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: 032017-006

Project Number: 2016-12-030

Installation ID: 165-0024

Parent Company: Platte County Ready Mix

Parent Company Address: P.O. Box 290, Platte City, MO 64079

Installation Name: Platte County Ready Mix

Installation Address: 15475 Knighton Avenue, Platte City, MO 64079

Location Information: Platte County, S25 53N R35W

Application for Authority to Construct was made for:
Replacement ready mix 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
Kathy Kolb
New Source Review Unit

Director or Designee
Department of Natural Resources
MAR 14 2017
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/
SITE SPECIFIC 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.”

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued construction permit 0293-002 from the Air Pollution Control Program.

2. Best Management Practices Requirement
   Platte County Ready Mix 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.

3. Annual Emission Limit
   A. Platte County Ready Mix shall emit less than 15.0 tons of PM$_{10}$ in any 12-month period from the entire installation as listed in Table 1.

   B. Platte County Ready Mix 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. Control Device Requirement-Baghouse
   A. Platte County Ready Mix shall control emissions from the equipment listed below using baghouses as specified in the permit application.
      1) Cement Silo (EP-3)
      2) Supplement/Fly Ash Silo (EP-4)
      3) Weigh Hopper (EP-5)
      4) Truck Mix Loadout (shroud vented to baghouse) (EP-6)

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

   C. Replacement filters for the baghouses 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 alkali resistance, and abrasion resistance).

   D. Platte County Ready Mix shall monitor and record the operating pressure drop across each baghouse at least once every 24 hours. The operating pressure
SITE SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

E. Platte County Ready Mix shall maintain a copy of the baghouse manufacturer's performance warranty on site.

F. Platte County Ready Mix 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.

5. Dismantled Equipment
   Platte County Ready Mix shall dismantle and deem inoperable the concrete plant that was originally permitted in Permit EX37400024005.

6. Record Keeping Requirement
   Platte County Ready Mix 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.

7. Reporting Requirement
   Platte County Ready Mix shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedances of the limitations imposed by this permit.
PROJECT DESCRIPTION

Platte County Ready Mix replaced their ready mix plant that was permitted in 1993 with a new plant rated at 120 cubic yards/hour (241.44 tons/hour) Stephens S/N 9507-15, manufactured in 2016. The cement silo and fly ash silo each have a dust collector. Also the Model RA-120 central dust collector controls emissions from the truck loading and concrete/slag/fly ash weigh hopper. The plant is powered off the grid. In addition, this plant has a propane-fired Kemco Model RM00 water heater, rated at 3 MMBtu/hour and manufactured in 2004. The old plant that was permitted in 1993 has been removed.

The following Table 1 lists the new equipment, storage piles and haul roads with the respective emission points, replacing all equipment from the 1993 plant.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>MHDR</th>
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<tr>
<td>EP-1</td>
<td>Aggregate Transfer</td>
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<tr>
<td>EP-2</td>
<td>Sand Transfer</td>
<td>241 tph</td>
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<td>EP-3</td>
<td>Cement Unloading to Silo</td>
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<tr>
<td>EP-4</td>
<td>Supplement/Fly Ash Unloading (Pneumatic)</td>
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<td>EP-5</td>
<td>Weigh Hopper</td>
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<td>EP-6</td>
<td>Truck Loading</td>
<td>241 tph</td>
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<tr>
<td>EP-7</td>
<td>Hot Water Heater Kemco Model RM00</td>
<td>3.0 MMBTU</td>
</tr>
<tr>
<td>EP-8a</td>
<td>Aggregate Storage Pile</td>
<td>0.3 acres</td>
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<tr>
<td>EP-8b</td>
<td>Sand Storage Pile</td>
<td>0.3 acres</td>
</tr>
<tr>
<td>EP-9a</td>
<td>Receiving Haul Road</td>
<td>400 feet</td>
</tr>
<tr>
<td>EP-9b</td>
<td>Shipping Haul Road</td>
<td>400 feet</td>
</tr>
</tbody>
</table>
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 located in Platte County, a maintenance area for ozone and an attainment area for all other criteria pollutants.

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

TABLES

The following permit has been issued to Platte County Ready Mix from the Air Pollution Control Program.

Table 2: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
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<tr>
<td>EX374000024005</td>
<td>Construction of a concrete plant</td>
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The following Table 3 summarizes the emissions of this project. The potential emissions of the process equipment, exclude emissions from haul roads and wind erosion. The existing actual emissions were taken from the 2016 EIQ. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with the annual emission limit. Conditioned potential emissions account for a voluntary annual PM_{10} emission limit of 15.0 tons per year in order to avoid refined modeling according to 10 CSR 10-6.060 (6)(B).3.

Table 3: Emissions Summary (tons per year)

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<td>PM</td>
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<td>16.28</td>
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<td>36.64</td>
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<td>PM_{10}</td>
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<td>7.56</td>
<td>6.12</td>
<td>27.04</td>
<td>&lt;15.0</td>
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<tr>
<td>PM_{2.5}</td>
<td>10.0</td>
<td>2.26</td>
<td>1.60</td>
<td>5.94</td>
<td>3.29</td>
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<tr>
<td>SO_{2}</td>
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<td>0.0</td>
<td>0.22</td>
<td>0.12</td>
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<tr>
<td>NO_{x}</td>
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<td>1.88</td>
<td>0.0</td>
<td>1.88</td>
<td>1.04</td>
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<td>19.65</td>
<td>10.90</td>
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<td>GHG (mass)</td>
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</table>

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

*Emissions from Process Equipment excluding haul roads and storage pile emissions

**Includes 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 are controlled with baghouses, so the controlled emission factors were used.

Emissions from the aggregate weigh hopper:
- Calculated using AP-42 Section 13.2.4, Equation (1).
- These emissions are controlled by a baghouse so a 99% control factor was applied to the calculation.
- Emissions from mixer loading/mix truck loading are controlled by a shroud vented to a baghouse, so the controlled emission factor was used.

Emissions from haul roads and vehicular activity areas:
- Calculated using the predictive equation from AP-42 Section 13.2.2 “Unpaved Roads,” November 2006.
- A 90% control efficiency for PM and PM$_{10}$ and a 74% control efficiency for PM$_{2.5}$ were applied to the emission calculations for the use of BMPs.

Emissions from storage piles:
- Load-in and load-out of storage piles were calculated using the predictive equation from AP-42 Section 13.2.4.
- The moisture content of the aggregate is 0.7% by weight.
- 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.”

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 include emissions from sources that will limit their production to ensure compliance with the annual PM$_{10}$ emission limit of 15.0 tons per year for stationary plants in order to avoid refined modeling according to 10 CSR 10-6.060 (6)(B)3. Potential emissions of PM are above de minimis but below major source levels. There are no modeling requirements for PM.
APPLICABLE REQUIREMENTS

Platte County Ready Mix 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

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

• No Operating Permit is required for this installation.

• 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 New Source Performance Standards (NSPS) apply to the installation.

• None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACS) apply to the proposed equipment.

• Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400 does not apply because silos, weigh hopper and truck loading are controlled by a baghouse. All other sources are fugitive.

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 December 14, 2016, received December 16, 2016, designating Platte County Ready Mix as the owner and operator of the installation.
This sheet covers the period from ______ to ______ (Month, Day Year) (Copy as needed).

<table>
<thead>
<tr>
<th>Month</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions¹ (lbs)</th>
<th>Monthly Emissions² (tons)</th>
<th>12-Month Total Emissions² (tons)</th>
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<td>Example</td>
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<td>1280</td>
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</tbody>
</table>

¹Multiply the monthly production by the emission factor.
²Divide the monthly emissions (lbs) by 2000.
³Add 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 PM₁₀ per consecutive 12 months is necessary for compliance.
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 (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 rational 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.
APPENDIX A

Abbreviations and Acronyms

% ............... percent
°F .............. degrees Fahrenheit
acfm .......... actual cubic feet per minute
BACT .............. Best Available Control Technology
BMPs ........ Best Management Practices
Btu .............. British thermal unit
CAM ............ Compliance Assurance Monitoring
CAS ............ Chemical Abstracts Service
CEMS .......... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e .......... carbon dioxide equivalent
COMS .......... Continuous Opacity Monitoring System
CSR .......... Code of State Regulations
dscf ............ dry standard cubic feet
EIQ .......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA ............ Environmental Protection Agency
EU .......... Emission Unit
fps ............. feet per second
ft .............. feet
GACT ........ Generally Available Control Technology
GHG ............ Greenhouse Gas
gpm .......... gallons per minute
gr .......... grains
GWP ........... Global Warming Potential
HAP .......... Hazardous Air Pollutant
hr .............. hour
hp .......... horsepower
lb .......... pound
lbs/hr ........ pounds per hour
MACT .......... Maximum Achievable Control Technology
µg/m³ .......... micrograms per cubic meter
m/s .......... meters per second
Mgal .......... 1,000 gallons
MW .......... megawatt
MHDR ........ maximum hourly design rate

MMBtu ........ Million British thermal units
MMCF .......... million cubic feet
MSDS .......... Material Safety Data Sheet
NAAQS .......... National Ambient Air Quality Standards
NESHAPs .......... National Emissions Standards for Hazardous Air Pollutants
NOₓ .......... nitrogen oxides
NSPS .......... New Source Performance Standards
NSR .......... New Source Review
PM .......... particulate matter
PM₂.₅ .......... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ .......... particulate matter less than 10 microns in aerodynamic diameter
ppm .......... parts per million
PSD .......... Prevention of Significant Deterioration
PTE .......... potential to emit
RACT .......... Reasonable Available Control Technology
RAL .......... Risk Assessment Level
SCC .......... Source Classification Code
scfm .......... standard cubic feet per minute
SDS .......... Safety Data Sheet
SIC .......... Standard Industrial Classification
SIP .......... State Implementation Plan
SMAL .......... Screening Model Action Levels
SOₓ .......... sulfur oxides
SO₂ .......... sulfur dioxide
tph .......... tons per hour
tpy .......... tons per year
VMT .......... vehicle miles traveled
VOC .......... Volatile Organic Compound
### Project Summary

**2016-12-03 Platte County Ready Mix.xlsx**

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.

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<th>Hours per day</th>
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<tr>
<td>4858.9</td>
<td>PM10</td>
<td>De Minimis</td>
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<table>
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<th>Pollutant</th>
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<th>Potential Emissions including fugitives (tons/yr)</th>
<th>Allowable Emissions for 4859 hours per year (tons/yr)</th>
<th>DeMinimis Thresholds</th>
<th>Plant-wide Composite Emission Factor (lb/ton)</th>
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Maximum hourly design rate (tons/hr): 241

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<th>Tons of product per day</th>
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<td>Tons of product per year</td>
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# Data Entry

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**NOTICE:** This spreadsheet is for use only and should be used with caution. MODNR does not guarantee the accuracy of the information contained. The spreadsheet is subject to change and updating. It is your responsibility to ensure the most current, accurate and complete information available. MODNR is not responsible for errors or omissions in the information. Neither the information contained in this spreadsheet nor MODNR can, in any manner, be used or interpreted as creating a contract, agreement or commitment. **This spreadsheet is subject to change and updating. It is your responsibility to ensure the most current, accurate and complete information available. MODNR is not responsible for errors or omissions in the information. Neither the information contained in this spreadsheet nor MODNR can, in any manner, be used or interpreted as creating a contract, agreement or commitment.**

## Hazard Information

<table>
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<tr>
<th>Hazardous Characteristics</th>
<th>Potential Health Effects</th>
<th>Potential Environmental Effects</th>
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## Chemicals Information

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## Physical Information

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## Engine Information

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<th>Horsepower</th>
<th>Torque</th>
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## Environmental Information

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## Fuel Information

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## Waste Information

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## Noise Information

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## Radiation Information

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## Other Information

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---
Mr. Randall Shackelford  
General Manager  
Platte County Ready Mix  
P.O. Box 290  
Platte City, MO 64079

RE: New Source Review Permit - Project Number: 2016-12-030

Dear Mr. Shackelford:

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, 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.
Mr. Randall Shackelford
Page Two

If you have any questions, please do not hesitate to contact Kathy Kolb, 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

Susan Heckenkamp
New Source Review Unit Chief

Enclosures

c: Kansas City Regional Office
   PAMS File: 2016-12-030

Permit Number: 032017-006