RE: Portable Source Relocation Request for PORT-0758
Project Number: 2019-12-019; Permit Number: 112017-005B

Dear Jason Luebbering:

This letter authorizes you to relocate your portable concrete plant from its present location in Nodaway County, S12, T65N, R36W, to a lot located at 850 Base Line Rd in Lawrence County, S5, T29N, R28W. Authority to operate at your new site is contingent on the following conditions:

- The equipment shall be operated and maintained in accordance with your existing permit.
- The equipment shall be operated in accordance with the attached site-specific conditions.
- Ozark Ready Mix PORT-0758 shall notify the Southwest Regional Office of equipment start-up within fifteen days after beginning operation at the new site.
- Authority to operate at this site expires on November 30, 2020.
- PORT-0758 cannot operate with any other plants that have ambient impact limits based on the Air Pollution Control Program’s nomographs. Please refer to the permits of any plant that you are operating with to see if their respective permits contain an ambient impact limit.

Upon moving to this site, authority to operate at the previous site expires. Permission to return to a previously authorized site will be granted if circumstances at the site have not changed since receiving the initial approval for the site and you submit a Portable Source Relocation Request form to the Air Pollution Control Program at least seven days before the planned relocation. The relocation request must include written notification of any concurrently operating plants. If you choose not to relocate your plant to this site, please notify the Air Pollution Control Program. A copy of this letter and your permit must be kept on-site with the plant and be made available to Department of Natural Resources’ personnel upon request.

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.

If we can be of further assistance, please contact Dakota Fox at the department’s Air Pollution Control Program, P.O. Box 176 Jefferson City, MO 65102 or you may telephone (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
Permits Section Chief

KBH:df.

Enclosures

c: Southwest Regional Office
   PAMS File: 2019-12-019
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 (3)(E). “Conditions required by permitting authority.”*

PORT ID Number: PORT-0758
Site Address: 850 Base Line Rd, Golden City, MO Lawrence
Site County: Lawrence S5, T29N, R28W

1. **Annual PM$_{10}$ Emission Limit**
   A. Ozark Ready Mix PORT-0758 shall emit less than 15.0 tons of PM$_{10}$ in any consecutive 12-month period from PORT-0758 and associated haul roads and storage piles while operating at this site. This limit shall include the summation of all PM$_{10}$ emissions from startup, shutdown, and malfunctions as reported to the Air Pollution Control Program's Compliance/Enforcement Section.

   B. Ozark Ready Mix PORT-0758 shall demonstrate compliance with Special Condition 1.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

2. **Undocumented Watering Requirement**
   Ozark Ready Mix PORT-0758 shall apply a water spray on all haul roads and vehicular activity areas whenever conditions exist that would allow visible emissions from these sources to leave the property.

3. **Control Device Requirement-Baghouse**
   A. Ozark Ready Mix PORT-0758 shall control emissions from the equipment listed below using a baghouse.
      1) Cement Silo
      2) Supplement Silo
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse 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 the Department of Natural Resources' employees may easily observe them.

C. Replacement filters for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkaline resistance, and abrasion resistance).

D. Ozark Ready Mix PORT-0758 shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours when the plant is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

E. Ozark Ready Mix PORT-0758 shall maintain a copy of the baghouse manufacturer's performance warranty on site.

F. Ozark Ready Mix PORT-0758 shall maintain an operating and maintenance log for the baghouse 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.

4. Nonroad Engine Requirements
   Ozark Ready Mix PORT-0758 cannot operate at this site longer than 12 consecutive months in order to avoid recordkeeping showing the movement of the engines. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, the engines cannot remain in one physical location for longer than 12 consecutive months.

5. Record Keeping Requirement
   Ozark Ready Mix PORT-0758 shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources' personnel upon request.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

6. Reporting Requirement
Ozark Ready Mix PORT-0758 shall report to the Air Pollution Control Program, Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedances of the limitations imposed by this permit.
Project Description

Ozark Ready Mix is relocating their PORT-0758 concrete plant to a field Southeast of Golden City, Missouri to supply material for a construction project in the area. This field is located at 850 Base Line Rd. This location will also be shared by portable plant PORT-0293 (Project #2019-10-052), which is another concrete facility owned by Ozark Ready Mix. Both of these portable plants were recently acquired by Ozark Ready Mix from Fischer Concrete Services. Plant PORT-0758 is capable of a MHDR of 400 tph. There will be a storage pile for aggregate (0.5 acres) and a storage pile for sand (0.5 acres). There are also two haul roads that are unpaved, 400 ft and 190 ft in length. Ozark Ready Mix will be using undocumented watering to control emissions from haul roads and vehicular activity areas.

The plant will be powered by a two generator set engines, however they meet the definition of a nonroad engine as defined in 40 CFR 89.2 (1)(i), as Ozark Ready Mix does not intend on staying at this location for more than 12 months. Therefore, the emissions of the engines were not included in the project emissions. NSPS III "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" and MACT ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" do not apply because the engines meet the definition of nonroad.

Tables

Table 1 summarizes the emissions of this project. The potential emissions of process equipment exclude emissions from haul roads and storage piles, which are site specific. Existing actual emissions are taken from the 2018 EIQ report, as reported by the facility. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). Conditioned potential emissions account for a voluntary annual PM$_{10}$ de minimis limit.
Table 1: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>De Minimis Level/SMAL</th>
<th>Existing Actual Emissions (2018 EQ)</th>
<th>Potential Emissions of Process Equipment&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Potential Emissions of the Application&lt;sup&gt;b&lt;/sup&gt;</th>
<th>Conditioned Potential Emissions&lt;sup&gt;c&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>N/D</td>
<td>268.85</td>
<td>515.93</td>
<td>47.89</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>15.0</td>
<td>1.0601</td>
<td>81.27</td>
<td>161.60</td>
<td>15.00</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>10.0</td>
<td>0.3240</td>
<td>63.89</td>
<td>74.06</td>
<td>6.87</td>
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<tr>
<td>SO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>40.0</td>
<td>0.0203</td>
<td>0.04</td>
<td>0.04</td>
<td>0.00</td>
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<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>40.0</td>
<td>0.03098</td>
<td>3.55</td>
<td>3.55</td>
<td>0.33</td>
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<tr>
<td>VOC</td>
<td>40.0</td>
<td>0.0252</td>
<td>0.06</td>
<td>0.06</td>
<td>0.01</td>
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<td>CO</td>
<td>100.0</td>
<td>0.0666</td>
<td>0.89</td>
<td>0.89</td>
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<td>Total HAPs</td>
<td>25.0</td>
<td>0.0000</td>
<td>0.01</td>
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N/D = Not Determined

<sup>a</sup> Excludes haul road and storage pile emissions

<sup>b</sup> Includes site specific haul road and storage pile emissions

<sup>c</sup> Conditioned potential emissions account for a 15 tpy limit of PM<sub>10</sub>

Emissions Calculations

Emissions for the project were calculated using emission factors found in the United States Environmental Protection Agency (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:
- PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the concrete batch plant were 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 are controlled with a baghouse, so the controlled emission factors were used.

Emissions from the aggregate weigh hopper:
- Uncontrolled PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the aggregate weigh hopper were calculated using AP-42, Section 13.2.4, Equation (1).
- PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from truck loading are not controlled by a baghouse, so the uncontrolled emission factor was used.

Emissions from haul roads and vehicular activity areas:
- PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from haul roads and vehicular activity areas were calculated using the predictive equation from AP-42, Section 13.2.2 "Unpaved Roads," November 2006. A 50% control efficiency for PM and PM<sub>10</sub> and a 41% control efficiency for PM<sub>2.5</sub> are applied to the emission calculations for the use of undocumented watering.
Emissions from storage piles:

- PM, PM$_{10}$, and PM$_{2.5}$ emissions from load-in and load-out of storage piles were calculated using the predictive equation from AP-42, Section 13.2.4 "Aggregate Handling and Storage Piles," November 2006. The moisture content of the aggregate is 0.7% by weight.

- PM, PM$_{10}$, and PM$_{2.5}$ emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program's Emissions Inventory Questionnaire Form 2.8 "Storage Pile Worksheet."
### Attachment A: PM$_{10}$ Annual Emissions Tracking Sheet

**Ozark Ready Mix PORT-0758**  
**Project Number:** 2019-12-019  
**Permit Number:** 112017-005B

**Site Name:** Field off 850 Base Line Rd  
**Site Address:** 850 Base Line Rd, Golden City, MO Lawrence  
**Site County:** Lawrence, S5, T29N, R28W

This sheet covers the period from _____ __ _ to ___ __ __ _ (Copy as need ed)  
(Month, Year) (Month, Year)

<table>
<thead>
<tr>
<th>Date (month/year)</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions (lbs)</th>
<th>SSM Emissions (tons)</th>
<th>Monthly Emissions$^3$ (tons)</th>
<th>12-Month Total Emissions$^4$ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Example</strong></td>
<td>20,000</td>
<td>0.0922</td>
<td>1,844</td>
<td>0.0</td>
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<td>0.9 + 11 previous months at this site</td>
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<td>0.0922</td>
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1 Multiply the monthly production by the emission factor.  
2 Write the startup, shutdown and malfunction emissions (SSM) in tons reported to the Air Pollution Control Program’s Enforcement/Compliance Section according to the provisions of 10 CSR 10-6.050 for the month  
3 Divide the monthly emissions (lbs) by 2000 and add the SSM Emissions.  
4 Add the monthly emissions (tons) to the sum of the monthly emissions from the previous eleven months. A total of less than **15.0** tons of PM$_{10}$ per 12 consecutive months is necessary for compliance.
Mar 19 2020

Jason Luebbering
Director of Operations
Ozark Ready Mix
1115 Bluff Drive
Osage Beach, MO 65065

RE: New Source Review Permit Correction - Permit Number: B
Project Number: 2019-12-019: Installation Number: PORT-0758

Dear Jason Luebbering:

This is a permit amendment correction for your portable concrete plant. The location of PORT-0758 was incorrectly listed as moving to 840 Base Line Road, instead of 850 Base Line Road. Additionally, Ozark Ready Mix was incorrectly referred to as Fischer Concrete Services, LLC in the Project Description and Special Condition 3 incorrectly listed truck loadout as being controlled by the baghouse. This correction will change the address of PORT-0758, correct the title of the parent company, and remove truck loadout from Special Condition 3. Attached is a new permit with the corrections, new project number 2019-12-019, but the same Permit# 112017-005B. Please replace the original Permit# 112017-005B (Project# 2019-10-053) with the following amendment.

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.
If you have any questions regarding this correction, please do not hesitate to contact Dakota Fox 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:dfa

Enclosures

c:     Southwest Regional Office
       PAMS File: 2019-12-019