

**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: **082012-006**

Project Number: 2012-06-048  
Installation ID: PORT-0537

Parent Company: Hutchens Construction Company

Parent Company Address: 1007 Main Street, Cassville, MO 65625

Installation Name: Hutchens Construction Company

Installation Address: Old Highway 39, Shell Knob, MO 65747

Location Information: Barry County, S5, T22N, R25W

Application for Authority to Construct was made for:

Construction of one portable Astec counterflow drum mix 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.

AUG 10 2012

EFFECTIVE DATE

Handwritten signature of Kyril L. Moore in cursive.

DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

You must notify the Department's Air Pollution Control Program of the anticipated date of startup 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 startup 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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**GENERAL SPECIAL CONDITIONS:**

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

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*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. **Equipment Identification Requirement**  
Hutchens Construction Company 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.
2. **Relocation of Portable Asphalt Plant**
  - A. Hutchens Construction Company shall not be operated at any location longer than 24 consecutive months except if the Site Specific Special Conditions of this portable plant, PORT-0573, contain a nonroad engine requirement limiting the 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 asphalt plant.
    - 1) If the portable asphalt 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 asphalt 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**  
Hutchens Construction Company 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**  
Hutchens Construction Company 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.

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**SITE SPECIFIC SPECIAL CONDITIONS:**

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

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*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."*

PORT ID Number: PORT-0537

Site ID Number: 009-P034

Site Name: Shell Knob Quarry

Site Address: Old Highway 39 Shell Knob, MO 65747

Site County: Barry S5, T22N, R25W

1. **Best Management Practices Requirement**  
Hutchens Construction Company shall control fugitive emissions from all of the haul roads and vehicular activity areas at this site by performing Best Management Practices as defined in Attachment AA.
2. **Annual Emission Limit**
  - A. Hutchens Construction Company shall emit less than 10.0 tons of PM<sub>2.5</sub> in any 12-month period from the entire installation.
  - B. Hutchens Construction Company shall demonstrate compliance with Special Condition 2.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
3. **Moisture Content Testing Requirement**
  - A. Hutchens Construction Company shall verify that the moisture content of the processed rock is greater than or equal to 1.5 percent by weight.
  - B. Testing shall be conducted according to the method prescribed by the American Society for Testing Materials (ASTM) D-2216, C-566 or another method approved by the Director.
  - C. The initial test shall be conducted no later than 45 days after the start of operation. A second test shall be performed the calendar year following the initial test during the months of July or August.
  - D. The test samples shall be taken from rock that has been processed by the plant or from each source of aggregate (e.g. quarry).
  - E. The written analytical report shall include the raw data and moisture content of each sample, the test date and the original signature of the individual performing

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**SITE SPECIFIC SPECIAL CONDITIONS:**

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

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the test. The report shall be filed on-site or at the Hutchens Construction Company main office within 30 days of completion of the required test.

- F. If the moisture content of either of the two tests is less than the moisture content in special condition 3.A, another test may be performed within 15 days of the noncompliant test. If the results of that test also exceed the limit, Hutchens Construction Company 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 Air Pollution Control Program Compliance Assistance section within 10 days of the second noncompliant test. The wet spray devices shall be installed and operational within 40 days of the second noncompliant test.

- G. In lieu of testing, Hutchens Construction Company 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. Hutchens Construction Company shall control emissions from the drum dryer (EP-4) using a baghouse as specified in the permit application.
- 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 the Department of Natural Resources employees may easily observe them.
- 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. Hutchens Construction Company shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. If emission unit EP-4 (Drum Dryer) operates during a day (24-hour period), then a pressure drop reading must be recorded regardless of the length of time operating. If during the 24-hour period the emission unit EP-4 (Drum Dryer) does not operate, then Hutchens Construction Company can simply record no operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

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**SITE SPECIFIC SPECIAL CONDITIONS:**

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

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- E. Hutchens Construction Company 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. Fuel Requirement-Drum Dryer
  - A. Hutchens Construction Company shall exclusively burn diesel fuel in their drum dryer (EP-4) with a sulfur content less than or equal to 0.07 percent by weight.
  
  - B. Hutchens Construction Company shall exclusively burn diesel fuel with a ultra low sulfur content less than or equal to 0.0015 percent by weight in the asphalt heater (EP-7) and in their generator (EP-8).
  
  - C. Hutchens Construction Company shall demonstrate compliance with Special Condition 5.A and Special Condition 5.B by obtaining records of the fuel's sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040 *Reference Methods*.
  
  - D. Hutchens Construction Company shall keep the records required by Special Condition 5.C with the unit and make them available for Department of Natural Resources' employees upon request.
  
- 6. Minimum Distance to Property Boundary Requirement  
The primary emission point shall be located at least 546 feet from the nearest property boundary.
  
- 7. Record Keeping Requirement  
Hutchens Construction Company 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.
  
- 8. Reporting Requirement  
Hutchens Construction Company 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.
  
- 9. Non-Road Engine  
This portable plant cannot operate at this site longer than 12 consecutive months in order for the diesel engine to meet the definition of a non-road engine as stated in 40 CFR 89.2 (1)(i).

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**SITE SPECIFIC SPECIAL CONDITIONS:**

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

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- 10. Operating Scenario  
Hutchens Construction Company is only permitted to operate with PORT-0510 and PORT-0577, which are both owned by Hutchens Construction Company.

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

Project Number: 2012-06-048

Installation ID Number: PORT-0537

Permit Number:

Hutchens Construction Company  
Old Highway 39  
Shell Knob, MO 65747

Complete: June 15, 2012

Parent Company:  
Hutchens Construction Company  
1007 Main Street  
Cassville, MO 65625

Barry County, S5, T22N, R25W

PROJECT DESCRIPTION

Hutchens Construction Company proposes to locate its portable asphalt plant (PORT-0537) to Shell Knob Quarry in Barry County. The drum mix asphalt plant is rated at 200 tons of hot mix asphalt production per hour. The drum dryer burner (EP4) is rated at 80 million British thermal units per hour (MMBtu/hr) heat input and is fueled by waste oil not exceeding 0.07% sulfur by weight. Emissions from the drum dryer are controlled by a baghouse. The asphalt plant is powered by a Caterpillar 250 kilowatt output Model 3406 rated at 310 horsepower (EP8). Hutchens Construction Company states that the engine meets the definition of non-road engine as defined in 40 CFR 89.2 (1)(i). Therefore, the emissions of the engine were not included. The asphalt plant is equipped with a recycled asphalt pavement (RAP) crusher with a maximum hourly design rate (MHDR) of 78 tons per hour. 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.

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.

The portable plant is moving to this site to complete highway project MoDOT Job # J8S2350, J8S2351, J8S2352, and J8S2353.

The portable plant is locating to Shell Knob Quarry, and two other portable plants (PORT-0577 and PORT-0510) are located at this site.

This installation is located in Barry County, attainment status.

This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

## TABLES

The following permits have been issued to Hutchens Construction Company from the Air Pollution Control Program for PORT-0537.

Table 1: Permit History

Permit Number	Description
112005-010	Asphalt - electrosab

Permit 112005-010 had been issued to Hutchens Construction Company from the Air Pollution Control Program for PORT-0537. The portable plant was moved to Arkansas and operated there. PORT-0537 never operated in Missouri, therefore a new permit is required since five years have lapsed since the Permit 112005-010 was issued.

Table 2 summarizes the emissions of this project. The potential emissions of the process equipment, which excluded emissions from haul roads and wind erosion, are site specific should not vary from site to site. There are no existing actual emissions since this is a new plant. 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 is based on limits to production to ensure compliance with the annual emission limit.

Table 2: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	<sup>a</sup> Potential Emissions of Process Equipment (tons/yr)	Existing Actual Emissions (N/A EIQ)	<sup>b</sup> Potential Emissions including fugitives (tons/yr)	<sup>c</sup> Conditioned Potential Emissions
PM	25.0	31.27	N/A	112.50	33.89
PM <sub>10</sub>	15.0	21.76	N/A	47.85	14.41
PM <sub>2.5</sub>	10.0	20.59	N/A	33.20	<10.0
SO <sub>x</sub>	40.0	13.43	N/A	13.43	4.04
NO <sub>x</sub>	40.0	50.43	N/A	50.43	15.19
VOC	40.0	42.17	N/A	42.17	12.70
CO	100.0	116.66	N/A	116.66	35.14
Formaldehyde	10.0/2.0 <sup>d</sup>	2.80	N/A	2.80	0.84
2-methylnapthalene <sup>e</sup>	10.0/0.01 <sup>d</sup>	0.15	N/A	0.15	0.04
Lead Compounds	10.0/0.01 <sup>d</sup>	0.01	N/A	0.01	0.0040
Total HAPs	25.0	9.01	N/A	9.01	2.71

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

<sup>a</sup>Excludes haul roads and storage piles emissions

<sup>b</sup>Includes site specific haul road and storage pile emissions

<sup>c</sup>Conditioned limit based on compliance with de minimis levels for PM<sub>2.5</sub>

<sup>d</sup>Screening Model Action Level (SMAL)

<sup>e</sup>2-methylnapthalene is a member of the Polycyclic Organic Matter (POM) HAP group.

Table 3 summarizes the ambient air quality impact analysis. The maximum modeled impact is the impact of each pollutant when the plant is operating continuously. The 24-hour limited impacts and daily limit are based on compliance with the NAAQS for PM<sub>10</sub>. The annual limited impacts for 2-methylnapthalene (C<sub>11</sub>H<sub>10</sub>) are based on the annual PM<sub>2.5</sub> emission limit.

Table 3: Ambient Air Quality Impact Analysis

Pollutant	<sup>a</sup> NAAQS/RAL (µg/m <sup>3</sup> )	Averaging Time	<sup>b</sup> Maximum Modeled Impact (µg/m <sup>3</sup> )	Limited Impact (µg/m <sup>3</sup> )	Background (µg/m <sup>3</sup> )	<sup>c</sup> Daily Limit (tons/day)
<sup>d</sup> PM <sub>10</sub> (same)	150.0	24-hour	31.71	N/A	20.0	N/A
2-methylnaphthalene	23	24-hour	0.04	N/A	N/A	N/A
2-methylnaphthalene <sup>f</sup>	2.3 <sup>e</sup>	Annual	0.0024	N/A	N/A	N/A

<sup>a</sup>National Ambient Air Quality Standards (NAAQS) and Risk Assessment Level (RAL)

<sup>b</sup>Modeled impact at maximum capacity with controls

<sup>c</sup>Indirect limit based on compliance with NAAQS.

<sup>d</sup>Solitary operation or operation with other plants that are owned by Hutchens Construction Company

<sup>e</sup>Annual standard is 10 times the annual RAL

<sup>f</sup>2-methylnaphthalene is a member of the polycyclic organic matter (POM) HAP group.

The plant's drum dryer (EP-4) and asphalt heater (EP-7) were modeled using the AERSCREEN screen modeling software. The generator (EP-8) was not modeled since it meets the definition of a non-road engine. The stack characteristic entered into the modeled are listed in Table 3.

Table 4: AERSCREEN Input Parameters

Equipment Description	Stack Height (m)	Stack Inside Diameter (m)	Stack Gas Exit Velocity (m/s)	Stack Gas Exit Temperature (K)	Dispersion Coefficient
Drum Dryer (EP4)	13.41	1.52	15.48	436.0	Rural
Asphalt Heater (EP7)	3.66	0.28	460.51	395.26	Rural

## 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 drum mix asphalt plant were calculated using emission factors from AP-42, Section 11.1 "Hot Mix Asphalt Plants," April 2004.
- Sulfur oxide (SO<sub>x</sub>) emissions were calculated using the SO<sub>2</sub> and SO<sub>3</sub> emission factors from AP-42, Section 1.3 "Fuel Oil Combustion," September 1998 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 PM, PM<sub>10</sub>, and PM<sub>2.5</sub> 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 1.3.
- 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 controlled emission factors were used because the inherent moisture content of the crushed rock is greater than 1.5% by weight.
- Emissions of the engine were not included because Hutchens Construction Company states that the engine meets the definition of non-road engine as defined in 40 CFR 89.2 (1)(i).
- PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from haul roads and vehicular activity areas were calculated using the predictive equation from AP-42, Section 13.2.2 “Unpaved Roads,” November 2006. A 90% control efficiency for PM and PM<sub>10</sub> and a 40% control efficiency for PM<sub>2.5</sub> are applied to the emission calculations for the use of BMPs. PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from 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% weight. PM, PM<sub>10</sub>, and PM<sub>2.5</sub> 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.”

VOC emissions are expected from the six asphalt oil storage tanks. Based on VOC storage tank emission calculations done for previous projects, VOC emissions from these asphalt oil tanks are not expected to cause an exceedance of the VOC de minimis levels for this project, therefore they were not evaluated.

### AMBIENT AIR QUALITY IMPACT ANALYSIS

An ambient air quality impact analysis (AAQIA) was performed to determine the impact of the pollutants listed in Table 3. The Air Pollution Control Program requires an AAQIA of PM<sub>10</sub> for all asphalt, concrete and rock-crushing plants regardless of the level of PM<sub>10</sub> emissions if a permit is required. An AAQIA is required for other pollutants if their emissions exceed their respective de minimis or screening model action level (SMAL). The AAQIA was performed using the Air Pollution Control Program’s generic nomographs and when appropriate the EPA modeling software SCREEN3. For each pollutant that was modeled, the maximum concentration that occurs at or beyond the site boundary was compared to the National Ambient Air Quality Standard (NAAQS) or Risk Assessment Level (RAL) for the pollutant. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS or RAL, the plant’s production is limited to ensure compliance with the standard. In cases where the plant is providing material for a highway project, the ambient impact is evaluated in

accordance with a memorandum issued by the Air Pollution Control Program titled "Permitting Asphalt/Concrete Plants for Temporary Highway Projects," dated April 10, 2000. This memorandum states that air quality should be analyzed at the nearest residence or location where the public could reasonably be expected to be found instead of all ambient air. This practice generally allows for a less restrictive daily production level while protecting the public.

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  $20 \mu\text{g}/\text{m}^3$  of  $\text{PM}_{10}$  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 Hutchens Construction Company shall demonstrate compliance with the NAAQS.

- When no other plants are located, no record keeping is required for solitary operation.
- When plants, PORT-0510 (Permit 102004-006) and PORT-0577 (Permit 102007-010B) that are owned by Hutchens Construction Company, which are referred to as same owner plants, are located at the site, the total maximum ambient impact for all three portables will be  $68.70 \mu\text{g}/\text{m}^3$  and therefore will not exceed the  $130 \mu\text{g}/\text{m}^3$  threshold. No record keeping will be required. If Hutchens Construction Company wants to move another plant not mentioned in this permit to the site, a new permit review will be required.

### PERMIT RULE APPLICABILITY

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of  $\text{PM}_{2.5}$  are conditioned below the de minimis level, and indirectly conditioned particulate matter (PM) remains above de minimis level.

### APPLICABLE REQUIREMENTS

Hutchens Construction Company 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.

- *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.
- 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 (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Kathy Kolb  
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, dated June 15, 2012, received June 15, 2012, designating Hutchens Construction Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.



## Attachment AA: Best Management Practices

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

1. Pavement
  - A. The operator shall pave the area with materials such as asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions<sup>1</sup> 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

<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.)

Mr. Phil Hutchens  
President  
Hutchens Construction Company  
1007 Main Street  
Cassville, MO 65625

Project Number: 2012-06-048; Installation Number: PORT-0537  
RE: New Source Review Permit - Project Number: 2012-06-048

Dear Mr. Hutchens:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions 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

Susan Heckenkamp  
New Source Review Unit Chief

SH:kk1

Enclosures

c: Southwest Regional Office  
PAMS File: 2012-06-048

Permit Number: