

STATE OF MISSOURI

PERMIT BOOK



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: 122009-003

Project Number: 2009-08-064

Parent Company: Covington Quarry, Inc.

Parent Company Address: 2488 Highway N, Franklin, MO 63069

Installation Name: Covington Quarry

Installation ID: 071-0228

Installation Address: Hoven Road SC01, Pacific, MO 63069

Location Information: Franklin County, S1, T43N, R2E

Application for Authority to Construct was made for:

The installation of a new limestone crushing plant. 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.

DEC - 3 2009

EFFECTIVE DATE

A handwritten signature in black ink, appearing to read "James L. Kavanaugh".
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 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 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.

Page No.	3
Permit No.	
Project No.	2009-08-064

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**
Covington Quarry 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. **Ambient Air Impact Limitation**
 - A. Covington Quarry shall not cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for particulate matter less than ten microns in aerodynamic diameter (PM₁₀) of 150.0 µg/m³ 24-hour average in ambient air.
 - B. Covington Quarry 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. Covington Quarry shall account for the impacts from other sources of PM₁₀ as instructed in Attachment A.
3. **Annual Emission Limit**
 - A. Covington Quarry shall emit less than 40.0 tons of NO_x in any 12-month period from the entire installation.
 - B. Covington Quarry shall demonstrate compliance with special condition 3.A using Attachment B or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
4. **Wet Suppression Control System Requirement**
 - A. Covington Quarry shall install and operate wet spray devices on all crushers and screens.
 - B. Watering may be suspended during periods of freezing condition, when use of the wet spray devices may damage the equipment. During these conditions, Covington Quarry shall adjust the production rate to control emissions from these units. Covington Quarry shall record a brief description of such events.
5. **Minimum Distance to Property Boundary Requirement**
The primary emission point shall be located at least 250 feet from the nearest property boundary.

Page No.	4
Permit No.	
Project No.	2009-08-064

SITE SPECIFIC SPECIAL CONDITIONS:

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

6. Record Keeping Requirement
Covington Quarry shall maintain all records required by this permit for five years and make them available to any Missouri Department of Natural Resources personnel upon request.

7. Reporting Requirement
Covington Quarry 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 (5) REVIEW

Project Number: 2009-08-064
Installation ID Number: 071-0228
Permit Number:

Covington Quarry
Hoven Road SC01
Pacific, MO 63069

Complete: September 1, 2009

Parent Company:
Covington Quarry, Inc.
2488 Highway N
Franklin, MO 63069

Franklin County, S1, T43N, R2E

PROJECT DESCRIPTION

Covington Quarry, Inc. is installing a new limestone crushing plant in Franklin County. The maximum hourly design rate of the plant is 300 tons of limestone per hour. Covington Quarry, Inc. will be using wet spray devices on all the crushers and screens to control particulate matter less than ten microns in diameter (PM₁₀) emissions from their plant. There are no other plants currently located at the site and a basic operating permit will be needed because a New Source Performance Standard (NSPS) applies to the installation.

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 Franklin County, a nonattainment area for the 8-hour ozone standard and an attainment area for all other 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 Covington Quarry from the Air Pollution Control Program.

The table below summarizes the emissions of this project. 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 are based on a voluntary limit of 40.0 tons per year of NO_x to avoid refined modeling.

Table 1: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level	Existing Potential Emissions	Existing Actual Emissions	¹ Potential Emissions of the Application	² Conditioned Potential Emissions
PM ₁₀	15.0	N/A	N/A	20.72	8.47
SO _x	40.0	N/A	N/A	6.46	2.63
NO _x	40.0	N/A	N/A	98.26	<40.0
VOC	40.0	N/A	N/A	8.06	3.28
CO	100.0	N/A	N/A	21.71	8.62
Total HAPs	25.0	N/A	N/A	0.09	0.04

N/A = Not Applicable

¹Includes site specific haul road and storage pile emissions

²Conditioned Potential Emissions based on a voluntary limit of 40.0 tons of NO_x to avoid screen modeling. All other pollutants are proportionally reduced.

Table 2: Ambient Air Quality Impact Analysis

Pollutant	¹ NAAQS (µg/m ³)	Averaging Time	² Maximum Modeled Impact (µg/m ³)	Limited Impact (µg/m ³)	Background (µg/m ³)	³ Daily Limit (tons/day)
⁴ PM ₁₀ (same)	150.0	24-hour	443.12	130.0	20.0	3109
⁵ PM ₁₀ (separate)	150.0	24-hour	N/A	100.0	50.0	2423

¹National Ambient Air Quality Standards (NAAQS)

²Modeled impact at maximum capacity with controls

³Indirect limit based on compliance with NAAQS.

⁴Solitary operation or operation with other plants that are owned by Covington Quarry, Inc.

⁵Operation with other plants that are not owned by Covington Quarry, Inc.

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 equipment is control by water spray devices.

Emissions from the diesel engines/generators were calculated using emission factors from AP-42 Section 3.3 Gasoline and Diesel Industrial Engines,” October 1996.

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 is 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 0.7% 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 PM₁₀. 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. The AAQIA was performed using the Air Pollution Control Program's generic nomographs. 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). The distance from the plant to the nearest site boundary is 250 feet. When the plant operates continuously, the modeled concentration of PM₁₀ is greater than the NAAQS, so the plant's production was limited to ensure compliance with the NAAQS.

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.

OPERATING SCENARIOS

The plant is permitted to operate with other plants located at the site as long as the NAAQS is not exceeded. The following scenarios explain how Covington Quarry shall demonstrate compliance with the NAAQS.

- When plants that are owned by Covington Quarry, Inc. are located at the site, Covington Quarry, Inc. must calculate the daily impact of each plant and limit the total impact of all plants below the NAAQS.
- When plants that are not owned by Covington Quarry, Inc. are located at the site, Covington Quarry, Inc. must account for the impacts of these plants as a background concentration and add it to the total impact of all plants owned by Covington Quarry, Inc. that are operating at the site. This total is limited below the NAAQS. Covington Quarry, Inc. will limit the total impact of all plants they own and operate at the site to 100 µg/m³ when any plants they do not own are located at the site. Covington Quarry is not permitted to operate with any plant that is not owned by Covington Quarry, Inc. that has a separate owner limited impact greater than 30 µg/m³.

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 conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Covington Quarry 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110. The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- A Basic 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

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- 40 CFR 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" applies to the equipment.
- 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.
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260

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.

Gerad Fox
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 14, 2008, received August 28, 2009, designating Covington Quarry, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- St. Louis Regional Office Site Survey, dated September 9, 2009.

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 and volume of water application 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. Roger Gullet
President
Covington Quarry
2488 Highway N
Franklin, MO 63069

RE: New Source Review Permit - Project Number: 2009-08-064

Dear Mr. Gullet:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, 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.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox, at the Departments' 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

Kendall B. Hale
New Source Review Unit Chief

KBH:gfl

Enclosures

c: St. Louis Regional Office
PAMS File: 2009-08-064

Permit Number: