

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: 072018-005

Project Number: 2018-05-028
Installation Number: 510-3035

Parent Company: Obax Infrastructures, LLC

Parent Company Address: 2170 South Mason Road, St. Louis, MO 63131

Installation Name: Obax Infrastructures, LLC

Installation Address: 4658 Rosalie Street, St. Louis, MO 63115

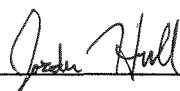
Location Information: St. Louis City

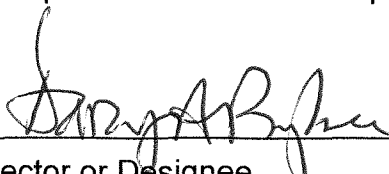
Application for Authority to Construct was made for:

New stationary truck-mix concrete 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.


Prepared by
Jordan Hull
New Source Review Unit


Director or Designee
Department of Natural Resources

JUL 11 2018

Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of 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's 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 the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:

<http://dnr.mo.gov/regions/>

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."

Obax Infrastructures, LLC
St. Louis City

1. Best Management Practices Requirement
Obax Infrastructures, LLC 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.
2. Control Device Requirement-Dust Collectors
 - A. Obax Infrastructures, LLC shall control emissions from the listed equipment using dust collectors as specified in the permit application.
 - 1) EP-3 Cement unloading to silo
 - 2) EP-4 Supplement unloading
 - 3) EP-5 Weigh hopper loading
 - B. The dust collector shall be operated and maintained in accordance with the manufacturer's specifications. The dust collector shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters for the dust collector shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Obax Infrastructures, LLC shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours while the plant is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Obax Infrastructures, LLC shall maintain a copy of the dust collector manufacturer's performance warranty on site.
 - F. Obax Infrastructures, LLC shall maintain an operating and maintenance log for the dust collectors which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

SPECIAL CONDITIONS:

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

3. **Record Keeping and Reporting Requirements**
 - A. Obax Infrastructures, LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. Obax Infrastructures, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2018-05-028
Installation ID Number: 510-3035
Permit Number: 072018-005

Installation Address:
Obax Infrastructures, LLC
4658 Rosalie Street
St. Louis, MO 63115

Parent Company:
Obax Infrastructures, LLC
2170 South Mason Road
St. Louis, MO 63131

St. Louis City

PROJECT DESCRIPTION

Obax Infrastructures, LLC has purchased a Con-E-Co model Lo-Pro 10HP concrete batch plant and would like to place it at 4658 Rosalie Road in St. Louis, MO in St. Louis City. The plant is transportable but is being permitted as a stationary Concrete Batch Plant. It has a MHDR of 120 cubic yards/ hour (241.44 tons per hour). Power will be supplied by the local utility. There is a 1.0 MMBtu/hr hot water heater using natural gas as its fuel. Particulate matter emissions from the silos and hopper are controlled by a three different dust control systems.

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 not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

No permits have been issued to Obax Infrastructures from the Air Pollution Control Program at this site.

Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

No Operating Permit is required for this installation.

Approval of this permit is recommended with special conditions.

TABLES

Table 1: Concrete Plant Equipment List

Emission Point	Description	MHDR
EP-1a	Sand Storage Pile- Load in	85.68 tph
EP-1b	Sand Storage Pile- Load out	85.68 tph
EP-1c	Sand Storage Pile- Wind Erosion	0.034 acres
EP-1d	Sand Storage Pile- Vehicular Activity	0.41 VMT/hr
EP-2a	Aggregate Storage Pile- Load in	111.9 tph
EP-2b	Aggregate Storage Pile- Load out	111.9 tph
EP-2c	Aggregate Storage Pile- Wind Erosion	0.034 acres
EP-2d	Aggregate Storage Pile- Vehicular activity	0.53 VMT/ hr
EP-3	Cement unloading to silo	29.46 tph
EP-4	Supplement unloading	4.38 tph
EP-5	Weigh hopper loading	197.58 tph
EP-6	Truck mix loading	33.84 tph
EP-7	Haul road	0.27 VMT/hr
EP-8	Hot water heater	1 MMBtu/hour

The table below summarizes the emissions of this project. The potential emissions of the process equipment exclude emissions from haul roads and wind erosion. This is a new plant so there are no existing actual emissions. Unconditioned potential emissions of the project represent emissions of the equipment with no controls being utilized. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	^a Potential Emissions of Process Equipment	Existing Actual Emissions (2017 EIQ)	^b Unconditioned Potential Emissions of the Project	Conditioned Potential Emissions of the Project
PM	25.0	3.01	N/A	188.53	30.29
PM ₁₀	15.0	1.23	N/A	97.93	13.95
PM _{2.5}	10.0	1.22	N/A	45.93	3.25
SO _x	40.0	0.00	N/A	0.00	2.58E-03
NO _x	40.0	0.43	N/A	0.43	0.43
VOC	40.0	0.02	N/A	0.02	0.02
CO	100.0	0.36	N/A	0.36	0.36
GHG (CO ₂ e)	N/A	N/A	N/A	N/D	518.36
GHG (mass)	N/A	N/A	N/A	N/D	515.31
HAPs	10.0/25.0	0.00	N/A	0.00	8.11E-03

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

^aExcludes haul roads and storage pile emissions

^bIncludes haul road and storage pile emissions

EMISSIONS CALCULATIONS

Emissions for the project were calculated as described below and 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 concrete batch plant:

- Calculated using emission factors from AP-42 Section 11.12 "Concrete Batching," June 2006.
- This section cites Equation (1) in Section 13.2.4 "Aggregate Handling and Storage Piles," November 2006 for calculating the emissions from aggregate and sand transfer.
- The cement and supplement silos and weigh hopper are controlled with dust collectors, so the controlled emission factors were used.

Emissions from haul roads and vehicular activity areas:

- Calculated using the predictive equation from AP-42 Section 13.2.1 "Paved Roads," November 2006.
- 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 74% control efficiency for PM_{2.5} were applied to the emission calculations for the use of BMPs.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The conditioned potential emissions of all pollutants except PM are conditioned below de minimis. Potential emissions of PM are above de minimis level but below the major source level.

APPLICABLE REQUIREMENTS

Obax Infrastructures, LLC 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.

GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- No Operating Permit is required for this installation because all emissions are conditioned below de minimis levels except PM and PM does not trigger

operating permits requirements. There are no federal regulations requiring an operating permit.

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

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) apply to the proposed equipment.
- *Control of Sulfur Dioxide Emissions*, 10 CSR 10-6.261 does not apply because natural gas is used as fuel for the water heater EP- 8.

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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 7, 2018, received May 14, 2018, designating Obax Infrastructures, LLC as the owner and operator of the installation.

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 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.

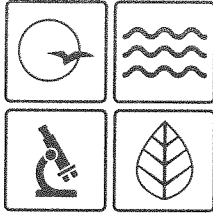
2. Application of Chemical Dust Suppressants
 - A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
 - B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with the 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 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 years, and the operator shall make these records available to Department of Natural Resources' personnel upon request.

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal 1,000 gallons
°Fdegrees Fahrenheit	MWmegawatt
acfmactual cubic feet per minute	MHDRmaximum hourly design rate
BACTBest Available Control Technology	MMBtuMillion British thermal units
BMPsBest Management Practices	MMCFmillion cubic feet
BtuBritish thermal unit	MSDSMaterial Safety Data Sheet
CAMCompliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPSNew Source Performance Standards
COcarbon monoxide	NSRNew Source Review
CO₂carbon dioxide	PMparticulate matter
CO₂ecarbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppmparts per million
dscfdry standard cubic feet	PSDPrevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTEpotential to emit
EPEmission Point	RACTReasonable Available Control Technology
EPAEnvironmental Protection Agency	RALRisk Assessment Level
EUEmission Unit	SCCSource Classification Code
fpsfeet per second	scfmstandard cubic feet per minute
ftfeet	SDSSafety Data Sheet
GACTGenerally Available Control Technology	SICStandard Industrial Classification
GHGGreenhouse Gas	SIPState Implementation Plan
gpmgallons per minute	SMALScreening Model Action Levels
grgrains	SO_xsulfur oxides
GWPGlobal Warming Potential	SO₂sulfur dioxide
HAPHazardous Air Pollutant	SSMStartup, Shutdown & Malfunction
hrhour	tphtons per hour
hphorsepower	tpytons per year
lbpound	VMTvehicle miles traveled
lbs/hrpounds per hour	VOCVolatile Organic Compound
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JUL 11 2018

Mr. Samuel Klucker
Operations Manager
Obax Infrastructures, LLC
2170 South Mason Road
St. Louis, MO 63131

RE: New Source Review Permit - Project Number: 2018-05-028

Dear Mr. Klucker:

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 and your new source review permit application 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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.oa.mo.gov/ahc.



Recycled paper

Mr. Samuel Klucker
Page Two

If you have any questions regarding this permit, please do not hesitate to contact Jordan Hull, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Susan Heckenkamp
New Source Review Unit Chief

SH:dgj

Enclosures

c: St. Louis Regional Office
PAMS File: 2018-05-028

Permit Number: **07 2018 - 005**

NOTICE: This spreadsheet is for your use only and should be used with caution. MoDNR does not guarantee the accuracy of the information it contains. This spreadsheet is subject to continual revision and updating. It is your responsibility to be aware of the most current, accurate and complete information available. MoDNR is not responsible for errors or omissions in this spreadsheet. Submittal of the information contained in this spreadsheet (workbook) does not relieve the responsible official of the certification statement signed on the first page of the application.

		Pollutant	Justification for Limit	Limit Hours per Year
Hours per day	24.0	PM10	NAAQS	
Days per year	271.5	N/A	N/A	Limit Hours per Year w/ 24 hr day
Hours per year	6516.9	PM10	De Minimis	

Pollutant	Potential Emissions of Process Equipment (tons/yr)	Potential Emissions including fugitives (tons/yr)	Allowable Emissions for 6517 hours per year (tons/yr)	DeMinimis Thresholds	Plant-wide Composite Emission Factor (lb/ton)	
PM	3.01	30.29	22.53	25	0.0286	
PM ₁₀	1.23	13.95	10.35	15	0.0132	
PM _{2.5}	1.22	3.25	2.39	10	0.0031	
SO ₂	0.00	0.00	0.00	40	0.0000	refer to natural gas combustion spreadsheet for these pollutants
NO ₂	0.00	0.00	0.00	40	0.0000	
VOC	0.00	0.00	0.00	40	0.0000	
CO	0.00	0.00	0.00	100	0.0000	
CH ₂ O	0.00	0.00	0.00	2	0.0000	
C ₁₁ H ₁₀	0.00	0.00	0.00	-	0.0000	
Pb	0.00	0.00	0.00	0.01	0.0000	
HAPs	0.00	0.00	0.00	10	0.0000	
CO ₂	0.00	0.00	0.00	100	0.0000	
N ₂ O	0.00	0.00	0.00	100	0.0000	
CH ₄	0.00	0.00	0.00	100	0.0000	
GHG _{mass}	#VALUE!	#VALUE!	#VALUE!	100	#VALUE!	
CO ₂ eq	0.00	0.00	0.00	100,000	0.0000	
Maximum hourly design rate (tons/hr)			241.44			

Tons of product per day	5,794.6
Tons of product per year	1,573,431.3

Call: C4
Comment: Peak Capacity
One cubic yard of concrete weighs approximately two tons

Call: C7A
Comment: Material 1
Also known as aggregate rock. Various limestone products is NOT a valid choice here

Call: C4C
Comment: Storage Pile ID No.
The storage pile No. is not used on the emission factor pages, but rather labeled "Storage Pile"

Call: C4D
Comment: Pile #1
This pile is associated with the Aggregate transfer, lead-in-lead-out used there for drop points

Call: C4E
Comment: Pile #2
This pile is associated with the Sand transfer, lead-in-lead-out used there for drop points

Call: C4I
Comment: Maximum Surface Area of Storage Pile (Acres)
Four for total surface area of all storage piles

Call: C4J
Comment: Storage Pile Materials - Moisture Content Information
Material Stored Range Moisture Content %
Crushed Limestone 0.7 to 1.1 0.7
Various Limestone Products 0.46 to 0.8 2.1
Sand -- 7.4
Clay/Dr Mix -- 14.0
Clay 8.9 to 11.0 10.0
* Additional documentation (e.g. test data, ASTM-C-138 method) should be provided if using a different value for the moisture contents if close of the default (near) value

Call: C4K
Comment: Storage Pile Materials - Oil Content Information
Material Stored Range Mean Oil Content %
Crushed Limestone 1.3 to 1.8 1.6
Various Limestone Products 0.8 to 1.4 14.5
Sand -- 7.4
Clay/Dr Mix -- 0.2
Clay 6.5 to 7.8 6.0
* Additional documentation (e.g. test data, ASTM-C-138 method) should be provided if using a different value for the oil contents if close of the default (near) value

Call: C4L
Comment: Oil Content %
The oil content values for all content should be replaced with site-specific information

Call: C4B
Comment: Unloaded Loader Weight
This data will be used by Permit & Design worksheets to calculate storage pile traffic emissions

Call: C5G
Comment: Rate
For this #1, the default is the primary crusher size

Call: C5I
Comment: max WMT per hour
 $WMTDR = 2 * D * R * F / (L - 1)$ where
WMTDR = maximum hourly design rate (WMT/hr)
D = ore size weight of haul road (inches)
R = rate of material hauler (ton/hr)
L = unloaded truck weight (tons)
I = loaded truck weight (tons)

Call: C5H
Comment: Haul Road ID No.
Enter a number or name to uniquely identify this emission endpoint at this installation. The value entered for the Haul Road ID No. must be consistent with those in your Emission Inventory Questionnaire (EIQ) and your Operating Permit Application

Call: C5B
Comment: Unloaded Truck Weight (Tons)
Enter the unloaded weight of the haul trucks. Note: If using haul trucks of varying unloaded weights, then a "fleet" weighted average value should be used and documentation of the analysis should be included with your submittal.
Example: 75% of rock is hauled in 45 ton trucks and 25% is hauled in a 30 ton truck. The "fleet" average unloaded weight would be calculated as follows:
"Fleet" Avg. Wt. = $(0.75 * 45 tons) + (0.25 * 30 tons)$
= 40 tons

Call: C5E
Comment: Average Loaded Truck Weight (Tons)
Enter the average loaded weight of the haul trucks. Note: If using haul trucks of varying loaded weights, then a "fleet" weighted average value should be used and documentation of the analysis should be included with your submittal.
Example: 75% of rock is hauled in a 45 ton truck and 25% is hauled in a 30 ton truck. The "fleet" average loaded weight would be calculated as follows:
"Fleet" Avg. Wt. = $(0.75 * 60 tons) + (0.25 * 30 tons)$
= 45 tons

Call: C5G
Comment: Rate (ton/hr)
For Road #1, the default is the primary crusher size

Call: C6I
Comment: max WMT per hour
 $WMTDR = 2 * D * R * F / (L - 1)$ where
WMTDR = maximum hourly design rate (WMT/hr)
D = ore size weight of haul road (inches)
R = rate of material hauler (ton/hr)
L = unloaded truck weight (tons)
I = loaded truck weight (tons)

Call: D67
Comment: Baffle Requirement
Because #61 and #62 are linked through code, if you want to assess them, you have to highlight both cells and then hit the delete key

Call: D68
Comment: Baffle Requirement
Because #61 and #62 are linked through code, if you want to assess them, you have to highlight both cells and then hit the delete key

Call: C7I
Comment: Generator and engine
means an engine used primarily to operate an electrical generator or alternator to produce electric power for other applications

Call: C7J
Comment: Fuel Sulfur Content
From: Randall, Rob
Sent: Monday, December 22, 2016 12:55 PM
To: Lette, David
Cc: Newkirk, Susan
Subject: FW: re permit required concurrence
The Air Quality Planning Section agrees with the 'no concurrence permit' recommended per the requirements of 10 CSR 10.0-01.

Additional Comment:
Phase rule that is part of the development of the 1-hour SO2 NAAQS State Implementation Plan. Missouri may in the next few years codify a state regulatory requirement that all diesel engines and boilers throughout Missouri (or near large SO2 sources) shall be required to use diesel fuel compliant with federal Ultra Low Sulfur Diesel (ULSD) requirements (15 ppm Sulfur content). Though the Air Program has been informed by diesel purchasers and users that ULSD is their only option when purchasing diesel fuel in Missouri and throughout the Midwest, the USEPA does not consider the federal requirement to be binding. If a permit is required by USEPA to Missouri such a loading ULSD requirement or a future state regulatory action as part of another permit and enforceable mechanism(s). Thank you.

From: Wilbur, Eric
Sent: Monday, December 15, 2016 1:52 PM
To: Randall, Rob
Subject: FW: re permit required concurrence

From: Lette, David
Sent: Monday, December 18, 2016 1:48 PM
To: Ryan, Gary; Chan, Nathan; Green, Jeffrey; Stansfield, Michael; Wilbur, Eric
Cc: Newkirk, Susan
Subject: re permit required concurrence

The Permits Section is requesting concurrence on a permit determination. A draft no permit required letter is attached. The Permits Section is sending this email to request each section to review the draft letter and provide input and approval. Please respond to this email by December 22.

Thank you,
David Lette, ES
Missouri Department of Natural Resources
Air Pollution Control Program

P.O. Box 178, Lawrence, MO 64502
Email: Hwang@mo.gov 573-321-8813

Call: 578

Comment: Date:
Enter your own description of combustion source 1.

Call: 080

Comment: Fuel Type:
You should fill in a choice for both Chap 11 & Part 69 and these choices must coincide

Call: 082

Comment: Default Fuel Sulfur Content:
= 15 grams/100 cubic feet (Default for Propane)
= 0.015 %S (Default for Fuel Oil)

Call: 092

Comment: Default Fuel Sulfur Content:
= 15 grams/100 cubic feet (Default for Propane)
= 0.015 %S (Default for Fuel Oil)

Call: 093

Comment: Default Fuel Sulfur Content:
= 15 grams/100 cubic feet (Default for Propane)
= 0.015 %S (Default for Fuel Oil)

