



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: 092020-005 Project Number: 2020-07-021
Installation ID: PORT-0818

Parent Company: Concrete Strategies, LLC

Parent Company Address: 2199 Innerbelt Business Center, St. Louis, MO 63114

Installation Name: Concrete Strategies, LLC

Installation Address: East Bannister and Euclid, Kansas City, MO 64131

Location Information: Jackson County, S21&28 T48N R33W

Application for Authority to Construct was made for:
New portable concrete plant at two locations on Bannister and Botts Road in Kansas City. 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 are applicable to this permit.



Director or Designee
Department of Natural Resources

September 8, 2020
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/>

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 to 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 (3)(E). "Conditions required by permitting authority."

1. **Equipment Identification Requirement**
Concrete Strategies, LLC shall maintain easily read permanent markings on each component of the plant. These markings shall be the equipment's serial number or a company assigned identification number that uniquely identifies the individual component. These identification numbers must be submitted to the Air Pollution Control Program no later than 15 days after start-up of the portable concrete plant.
2. **Relocation of Portable Concrete Plant**
 - A. Concrete Strategies, LLC shall not be operated at any location longer than 24 consecutive months except if the Site Specific Special Conditions of this portable plant, PORT-0818, contain a nonroad engine requirement limiting the portable plant at the site specific location to 12 consecutive months.
 - B. A complete "Portable Source Relocation Request" application must be submitted to the Air Pollution Control Program prior to any relocation of this portable concrete plant.
 - 1) If the portable concrete plant is moving to a site previously permitted, and if the circumstances at the site have not changed, then the application must be received by the Air Pollution Control Program at least seven days prior to the relocation.
 - 2) If the portable concrete plant is moving to a new site, or if circumstances at the site have changed (e.g. the site was only permitted for solitary operation and now another plant is located at the site), then the application must be received by the Air Pollution Control Program at least 21 days prior to the relocation. The application must include written notification of any concurrently operating plants.
3. **Record Keeping Requirement**
Concrete Strategies, LLC shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
4. **Reporting Requirement**
Concrete Strategies, LLC shall report to the Air Pollution Control Program Compliance/Enforcement Section by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov, no later than 10 days after any exceedances of the limitations imposed by this permit.

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 (3)(E). "Conditions required by permitting authority."

PORT ID Number: PORT-0818

Site ID Number: 095-0405

Site Name: Bannister Complex

Site Address: East Bannister and Euclid, Kansas City, MO 64131

Site County: Jackson S21&28 T48N R33W

PORT ID Number: PORT-0818

Site Name: Amazon

Site Address: 996 Botts Road, Kansas City, MO 64147

Site County: Jackson S35 T47N R33W

1. **Best Management Practices Requirement**
Concrete Strategies, LLC shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing BMPs as defined in Attachment AA.
2. **Annual Emission Limit**
 - A. Concrete Strategies, LLC shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month rolling period from the entire installation which consists of the equipment listed in Table 1 in the Table Section of this permit. Concrete Strategies, LLC shall include all actual emissions in the limit including SSM emissions as well as any excess emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*.
 - B. Concrete Strategies, LLC shall demonstrate compliance with Special Condition 2.A using Attachment A for the Bannister site/Attachment B for the Botts Road site or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
3. **Moisture Content Testing Requirement**
 - A. Concrete Strategies, 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.

SITE SPECIFIC SPECIAL CONDITIONS:

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

- 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 Concrete Strategies, 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 is less than the moisture content in Special Condition 3.A, Concrete Strategies, LLC shall either:
 - 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. Plans may be sent by mail to P.O. Box 176, Jefferson City, MO 65102 or by email at aircompliancereporting@dnr.mo.gov. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.
 - G. In lieu of testing, Concrete Strategies, LLC may obtain test results that demonstrate compliance with the moisture content in Special Condition 3.A from the supplier of the aggregate.
4. Control Device Requirement-Baghouse
- A. Concrete Strategies, LLC shall control emissions from the equipment listed below using a baghouse as specified in the permit application.
 - 1) Cement Silo EU-3
 - 2) Supplement Silo EU-4
 - 3) Weigh Hopper EU-5
 - 4) Truck Mix Load-out (shroud vented to baghouse) EU-6
 - B. The baghouse 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.

SITE SPECIFIC SPECIAL CONDITIONS:

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

- C. Replacement filters for the baghouse 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. Concrete Strategies, LLC shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours when the associated equipment is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Concrete Strategies, LLC shall maintain a copy of the baghouse manufacturer's performance warranty on site.
 - F. Concrete Strategies, LLC shall maintain an operating and maintenance log for the baghouse 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 Requirement
Concrete Strategies, 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.
6. Reporting Requirement
Concrete Strategies, LLC shall report to the Air Pollution Control Program, Compliance / Enforcement Section by mail to P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after any exceedances of the limitations imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2020-07-021
Installation ID Number: PORT-0818
Permit Number: 092020-005

Concrete Strategies, LLC:
East Bannister and Euclid
Kansas City, MO 64131

Complete: July 20, 2020

Parent Company:
Concrete Strategies, LLC
2199 Innerbelt Business Center
St. Louis, MO 63114

Jackson County, S21&28 T48N R33W

PROJECT DESCRIPTION

Concrete Strategies, LLC will be building initially a new concrete batch plant near East Bannister and Euclid in Kansas City, Missouri in Jackson County. The concrete plant will then be moved to 996 Botts Road in Kansas City (Amazon). The new plant is a Vince Hagan HT-12400D-65/4 concrete batch plant, rated at 200 cubic yards per hour (402.4 tons per hour), manufactured in 2018, with Model VH-245JP silo top dust collectors for the two silos and a Model VH1083JP dust collector for controlling emissions from the truck loading. Also with the plant will be a Model VH-14 weigh batcher dust collector along with a 5MMBTU/hr Sioux Model M-5 propane-fired water heater. It is paired with a Hetzel Mixer Drum to make it a central mix plant. Power is supplied by Evergy.

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.

These installations are located in Jackson County but outside of the designated area for the 2010 SO₂ Standard; it is located in the attainment/unclassifiable 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 Concrete Strategies, LLC from the Air Pollution Control Program.

TABLES

Table 1: Concrete Plant Equipment List in Kansas City

Emission Point	Description	Bannister MHDR	Botts Road MHDR
EU-1	Aggregate Transfer	186.50 tph	186.50 tph
EU-2	Sand Transfer	142.80 tph	142.80 tph
EU-3	Cement Unloading to Silo	49.10 tph	49.10 tph
EU-4	Supplement Unloading	7.30 tph	7.30 tph
EU-5	Weigh Hopper	329.30 tph	329.30 tph
EU-6	Truck Loading (Central Mix/Cement and Supplement loading per AP-42)	56.40 tph	56.40 tph
EU-7a	Aggregate Storage Pile-Load in	186.50 tph	186.50 tph
EU-7b	Aggregate Storage Pile-Load out	186.50 tph	186.50 tph
EU-7c	Aggregate Storage Pile-Vehicular Activity	2.83 VMT	2.83 VMT
EU-7d	Aggregate Storage Pile-Wind Erosion	0.19 acre	0.19 acre
EU-8a	Sand Storage Pile-Load in	142.80 tph	142.80 tph
EU-8b	Sand Storage Pile-Load out	142.80 tph	142.80 tph
EU-8c	Sand Storage Pile-Vehicular Activity	2.16 VMT	2.16 VMT
EU-8d	Sand Storage Pile-Wind Erosion	0.19 acres	0.19 acres
EU-9	Haul #1 Raw Material	0.97 VMT/hr	3.41 VMT/hr
EU-10	Haul #2 Finished Product	1.90 VMT/hr	12.38 VMT/hr

The tables below summarize the emissions of this project at each location. The potential emissions of the process equipment, which excluded emissions from haul roads and wind erosion, are not site specific and should not vary from site to site. There are no existing actual emissions since this is a new port. 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 voluntary annual PM₁₀ de minimis emission limit to avoid dispersion modeling requirements found in 10 CSR 10-6.060 Section (5).

Table 2: Emissions Summary (tons per year) at the Bannister site in Kansas City

Air Pollutant	De Minimis Level/SMAL	^a Potential Emissions of Process Equipment	Existing Actual Emissions	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	10.51	N/A	60.23	39.51
PM ₁₀	15.0	5.32	N/A	22.87	<15.00
PM _{2.5}	10.0	1.92	N/A	5.59	3.67
SO _x	40.0	0.36	N/A	0.36	0.24
NO _x	40.0	3.13	N/A	3.13	2.05
VOC	40.0	0.24	N/A	0.24	0.16
CO	100.0	1.80	N/A	1.80	1.18
Total HAPs	25.0	0.0	N/A	0.0	0.0

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

^aExcludes site specific haul road and storage pile emissions

^bIncludes site specific haul road and storage pile emissions

Table 3: Emissions Summary (tons per year) at the Botts Road site in Kansas City

Air Pollutant	De Minimis Level/SMAL	^a Potential Emissions of Process Equipment	Existing Actual Emissions	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	10.51	N/A	119.18	44.40
PM ₁₀	15.0	5.32	N/A	40.26	<15.00
PM _{2.5}	10.0	1.92	N/A	10.12	3.77
SO _x	40.0	0.36	N/A	0.36	0.13
NO _x	40.0	3.13	N/A	3.13	1.17
VOC	40.0	0.24	N/A	0.24	0.09
CO	100.0	1.80	N/A	1.80	0.67
Total HAPs	25.0	0.0	N/A	0.0	0.0

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

^aExcludes site specific haul road and storage pile emissions

^bIncludes site specific haul road and storage pile emissions

EMISSIONS CALCULATIONS

Emissions for the project were calculated as described below and 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 concrete batch plant:

- Calculated using emission factors from AP-42 Section 11.12 “Concrete Batching,” June 2006.
- This section cites Equation (1) in Section 13.2.4 “Aggregate Handling and Storage Piles,” November 2006 for calculating the emissions from aggregate and sand transfer.
- The cement and supplement silos are controlled with baghouses, so the controlled emission factors were used.

Emissions from the aggregate weigh hopper and truck loading:

- Calculated using AP-42 Section 13.2.4, “Aggregate Handling and Storage Piles,” November 2006, Equation (1).
- The weigh hopper emissions are controlled by a baghouse so a 99% control factor was applied to the calculation.
- Emissions from mixer loading/mix truck loading are controlled by a shroud vented to a baghouse, so the controlled emission factor was used.

Emissions from haul roads and vehicular activity areas:

- 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 74% control efficiency for PM_{2.5} were applied to the emission calculations for the use of BMPs.

Emissions from storage piles:

- Load-in and load-out of storage piles were calculated using the predictive

equation from AP-42 Section 13.2.4 "Aggregate Handling and Storage Piles," November 2006.

- 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."

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are above/ conditioned to de minimis levels. Potential emissions of PM are above de minimis levels, but below major levels.

APPLICABLE REQUIREMENTS

Concrete Strategies, 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.
- 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

- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) 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*, 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 July 10, 2020, received July 14, 2020, designating Concrete Strategies, LLC as the owner and operator of the installation.

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 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 emissions 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.

APPENDIX A

Abbreviations and Acronyms

% percent	MMBtuMillion British thermal units
°F degrees Fahrenheit	MMCFmillion cubic feet
acfm actual cubic feet per minute	MSDSMaterial Safety Data Sheet
BACT Best Available Control Technology	NAAQSNational Ambient Air Quality Standards
BMPs Best Management Practices	NESHAPs ..National Emissions Standards for Hazardous Air Pollutants
Btu British thermal unit	NO_xnitrogen oxides
CAM Compliance Assurance Monitoring	NSPSNew Source Performance Standards
CAS Chemical Abstracts Service	NSRNew Source Review
CEMS Continuous Emission Monitor System	PMparticulate matter
CFR Code of Federal Regulations	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
CO carbon monoxide	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CO₂ carbon dioxide	ppmparts per million
CO_{2e} carbon dioxide equivalent	PSD Prevention of Significant Deterioration
COMS Continuous Opacity Monitoring System	PTEpotential to emit
CSR Code of State Regulations	RACTReasonable Available Control Technology
dscf dry standard cubic feet	RALRisk Assessment Level
EQ Emission Inventory Questionnaire	SCCSource Classification Code
EP Emission Point	scfmstandard cubic feet per minute
EPA Environmental Protection Agency	SDSSafety Data Sheet
EU Emission Unit	SICStandard Industrial Classification
fps feet per second	SIPState Implementation Plan
ft feet	SMALScreening Model Action Levels
GACT Generally Available Control Technology	SO_xsulfur oxides
GHG Greenhouse Gas	SO₂sulfur dioxide
gpm gallons per minute	SSMstartup, shutdown, & malfunction
gr grains	tphtons per hour
GWP Global Warming Potential	tpytons per year
HAP Hazardous Air Pollutant	VMT vehicle miles traveled
hr hour	VOC Volatile Organic Compound
hp horsepower	
lb pound	
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	
Mgal 1,000 gallons	
MW megawatt	
MHDR maximum hourly design rate	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

September 8, 2020

Joe Vitale
Chairman
Concrete Strategies, LLC
2199 Innerbelt Business Center
St. Louis, MO 63114

RE: New Source Review Permit - Project Number: 2020-07-021

Dear Joe Vitale:

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 and your new source review permit is necessary for continued compliance. In addition, please note that Concrete Strategies, LLC cannot operate with any other plants that have ambient impact limits based on the Air Pollution Control Program's nomographs. Please refer to the permits of any plant that you are operating with to see if their respective permits contain an ambient impact limit. 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,



Joe Vitale
Page Two

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.ao.mo.gov/ahc.

If you have any questions regarding this permit, 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

A handwritten signature in blue ink, appearing to read "S Heckenkamp".

Susan Heckenkamp
New Source Review Unit Chief

SH:kka

Enclosures

c: Kansas City Regional Office
PAMS File: 2020-07-021

Permit Number: 092020-005