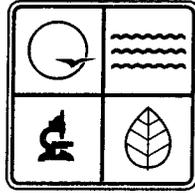


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION



**PERMIT BOOK**

**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: **092006-001** Project Number: **2006-06-003**  
**PORT-0527**  
Owner: **Damon Pursell Construction**  
Owner's Address: **300 N. Church Road, Liberty, MO 64068**  
Installation Name: **Riverside Composting and Recycling**  
Installation Address: **6105 NW River Park Drive, Riverside, MO 64152**  
Location Information: **Platte County, S6, T50N, R33W**

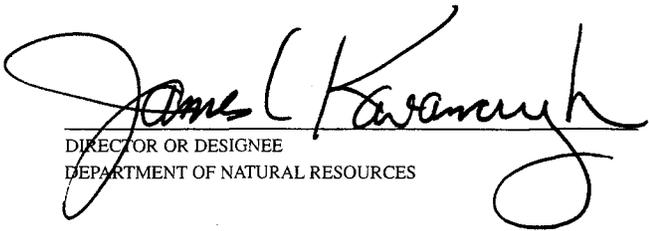
Application for Authority to Construct was made for:

The modification of an existing crushing and grinding plant to remove the spray bar and add an inherent moisture content condition and to add seven conveyors, one feeder, one screen, and one surge bin. Recycled asphalt and recycled concrete are processed through two feeders, a crusher, two screens, a surge bin and 16 conveyors. Vegetative matter is processed into mulch through a tub grinder equipped with one conveyor. The portable asphalt and concrete crushing plant has a maximum hourly design rate (MHDR) of 350 tons per hour (tph), as does the grinding (mulching) 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 (listed as attachments starting on page 2) are applicable to this permit.

SEP - 6 2006

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.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

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

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, 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 Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

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 Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

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Permit No.	
Project No.	2006-06-003

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

1. **Portable Equipment Identification Requirement**  
To assure that each component is properly identified as being a part of this portable crushing and grinding plant, (PORT-0527) Riverside Composting and Recycling shall provide and maintain suitable, easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable crushing and grinding plant.
2. **Relocation of Portable Crushing and Grinding Plant**
  - A. If this portable crushing and grinding plant moves from the initial site reviewed in this permit (Site ID No: 165-0035), then the portable crushing and grinding plant shall not be operated at any site location longer than 24 consecutive months without an intervening relocation.
  - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable crushing and grinding plant.
    - 1.) If the portable crushing and grinding plant is moving to a site previously permitted, and if there are no other new plants at the site, then the application must be received by the Air Pollution Control Program at least seven (7) days prior to the relocation.
    - 2.) If the portable crushing and grinding plant is moving to a new site, or if there are other plants or equipment at the site that have not been evaluated for concurrent operation, then the application must be received by the Air Pollution Control Program at least twenty-one (21) days prior to the relocation. The application must include written notification of any concurrently operating plants.
3. **Operating Permit Applicability**  
If this portable crushing and grinding plant does not move from the initial site (Site ID No: 165-0035) within 24 consecutive months, then Riverside Composting and Recycling shall submit an operating permit application. The Air Pollution Control Program must receive this application no later than 30 days after the exceedance of the 24 months.
4. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (072005-050) from the Air Pollution Control Program.
5. **Power Generation**  
Two diesel generators power the plant and may not run unless the primary crusher (EP04) is running. The sum of the MHDR of the generators is 860 horsepower (hp).

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Project No.	2006-06-003

**SITE-SPECIFIC SPECIAL CONDITIONS:**

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

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Site ID No.: 165-0035  
Site Address: 6105 NW River Park Drive, Riverside, MO 64152  
Site County: Platte County, S6, T50N, R33W

1. **Best Management Practices**  
Riverside Composting and Recycling shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) for Riverside Composting and Recycling's portable crushing and grinding plant (PORT-0527) shall ensure, while operating at this site, that the ambient impact of PM<sub>10</sub> at or beyond the nearest property boundary does not exceed 150 µg/m<sup>3</sup> in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM<sub>10</sub> Impact Tracking Record*, or other equivalent form(s), will be used for this purpose.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that Riverside Composting and Recycling's portable crushing and grinding plant emits less than 50 tons of PM<sub>10</sub> into the atmosphere in any 12-month period.
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM<sub>10</sub>. Attachment B, *Monthly PM<sub>10</sub> Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Moisture Content Testing Requirement for Inherent Moisture Content**
  - A. Riverside Composting and Recycling claimed the inherent moisture content of the processed concrete, asphalt, and vegetative matter to be greater than or equal to 1.5 wt.%, which shall be verified by testing.
  - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director. The first test shall be no later than 45 days after startup. Testing shall be conducted at least once every two years after the initial test, during the months of June through September, while the both the portable crushing and portable grinding plants are active at this site.
  - C. Test samples shall be obtained before and after processing. During the sample processing run only, any spray devices shall be turned off during the processing from which test samples are obtained. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be submitted to the Enforcement section of the Air Pollution Control Program, and a copy shall be sent to the Regional Office. Testing shall be performed on samples taken from
    - 1.) The recycled asphalt product before entering the primary crusher (EP04)
    - 2.) The recycled asphalt product just before load-in to storage piles
    - 3.) The recycled concrete product before entering the primary crusher (EP04)
    - 4.) The recycled concrete product just before load-in to storage piles
    - 5.) The vegetative matter before entering the tub grinder (EP12) and
    - 6.) The mulch product just before load-in to storage piles.
  - D. If, for any of the six required samples, the inherent moisture content result of the first test is less than 1.5 wt.%, a second test must be performed within 30 days. If the result of the second test is less than 1.5 wt.%, Riverside Composting and Recycling shall apply for a new construction permit to account for the revised information and install wet spray devices on the affected units.

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Permit No.	
Project No.	2006-06-003

**SITE-SPECIFIC SPECIAL CONDITIONS:**

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

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5. Performance Testing for New Source Performance Standards (NSPS)
  - A. Riverside Composting and Recycling shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program for all equipment applicable to NSPS Subpart "OOO". Riverside Composting and Recycling shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date.
  - B. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. The performance test results shall be submitted to the Enforcement section no later than 30 days after completion of any required testing.
6. Prohibition Against Concurrent Operations Without Further Review  
The portable crushing and grinding plant (PORT-0527) is prohibited from operating whenever any other plants are located at this site.
7. Restriction on Process Configuration of Primary Emission Point(s)  
The maximum hourly design rate of the plant is equal to the design rate(s) of the primary emission point(s). Riverside Composting and Recycling has designated the screen to be the primary emission point of the crushing plant and the tub grinder, the primary emission point of the grinding plant. Although this primary screen and tub grinder need not operate simultaneously, bypassing the primary emission point of each plant is prohibited. I.e., when the crushing plant is operating, the primary screen shall not be bypassed, and when the grinding plant runs, the tub grinder shall not be bypassed.
8. Restriction on Minimum Distance to Nearest Property Boundary
  - A. The primary emission point of the portable crushing and grinding plant, which is the primary crusher (EP04), shall be located at least 350 feet from the nearest property boundary whenever it is operating at this site.
  - B. The tub grinder (EP12) shall also be located at least 350 feet from the nearest property boundary whenever it is operating at this site.
9. Record Keeping Requirement  
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
10. Reporting Requirement  
The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## **PROJECT DESCRIPTION**

Asphalt and concrete are processed through two feeders, a crusher, two screens, a surge bin and 16 conveyors. Not including the bins on-board the vibrating feeders (EP02 and EP16), the only bins used with this plant are the feed hopper (no emission point assigned) of the tub grinder (EP12) and a surge bin (EP22).

Yard waste and brushes composed of woody and vegetative matter are processed through a tub grinder, which is equipped with a 28-foot conveyor. The emissions associated with the feed hopper to and the conveyance from the tub grinder were not included in the calculations because the emission factor of 0.01 lb PM<sub>10</sub>/ton (published for the log debarking process, SCC 3-07-008-01) was assumed to approximate the emissions from the entire tub grinder unit. No equipment other than the Morbark 1300 tub grinder is associated with the grinding operation. Therefore, other than hauling and storing, the only emission point associated with this grinding operation is that of the tub grinder, EP12.

Processing equipment is powered with city electricity and up to two diesel engines. The emission points are listed in the attached spreadsheet summary. This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2. It is located in an attainment area for all criteria air pollutants.

The purpose of this review was to make the following changes to the previous permit 072005-050:

1. remove the spray bar special condition;
2. add an inherent moisture content special condition for all materials processed at this plant; and
3. add EPs 16 to 25 comprised of a vibrating feeder, a screen, a surge bin, and seven conveyors.

**Table 1. Other Permits Issued for Site 165-0035**

Permit Number	Completed	Description
072005-050	2005	New tub grinder for mulch production and new recycled asphalt and concrete sizing operation.

## **EMISSIONS EVALUATION**

The potential emissions of criteria pollutants were calculated from the MHDR of the equipment, emission factors, control device efficiencies, and the limited daily hours of operation at the MHDR. Based on the conditioned potential emissions, the operation is considered a minor source under 10 CSR 10-6.060 section (6).

The portable crushing and grinding plant has an annual emission limit of less than 50 tons of PM<sub>10</sub> in any 12-month period. If the conditioned potential emissions of PM<sub>10</sub> were 50 tons per year or greater, the owner would have been required to submit dispersion modeling results.

**Table 2: Emissions Summary (tons per year)**

Air Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	***Potential Emissions of the Application	**New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	193.1	0.75	179.57	<50	0.1171
SOx	40.0	25.8	0.00	12.90	3.59	N/A
NOx	40.0	204.4	0.00	102.20	28.46	N/A
VOC	40.0	5.2	0.00	2.62	0.73	N/A
CO	100.0	54.3	0.00	27.15	7.56	N/A
HAPs	10.0/25.0	0.10	0.00	0.05	0.01	N/A

Note: N/A = Not Applicable

\* Existing potential emissions taken from permit # 072005-050.

\*\* Conditioned potential based on 50-ton-per-year limit for PM<sub>10</sub>. Other pollutants proportionately reduced.

\*\*\* Emissions reflect the potential emissions of the entire installation.

## **IMPACT ANALYSIS FOR AMBIENT AIR QUALITY**

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. This impact, evaluated at a distance of 350 feet to the nearest property boundary, shall not exceed the NAAQS of 150  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$  at or beyond the nearest property boundary in any single 24-hour period. For sources agreeing to use BMPs, haul roads and stockpiles are addressed as a background level of 20  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ . The remaining process emissions are therefore limited to an impact of less than 130  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ .

**Table 3: Ambient Air Quality Impact Analysis of  $\text{PM}_{10}$ , 24-Hour Averaging Time**

Operation	Ambient Impact Factor ( $\mu\text{g}/\text{m}^3/\text{ton}$ )	Modeled Impact ( $\mu\text{g}/\text{m}^3$ )	*Background ( $\mu\text{g}/\text{m}^3$ )	NAAQS ( $\mu\text{g}/\text{m}^3$ )	Daily Production Limit (tons)
1. Solitary	0.0262	130.00	20.00	150.00	4952

\* Background  $\text{PM}_{10}$  level of 20.00  $\mu\text{g}/\text{m}^3$  from haul roads and stockpiles.

## **APPLICABLE REQUIREMENTS**

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

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- If this portable crushing and grinding plant remains at the initial site reviewed in this permit longer than 24 consecutive months, then the owner shall submit an Operating Permit Application. The Air Pollution Control Program must receive this application no later than 30 days after the exceedance of 24 months.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- 40 CFR Part 60 Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, of the New Source Performance Standards (NSPS)
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

## **STAFF RECOMMENDATION**

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
 Jeannie Kozak  
 Environmental Engineer

\_\_\_\_\_  
 Date

## **PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Damon Pursell Construction as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*.
- Noyes Data Corporation, Orlemann, et al. 1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Kansas City Regional Office Site Survey.
- Best Management Practices.





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

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

### For Haul Roads:

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

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

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

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

Mr. Casey Kelley  
Plant Manager  
Damon Pursell Construction  
300 N. Church Road  
Liberty, MO 64068

RE: New Source Review Permit - Project Number: 2006-06-003

Dear Mr. Kelley:

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

Continued compliance requires operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2006-06-003, and your future operating permit, if required. Please note the specific requirements for moisture content testing, and inform us if you have any problems obtaining these samples, applying the testing methods of the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or gaining the required approval if any other methods are used. Also please note the new special condition requiring both your primary crusher (EP04) and your tub grinder to be located at least 350 feet from the nearest property boundary.

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

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall Hale, P.E.  
New Source Review Unit Chief

KH:jkl

Enclosures

c: Kansas City Regional Office  
PAMS File: 2006-06-003  
Permit Number: