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: 082018-005
Project Number: 2018-06-043
Installation ID: 079-0014

Parent Company: Trenton Asphalt
Parent Company Address: 1100 Main Street, Trenton, MO 64683
Installation Name: Trenton Asphalt Plant
Installation Address: 1900 E. 16th Street, Trenton, MO 64683
Location Information: Grundy County, S16 T61 N R24W

Application for Authority to Construct was made for:
New Asphalt 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
AUG 06 2018
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 sources(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/
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. Undocumented Watering Requirement
   Trenton Asphalt Plant shall apply a water spray on all haul roads and vehicular activity areas whenever conditions exist that would allow visible emissions from these sources to leave the property.

2. Annual Emission Limit
   A. Trenton Asphalt Plant shall emit less than 15.0 tons of PM10 in any consecutive 12-month period from the entire installation including the summation of all PM10 emissions from startup, shutdown, and malfunction as reported the Air Pollution Control Program’s Compliance/Enforcement Section. (See Table 1 for the list of equipment associated with the limit).
   B. Trenton Asphalt Plant shall demonstrate compliance with Special Condition 2.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

3. Fuel Requirement-Drum Dryer
   A. Trenton Asphalt Plant shall burn exclusively natural gas in their drum dryer (EP-4).
   B. Trenton Asphalt Plant shall burn exclusively natural gas in their asphalt heater (EP-7).
   C. Trenton Asphalt Plant shall keep the records from the natural gas provider verifying it’s usage with the unit and make them available for Department of Natural Resources’ employees upon request.

4. Control Device Requirement-Baghouse
   A. Trenton Asphalt Plant shall control emissions from the drum dryer (EP-04) using a baghouse as specified in the permit application.
   B. The baghouse shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources’ employees may easily observe them.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

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

D. Trenton Asphalt Plant shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

E. Trenton Asphalt Plant shall maintain a copy of the baghouse manufacturer's performance warranty on site.

F. Trenton Asphalt Plant 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. Record Keeping Requirement
   Trenton Asphalt Plant 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.

6. Reporting Requirement
   Trenton Asphalt Plant 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.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW
Project Number: 2018-06-043
Installation ID Number: 079-0014
Permit Number: 082018-005

Trenton Asphalt Plant: Complete: July 2, 2018
1900 E. 16th Street
Trenton, MO 64683

Parent Company:
Trenton Asphalt
1100 Main Street
Trenton, MO 64683

Grundy County, S16 T61 N R24W

PROJECT DESCRIPTION

The City of Trenton procured an asphalt plant rated at 110 tph and will be located
Grundy County. The asphalt drum dryer and associated bins were manufactured by
ADM (Model RB110 [Road Builder Series]) with a Starjet Burner rated at 40.3
MMBTU/hr. The direct fire asphalt tank has a capacity of 20,000 gallons and the
asphalt heater is rated at 0.5 MMBTU/hr. The plant will use natural gas to fuel the drum
dryer and asphalt heater. There are various conveyors and a vibrating screen totaling
nine drop points. Electric power will be provided by the local utility.

The applicant is using undocumented watering to control emissions from haul roads and
vehicular activity areas.

The following table lists the new pieces of equipment associated with this project.

Table 1: Project Equipment List

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Equipment Description</th>
<th>MHDR</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Aggregate Bins</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP2</td>
<td>Aggregate handling conveyor (3)</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP3</td>
<td>Vibrating Screen</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP4</td>
<td>Drum Dryer</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP5</td>
<td>Plant Loadout</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP6</td>
<td>Silo Loading</td>
<td>110 tph</td>
</tr>
<tr>
<td>EP7</td>
<td>Asphalt Heater</td>
<td>0.5 MMBTU/hr</td>
</tr>
<tr>
<td>EP8a</td>
<td>Storage Piles (Sand)</td>
<td>0.5 acres</td>
</tr>
<tr>
<td>EP8b</td>
<td>Storage Pile (Aggregate)</td>
<td>0.5 acres</td>
</tr>
<tr>
<td>EP9a</td>
<td>Haul Roads (Receiving Aggregate)</td>
<td>850 feet</td>
</tr>
<tr>
<td>EP-9b</td>
<td>Haul Roads (Receiving Sand)</td>
<td>850 feet</td>
</tr>
<tr>
<td>EP-9c</td>
<td>Haul Roads (Shipping/Finished Product)</td>
<td>850 feet</td>
</tr>
</tbody>
</table>
This installation is located in Grundy County, an attainment area for all criteria pollutants.

This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. Fugitive emissions are counted toward major source applicability. However, Category 27 does not apply to the 100 tons per year major source level thresholds. Therefore, the major source threshold for this asphalt plant is 250 tons per year.

No permits have been issued to Trenton Asphalt Plant from the Air Pollution Control Program.

TABLES

The table below summarizes the emissions of this project. The potential emissions of the process equipment exclude emissions from haul roads and wind erosion. There are no existing actual emissions since this is a new plant. 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.

Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th>Air Pollutant</th>
<th>De Minimis Level/SMAL</th>
<th><strong>Potential Emissions of Process Equipment</strong></th>
<th>Existing Actual Emissions</th>
<th><strong>Potential Emissions of the Application</strong></th>
<th>Conditioned Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>41.76</td>
<td>N/A</td>
<td>248.05</td>
<td>48.70</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>20.96</td>
<td>N/A</td>
<td>76.40</td>
<td>&lt;15.0</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>10.0</td>
<td>13.23</td>
<td>N/A</td>
<td>21.55</td>
<td>4.23</td>
</tr>
<tr>
<td>SO$_{2}$</td>
<td>40.0</td>
<td>0.00</td>
<td>N/A</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>NO$_{X}$</td>
<td>40.0</td>
<td>17.36</td>
<td>N/A</td>
<td>17.36</td>
<td>3.41</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>29.05</td>
<td>N/A</td>
<td>29.05</td>
<td>5.70</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>18.11</td>
<td>N/A</td>
<td>18.11</td>
<td>3.55</td>
</tr>
<tr>
<td>GHG (CO$_{2}$)</td>
<td>N/A</td>
<td>20,931.35</td>
<td>N/A</td>
<td>20,931.35</td>
<td>4,096.61</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>N/A</td>
<td>20,865.23</td>
<td>N/A</td>
<td>20,865.23</td>
<td>4,109.60</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>10.0/2.0$^c$</td>
<td>1.58</td>
<td>N/A</td>
<td>1.58</td>
<td>0.31</td>
</tr>
<tr>
<td>2-methylnaphthalene$^d$</td>
<td>10.0/0.0.01$^c$</td>
<td>0.04</td>
<td>N/A</td>
<td>0.04</td>
<td>0.0083</td>
</tr>
<tr>
<td>Lead Compounds</td>
<td>10.0/0.0.01$^c$</td>
<td>0.00</td>
<td>N/A</td>
<td>3.0E-4</td>
<td>5.9E-5</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>2.77</td>
<td>N/A</td>
<td>2.77</td>
<td>5.4E-3</td>
</tr>
</tbody>
</table>

N/A = Not Applicable

$^a$Excludes haul road and storage pile emissions

$^b$Includes haul road and storage pile emissions

$^c$SMAL

$^d$2-methylnaphthalene is a member of the Polycyclic Organic Matter (POM) HAP group.
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 drum mix asphalt plant:
- Calculated using emission factors from AP-42 Section 11.1 “Hot Mix Asphalt Plants,” April 2004.
- SOx emissions were calculated using the SO₂ and SO₃ emission factors from AP-42 Section 1.4 “Natural Gas Combustion,” July 1998 and assuming half of the sulfur up to 0.1 pound per ton of product is absorbed into the product.
- The asphalt plant is controlled by a baghouse, so the fabric filter controlled emission factor was used to calculate PM₁₀ emissions.
- Emissions from plant load-out were calculated using predictive equations found in AP-42 Table 11.1-14. Default values were used for asphalt volatility and mix temperature.

Emissions from the asphalt heater:
- Calculated using emission factors from AP-42 Section 1.4.

Emissions from aggregate handling:
- The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5% by weight.

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 50% control efficiency for PM and PM₁₀ and a 41% control efficiency for PM₂.₅ were applied to the emission calculations for the use of undocumented watering.

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 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. PM$_{10}$ and all other pollutants are under de minimis.

APPLICABLE REQUIREMENTS

Trenton Asphalt Plant 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

- *Operating Permits*, 10 CSR 10-6.065 is not required because conditioned emissions from this installation is below de minimis except for PM; PM does not trigger operating permit requirements.

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050


- *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 does not apply because the drum dryer is controlled by a baghouse. All other sources are fugitive.
• 40 CFR 60 Subpart I, "Standards of Performance for Hot Mix Asphalt Facilities" applies to the equipment.

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

• Control of Sulfur Dioxide Emissions, 10 CSR 10-6.261 does not apply because this plant's fuel usage is natural gas.

**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 June 29, 2018, received June 29, 2018, designating Trenton Asphalt as the owner and operator of the installation.
Attachment A: Annual PM\textsubscript{10} Emissions Tracking Sheet
Trenton Asphalt Plant
Project Number: 2018-06-043
Permit Number: 082018-005

Site Address: 1900 E. 16th Street, Trenton, MO 64683
Site County: Grundy

This sheet covers the period from ________ to ________ (Copy as needed)

<table>
<thead>
<tr>
<th>Month</th>
<th>Production (tons)</th>
<th>Emission Factor (lb/ton)</th>
<th>Monthly Emissions\textsuperscript{1} (lbs)</th>
<th>Monthly Emissions\textsuperscript{2} (tons)</th>
<th>12-Month Total Emissions\textsuperscript{3} (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>26,000</td>
<td>0.1586</td>
<td>4,123.6</td>
<td>2.06</td>
<td>2.06 + 11 previous months</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\textsuperscript{1} Multiply the monthly production by the emission factor.
\textsuperscript{2} Divide the monthly emissions (lbs) by 2000.
\textsuperscript{3} Add the monthly emissions (tons) to the sum of the monthly emissions from the previous eleven months and add SSM emission from the same 12 month period as reported to the Air Pollution Control Program in accordance with 10 CSR 10-6.050. A total of less than 15.0 tons of PM\textsubscript{10} per consecutive 12 months is necessary for compliance.
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
PM₉.₅ ........ 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
SSM .......... startup, shutdown, & malfunction
tph .......... tons per hour
tpy .......... tons per year
VMT .......... vehicle miles traveled
VOC .......... Volatile Organic Compound
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.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emissions of Process Equipment (tons/yr)</th>
<th>Potential Emissions including fugitives (tons/yr)</th>
<th>Allowable Emissions for 1720 hours per year (tons/yr)</th>
<th>Deminimis Thresholds</th>
<th>Plant-wide Composite Emission Factor (lbs/ton)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>41.76</td>
<td>248.05</td>
<td>48.70</td>
<td>0.5148</td>
<td></td>
</tr>
<tr>
<td>PM_{10}</td>
<td>20.96</td>
<td>76.40</td>
<td>15.00</td>
<td>0.1586</td>
<td></td>
</tr>
<tr>
<td>PM_{2.5}</td>
<td>13.23</td>
<td>21.55</td>
<td>4.23</td>
<td>0.0447</td>
<td></td>
</tr>
<tr>
<td>SO_{2}</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.0000</td>
<td></td>
</tr>
<tr>
<td>NO_{2}</td>
<td>17.36</td>
<td>17.36</td>
<td>3.41</td>
<td>0.0360</td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>29.05</td>
<td>29.05</td>
<td>5.70</td>
<td>0.0603</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>18.11</td>
<td>18.11</td>
<td>3.55</td>
<td>0.0376</td>
<td></td>
</tr>
<tr>
<td>H2S</td>
<td>2.43</td>
<td>2.43</td>
<td>0.476</td>
<td>0.0050</td>
<td></td>
</tr>
<tr>
<td>CH_{2}O</td>
<td>1.58</td>
<td>1.58</td>
<td>0.31</td>
<td>0.0033</td>
<td></td>
</tr>
<tr>
<td>C_{11}H_{10}</td>
<td>0.04</td>
<td>0.04</td>
<td>0.0083</td>
<td>0.0001</td>
<td></td>
</tr>
<tr>
<td>Pb</td>
<td>0.00</td>
<td>0.00300</td>
<td>0.00059</td>
<td>0.0000</td>
<td></td>
</tr>
<tr>
<td>HAPs</td>
<td>2.77</td>
<td>2.77</td>
<td>0.54</td>
<td>0.0057</td>
<td></td>
</tr>
<tr>
<td>CO_{2}</td>
<td>20,862.92</td>
<td>20,862.92</td>
<td>4,096.16</td>
<td>43.3020</td>
<td></td>
</tr>
<tr>
<td>CH_{4}</td>
<td>2.27</td>
<td>2.27</td>
<td>0.45</td>
<td>0.0047</td>
<td></td>
</tr>
<tr>
<td>N_{2}O</td>
<td>0.04</td>
<td>0.04</td>
<td>0.01</td>
<td>0.0001</td>
<td></td>
</tr>
<tr>
<td>GHG_{mass}</td>
<td>20,865.23</td>
<td>20,865.23</td>
<td>4,096.61</td>
<td>43.3068</td>
<td></td>
</tr>
<tr>
<td>CO_{2}eq</td>
<td>20,931.35</td>
<td>20,931.35</td>
<td>4,109.60</td>
<td>43.4441</td>
<td></td>
</tr>
</tbody>
</table>

Maximum hourly design rate (tons/hr) | 110
Distance to property boundary (ft) | 300

Tons of product per day | 2640.0
Tons of product per year | 189,190.2
Mr. Ron Urton  
City Administrator  
Trenton Asphalt Plant 
1100 Main Street  
Trenton, MO 64683

RE: New Source Review - Permit Number: 
   Project Number: 2018-06-043; Installation Number: 079-0014

Dear Mr. Urton:

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. In addition, please note that Trenton Asphalt Plant cannot 
operate with any other plants that have ambient impact limits based on the Air Pollution Control 
Program’s nomographs. Please refer to the permits of any plant that you are operating with to 
see if their respective permits contain an ambient impact limit. 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 

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/ahec.

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

[Signature]
Susan Heckenkamp
New Source Review Unit Chief

SH:kkj

Enclosures

c: Northeast Regional Office
PAMS File: 2018-06-043

Permit Number: 082018-005
<table>
<thead>
<tr>
<th>Process (A11 field number)</th>
<th>Process (Process number)</th>
<th>Descriptor</th>
<th>GOC</th>
<th>Control Device Number</th>
<th>Control Type</th>
<th>Capture Efficiency (%)</th>
<th>Emission Factor</th>
<th>Units (pounds per unit shown)</th>
<th>Available Base pounds per unit</th>
<th>Available Base pounds per unit</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
<th>Ambient Air Concentration</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Aggregate handling area</td>
<td>AGR</td>
<td>Baffle screen</td>
<td>AG</td>
<td>1000</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Aggregate handling screen</td>
<td>AGR</td>
<td>Baffle screen</td>
<td>AG</td>
<td>900</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>Vertical aeration tank</td>
<td>VRT</td>
<td>Drum</td>
<td>VT</td>
<td>1250</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
<td>Drum aeration tank</td>
<td>DR</td>
<td>Centrifugal blower</td>
<td>DR</td>
<td>2000</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process (A11 field number)</th>
<th>Process (Process number)</th>
<th>Descriptor</th>
<th>GOC</th>
<th>Control Device Number</th>
<th>Control Type</th>
<th>Capture Efficiency (%)</th>
<th>Emission Factor</th>
<th>Units (pounds per unit shown)</th>
<th>Available Base pounds per unit</th>
<th>Available Base pounds per unit</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
<th>Ambient Air Concentration</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>5</td>
<td>Incinerator</td>
<td>INV</td>
<td>Inert gas combustion</td>
<td>INV</td>
<td>1500</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>6</td>
<td>6</td>
<td>Incinerator</td>
<td>INV</td>
<td>Hot gas shot</td>
<td>INV</td>
<td>1500</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process (A11 field number)</th>
<th>Process (Process number)</th>
<th>Descriptor</th>
<th>GOC</th>
<th>Control Device Number</th>
<th>Control Type</th>
<th>Capture Efficiency (%)</th>
<th>Emission Factor</th>
<th>Units (pounds per unit shown)</th>
<th>Available Base pounds per unit</th>
<th>Available Base pounds per unit</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
<th>Ambient Air Concentration</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>7</td>
<td>Bio-digester</td>
<td>BD</td>
<td>Solid separator</td>
<td>BD</td>
<td>1200</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process (A11 field number)</th>
<th>Process (Process number)</th>
<th>Descriptor</th>
<th>GOC</th>
<th>Control Device Number</th>
<th>Control Type</th>
<th>Capture Efficiency (%)</th>
<th>Emission Factor</th>
<th>Units (pounds per unit shown)</th>
<th>Available Base pounds per unit</th>
<th>Available Base pounds per unit</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
<th>Ambient Air Concentration</th>
<th>Net Emissons (Adjusted by zero order then by ambient air concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>8</td>
<td>Bio-digester</td>
<td>BD</td>
<td>Solid separator</td>
<td>BD</td>
<td>1200</td>
<td>1.5</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>Emission Event Number</td>
<td>Emission Unit Number</td>
<td>Description</td>
<td>SCC</td>
<td>Measurement</td>
<td>Design Flow</td>
<td>Units</td>
<td>Control Device Number</td>
<td>Control Type</td>
<td>Capture Efficiency (%)</td>
<td>Control Factor</td>
<td>Loss of grams per unit</td>
<td>Emission Factor</td>
<td>Loss of grams per hour</td>
</tr>
<tr>
<td>-----------------------</td>
<td>----------------------</td>
<td>-------------</td>
<td>-----</td>
<td>-------------</td>
<td>-------------</td>
<td>-------</td>
<td>-----------------------</td>
<td>--------------</td>
<td>----------------------</td>
<td>---------------</td>
<td>----------------------</td>
<td>---------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>1a 1a</td>
<td>2946c</td>
<td>0.73</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>tons</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Load 1</td>
<td>0.73</td>
<td>tons per hour</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Individual Activity</td>
<td>0.73</td>
<td>tons per hour</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Sheet Emission</td>
<td>0.73</td>
<td>tons</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>1a 1b</td>
<td>2946c</td>
<td>0.08</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>tons</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Load 1</td>
<td>0.08</td>
<td>tons per hour</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Individual Activity</td>
<td>0.08</td>
<td>tons per hour</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Sheet Emission</td>
<td>0.08</td>
<td>tons</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>1b 1a</td>
<td>2946c</td>
<td>0.73</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>tons</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Load 1</td>
<td>0.73</td>
<td>tons per hour</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Individual Activity</td>
<td>0.73</td>
<td>tons per hour</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>Sheet Emission</td>
<td>0.73</td>
<td>tons</td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>t</td>
<td></td>
<td></td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
<td>0.73</td>
</tr>
<tr>
<td>1b 1b</td>
<td>2946c</td>
<td>0.08</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>tons</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Load 1</td>
<td>0.08</td>
<td>tons per hour</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Individual Activity</td>
<td>0.08</td>
<td>tons per hour</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t/h</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Sheet Emission</td>
<td>0.08</td>
<td>tons</td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>t</td>
<td></td>
<td></td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
</tr>
</tbody>
</table>