

STATE OF MISSOURI

PERMIT BOOK



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:

032015-004

Project Number: 2014-11-055

Installation Number: 031-0134

Parent Company: Riverfront Contracting, LLC

Parent Company Address: 100 La Cruz Lane, Cape Girardeau, MO 63703

Installation Name: Riverfront Contracting, LLC

Installation Address: 100 La Cruz Lane, Cape Girardeau, MO 63703

Location Information: Cape Girardeau County, S7, T30N, R14E

Application for Authority to Construct was made for:  
Installation of a sand and aggregate barge loading facility. 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.

MAR 04 2015

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 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 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 Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. 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 these air contaminant sources.

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 sources(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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**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.”*

Riverfront Contracting, LLC  
Cape Girardeau County, S7, T30N, R14E

1. PM<sub>10</sub> Emission Limitation
  - A. Riverfront Contracting, LLC shall emit less than 15.0 tons of PM<sub>10</sub> in any consecutive 12-month period from the entire installation as shown in Table 1.
  - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.

Table 1: Emission Units

Emission Unit	Description	Emission Controls
EU-01	Truck unloading to receiving pit	None
EU-02	Receiving pit to telestacker	None
EU-03	Telestacker loading barges	None
EU-04	Haul Road	BMPs

2. Best Management Practices (BMPs) Requirement
  - A. Riverfront Contracting, LLC shall control dust from all haul roads at this site using water or surfactant spray consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary.
    - 1) The following conditions apply to haul road watering:
      - a) The water application rate shall be 100 gallons per 1000 square feet at least once every day.
      - b) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application
      - c) Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.
    - 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.

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**SPECIAL CONDITIONS:**

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

- 3) 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.
  - 4) 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.
- B. Riverfront Contracting, LLC shall keep the following records on file and available for inspection:
- 1) A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.
  - 2) Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.
  - 3) Records of watering equipment breakdowns and repairs.
3. Operational Requirement – Material Handling
- A. Riverfront Contracting, LLC shall load barges with either aggregate or sand. Loading other materials is prohibited.
4. Record Keeping and Reporting Requirements
- A. Riverfront Contracting, 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. Riverfront Contracting, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2014-11-055  
Installation ID Number: 031-0134  
Permit Number:

Riverfront Contracting, LLC  
100 La Cruz Lane  
Cape Girardeau, MO 63703

Complete Date  
of Application: November 26, 2014

Parent Company:  
Riverfront Contracting, LLC  
100 La Cruz Lane  
Cape Girardeau, MO 63703

Cape Girardeau County, S7, T30N, R14E

REVIEW SUMMARY

- Riverfront Contracting, LLC has applied for authority to install a sand and aggregate barge loading facility.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment. BMPs will be used to control particulate emissions from the haul road.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are conditioned below de minimis levels. Potential emissions of PM are above the de minimis level but remain below the major source level.
- This installation is located in Cape Girardeau County, an attainment area for all 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.
- Ambient air quality modeling was not performed for this review. There is no modeling standard for PM.

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

#### INSTALLATION/PROJECT DESCRIPTION

Riverfront Contracting, LLC has applied for the authority to construct a new sand and aggregate barge loading installation. Riverfront Contracting, LLC has not previously received a permit or operated at this site. Riverfront Contracting, LLC is considered a minor source for construction permitting purposes. An operating permit is not required for this installation at this time. Riverfront Contracting, LLC is located along the Mississippi River in Cape Girardeau, Missouri. Riverfront Contracting, LLC will receive sand or aggregate from trucks via a receiving pit that has an MHDR equal to 750 tons of product per hour. After receiving the sand or aggregate, Riverfront Contracting, LLC will transfer the material into barges using a telestacker and a chute that have an MHDR equal to 1000 tons per hour. The receiving conveyor will serve as the bottleneck of this installation. The emission units associated with this installation can be found in Table 1 of this permit. Particulate emissions are the only pollutant of concern from this project.

#### EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the following sections of EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition:

- Section 11.19.2, *Crushed Stone Processing and Pulverized Mineral Processing*, August 2004
- Section 13.2.2, *Unpaved Roads*, November 2006

The following table provides an emissions summary for this project. Existing potential emissions and existing actual emissions do not exist. Potential emissions of the application represent the potential of the all of the equipment onsite, assuming continuous operation (8760 hours per year). The new installation conditioned potential emissions are based on a voluntary PM<sub>10</sub> limit to the de minimis level. Potential emissions are calculated assuming PM and PM<sub>10</sub> control efficiencies are equal to 90% and PM<sub>2.5</sub> control efficiency equal to 40% for documented haul road watering as required in Special Condition 2 of this permit.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/A	N/A	107.8	47.9
PM <sub>10</sub>	15.0	N/A	N/A	33.7	<15.0
PM <sub>2.5</sub>	10.0	N/A	N/A	17.2	7.6
SO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
GHG (CO <sub>2</sub> e)	100,000	N/A	N/A	N/A	N/A
GHG (mass)	0.0 / 250.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are conditioned below de minimis levels. Potential emissions of PM are above the de minimis level but remain below the major source level.

### APPLICABLE REQUIREMENTS

Riverfront Contracting, 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

- *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

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400 applies to the conveyor, but the equipment is inherently compliant.

## 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.

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J Luebbert  
New Source Review Unit

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Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 18, 2014, received November 20, 2014, designating Riverfront Contracting, LLC as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.



## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>m/s</b> .....	meters per second
<b>°F</b> .....	degrees Fahrenheit	<b>Mgal</b> .....	1,000 gallons
<b>acfm</b> .....	actual cubic feet per minute	<b>MW</b> .....	megawatt
<b>BACT</b> .....	Best Available Control Technology	<b>MHDR</b> .....	maximum hourly design rate
<b>BMPs</b> .....	Best Management Practices	<b>MMBtu</b> ....	Million British thermal units
<b>Btu</b> .....	British thermal unit	<b>MMCF</b> .....	million cubic feet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAS</b> .....	Chemical Abstracts Service	<b>NAAQS</b> ...	National Ambient Air Quality Standards
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NESHAPs</b>	National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> .....	Code of Federal Regulations	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CO</b> .....	carbon monoxide	<b>NSPS</b> .....	New Source Performance Standards
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2e</sub></b> .....	carbon dioxide equivalent	<b>PM</b> .....	particulate matter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....	dry standard cubic feet	<b>ppm</b> .....	parts per million
<b>EQ</b> .....	Emission Inventory Questionnaire	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EP</b> .....	Emission Point	<b>PTE</b> .....	potential to emit
<b>EPA</b> .....	Environmental Protection Agency	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EU</b> .....	Emission Unit	<b>RAL</b> .....	Risk Assessment Level
<b>fps</b> .....	feet per second	<b>SCC</b> .....	Source Classification Code
<b>ft</b> .....	feet	<b>scfm</b> .....	standard cubic feet per minute
<b>GACT</b> .....	Generally Available Control Technology	<b>SDS</b> .....	Safety Data Sheet
<b>GHG</b> .....	Greenhouse Gas	<b>SIC</b> .....	Standard Industrial Classification
<b>gpm</b> .....	gallons per minute	<b>SIP</b> .....	State Implementation Plan
<b>gr</b> .....	grains	<b>SMAL</b> .....	Screening Model Action Levels
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>HAP</b> .....	Hazardous Air Pollutant	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>hr</b> .....	hour	<b>tph</b> .....	tons per hour
<b>hp</b> .....	horsepower	<b>tpy</b> .....	tons per year
<b>lb</b> .....	pound	<b>VMT</b> .....	vehicle miles traveled
<b>lbs/hr</b> .....	pounds per hour	<b>VOC</b> .....	Volatile Organic Compound
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		

Mr. Danny Dumey  
Member  
Riverfront Contracting, LLC  
100 La Cruz Lane  
Cape Girardeau, MO 63703

RE: New Source Review Permit - Project Number: 2014-11-055

Dear Mr. Dumey:

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, if any, 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.

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 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 Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, MO 65102, [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this permit, please do not hesitate to contact J Luebbert, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:jl

Enclosures

c: Southeast Regional Office  
PAMS File: 2014-11-055

Permit Number: