



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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MAR 17 2016

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

RE: New Source Review Permit Amendment - Permit Number: 092015-012A
Project Number: 2015-12-046; Installation Number: 157-0046

Dear Mr. Rollet:

The Missouri Department of Natural Resources' Air Pollution Control Program recently received your request to amend Construction Permit 092015-012 for your aggregate blending and transportation facility in Perry County (S33, T36N, R10E). Your permit was amended to account for minor changes to equipment arrangement and process flow.

Rollet Bros. Logistics, Inc. currently has three silos (EP-01, EP-02 & EP-03) whose contents are transported by auger into a mixer (EP-07). All three silos are controlled by baghouses. Rollet Bros. Logistics, Inc. is proposing to no longer have the silos auger directly into the mixer; instead, a 12 yard batcher will be added to Silo #1. Silo #1 will gravity feed to the batcher, while Silo #2 & Silo #3's augers will connect to the new batcher. Each batch is then weighed before being gravity fed to the mixer. The mixer will still serve as the process bottleneck at 13.7 tons per hour, but now 8 batches will be loaded into each trailer, instead of the originally permitted 5 batches per trailer. Also, Silo #2 and Silo #3 will now be connected to the same baghouse as Silo #1.

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 baghouse was given a control efficiency 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 addition of the batcher and the rearrangement of the other equipment will not allow for any debottlenecking or increase in design rate. Consolidating all three silos' exhaust into one baghouse will not change the control efficiency or operation of the control device. An updated summary of emissions is listed in the table below.

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	94.58	9.58
PM ₁₀	15.0	N/A	N/A	42.47	3.10
PM _{2.5}	10.0	N/A	N/A	38.56	1.27
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

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, Room 640, 301 W. High Street, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Ryan Schott, 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



Kendall B. Hale
Permits Section Chief

KBH:rsf

Enclosures

c: Southeast Regional Office
PAMS File: 2015-12-046

Page No.	3
Permit No.	092015-012A
Project No.	2015-12-046

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. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the Construction Permit 092015-012, previously issued by the Air Pollution Control Program.
2. **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 suspending when the ground is frozen, during periods of freezing conditions where watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads.
3. **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).

Page No.	4
Permit No.	092015-012A
Project No.	2015-12-046

SPECIAL CONDITIONS:

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

- 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 manufacturer's performance warranty on site.
 - 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.
4. **Record Keeping Requirements**
Rollet Bros. Logistics, Inc. shall maintain all records required by this permit for no less than five years and shall make them available to any Department of Natural Resources' personnel upon request.