



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: 092015-012 Project Number: 2015-06-012
Installation Number: 157-0046

Parent Company: Rollet Bros. Logistics, Inc.
Parent Company Address: 227 Highway M, Perryville, MO 63775
Installation Name: Rollet Bros. Logistics, Inc.
Installation Address: 227 Highway M, Perryville, MO 63775
Location Information: Perry County (S33, T36N, R10E)

Application for Authority to Construct was made for:
The installation of three silos, three augers, a mixer, and associated conveyors. 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.

Ryan Schott
Prepared by
Ryan Schott
New Source Review Unit

Kyra L Moore
Director or Designee
Department of Natural Resources

SEP 22 2015

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 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 these air contaminant sources. 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 these air contaminant sources.

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 sources(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.

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."

Rollet Bros. Logistics, Inc.
Perry County (S33, T36N, R10E)

1. Haul Road Watering
 - A. Rollet Bros. Logistics, Inc. shall water haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.
 - B. Watering may 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.
2. Control Device Requirement – Baghouse
 - A. Rollet Bros. Logistics, Inc. shall control emissions from the following equipment using baghouses as specified in the permit application:
 - 1) EP-01 Silo #1 Unloading
 - 2) EP-02 Silo #2 Unloading
 - 3) EP-03 Silo #3 Unloading
 - 4) EP-07 Mixer
 - B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouses shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Rollet Bros. Logistics, Inc. shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours while the plant is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Rollet Bros. Logistics, Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.

SPECIAL CONDITIONS:

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

- F. Rollet Bros. Logistics, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

- 3. Record Keeping and Reporting Requirements
 - A. Rollet Bros. Logistics, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

 - B. Rollet Bros. Logistics, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2015-06-012
Installation ID Number: 157-0046
Permit Number:

Installation Address:

Rollet Bros. Logistics, Inc.
227 Highway M
Perryville, MO 63775
Perry County (S33, T36N, R10E)

Parent Company:

Rollet Bros. Logistics, Inc.
227 Highway M
Perryville, MO 63775

REVIEW SUMMARY

- Rollet Bros. Logistics, Inc. has applied for authority to install three silos, three augers, a mixer, and associated conveyors.
- The application was deemed complete on June 16, 2015.
- HAP emissions are not expected from the proposed equipment.
- 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*, applies to the equipment.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Baghouses are being used to control PM, PM₁₀, and PM_{2.5} emissions.
- 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.
- This installation is located in Perry County, an attainment 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.
- Emissions testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION/ PROJECT DESCRIPTION

Rollet Bros. Logistics, Inc. is proposing to construct a new facility in Perry County, Missouri. Equipment to be installed includes three silos (EP-01, EP-02, EP03), three augers (EP-04, EP-05, EP06), a mixer (EP-07), associated conveyors (EP-08) and an associated haul road (EP-09). The project consists of blending ground dolomitic lime, standard quicklime, and crystalline silica quartz together and loading the product onto a pneumatic trailer. The product will be 15.38% ground dolomitic lime, 61.53% standard quicklime, and 23.08% crystalline silica quartz. The mixer can blend 5 tons at a time, so it will take five mixer loads to fill one pneumatic trailer with a capacity of 25 tons. The maximum design rate of the mixer is 13.7 tons per hour, and this will serve as the bottleneck for the process.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition, Section 11.12, *Concrete Batching* (June 2006). Emission factors from this section most adequately represent the process emissions from the hauling, loading/ unloading, storing, and mixing of ground/ granular material. The baghouses were given control efficiencies of 99% for PM, PM₁₀, and PM_{2.5}.

Emissions from haul roads were calculated using the predictive equation from AP-42 Section 13.2.2 *Unpaved Roads* (November 2006). A 50% control efficiency for PM and PM₁₀, and a 22% control efficiency for PM_{2.5} were applied to the emission calculations for watering the haul roads.

The following table provides an emissions summary for this project. This is a new facility, so there are no existing potential or actual emissions. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year). The new installation conditioned potential takes into consideration the use of baghouses and haul road watering.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/A	N/A	94.17	9.17
PM ₁₀	15.0	N/A	N/A	42.27	2.91
PM _{2.5}	10.0	N/A	N/A	38.36	1.07
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	N/A	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0 / 25.0	N/A	N/A	N/A	N/A

N/A = Not Applicable

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

Rollet Bros. Logistics, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. 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
- *Operating Permits*, 10 CSR 10-6.065
- *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
- *New Source Performance Regulations*, 10 CSR 10-6.070
 - *Standards of Performance for Nonmetallic Mineral Processing Plants*, 40 CFR Part 60, Subpart OOO

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 recommend 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 May 29, 2015, received June 3, 2015, designating Rollet Bros. Logistics, Inc. as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Mr. Michael Rollet
President
Rollet Bros. Logistics, Inc.
P.O. Box 31
Perryville, MO 63775

RE: New Source Review Permit - Project Number: 2015-06-012

Dear Mr. Rollet:

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

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, Missouri 65102, www.oa.mo.gov/ahc. If you have any questions regarding this permit contact Ryan Schott, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:rs1

Enclosures

c: Southeast Regional Office
PAMS File: 2015-06-012
Permit Number: