

## DEPARTMENT OF NATURAL RESOURCES

## MISSOURI AIR CONSERVATION COMMISSION

## PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 042009-011      Project Number: 2009-01-014  
PORT-0631

Parent Company: Progressive Contractors Incorporated

Parent Company Address: 14123 42<sup>nd</sup> St. NE, St. Michael, MO 55376

Installation Name: Williamsville Stone

Installation Address: US 67 N, Poplar Bluff, MO 63901

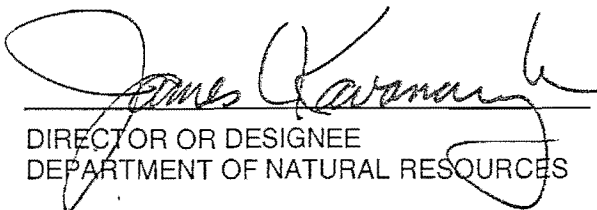
Location Information: Butler County, S14, T26N, R5E

This permit is for the installation of a new portable concrete plant. Concrete is produced through a central mix process. The portable concrete plant has a maximum hourly design rate (MHDR) of 905 tons per hour (tph). Best Management Practices will be used at the initial site. 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.

APR 17 2009

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years/18 months from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years/18 months 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 Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant 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 at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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|-------------|-------------|
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**GENERAL SPECIAL CONDITIONS:**

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

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*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority"; by 10 CSR 10-6.010 "Ambient Air Quality Standards" and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3. Furthermore, one or more of the Subparts of 40 CFR Part 60, New Source Performance Standards (NSPS), applies to this installation.*

1. **Portable Equipment Identification Requirement**  
To assure that each component is properly identified as being a part of this portable concrete plant, (PORT-0631) Progressive Contractors Incorporated (PCI) shall provide and maintain suitable, 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. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable concrete plant.
2. **Relocation of Portable Concrete Plant**
  - A. The portable concrete plant shall not be operated at any site location longer than 24 consecutive months without an intervening relocation.
  - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable concrete plant.
    - 1.) If the portable concrete plant is moving to a site previously permitted, and if there are no other new plants at the site, then the application must be received by the Air Pollution Control Program at least seven (7) days prior to the relocation.
    - 2.) If the portable concrete plant is moving to a new site, or if there are other plants or equipment at the site that have not been evaluated for concurrent operation, then the application must be received by the Air Pollution Control Program at least twenty-one (21) days prior to the relocation. The application must include written notification of any concurrently operating plants.
3. **Record Keeping Requirement**  
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.

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**SITE-SPECIFIC SPECIAL CONDITIONS:**

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

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Site ID No.: 023-0003  
Site Name: Williamsville Stone  
Site Address: US 67 N, Poplar Bluff, MO 63901  
Site County: Butler County, S14, T26N, R5E

1. **Best Management Practices**  
PCI shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>).**
  - A. The total daily ambient impact of PM<sub>10</sub> at this site 023-0003 shall include the combined impact of PORT-0631 and ambient background concentration from Williamsville Stone's operation of its rock-crushing, agricultural lime, and asphalt plants. The operator(s) for PORT-0631 shall ensure, while operating at this site, that the ambient impact of PM<sub>10</sub> at the nearest residence does not exceed 150.0 µg/m<sup>3</sup> in any 24-hour period.
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM<sub>10</sub> Impact Tracking Record*, or other equivalent form(s), will be used for this purpose.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that Progressive Contractors Incorporated's (PCI) portable concrete plant emits less than 50.0 tons of PM<sub>10</sub> into the atmosphere in any 12-month period.
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM<sub>10</sub>. Attachment B, *Monthly PM<sub>10</sub> Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Moisture Content Testing of Storage Piles Requirement**
  - A. The moisture content of the stockpiled rock will reduce particulate emissions. PCI claimed the moisture content of the stored rock to be greater than or equal to 1.0 wt.%, which shall be verified by testing.
  - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director.
  - C. The operator may obtain a copy of the test results of the inherent moisture content from the supplier(s) of the aggregate. Otherwise, the operator shall obtain test samples from each shipment of untested aggregate. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be filed on-site or at the PCI main office.
  - D. If the moisture content result of the first test is less than 1.0 wt.%, a second test must be performed within 30 days. If the result of the second test is less than 1.0 wt.%, Progressive Contractors Incorporated shall apply for a new construction permit to account for the revised information or install wet spray devices on the affected units.
5. **Silt Content Testing Requirement – Storage Pile – Aggregate Rock - Sand**
  - A. The reduced silt content of the aggregate rock and sand Storage Pile(s) will reduce particulate emissions. PCI claimed the silt content to be less than or equal to 1.0 wt.% for aggregate rock and 0.5 wt.% for sand which shall be verified by testing.
  - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM C-136)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director. The first test shall be no later than 45 days after startup. Testing shall be conducted at least once every two years after the initial test, during the months of June through

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**SITE-SPECIFIC SPECIAL CONDITIONS:**

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

- September, while the portable concrete plant is active at this site.
- C. The operator shall obtain test samples from each storage pile. The written analytical report shall include the raw data and silt content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be filed on-site or at the PCI main office.
- D. If the silt content result of the first test is greater than 1.0wt.% (aggregate rock) or 0.5wt.% (sand), a second test must be performed within 30 days. If the result of the second test is greater than 1.0wt.% (aggregate rock) or 0.5wt.% (sand), PCI shall apply for a new construction permit to account for the revised information.
6. Baghouse(s) Control System Requirements
- A. PCI shall install and operate baghouse(s) to restrict the emission of particulate matter. The baghouse(s) must be used whenever these units are in operation. The baghouse(s) shall be installed on the following units: Material to Mixing Drum EP-10, Cement Silo EP-05, Fly Ash Silo EP-06, and Cement and Fly Ash Scale EP-08.
- B. PCI shall install instruments to monitor the operating pressure drop across the baghouse. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's preventive maintenance recommendations. The operator(s) shall check and record the pressure drop across the baghouse filter once per operating day during silo loading. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
- C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the baghouse for structural component failures, for leaks and wear, and for the cleaning sequence of the baghouse. Replacement bags shall be kept on hand at all times to replace defective bags (The bags shall be made of fibers appropriate for the operating conditions expected to occur). All inspections, corrective actions, and instrument calibrations shall be recorded.
7. Prohibition Against Concurrent Operations Without Further AIR POLLUTION CONTROL PROGRAM Review
- The portable concrete plant, PORT-0631 is prohibited from operating whenever any other plant(s) are located at this site, except for the following three (3) plants:
- A. Williamsville Stone Rock Crushing Plant, Installation ID 023-0003, Permit 032004-017A.
- B. Williamsville Stone Agriculture Lime Plant, Installation ID 023-0003, Permit 032004-016A.
- C. Delta Companies Asphalt Plant, Installation ID 023-0003, Permits 0579-021 and 032004-017A.
8. Restriction on Minimum Distance to Nearest Property Boundary
- The primary emission point of the portable concrete plant PORT-0631, Mixer Loading EU-07, shall be located at least 2000 feet from the nearest residence whenever it is operating at this site.
9. Record Keeping Requirement
- The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
10. Reporting Requirement
- The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## **PROJECT DESCRIPTION**

Concrete is composed of water, cement, sand (fine aggregate), and non-metallic coarse aggregate rock. These materials are processed in a central mix drum. Processed concrete is delivered as sellable product. The emission points are listed in the attached spreadsheet summary. This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2]. The installation is located in Butler County, an attainment area for all criteria air pollutants. PORT-0631 has received no permits from the Air Pollution Control Program.

The general Missouri Department of Natural Resources New Source Review permitting process for portable concrete plants is to evaluate the ambient impact from the installation's operation at the nearest property boundary. PCI proposes installing the concrete plant on the property of Williamsville Stone, at an approximate distance of 327 feet from the right-of-way of Highway 67 for the completion of a temporary MoDOT project. Citing a memorandum which updated the Missouri Department of Natural Resources Air Pollution Control Program Procedures Manual, pertaining to permitting concrete plants for temporary highway projects, "When evaluating temporary highway projects where the concrete plant is located on or adjacent to the project site, the distance to the closest residence or to where the public could reasonably be expected to be found shall be used for the ambient impact analysis". The nearest residence is located on County Road 401 approximately 1200 feet southeast of the entrance to Williamsville Stone. This residence will have the largest combined daily ambient impact of any residence, from PORT-0631 and Williamsville Stone's rock-crushing, agricultural lime, and asphalt plants.

## **EMISSIONS EVALUATION**

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM<sub>10</sub>. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a minor source under 10 CSR 10-6.060 section (6).

The portable concrete plant has an annual emission limit of less than 50.0 tons of PM<sub>10</sub> in any 12-month period. A composite PM<sub>10</sub> emission factor was developed for the portable concrete plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment B. If the conditioned potential emissions of PM<sub>10</sub> were 50.0 tons per year or greater, then the owner would be required to submit dispersion modeling results.

**Table 1: Emissions Summary (tons per year)**

| <b>Air Pollutant</b> | <b>Regulatory De Minimis Levels</b> | <b>Existing Potential Emissions</b> | <b>Existing Actual Emissions (year EIQ)</b> | <b>Potential Emissions of the Application</b> | <b>New Installation Conditioned Potential</b> | <b>Emission Factor (pounds of PM<sub>10</sub>/ton )</b> |
|----------------------|-------------------------------------|-------------------------------------|---|---|---|---|
| PM <sub>10</sub>     | 15.0                                | N/A                                 | N/A   | 85.64   | < 50.0  | 0.0216  |
| SO <sub>x</sub>      | 40.0                                | N/A                                 | N/A   | 1.81  | 1.06  | N/A   |
| NO <sub>x</sub>      | 40.0                                | N/A                                 | N/A   | 27.49   | 16.05   | N/A   |
| VOC                  | 40.0                                | N/A                                 | N/A   | 2.24  | 1.31  | N/A   |
| CO                   | 100.0                               | N/A                                 | N/A   | 5.92  | 3.46  | N/A   |
| HAPs                 | 10.0/25.0                           | N/A                                 | N/A   | 0.02  | 0.01  | N/A   |

N/A = Not Applicable

## **AMBIENT AIR QUALITY IMPACT ANALYSIS**

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 2000 feet to the nearest residence. The screening tools were used to develop an ambient impact factor for the portable concrete plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A. An ambient background level of PM<sub>10</sub> from the operation(s) of Williamsville Stone's rock crushing, agriculture lime, and asphalt plants is also included in Attachment A.

As previously stated, while PORT-0631 is operating on Williamsville Stone's property for the completion of MoDOT Highway 67, the ambient impact from all operations is evaluated at the nearest residence as determined by being the residence with the highest ambient impact upon it. After PORT-0631 is moved from Williamsville Stone property, it cannot be relocated to Williamsville Stone property unless the ambient impact analysis performed by the Air Pollution Control Program uses the distance to the nearest property boundary for all plants. This location on the property boundary shall be selected as the location that has the highest combined impact upon it.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20.0  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ . To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130.0  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$  at or beyond the nearest property boundary, amended to the nearest residence by the Missouri Department of Natural Resources.

**Table 2: Ambient Air Quality Impact Analysis of  $\text{PM}_{10}$ , 24-Hour Averaging Time**

| Operation           | Distance to Highest Impacted Residence (feet) | Ambient Impact Factor ( $\mu\text{g}/\text{m}^3/\text{ton}$ ) | Modeled Impact ( $\mu\text{g}/\text{m}^3$ ) | <sup>1</sup> Background ( $\mu\text{g}/\text{m}^3$ ) | NAAQS ( $\mu\text{g}/\text{m}^3$ ) | Daily Product Limit (tons) |
|---------------------|---|---|---|--|------------------------------------|----------------------------|
| PORT-0631           | 2000  | 0.0031  | 43.62                                       | 106.38   | 150.0                              | 14,067                     |
| Williamsville Stone | N/D   | N/D   | N/D   | N/D  |                                    | N/D                        |

N/D = Not Determined

<sup>1</sup> Background of 106.38  $\mu\text{g}/\text{m}^3$  equivalent to shared 20.00  $\mu\text{g}/\text{m}^3$  from BMPs summed with 86.38  $\mu\text{g}/\text{m}^3$ . 86.38  $\mu\text{g}/\text{m}^3$  is the allotted daily ambient impact of Williamsville Stone.

### **APPLICABLE REQUIREMENTS**

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

### **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*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
David Little  
Environmental Engineer

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Date

### **PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Progressive Contractors Incorporated as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*.
- Noyes Data Corp. book, Orlemann, et al. 1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Southeast Regional Office Site Survey.
- Best Management Practices
- Memorandum to Air Pollution Control Program Procedures Manual, *Permitting Asphalt/Concrete Plants for Temporary Highway Projects*. April 10, 2000.







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

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

### For Haul Roads:

1. Pavement of Road Surfaces –
  - A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions<sup>1</sup>” while the plant is operating.
  - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  
2. Usage of Chemical Dust Suppressants –
  - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
  
3. Usage of Documented Watering –
  - A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
  - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)
  - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
  - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
  - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

<sup>1</sup> For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

**For Vehicle Activity Areas around Open Storage Piles:**

1. Pavement of Stockpile Vehicle Activity Surfaces –
  - A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
  - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  
2. Usage of Chemical Dust Suppressants –
  - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
  - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
  - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
  
3. Usage of Documented Watering –
  - A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
  - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)
  - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
  - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
  - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

Mr. Joe Miessen  
Project Manager  
Progressive Contractors Incorporated  
14123 42<sup>nd</sup> St. NE  
St. Michael, MN 55376-9564

RE: New Source Review Permit - Project Number: 2009-01-014

Dear Mr. Miessen:

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.

Operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2009-01-014, and your amended operating permit, if required, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your portable concrete plant, including any special conditions from your New Source Review permit.

The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact David Little at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:dll

Enclosures

c: Southeast Regional Office  
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