STATE OF 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: 112009-009
Project Number: 2009-05-029
Parent Company: Trager Limestone, LLC
Parent Company Address: 6468 St. Hwy Y, Chilicothe, MO 64601
Installation Name: Trager Limestone, LLC
Installation ID: 025-P006
Installation Address: 9010 Des Moines Rd, Hamilton, MO 64644
Location Information: Caldwell County, S6, T57W, R26W

Application for Authority to Construct was made for:

The permitting of existing rock crushing equipment. The equipment were installed without obtaining a construction permit. This permit is issued as part of a remedial action required by the Air Pollution Control Program. The rock crushing plant has a maximum hourly design rate (MHDR) of 217 tons per hour (tph). Best Management Practices will be used to control fugitive emissions from haul roads and vehicular activity areas. This review was conducted in accordance with Section (5) 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.

NOV 23 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 (2) 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 (2) 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 devises 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 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 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.
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.”

Site ID Number: 025-P006
Site Name: Trager Limestone, LLC
Site Address: 9010 Des Moines Road, Hamilton, MO 64644
Site County: Caldwell County (S6, T57N, R26W)

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued construction permit (022008-008) from the Air Pollution Control Program.

2. Best Management Practices Requirement
   Trager Limestone, LLC shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.

3. Ambient Air Impact Limitation
   A. Trager Limestone, LLC shall not cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM$_{10}$) of 150.0 µg/m³ 24-hour average in ambient air at or beyond the nearest property boundary.

   B. Trager Limestone, LLC shall demonstrate compliance with special condition 3.A using Attachment A or other equivalent forms that have been approved by the Air Pollution Control Program, including electronic forms. During concurrent operations, Trager Limestone, LLC shall account for the impacts from other sources of PM$_{10}$ as instructed in Attachment A.

4. Annual Emission Limit – PM$_{10}$
   A. Trager Limestone, LLC shall emit less than 15.0 tons of PM$_{10}$ in any 12-month period from the entire installation.

   B. Trager Limestone, LLC shall demonstrate compliance with special condition 4.A using Attachment B or other equivalent forms that have been approved by the Air Pollution Control Program, including electronic forms.

5. Wet Suppression Control System Requirement
   A. Trager Limestone, LLC shall install and operate wet spray devices on the secondary crusher (EP-05) and the screen (EP-06).
SITE SPECIFIC SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

B. Watering may be suspended during periods of freezing condition, when use of the wet spray devices may damage the equipment. During these conditions, Trager Limestone, LLC shall adjust the production rate to control emissions from these units. Trager Limestone, LLC shall record a brief description of such events.

6. Diesel Engine/Generator Operating Requirements
Trager Limestone, LLC shall only operate its diesel engines/generators to power equipment for production. If the company decides to use the diesel engines/generator for other purposes, a new permit review will be required.

7. Minimum Distance to Property Boundary Requirement
The primary emission point shall be located at least 400 feet from the nearest property boundary.

8. Record Keeping Requirement
Trager Limestone, LLC shall maintain all records required by this permit for five years and make them available to any Missouri Department of Natural Resources personnel upon request.

9. Reporting Requirement
Trager Limestone, LLC shall report to the Air Pollution Control Program Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.
Trager Limestone, LLC
9010 Des Moines Rd
Hamilton, MO 64644

Parent Company:
6468 St. Hwy Y
Chillicothe, MO 64601
Caldwell County, S6, T57W, R26W

PROJECT DESCRIPTION

Trager Limestone applied for and received a construction permit (no. 022008-008) in January, 2008 for the installation of a new rock crushing plant but the only equipment permitted were two (2) crushers, one (1) screen, two (2) conveyors and two (2) diesel engines with a combined maximum design rate of 745 horsepower (hp). The facility has been operating with more equipment than permitted and this permit is issued as part of a remedial action required by the Air Pollution Control Program. This project permits the entire facility which consists of two (2) crushers, eleven (11) conveyors, two (2) screens, one (1) bin, one (1) 75 hp diesel engine and one (1) 749 hp diesel engine. The maximum distance from the property boundary is also changed from 300 feet to 400 feet.

The maximum design rate of the plant is 217 tons per hour. The applicant will use one of the methods described in Attachment AA, “Best Management Practices,” to control emissions from haul roads and vehicular activity areas. A basic operating permit was issued to the facility on July 28, 2009 and the facility will be required to submit a basic operating permit modification request within thirty (30) days after the issuance of this permit.

There is a small washing plant with a maximum hourly design rate of 40 tons per hour located on the site. Since the process is saturated with water, there should be no emissions from the wash plant, which consists of one (1) wash screen and one (1) conveyor. The wash plant is located right off of the product haul road of the rock crushing plant. When need arises, the product from the rock crushing plant will be dropped off at the wash plant instead of continuing onto the truck scales. After washing, the clean product is loaded and will be hauled to the scale house. There should be no additional hauling emissions from the operation of the wash plant. This wash plant should be considered part of the same installation as the rock crushing plant.

This installation is located in Caldwell County, an attainment area for all criteria pollutants, and is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
A notice of violation (NOV #A2414KC) was issued to the installation in April, 2006 and again in April, 2007 (NOV #A2568KC) for failure to conduct performance testing in accordance with Missouri State Rules 10 CSR 10-6.070, New Source Performance Regulations. In April, 2007 and June, 2008, two separate NOVs (#A2567KC, 608NE1) were issued to the installation for constructing equipment without first obtaining a construction permit in violation of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

The following construction permits have been issued to Trager Limestone, LLC from the Air Pollution Control Program.

Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>022008-008</td>
<td>Permitting of existing equipment constructed without obtaining a construction permit.</td>
</tr>
</tbody>
</table>

EMISSIONS CALCULATIONS

Emissions for the project were calculated using emission factors (EF) found in various sources. Table 2 lists the emission units and the sources of the emission factors.

Table 2: Sources of Emission Factors

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Pollutant</th>
<th>EF Source</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secondary Crusher</td>
<td>PM₁₀</td>
<td>AP-42, Ch. 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing</td>
<td>Used controlled EF because the equipment is controlled by a wet spray device.</td>
</tr>
<tr>
<td>Primary Screen</td>
<td>PM₁₀</td>
<td>AP-42, Ch. 11.19.2</td>
<td>Used controlled EF because the equipment is controlled by a wet spray device.</td>
</tr>
<tr>
<td>All Other Processing Equipment</td>
<td>PM₁₀</td>
<td>AP-42, Ch. 11.19.2</td>
<td>Used uncontrolled EF because the inherent moisture content of the aggregate is less than 1.5% and no control device is used.</td>
</tr>
<tr>
<td>75 hp Diesel Engine</td>
<td>PM₁₀, NOₓ, SOₓ, VOC, CO, HAPs</td>
<td>AP-42, Ch. 3.3, Gasoline and Diesel Industrial Engines</td>
<td>N/A</td>
</tr>
<tr>
<td>749 hp Diesel Engine</td>
<td>PM₁₀, NOₓ, SOₓ, VOC, CO, HAPs</td>
<td>AP-42, Ch. 3.4, All Stationary Diesel and All Stationary Dual Fuel Engines</td>
<td>N/A</td>
</tr>
<tr>
<td>Haul Roads and Vehicular Activity Areas</td>
<td>PM₁₀</td>
<td>AP-42, Ch. 13.2.2, Unpaved Roads</td>
<td>Applied 90% control efficiency from the use of BMPs to the predictive equation</td>
</tr>
<tr>
<td>Storage Pile Load-In and Load-Out</td>
<td>PM₁₀</td>
<td>AP-42, Ch. 13.2.4, Aggregate Handling and Storage Piles</td>
<td>Used a moisture content of 0.7% in the predictive equation.</td>
</tr>
<tr>
<td>Wind Erosion of Storage Piles</td>
<td>PM₁₀</td>
<td>EIQ Form 2.8, Storage Pile Worksheet</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A – Not Applicable
Note 1: AP-42 is the Environmental Protection Agency (EPA) document, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Areas Sources, Fifth Edition. EIQ is the Emissions Inventory Questionnaire.
The table below summarizes the emissions of this project. Since most of the equipment was constructed without first obtaining a construction permit, this permit treats the plant as if it is a new installation. Therefore, there are no existing potential emissions for the installation and the potential emissions of the application are the potential emissions for the entire installation assuming continuous operations (8760 hours). The existing actual emissions were taken from the 2008 EIQ since the plant operated that year. The installation conditioned potential emissions are based on the 15.0 tons per year limit of PM$_{10}$. The PM$_{10}$ limit is necessary because the facility does not want to perform increment modeling.

Table 3: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>N/A</td>
<td>1.22</td>
<td>53.51</td>
<td>&lt;15.00</td>
</tr>
<tr>
<td>SO$_{2}$</td>
<td>40.0</td>
<td>N/A</td>
<td>0.13</td>
<td>10.32</td>
<td>2.78</td>
</tr>
<tr>
<td>NO$_{x}$</td>
<td>40.0</td>
<td>N/A</td>
<td>8.21</td>
<td>86.82</td>
<td>23.41</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>N/A</td>
<td>0.22</td>
<td>2.81</td>
<td>0.76</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/A</td>
<td>2.18</td>
<td>22.53</td>
<td>6.08</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>N/A</td>
<td>N/D</td>
<td>0.05</td>
<td>0.01</td>
</tr>
</tbody>
</table>

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

AMBIENT AIR QUALITY IMPACT ANALYSIS

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of PM$_{10}$. The Air Pollution Control Program requires an AAQIA of PM$_{10}$ for all rock-crushing plants regardless of the level of PM$_{10}$ emissions if a permit is required. The AAQIA was performed using the Air Pollution Control Program’s generic nomographs. The maximum concentration that occurs at or beyond the site boundary was compared to the National Ambient Air Quality Standard (NAAQS). The distance from the plant to the nearest property boundary is 400 feet. When the plant operates continuously, the modeled concentration of PM$_{10}$ is greater than the NAAQS, so the plant’s production was limited to ensure compliance with the NAAQS.

This plant uses BMPs to control emissions from haul roads and vehicular activity areas, so emissions from these sources were not included in the AAQIA. Instead, they were addressed as a background concentration of 20.0 µg/m$^3$ of PM$_{10}$ in accordance with the Air Pollution Control Program’s BMPs interim policy.

Table 4: Ambient Air Quality Impact Analysis

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>NAAQS (µg/m$^3$)</th>
<th>Averaging Time</th>
<th>Maximum Modeled Impact (µg/m$^3$)</th>
<th>Limited Impact (µg/m$^3$)</th>
<th>Background (µg/m$^3$)</th>
<th>Daily Limit (tons/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$ (same)</td>
<td>150.0</td>
<td>24-hour</td>
<td>528.35</td>
<td>130.00</td>
<td>20.00</td>
<td>2,110</td>
</tr>
<tr>
<td>PM$_{10}$ (separate)</td>
<td>150.0</td>
<td>24-hour</td>
<td>77.48</td>
<td>77.48</td>
<td>72.52</td>
<td>1,196</td>
</tr>
</tbody>
</table>

1National Ambient Air Quality Standards (NAAQS).
2Modeled impact at maximum capacity with controls.
3Indirect limit based on compliance with NAAQS.
4Solitary operation or operation with other plants that are owned by Trager Limestone, LLC.
5Operation with other plants that are not owned by Trager Limestone, LLC.
6Background concentration includes 20.00 µg/m$^3$ from the haul roads and vehicular activity areas.
OPERATING SCENARIOS

The plant is permitted to operate with other plants located at the site as long as the NAAQS is not exceeded. The following scenarios explain how Trager Limestone LLC shall demonstrate compliance with the NAAQS.

- When plants owned by Trager Limestone, LLC are located at the site, Trager Limestone, LLC must calculate the daily impact of each plant and limit the total impact of all plants below the NAAQS.

- When plants not owned by Trager Limestone, LLC are located at the site, Trager Limestone, LLC must account for the impacts of these plants as a background concentration and add it to the total impact of all plants owned by Trager Limestone, LLC that are operating at the site. This total shall be limited below the NAAQS. Trager Limestone, LLC shall limit the total impact of all plants they own and operate at the site to 77.48 µg/m³ when any plants they do not own are located at the site. Trager Limestone, LLC is not permitted to operate with any plant(s) that is not owned by them that has a combined separate owner limited impact greater than 52.52 µg/m³. The remaining 20.00 µg/m³ allowed under the NAAQS are reserved for the haul roads and vehicular areas since the installation will use Best Management Practices to control emissions from these sources.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Trager Limestone, 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110. The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.

- Operating Permits, 10 CSR 10-6.065

- 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*

**SPECIFIC REQUIREMENTS**

• Standard of Performance for New Stationary Sources (NSPS) Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*, applies to the equipment of the rock crushing plant. Equipment from the washing plant is exempt from Subpart OOO.

• NSPS, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, does not apply to the diesel engines because the engines were not constructed, reconstructed or modified after July 11, 2005 and were not manufactured after April 1, 2006.

• The National Emission Standards for Hazardous Air Pollutants for Source Categories (also known as Maximum Achievable Control Technology (MACT)) Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, applies to the diesel engines. However, the diesel engines are considered existing diesel engines because they were manufactured before June 12, 2006 and there are currently no requirements in the subpart for them.

• None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) apply to the installation.

• *Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260*
STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5) State Rule 10 CSR 10-6.060, Construction Permits Required, I recommend this permit be granted with special conditions.

________________________________  ________________________________
Chia-Wei Young                        Date
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 12, 2009, received May 14, 2009, designating Trager Limestone, LLC as the owner and operator of the installation.


- Kansas City Regional Office Site Survey, dated June 18, 2009
**Attachment A: Ambient Impact Tracking Sheet**

**Trager Limestone, LLC, Stationary Rock Crushing Plant, 025-P006**  
**Project Number: 2009-05-029**

**Site Name:** Trager Limestone, LLC  
**Site Address:** 9010 Des Moines Rd, Hamilton, MO 64644  
**Site County:** Caldwell County (S6, T57W, R26W)

This sheet covers the period from ____________________ to ____________________ (Copy as needed)  
(Month, Day Year)                 (Month, Day Year)

| Date       | Trager Limestone, LLC Installation ID: 025-P006 Project No. 2009-05-029 | Same Owner Plant Plant Name: Plant ID: Permit #: | Same Owner Plant Plant Name: Plant ID: Permit #: | Separate Owner Plant Plant Name: Plant ID: Permit #: | | Date       | Trager Limestone, LLC Installation ID: 025-P006 Project No. 2009-05-029 | Same Owner Plant Plant Name: Plant ID: Permit #: | Same Owner Plant Plant Name: Plant ID: Permit #: | Separate Owner Plant Plant Name: Plant ID: Permit #: |
|------------|--------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------------------|--------------------------------------------------|------------------------------------------------|------------|--------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------------------|--------------------------------------------------|--------------------------------------------------|------------------------------------------------|------------|
| **Example 1** | 1,500 0.06160 92.4 N/A | | | | | **Example 2** | 1,000 0.06475 64.75 N/A | | | | |

1. Calculate the impact for Trager Limestone, LLC by multiplying the daily production by the impact factor. For the impact factor, 0.06160 µg/m³/ton should be used when the only plants at the site are owned by Trager Limestone, LLC. 0.06475 µg/m³/ton should be used whenever there are plants not owned by Trager Limestone, LLC at the site.

2. Input the impact for any other plants owned by Trager Limestone, LLC that are operating on the site.

3. The impact of 52.52 µg/m³ shall be used if there are plants not owned by Trager Limestone, LLC at the site. The N/A shall be used when there are no plants not owned by Trager Limestone, LLC at the site. Circle where applicable.

4. Calculate the total impact by adding the applicable impacts and background. Include the separate owner plant impact if a plant that is not owned by Trager Limestone, LLC is located at the site. A total of **150.0 µg/m³** or less is necessary for compliance.
### Attachment B: PM$_{10}$ Emissions Tracking Sheet
Trager Limestone, LLC, Stationary Rock Crushing Plant, 025-P006
Project Number: 2009-05-029

Site Name: Trager Limestone, LLC
Site Address: 9010 Des Moines Rd, Hamilton, MO 64644
Site County: Caldwell County (S6, T57W, R26W)

This sheet covers the period from ____________________ to ____________________ (Copy as needed) (Month, Day Year)(Month, Day Year)

<table>
<thead>
<tr>
<th>Month</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions$^1$ (lbs)</th>
<th>Monthly Emissions$^2$ (tons)</th>
<th>12-Month Total Emissions$^3$ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>200,000</td>
<td>0.05629</td>
<td>11258.0</td>
<td>5.629</td>
<td>5.629</td>
</tr>
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</table>

$^1$Multiply the monthly production by the emission factor.
$^2$Divide the monthly emissions (lbs) by 2,000.
$^3$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 per year 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 portable 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\(^1\) 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 manufacture’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 and volume of water application 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.

\(^1\)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.)
## Attachment BB: Emission Calculations
### Trager Limestone, LLC
#### 2009-05-029

<table>
<thead>
<tr>
<th>Description</th>
<th>¹MHDR</th>
<th>²MHDR Units</th>
<th>²PM₁₀ EF</th>
<th>EF Units</th>
<th>Control Eff. %</th>
<th>Emissions (lb/hr)</th>
<th>³Modeling Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hauling to Primary Crusher</td>
<td>3.0824</td>
<td>VMT</td>
<td>2.3605</td>
<td>lbs/VMT</td>
<td>90.00%</td>
<td>0.7276</td>
<td>0.2948</td>
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<tr>
<td>Primary Crusher</td>
<td>217</td>
<td>Tons</td>
<td>0.0024</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.5208</td>
<td>0.2110</td>
</tr>
<tr>
<td>Crusher Underconveyor</td>
<td>217</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.2387</td>
<td>0.0967</td>
</tr>
<tr>
<td>Secondary Crusher</td>
<td>217</td>
<td>Tons</td>
<td>0.0024</td>
<td>Lbs/ton</td>
<td>75.00%</td>
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<tr>
<td>Screen</td>
<td>275</td>
<td>Tons</td>
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<td>Lbs/ton</td>
<td>91.50%</td>
<td>0.2034</td>
<td>0.0824</td>
</tr>
<tr>
<td>Screen Underconveyor</td>
<td>100</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.1100</td>
<td>0.0446</td>
</tr>
<tr>
<td>Product Hauling</td>
<td>3.4720</td>
<td>VMT</td>
<td>2.4576</td>
<td>Lbs/VMT</td>
<td>90.00%</td>
<td>0.8533</td>
<td>0.3458</td>
</tr>
<tr>
<td>Storage Pile load In</td>
<td>217</td>
<td>Tons</td>
<td>0.011991</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>2.6021</td>
<td>1.0544</td>
</tr>
<tr>
<td>Storage Pile Load Out</td>
<td>217</td>
<td>Tons</td>
<td>0.011991</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>2.6021</td>
<td>1.0544</td>
</tr>
<tr>
<td>Storage Pile Vehicular Activity</td>
<td>217</td>
<td>Tons</td>
<td>0.006609</td>
<td>Lbs/ton</td>
<td>90.00%</td>
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<td>0.0581</td>
</tr>
<tr>
<td>Storage Pile Wind Erosion</td>
<td>2.0</td>
<td>Acres</td>
<td>0.089166</td>
<td>Lbs/acre.hr</td>
<td>0.00%</td>
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<td>0.0723</td>
</tr>
<tr>
<td>Diesel Engine (75 hp)</td>
<td>0.0040</td>
<td>Mgal</td>
<td>7.85</td>
<td>Lbs/Mgal</td>
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<tr>
<td>Diesel Engine (749 hp)</td>
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<td>Mgal</td>
<td>42.47</td>
<td>Lbs/Mgal</td>
<td>0.00%</td>
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<tr>
<td>Loading Feeder</td>
<td>217</td>
<td>Tons</td>
<td>0.000016</td>
<td>Lbs/ton</td>
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<td>0.0035</td>
<td>0.0014</td>
</tr>
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<td>Surge Bin</td>
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<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
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<td>0.0967</td>
</tr>
<tr>
<td>Conveyor</td>
<td>217</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.2387</td>
<td>0.0967</td>
</tr>
<tr>
<td>Conveyor</td>
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<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.1925</td>
<td>0.0780</td>
</tr>
<tr>
<td>Conveyor</td>
<td>217</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.2387</td>
<td>0.0967</td>
</tr>
<tr>
<td>Conveyor</td>
<td>100</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.1100</td>
<td>0.0446</td>
</tr>
<tr>
<td>Conveyor</td>
<td>175</td>
<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.1925</td>
<td>0.0780</td>
</tr>
<tr>
<td>Inside Cross Conveyor</td>
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<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
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</tr>
<tr>
<td>Outside Cross Conveyor</td>
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<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.1925</td>
<td>0.0780</td>
</tr>
<tr>
<td>Conveyor</td>
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<td>Tons</td>
<td>0.0011</td>
<td>Lbs/ton</td>
<td>0.00%</td>
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<td>0.0446</td>
</tr>
<tr>
<td>Screen</td>
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<td>Lbs/ton</td>
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<tr>
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<td>Tons</td>
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<td>Lbs/ton</td>
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<td>0.0780</td>
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<tr>
<td>Loading Wash Plant</td>
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<td>Lbs/ton</td>
<td>0.00%</td>
<td>0.0006</td>
<td>0.0003</td>
</tr>
</tbody>
</table>

¹Maximum Hourly Design Rate (MHDR)
²Emission Factor (EF)
³The Modeling Rate is the emission rate scaled to the daily hours of operation at MHDR allowed by the permit during solitary operations.
Ms. Becky Weldon  
Compliance Manager  
Trager Limestone, LLC  
6468 St. Hwy Y  
Chillicothe, MO  


Dear Ms. Weldon:  

Enclosed with this letter is your permit to construct. Please study it carefully. 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, your new source review permit application and with your amended operating permit 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 have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young, at the Departments’ 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  
New Source Review Unit Chief  

KBH:cwyl  

Enclosures  

c: Kansas City Regional Office  
PAMS File: 2009-05-029  

Permit Number: