

STATE OF 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: 062009-006

Project Number: 2009-03-087

Parent Company: Delta Companies, Inc.

Parent Company Address: P.O. Box 880, Cape Girardeau, MO 63702-0880

Installation Name: Brown Sand & Gravel Company - Dexter

Installation Address: Highway 25N, Dexter, MO 63841

Location Information: Stoddard County, S2, T25N, R10E

Application for Authority to Construct was made for:

The addition of two (2) screens, one (1) crusher, one (1) bin and nine (9) conveyors to an existing rock washing installation. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUN - 8 2009

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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/18 months 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 Departments' 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 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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### **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. **Best Management Practices**  
Brown Sand & Gravel Company 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 Brown Sand & Gravel Company's rock washing/crushing plant (207-0012) 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. The installation 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 PM<sub>10</sub> at this site shall include the combined impact of the rock washing/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. 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.
3. **Annual Emission Limit of Particulate Matter Less Than Ten Microns in Diameter (PM<sub>10</sub>)**
  - A. The operator(s) shall ensure that Brown Sand & Gravel Company's rock washing plant emits less than 15.00 tons of PM<sub>10</sub> into the atmosphere in any 12-month period from the equipment and activities of this project. The equipment of this project includes one (1) VSI crusher, two (2) screens, one (1) bin and nine (9) conveyors. The activity involved in this project include raw material hauling and loading, product loading and hauling, storage pile load in and load out, storage pile wind erosion and storage pile vehicular activity.
  - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and PM<sub>10</sub>. Attachment C, or other equivalent form(s), shall be used for this purpose.
4. **Performance Testing for New Source Performance Standards (NSPS)**  
Brown Sand and Gravel Company shall comply with all appropriate monitoring, testing, reporting and record keeping requirements of 40 CFR Part 60, Subpart OOO – *Standards of Performance for Nonmetallic Mineral Processing Plants*.
5. **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.
6. **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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**SPECIAL CONDITIONS:**

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

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7. Superseding Condition  
Special condition no. 2 of this permit supersede special condition 2 found in the previously issued construction permit (112007-003) from the Air Pollution Control Program.

# TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

## PROJECT DESCRIPTION

Brown Sand & Gravel Company proposes to add two (2) screens, one (1) crusher, one (1) storage bin, and nine (9) conveyors to its existing rock washing installation. The equipment will also have its own hauling activities and storage piles. The equipment will be powered with electrical power and not diesel engines/generator. 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 Stoddard County, an attainment area for all criteria air pollutants.

Before the issuance of this permit, the installation was not required to apply for an operating permit because the potential emissions of all pollutants were below *de minimis* levels and no New Source Performance Standards (NSPS) applied to the facility. Subpart OOO of the NSPS did not apply because the installation was a wet material processing operation and no crushers were being used at the site. However, with the addition of new equipment, the emissions for the installation will be greater than *de minimis* levels and subpart OOO will apply to the facility because the installation will now be using a rock crusher, so the facility will be required to apply for a basic operating permit. The equipment are being brought onto the site for a Missouri Department of Transportation job and might be removed after the completion of the job. Once the equipment are removed, the facility can submit a request to the Air Pollution Control Program to rescind its basic operating permit.

**Table 1: Other Permits Issued for Site 207-0012**

Permit Number	Completed	Description
0799-009	7/15/1999	Installation of Wet Screening and Conveying System.
072002-002	7/6/2000	Installation of Screen and Radial Stacker.
112007-003	11/6/2007	Adding BMPs and allowing collocation.

## EMISSIONS EVALUATION

Criteria air pollutants will be emitted from the new equipment. The main air pollutant of concern is PM<sub>10</sub>. 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 new rock crushing equipment has an annual emission limit of less than 15.00 tons of PM<sub>10</sub> in any 12-month period for the equipment of this project. A composite PM<sub>10</sub> emission factor was developed for the new equipment and it is incorporated into the monthly record keeping table, Attachment C. The 15.00 ton limit applies only to the new equipment. The existing rock washing equipment has, in its previous permit (112007-003), a limit of 15.00 tons per year of PM<sub>10</sub> and this limit is still valid. After the issuance of this permit, the installation will have two (2) separate limits: A limit of 15.00 tons per year of PM<sub>10</sub> for the existing rock washing equipment (in permit 112007-003) and a limit of 15.00 tons per year of PM<sub>10</sub> for the new rock crushing equipment.

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

Air Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	**New Installation Conditioned Potential	Emission Factor (lb/ton)
PM <sub>10</sub>	15.0	15.00	5.32	95.58	<15.00	0.07274
SO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/A	N/A	N/A	N/A

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

\* Existing potential emissions taken from permit # 112007-003 and based on conditioned potential.

\*\* Conditioned potential based on limit required to avoid increment analysis.

## 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 700 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (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 Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ . To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$  at or beyond the nearest property boundary.

The portable plant is permitted to operate under four (4) scenarios.

- Solitary Operations: This is operations when the stationary rock washing/crushing plant is at the site by itself.
- Concurrent (Same Owner) Operations: This is operations when other plants owned by Delta Companies, Inc. are located at this site. The stationary rock washing/crushing plant shall track the daily  $\text{PM}_{10}$  ambient impact of all plants at the site to ensure compliance with NAAQS.
- Concurrent (Separate Owner) Operations: This is operations when plants owned by other companies are located at this site. The stationary rock washing/crushing plant is permitted for 80.00  $\mu\text{g}/\text{m}^3$  of daily  $\text{PM}_{10}$  ambient impact while plants owned by other companies are permitted for 50.00  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ . The stationary rock washing/crushing plant shall track its own daily  $\text{PM}_{10}$  ambient impact to ensure that it does not exceed 80.00  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ .
- Concurrent (Same and Separate Owner) Operations: This is operations when plants owned by Delta Companies, Inc. and plants owned by other companies are located at the site. Plants owned by Delta Companies, Inc. are allowed a combined daily  $\text{PM}_{10}$  ambient impact of 80.00  $\mu\text{g}/\text{m}^3$  while plants owned by other companies are permitted for 50.00  $\mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$ . The stationary rock crushing/washing plant shall track the daily  $\text{PM}_{10}$  ambient impact of all plants owned by Delta Companies, Inc. to ensure that the combined daily  $\text{PM}_{10}$  ambient of these plants does not exceed 80.00  $\mu\text{g}/\text{m}^3$ .

Screening tools were used to develop ambient impact factors for the rock washing/crushing plant during each operating scenario and the ambient impact factors are incorporated into the daily record keeping tables, Attachment A and Attachment B. Attachment A should be used during solitary and concurrent (same owner) operations. Attachment B should be used during concurrent (separate owner) and concurrent (same and separate owner) operations.

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

Operation	<sup>1</sup> Ambient Impact Factor ( $\mu\text{g}/\text{m}^3/\text{ton}$ )	Modeled Impact ( $\mu\text{g}/\text{m}^3$ )	<sup>2</sup> Background ( $\mu\text{g}/\text{m}^3$ )	NAAQS ( $\mu\text{g}/\text{m}^3$ )	Daily Production Limit (tons)
1. Solitary	0.02155/0.03368	130.00	20.00	150.00	Note 3
2. Concurrent (Same Owner)	0.02155/0.03368	Note 3	20.00	150.00	Note 3
3. Concurrent (Separate Owners)	0.01910/0.02536	80.00	70.00	150.00	Note 3
4. Concurrent (Same and Separate Owners)	0.01910/0.02536	Note 3	70.00	150.00	Note 3

Note 1: Ambient Impact Factor of 0.02155 and 0.01910 from the existing rock washing equipment and 0.03368 and 0.02536 from the new rock crushing equipment

Note 2: Background  $\text{PM}_{10}$  level of 20.00  $\mu\text{g}/\text{m}^3$  from haul roads and stockpiles and 50.00  $\mu\text{g}/\text{m}^3$  from the operation of plants owned by other companies.

Note 3: The operator(s) must balance production among the existing rock washing operation, the new rock crushing operation and any concurrently operating plants owned by Delta Companies, Inc., with the ambient impacts and/or ambient impact factors for each, such that NAAQS is not exceeded. Ambient impact factors for the rock washing and rock crushing operation are listed in Table 3 and Attachments A and B. Ambient impacts for other plants owned by Delta Companies, Inc. can be obtained from the operators of these plants.

Separate ambient impact factors are given for the existing rock washing equipment and the new rock crushing equipment so ambient impact from each operation can be calculated separately. The ambient impact factors for the existing rock washing equipment are taken from permit #112007-003 (Project #2007-08-082), and the ambient impact factors for the new equipment were calculated during the review for this project. If the new rock crushing equipment are removed from the site due to the completion of the MoDOT job, the ambient impact from the new equipment should no longer be taken into account while tracking the daily  $\text{PM}_{10}$  ambient impact from the site.

## **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 requirement.

- *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.

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Chia-Wei Young  
Environmental Engineer

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Date

## **PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Delta Companies, Inc. 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.
- Southeast Regional Office 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. Jerry Neels  
Safety and Environmental Manager  
Delta Companies, Inc.  
P.O. Box 880  
Cape Girardeau, MO 63702-0880

RE: New Source Review Permit - Project Number: 2009-03-087

Dear Mr. Neels:

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 2009-03-087, 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 me at (573) 751-4817, or you may write to the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. 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: Southeast Regional Office  
PAMS File: 2009-03-087  
Permit Number: