072014-001 the maximum modeled impact for PM₁₀ was 60.57 µg/m³ and as a result no daily throughput limitation is needed. This amendment will remove Special Condition 2 of Permit #072014-001.

This amendment will also remove Special Condition 6 and 7 of Permit #072014-001. Special Condition 6 prohibited Magruder Limestone Co., Inc. from operating when other plants not owned by Magruder Limestone Co., Inc. were co-located at the site. Magruder Limestone Co., Inc. is permitted to operate with other plants that relocate to this site, as long as each plant acquires the appropriate permits prior to locating at this site. Special Condition 7 required a minimum distance to the property boundary, which is no longer needed since Magruder Limestone Company, Inc. has taken an annual 15.0 tons of PM₁₀ limit.



Recycled Paper

Mr. Bono
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For your convenience, attached are new tracking sheets for the annual PM₁₀ and engine relocation tracking.

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, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Chad Stephenson, at the department's 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



Kendall B. Hale
Permits Section Chief

KBH:csj

Enclosures

c: Southwest Regional Office
PAMS File: 2016-05-073

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SPECIAL CONDITIONS:

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

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

Magruder Limestone Co., Inc.
Miller County, S32, T40N, R15W

1. Superseding Condition
 - A. The conditions of this permit supersede all special conditions found in the previously issued construction permit 072014-001 issued by the Air Pollution Control Program.
2. Best Management Practices Requirement
Magruder Limestone Company, Inc. at RIS, Inc. shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.
3. Annual Emission Limit
 - A. Magruder Limestone Company, Inc. at RIS, Inc. shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation.
 - B. Magruder Limestone Company, Inc. at RIS, 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. Magruder Limestone Company, Inc. at RIS, 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.

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

- 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 Magruder Limestone Company, Inc. at RIS, Inc. main office within 30 days of completion of the required test.
 - 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 also exceed the limit, Magruder Limestone Company, Inc. at RIS, 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, Magruder Limestone Company, Inc. at RIS, Inc. may obtain test results that demonstrate compliance with the moisture content in Special Condition 4.A from the supplier of the aggregate.
5. Primary Equipment Requirement
Magruder Limestone Company, Inc. at RIS, Inc. shall process all rock through the primary grizzly screen (EU-3). Bypassing the primary grizzly screen is prohibited.
6. Nonroad Engine Requirement
- A. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, any engine at Magruder Limestone Company, Inc. at RIS, Inc. cannot remain in one physical location for longer than 12 consecutive months.
 - B. Magruder Limestone Company, Inc. at RIS, Inc. shall keep records of the relocation within the site of all engines using Attachment B or other equivalent forms that have been approved by the Air Pollution Control Program, including electronic forms.

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

- C. If any engines remain in the same physical location for longer than 12 months, they will be subject to 40 CFR 60 Subpart III, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" and 40 CFR Part 63, Subpart ZZZZ, "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and Magruder Limestone Company, Inc. at RIS, Inc. shall apply for a new permit to account for the engine's revised status.

- 7. Generic Plant Designation and Maximum Combined Hourly Design Rate
Magruder Limestone Company, Inc. at RIS, Inc. has been designated to be a Generic Plant Operation. The combined Maximum Hourly Design Rate (MHDR) of each of the following generic equipment types shall not exceed the rates and numbers listed in Table 1.

Table 1: Generic Equipment

Equipment Type	Maximum Combined Hourly Design Rate	Maximum Number of Units
Primary Unit (Grizzly)	300 tons per hour	1
Grizzly	300 tons per hour	1
Crushers including primary crusher	900 tons per hour	3
Conveyors	4,200 tons per hour	14
Screens	900 tons per hour	3
Storage Bins	900 tons per hour	3

- 8. Generic Plant Equipment Identification Requirement
 - A. Magruder Limestone Company, Inc. at RIS, Inc. shall submit the following information to the Air Pollution Control Program's Permitting Section and the Southwest Regional Office within 15 days of actual startup.
 - 1) A master list of all equipment that will be permitted for use with the generic plant. This master list shall include at minimum the following information for each piece of equipment:
 - a) Manufacturer's name
 - b) Model number
 - c) Serial number
 - d) Actual MHDR
 - e) Date of manufacture
 - f) Any other additional information that is necessary to uniquely identify the equipment.

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

- 2) A list of the core equipment that will always be utilized with the generic plant. The core equipment associated with the generic plant shall include at least one primary unit that controls the rate of the process flow (e.g., a primary crusher or primary screen).
 - 3) A determination of the applicability of 40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" for each piece of equipment indicating whether each piece of equipment is subject to Subpart OOO and justification for this determination.
 - 4) Magruder Limestone Company, Inc. at RIS, Inc. shall notify the Air Pollution Control Program's Permitting Section and the Southwest Regional Office when new equipment is added to the master list and when core equipment is changed within 30 days of the change.
- B. Magruder Limestone Company, Inc. at RIS, Inc. shall maintain a list of the specific equipment currently being utilized with the generic plant. Any arrangement of the generic plant's equipment must be such that the core equipment is not bypassed in the process flow.
9. **Equipment Identification Requirement**
Magruder Limestone Company, Inc. at RIS, Inc. shall maintain 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.
 10. **Record Keeping Requirement**
Magruder Limestone Company, Inc. at RIS, Inc. shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
 11. **Reporting Requirement**
Magruder Limestone Company, Inc. at RIS, Inc. shall report to the Air Pollution Control Program Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.

- Attachment AA: Best Management Practices

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 emissions¹ 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 rationale 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

¹For 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.)