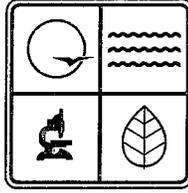


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



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: **022008-009**

Project Number: **2007-07-112
061-P019**

Owner: **Trager Limestone LLC**
Owner's Address: **6468 St. Hwy Y, Chillicothe, MO 64601**
Installation Name: **Trager Limestone LLC**
Installation Address: **21008 Unity Avenue, Gallatin, MO 64640**
Location Information: **Daviess County, S13, T58N, R28W**

Application for Authority to Construct was made for:

The installation of a new rock-crushing plant. The rock-crushing plant has a maximum hourly design rate (MHDR) of 217 tons per hour (tph). The rock-crushing plant is a Generic Plant. Rock is processed through no more than 2 crusher(s), 1 screen(s), and 2 conveyor(s). 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 (listed as attachments starting on page 2) are applicable to this permit.

FEB 11 2008

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.

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. Generic Plant Designation and Maximum Combined Hourly Design Rate
Trager Limestone LLC's stationary rock-crushing plant (061-P019) has been designated to be a Generic Plant Operation. The combined Maximum Hourly Design Rate (MHDR) for the primary unit(s) and each of the following generic equipment types shall not exceed the maximum installation capacities listed below at any time the installation is in operation.

Equipment Type	Maximum Combined Hourly Design Rate	Maximum Number of Units
Primary Unit(s) (Primary Crusher)	217 tons per hour	1
Crusher(s), including primary crusher	434 tons per hour	2
Conveyor(s)	434 tons per hour	2
Screen(s)	217 tons per hour	1
Diesel Engine(s)	745 horsepower	2

2. Generic Plant Equipment Identification Requirement
 - A. Within fifteen (15) days of actual startup, Trager Limestone LLC shall submit to the Air Pollution Control Program's Permitting Section, and the Kansas City Regional Office Regional Office, the following information for the generic plant (061-P019)
 - 1.) A Master List of all equipment that will be permitted for use with the generic plant (061-P019). This master list shall include the following information for each piece of equipment. The manufacturer's name, the model number, the serial number, the actual MHDR, the date of manufacture, any company-assigned equipment number, and any other additional information such as sizes and/or dimensions that is necessary to uniquely identify all of the equipment.
 - 2.) A list of the core equipment that will always be utilized with the generic (061-P019). The core equipment associated with the generic plant shall include at least one (1) primary unit. Core equipment items are rate-controlling components of the process flow (e.g., primary crusher and/or primary screen). The maximum hourly design rate of the generic plant is defined to be the sum of the MHDR(s) of the core equipment. Any arrangement of the generic plant's equipment must be such that the core equipment is not bypassed in the process flow.
 - 3.) A determination on the applicability of 40 CFR Part 60, Subpart "OOO", *Standards of Performance for Nonmetallic Mineral Processing Plants*, for each piece of equipment. Trager Limestone LLC shall indicate whether or not each piece of equipment is subject to Subpart "OOO" and provide the justification for this applicability determination.
 - 4.) Trager Limestone LLC shall submit notification to the AIR POLLUTION CONTROL PROGRAM and the Regional Office if the core equipment is changed and/or if new equipment is added to the supplemental equipment list.
 - B. To assure that each piece of equipment is properly identified as being a part of this generic stationary rock-crushing plant (061-P019), Trager Limestone LLC 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

Page No.	4
Permit No.	
Project No.	2007-07-112

GENERAL SPECIAL CONDITIONS:

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

- uniquely identifies the individual component. These identification numbers must be submitted to the AIR POLLUTION CONTROL PROGRAM and the Regional Office no later than fifteen (15) days after start-up of the generic plant.
- C. Trager Limestone LLC shall at all times maintain a list of the specific equipment currently being utilized with the generic stationary rock-crushing plant (061-P019). The installation shall immediately make this list of currently used equipment available to any Missouri Department of Natural Resources' personnel upon request.
3. Record Keeping Requirement
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
4. Reporting Requirement
The operator(s) shall report to the Air Pollution Control Program (APCP) 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.

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Permit No.	
Project No.	2007-07-112

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. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)
 - A. The operator(s) for Trager Limestone LLC's rock-crushing plant (061-P019) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The stationary plant is permitted to operate under four (4) scenarios: Solitary, concurrent (same owner), concurrent (separate owners), and concurrent (same **and** separate owners) operations. The total daily ambient impact of PM₁₀ at this site shall include the combined impact of the rock-crushing plant and any ambient background concentration from installations or equipment located on the same site as the rock-crushing plant.
 - C. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed during each operating scenario. Attachment A, or other equivalent form(s), shall be used for this purpose during solitary and concurrent (same owner) operations. Attachment B, or other equivalent form(s), shall be used for this purpose during concurrent (separate owners) and concurrent (same **and** separate owners) operations.

2. Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)
 - A. The operator(s) shall ensure that Trager Limestone LLC's rock-crushing plant emits less than 15 tons of PM₁₀ into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM₁₀. Attachment C, *Monthly PM₁₀ Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.

3. Performance Testing for New Source Performance Standards (NSPS)
 - A. Trager Limestone LLC shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program for all equipment applicable to NSPS Subpart "OOO". Trager Limestone LLC 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.

4. Restriction on Process Configuration of Primary Emission Point(s)

The maximum hourly design rate of the plant is equal to the sum of the design rate(s) of the primary emission point(s). Trager Limestone LLC has designated the following unit(s) as the primary emission point(s) of the rock-crushing plant: primary crusher (EP03). Bypassing the primary emission point(s) for processing is prohibited.

5. Restriction on Minimum Distance to Nearest Property Boundary

The primary emission point of the rock-crushing plant, which is the primary crusher (EP03), shall be located at least 1,320 feet from the nearest property boundary whenever it is operating at this site.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

This permit is for the installation of a new rock-crushing plant. There used to be a stationary rock-crushing plant (permits 0395-029 and 0597-017) located at this site but was removed. The installation would like to ability to replace equipment at this plant with equipment from another plant. This is done through the issuance of a generic permit. Since the primary crusher (EP03) is the core equipment of the generic plant, it is the one equipment that cannot be replaced with a crusher from another plant. The installation has more than two (2) conveyors being stored at the site, but the plant itself can only use two (2) conveyors at one time. Therefore, General Special Condition #1 only lists two (2) conveyors (434 combined tph) as equipment being permitted at the site.

Rock, composed of non-metallic minerals, is drilled/blasted, loaded into haul trucks, and transported to processing. Rock is processed through feeder(s), crusher(s), screen(s), conveyor(s), and bin(s). Processing equipment is powered with diesel engine(s). The emission points are listed in the attached spreadsheet summary. This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2]. The installation is located in Daviess County, an attainment area for all criteria air pollutants.

The plant is permitted to operate under four (4) scenarios and they are defined below.

- Solitary operations: Operations when the plant is located at the site by itself.
- Concurrent (same owner) operations: Operations when the plant is located at the site at the same time as other plants owned by Trager Limestone LLC.
- Concurrent (separate owners) operations: Operations when the plant is located at the site at the same time as other plants owned by other companies.
- Concurrent (same **and** separate owners) operations: Operations when the plant is located at this site at the same time as plants owned by Trager Limestone LLC **and** plants owned by other companies.

Table 1. Other Permits Issued for Site 061-P019

Permit Number	Completed	Description
0395-029	3/30/1995	New rock-crushing plant.
0597-017	5/27/1997	Addition and replacement of equipment.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM₁₀. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a *de minimis* source under 10 CSR 10-6.060 section (5).

The rock-crushing plant has an annual emission limit of less than 15.0 tons of PM₁₀ in any 12-month period. With this limit, the installation will not be required to perform increment analysis. A composite PM₁₀ emission factor was developed for the rock-crushing plant. The composite emission factor is incorporated into the monthly record keeping table, Attachment C.

A 745 horsepower diesel engine is permitted as part of this plant. This diesel engine shall only be used for the purpose of producing crushed rock. If the company decides to use this diesel engine for any other purpose, a new permit review will be required. A 35% engine efficiency is assumed for the emissions evaluation.

Table 2: Emissions Summary (tons per year)

Air Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	N/A	N/A	125.43	<15.00	0.1320
SO _x	40.0	N/A	N/A	11.98	1.37	N/A
NO _x	40.0	N/A	N/A	75.88	8.66	N/A
VOC	40.0	N/A	N/A	1.94	0.22	N/A
CO	100.0	N/A	N/A	20.16	2.30	N/A
HAPs	10.0/25.0	N/A	N/A	0.04	0.00	N/A

Note: N/A = Not Applicable

* PM₁₀ conditioned potential based on daily production limit from ambient impact analysis. Other pollutants proportionately reduced.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 1,320 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the rock-crushing plant for each operating scenario. These ambient impact factors are incorporated into the daily record keeping tables, Attachment A and B. An ambient background level of PM₁₀ from the operation(s) of other plants owned by other companies is included in Attachment B.

During each operating scenario, the following procedures must be kept to ensure compliance with NAAQS.

- Solitary Operations: The stationary plant must track its daily PM₁₀ ambient air impact to ensure compliance with the NAAQS limit of 150 µg/m³. Attachment A, or equivalent forms, shall be used for this purpose.
- Concurrent (Same Owner) Operations: The stationary plant must track its daily PM₁₀ ambient impact **and** the ambient impact of all other plants at the site to ensure the combined ambient impact of all plants at the site does not exceed 150 µg/m³. Attachment A, or equivalent forms, shall be used for this purpose.
- Concurrent (Separate Owners) Operations: The stationary plant is permitted to use 56.87 µg/m³ while plants owned by other companies are permitted to use 93.13 µg/m³. The stationary plant must track its own daily PM₁₀ ambient impact to ensure that it does not exceed 56.87 µg/m³. Attachment B, or equivalent forms, shall be used for this purpose.
- Concurrent (Same **and** Separate Owners) Operations: Plants owned by Trager Limestone LLC are allowed a total of 56.87µg/m³ while plants owned by other companies are permitted to use 93.13 µg/m³. The stationary plant must track its own daily PM₁₀ ambient impact **and** the ambient impact of other plants owned by Trager Limestone LLC to ensure that the combined PM₁₀ ambient impact of all Trager Limestone LLC plants at the site does not exceed 56.78 µg/m³. Attachment B, or equivalent forms, shall be used for this purpose.

Table 3: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

Operation	Ambient Impact Factor (µg/m ³ /ton)	Modeled Impact (µg/m ³)	*Background (µg/m ³)	NAAQS (µg/m ³)	Daily Production Limit (tons)
1. Solitary	0.06076	150.00	N/A	150.00	2,468
2. Concurrent (Same Owner)	0.06076	**	N/A	150.00	**
3. Concurrent (Separate Owners)	0.05687	56.87	93.13	150.00	1,000
4. Concurrent (Same and Separate Owners)	0.05687	**	93.13	150.00	**

* Background PM₁₀ level of 93.13 µg/m³ from the operation of other plants owned by other companies.

** The operator(s) must balance production among concurrently operating plants, with the ambient impacts for each, such that NAAQS is not exceeded. Ambient impacts of other plants owned by Trager Limestone LLC can be obtained from the operators of these plants.

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
- An Operating Permit application is required for this installation within 30 days of equipment startup.
- *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 (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Chia-Wei Young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

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

Ms. Becky Weldon
Compliance Manager
Trager Limestone LLC
6468 St. Hwy Y
Chilicothe, MO 64601

RE: New Source Review Permit - Project Number: 2007-07-112

Dear Ms. Weldon:

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

Operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2007-07-112, and your operating permit, if required, is necessary for continued compliance. Please review your operating permit, as it will contain all applicable requirements for your rock-crushing plant, including any special conditions from your New Source Review permit.

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

If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102 or (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

KBH:cwyl

Enclosures

c: Kansas City Regional Office
PAMS File: 2007-07-112
Permit Number: