

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 032017-017

Project Number: 2017-03-005
Installation Number: 077-0259

Parent Company: Blevins Asphalt Construction Co. Inc.

Parent Company Address: P.O. Box 230, Mt. Vernon, MO 65712

Installation Name: Blevins Asphalt Construction Co. Inc.

Installation Address: 5650 U.S. Highway 60, Springfield, MO 65802

Location Information: Greene County, S1, T28N, R23E

Application for Authority to Construct was made for:

Replacement of Drum Dryer and Burner on a Hot-Mix Stationary 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
Jordan Hull
New Source Review Unit

Director or Designee
Department of Natural Resources

MAR 30 2017

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 source(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."

Blevins Asphalt Construction Co. Inc.
Greene County, S1, T28N, R23E

1. Superseding Condition

The conditions of this permit supersede all special conditions found in the previously issued construction permit 012010-013 issued by the Air Pollution Control Program.

2. PM₁₀ Emission Limitation

A. Blevins Asphalt Construction Co. Inc. shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the entire installation as defined in Table 2.

B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.

3. Documented Haul Road Watering

A. Blevins Asphalt Construction Co. Inc. shall control dust from all haul roads at this site using water or surfactant spray consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary. The following conditions apply to haul road watering:

- 1.) The water application rate shall be 100 gallons per 1000 square feet at least once every day.
- 2.) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application
- 3.) Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.

B. Blevins Asphalt Construction Co. Inc. shall keep the following records on file and available for inspection:

- 1.) A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.
- 2.) Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.

SPECIAL CONDITIONS:

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

- 3.) Records of watering equipment breakdowns and repairs.
4. Control Device Requirement-Baghouse
 - A. Blevins Asphalt Construction Co. Inc. shall control emissions from the Drum Dryer (EP-4) using baghouses as specified in the permit application.
 - B. The baghouses 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.
 - C. Replacement filters for the baghouses 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. Blevins Asphalt Construction Co. Inc. shall monitor and record the operating pressure drop across the baghouses 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. Blevins Asphalt Construction Co. Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.
 - F. Blevins Asphalt Construction Co. Inc. shall maintain an operating and maintenance log for the baghouses 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 and Reporting Requirements
 - A. Blevins Asphalt Construction Co. Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. Blevins Asphalt Construction Co. Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2017-03-005
Installation ID Number: 077-0259
Permit Number: 032017-017

Installation Address:

Blevins Asphalt Construction Co. Inc.
5650 U.S. Highway 60
Springfield, MO 65802

Parent Company:

Blevins Asphalt Construction Co. Inc.
P.O. Box 230
Mt. Vernon , MO 65712

Greene County, S1, T28N, R23E

PROJECT DESCRIPTION

Blevins Asphalt Construction Co. Inc. is an existing stationary asphalt plant previously permitted in permit # 012010-013. Blevins Asphalt Construction Co. Inc. is installing a new replacement drum dryer with a higher capacity than in the original permitted drum dryer. A new drum burner and baghouse are also being installed with the addition of the new drum dryer. A new installation-wide de minimis limit was requested to incorporate the new and existing equipment. The upgrade asphalt plant will have an MHDR of 400 tons per hour and is powered by municipal power. The new drum burner is rated at 100 MMBTU per hour. No request was made for a backup fuel evaluation; therefore the Natural Gas will be the only fuel consumed by the burners and heaters.

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

The following New Source Review permits have been issued to Blevins Asphalt Construction Co. Inc. from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
012010-013	Stationary Asphalt Plant (2010)

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.

The following table lists the new and existing equipment used at the installation that is associated with this project

Table 2: Project Equipment List

Emission Unit	Equipment Description	MHDR
EP1	Aggregate Bins	400 tph
EP2	Aggregate handling conveyor (6)	400 tph
EP3	Vibrating Screen	400 tph
EP4	Drum Dryer	400 tph
EP5	Plant Loadout	400 tph
EP6	Silo Loading	400 tph
EP7	Asphalt Heater	1.0 MMBTU/hr
EP8	Oil Burner	2.2 MMBTU/hr
EP9a	Storage Piles (Sand)	0.5 acres
EP9b	Storage Piles (Crushed Limestone)	1.5 Acres
EP9c	Storage Piles (RAP/Millings)	3.0 Acres
EP10a	Haul Roads (Receiving)	2.41 VMT
EP-10b	Haul Roads (Shipping)	0.52 VMT

EMISSIONS/CONTROLS EVALUATION

Emissions for the project were calculated 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 were calculated using emission factors from AP-42 Section 11.1 "Hot Mix Asphalt Plants," April 2004. SO_x emissions were calculated using the SO₂ and SO₃ emission factors from AP-42 Section 1.5 "Liquefied Petroleum Gas Combustion," July 2008 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 were calculated using emission factors from AP-42 Section 1.5. Emissions from aggregate handling were calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004. 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 were 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 40% control efficiency for PM_{2.5} were applied to the emission calculations for the use of undocumented watering. 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 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."

TABLES

The table below summarizes the emissions of this project. The existing actual emissions were taken from the 2016 EIQ. 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 for PM₁₀ to avoid dispersion modeling requirements found in 10 CSR 10-6.060 Section (6). With this limit in place, emissions of all other pollutants, except PM, are below their respective de minimis levels. PM does not have NAAQS or increment standards so it does not trigger modeling requirements when its potential emissions are above the de minimis level.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2016 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	N/D	N/A	227.82	31.50
PM ₁₀	15.0	<15.0	1.66	108.49	<15.0
PM _{2.5}	10.0	N/D	0.36	51.89	7.18
SOx	40.0	0.04	0.08	0.26	0.04
NOx	40.0	6.28	0.00	120.66	16.68
VOC	40.0	5.87	0.79	84.34	11.66
CO	100.0	32.00	3.23	41.37	5.72
GHG (CO ₂ e)	N/A	N/D	N/D	53,010.77	7,329.62
GHG (mass)	N/A	N/D	N/D	52,841.59	7,306.23
HAPs	10.0/25.0	1.74	0.00	9.79	1.35
2-methylnaphalene	10.0/0.01	N/D	N/D	0.13	0.02

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

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 PM₁₀ 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.

APPLICABLE REQUIREMENTS

Blevins Asphalt Construction Co. Inc. 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.*
- No 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

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *40 CFR 60 Subpart I, "Standards of Performance for Hot Mix Asphalt Facilities" applies to the equipment.*
- *Control of Sulfur Dioxide Emissions, 10 CSR 10-6.261*
- *Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260*

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

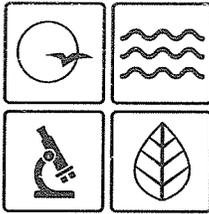
The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 1, 2017, received March 2, 2017, designating Blevins Asphalt Construction Co. Inc. as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal1,000 gallons
°Fdegrees Fahrenheit	MWmegawatt
acfmactual cubic feet per minute	MHDRmaximum hourly design rate
BACTBest Available Control Technology	MMBtuMillion British thermal units
BMPsBest Management Practices	MMCFmillion cubic feet
BtuBritish thermal unit	MSDSMaterial Safety Data Sheet
CAMCompliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPSNew Source Performance Standards
COcarbon monoxide	NSRNew Source Review
CO₂carbon dioxide	PMparticulate matter
CO_{2e}carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppmparts per million
dscfdry standard cubic feet	PSDPrevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTEpotential to emit
EPEmission Point	RACTReasonable Available Control Technology
EPAEnvironmental Protection Agency	RALRisk Assessment Level
EUEmission Unit	SCCSource Classification Code
fpsfeet per second	scfmstandard cubic feet per minute
ftfeet	SDSSafety Data Sheet
GACTGenerally Available Control Technology	SICStandard Industrial Classification
GHGGreenhouse Gas	SIPState Implementation Plan
gpmgallons per minute	SMALScreening Model Action Levels
grgrains	SO_xsulfur oxides
GWPGlobal Warming Potential	SO₂sulfur dioxide
HAPHazardous Air Pollutant	tphtons per hour
hrhour	tpytons per year
hphorsepower	VMTvehicle miles traveled
lbpound	VOCVolatile Organic Compound
lbs/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 30 2017

Mr. Derek Stokes
President
Blevins Asphalt Construction Co. Inc.
P.O. Box 230
Mt. Vernon, MO 65712

RE: New Source Review Permit - Project Number: 2017-03-005

Dear Mr. Stokes:

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 and with your operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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 <http://dnr.mo.gov/cav/compliance.htm>.

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/ahc.



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Mr. Derek Stokes
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If you have any questions regarding this permit, please do not hesitate to contact Jordan Hull, at the Department of Natural Resources' 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:jhj

Enclosures

c: Southwest Regional Office
PAMS File: 2017-03-005

Permit Number: 032017-017