



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 072013-014 Project Number: 2012-12-047
Installation ID: 101-0067

Parent Company: Radmacher Brothers Excavating Co., Inc.

Parent Company Address: 2201 N State Rte 7 Highway, Suite B,
Pleasant Hill, MO 64080

Installation Name: AA Quarry, LLC

Installation Address: 381 NW AA Highway, Kingsville, MO 64061

Location Information: Johnson County, S2 T46 R29

Application for Authority to Construct was made for:
Construction of a new rock crushing 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.

JUL 22 2013

EFFECTIVE DATE

A handwritten signature in cursive script, reading "Kyma L. Moore".

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

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

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SITE SPECIFIC SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

1. **Best Management Practices Requirement**
AA Quarry, LLC shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.
2. **Annual Emission Limit**
 - A. AA Quarry, LLC shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation.
 - B. AA Quarry, LLC 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. **Moisture Content Testing Requirement**
 - A. AA Quarry, LLC shall verify that the moisture content of the processed rock is greater than or equal to 1.5 percent by weight.
 - B. Testing shall be conducted according to the method prescribed by the American Society for Testing Materials (ASTM) D-2216, C-566 or another method approved by the Director.
 - C. The initial test shall be conducted no later than 45 days after the start of operation. A second test shall be performed the calendar year following the initial test during the months of July or August.
 - D. The test samples shall be taken from rock that has been processed by the plant or from each source of aggregate (e.g. quarry).
 - E. The written analytical report shall include the raw data and moisture content of each sample, the test date and the original signature of the individual performing the test. The report shall be filed on-site or at the AA Quarry, LLC main office within 30 days of completion of the required test.
 - F. If the moisture content of either of the two tests is less than the moisture content in Special Condition 3.A, another test may be performed within 15 days of the noncompliant test. If the results of that test also exceed the limit, AA Quarry, LLC shall either:

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SITE SPECIFIC SPECIAL CONDITIONS:

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

- 1) Apply for a new permit to account for the revised information, or
 - 2) Submit a plan for the installation of wet spray devices to the Compliance/Enforcement Section of the Air Pollution Control Program within 10 days of the second noncompliant test. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.
- G. In lieu of testing, AA Quarry, LLC may obtain test results that demonstrate compliance with the moisture content in Special Condition 3.A from the supplier of the aggregate.
4. **Minimum Distance to Property Boundary Requirement**
The primary emission point, the primary crusher (EP-3) shall be located at least 850 feet from the nearest property boundary.
 5. **Concurrent Operation Restriction**
AA Quarry, LLC is prohibited from operating whenever other plants are located at the site.
 6. **Primary Equipment Requirement**
AA Quarry, LLC shall process all rock through the primary crusher (EP3). Bypassing the primary crusher is prohibited.
 7. **Nonroad Engine Requirement**
 - A. AA Quarry, LLC cannot operate at this site longer than 12 consecutive months in order to avoid recordkeeping showing the movement of the 1996 CAT 3508, 1489 horsepower engine. To meet the definition of a nonroad engine as stated in 40 CFR 89.2, the 1996 CAT 3508, 1489 horsepower engine cannot remain in one physical location for longer than 12 months.
 - B. AA Quarry, LLC shall keep records of the relocation of their diesel engine within the site using Attachment C.
 8. **Record Keeping Requirement**
AA Quarry, LLC 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.
 9. **Reporting Requirement**
AA Quarry, LLC shall report to the Air Pollution Control Program Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedances of the limitations imposed by this permit.

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

Project Number: 2012-12-047
Installation ID Number: 101-0067
Permit Number:

AA Quarry, LLC
381 NW AA Highway
Kingsville, MO 64061

Complete: December 26, 2012

Parent Company:
Radmacher Brothers Excavating Co., Inc.
2201 N State Rte 7 Highway, Suite B
Pleasant Hill, MO 64080

Johnson County, S2 T46 R29

PROJECT DESCRIPTION

The AA Quarry, LLC operations will include fracturing of rock through drilling and blasting, transport of the rock to an onsite rock crushing plant, storage of final product in open stockpiles, and load-out of product via truck. In accordance with the approved industrial mine permit issued to AA Quarry, facility operations will occur over eight phases of the property spanning approximately 50 years of operation.

AA Quarry proposes the use of a rock crushing plant capable of processing up to 1,000 tons per hour (tph) of material. The rock crushing plant will initially be located in Phase 1. It is anticipated that the rock crushing plant will remain in Phase 1 while quarrying occurs in Phase 1, 2, and 3; therefore the plant will be stationary for up to 20 years. Based on the estimated location of the rock crushing plant and future operations at the facility, the rock crushing plant will not be closer than 850 feet from the property boundary.

Rock will be fractured by drilling and blasting, then loaded by a front-end loader into haul trucks to transport the material to the rock crushing plant. The rock will be dumped from the haul trucks into the vibrating grizzly feeder, which separates large boulders from small pieces of rock that do not require primary crushing. The primary crusher product and the grizzly product are discharged onto a belt conveyor, which takes it to a vibrating inclined screen. This first screen separates oversized rock from smaller aggregate. The undersize material from the first screen is considered to be product stream and is separated by size to different decks of the screen and conveyed out to storage piles. The aggregate that is too large to pass through the upper deck of the first screen is processed in the secondary crusher. The output from the secondary crusher is processed through the secondary screen. Various product streams with different size gradations are separated during the screening operation.

The crushed/sized aggregate is conveyed to storage piles, which will cover no more than 20 acres combined. The final product is removed from the storage piles by a front-end loader into haul trucks and hauled off of the premises.

The rock crushing plant will be powered by a CAT 3508, 1489 hp diesel engine. It was manufactured in 1996. AA Quarry, LLC plans to move the engine to other locations as needed, thus making the engine a non-road engine.

Table 1: Emission Units

Unit ID	Equipment/Description
1	Truck to Grizzly/Truck unloading
2	Grizzly Feeder
3	Primary Crusher
4	Primary Screen
5	Secondary Crusher
6	Secondary Screen
7	Conveyors (15 total)
8	Storage Pile Load-in (conveyor)
9a	Storage Pile Wind Erosion
9b	Storage Pile Vehicular Activity
9c	Storage Pile Load-out
10a	Haul Road (Pit to Plant)
10b	Haul Road (Plant to Exit)
11	Generator Engine 1996 CAT 3508 1489 hp

Haul roads will be constructed to allow trucks to transport fragmented rock to the rock crushing plant and haul finished product from the facility. The applicant is using one of the methods described in Attachment AA, "Best Management Practices," to control emissions from haul roads and vehicular activity areas.

This installation is located in Johnson County, an attainment area for all criteria pollutants.

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

No permits have been issued to AA Quarry, LLC from the Air Pollution Control Program.

TABLES

The table below summarizes the emissions of this project. Since this is a new plant at this site, there are no existing actual emissions. 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.

Table 2: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	Existing Actual Emissions (2012 EIQ)	^a Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	N/A	449.96	45.18
PM ₁₀	15.0	N/A	149.37	<15.0
PM _{2.5}	10.0	N/A	63.54	6.38
SO _x	40.0	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A
Total HAPs	25.0	N/A	N/A	N/A

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

^aIncludes site specific haul road and storage pile emissions

Table 3 summarizes the ambient air quality impact analysis. The maximum modeled impact is the impact of each pollutant when the plant is operating continuously. The 24-hour limited impacts and daily limit are based on compliance with the NAAQS for PM₁₀, however no limit is required due to the NAAQS.

Table 3: Ambient Air Quality Impact Analysis

Pollutant	^a NAAQS/RAL (µg/m ³)	Averaging Time	^b Maximum Modeled Impact (µg/m ³)	Limited Impact (µg/m ³)	Background (µg/m ³)	^c Daily Production (tons/day)
^c PM ₁₀ (solitary)	150.0	24-hour	107.67	N/A	20.0	24,000

^aNational Ambient Air Quality Standards (NAAQS)

^bModeled impact at maximum capacity with controls

^cSolitary operation only

EMISSIONS CALCULATIONS

Emissions for the project were calculated using emission factors found in the United States Environmental Protection Agency (EPA) document AP-42 *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition (AP-42).

Emissions from the rock-crushing equipment were calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004. The controlled emission factors were used because the inherent moisture content of the crushed rock is greater than 1.5 percent (%) by weight.

The engine emissions were not evaluated for this review as the diesel engine at this site is classified as a non-road engine. 40 CFR 63 Subpart ZZZZ, "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary

Compression Ignition Internal Combustion Engines” do not apply. However, if the self-contained plant were to remain in one location for longer than 12 consecutive months, it would not be in compliance with this permit because engine emissions were not evaluated. It may also not be in compliance with MACT ZZZZ. NSPS IIII does not apply unless the engine is modified or reconstructed and the self-contained plant is in one location for longer than 12 consecutive months.

Emissions from haul roads and vehicular activity areas were calculated using the predictive equation from AP-42 Section 13.2.2 “Unpaved Roads,” November 2006. A 90% control efficiency for PM and PM₁₀ and a 40% control efficiency for PM_{2.5} are applied to the emission calculations for the use of BMPs. Emissions from 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 1.5% 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.”

AMBIENT AIR QUALITY IMPACT ANALYSIS

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of the pollutants listed in Table 3. The Air Pollution Control Program requires an AAQIA of PM₁₀ for all asphalt, concrete and rock-crushing plants regardless of the level of PM₁₀ emissions if a permit is required. An AAQIA is required for other pollutants if their emissions exceed their respective de minimis or screening model action level (SMAL). The AAQIA was performed using the Air Pollution Control Program’s generic nomographs and when appropriate the EPA modeling software AERSCREEN. For each pollutant that was modeled, the maximum concentration that occurs at or beyond the site boundary was compared to the National Ambient Air Quality Standard (NAAQS) or Risk Assessment Level (RAL) for the pollutant. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS or RAL, the plant’s production is limited to ensure compliance with the standard.

This plant uses BMPs to control emissions from haul roads and vehicular activity areas, so emissions from these sources were not included in the AAQIA. Instead they were addressed as a background concentration of 20 µg/m³ of PM₁₀ in accordance with the Air Pollution Control Program’s BMPs interim policy.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below the de minimis level. Potential emissions of PM are the above de minimis level but below the major source level.

OPERATING SCENARIO

- AA Quarry, LLC is a solitary operation and therefore prohibited from operating whenever other plants are located at the site.

APPLICABLE REQUIREMENTS

AA Quarry, LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110.
- An Operating Permit is required for this installation.
- *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

- 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" applies to the equipment.
- 40 CFR 60 Subpart IIII, "New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines" does not apply because the CAT 3508 engine was built in 1996, prior to July 11, 2005.

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.

Kathy Kolb
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 19, 2012, received December 26, 2012, designating Radmacher Brothers Excavating Co., Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Attachment AA: Best Management Practices

Haul roads and vehicular activity areas shall be maintained in accordance with at least one of the following options when the portable plant is operating.

1. Pavement
 - A. The operator shall pave the area with materials such as asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions¹ while the plant is operating.
 - B. Maintenance and repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator shall periodically wash or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Application of Chemical Dust Suppressants
 - A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
 - B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with the manufacturer's recommendation (if available) and in sufficient quantities to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator shall keep these records with the plant for not less than five (5) years and make these records available to Department of Natural Resources personnel upon request.

3. Application of Water-Documented Daily
 - A. The operator shall apply water to unpaved areas. Water shall be applied at a rate of 100 gallons per day per 1,000 square feet of unpaved or untreated surface area while the plant is operating.
 - B. Precipitation may be substituted for watering if the precipitation is greater than one quarter of one inch and is sufficient to control fugitive emissions.
 - C. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads.
 - D. The operator shall record the date, volume of water application and total surface area of active haul roads or the amount of precipitation that day. The operators shall also record the rationale for not watering (e.g. freezing conditions or not operating).
 - E. The operator shall keep these records with the plant for not less than five (5) years, and the operator shall make these records available to Department of Natural Resources personnel upon request.

¹For 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.)

Mr. Robert Radmacher
President
AA Quarry, LLC
2201 N State Rte 7 Highway, Suite B
Pleasant Hill, MO 64080

RE: New Source Review Permit - Project Number: 2012-12-047

Dear Mr. Radmacher:

Enclosed with this letter is your permit to construct. Please study it carefully. 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. 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, 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

Susan Heckenkamp
New Source Review Unit Chief

SH:kk1

Enclosures

c: Kansas City Regional Office
PAMS File: 2012-12-047

Permit Number: