



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

MAR 27 2020

Tina Trosper
Office Manager
Trager Limestone LLC (G2 Location)
9005 NE Des Moines Rd.
Hamilton, MO 64644

RE: New Source Review Permit - Project Number: 2020-01-041
Project Number: 2020-01-041; Installation Number: 061-0024

Dear Tina Trosper:

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 application are necessary for continued compliance. In addition, please note that Trager Limestone LLC (G2 Location) 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,

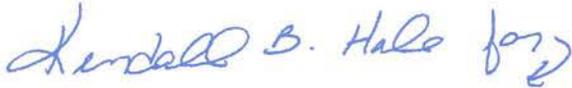
Tina Trosper
Page Two

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.aa.mo.gov/ahc.

If you have any questions, please do not hesitate to contact Chad Stephenson, 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



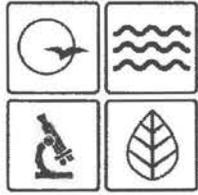
Susan Heckenkamp
New Source Review Unit Chief

SH:scj

Enclosures

c: Northeast Regional Office
PAMS File: 2020-01-041

Permit Number: **032020-008**



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: **032020-008**

Project Number: 2020-01-041
Installation ID: 061-0024

Parent Company: Trager Limestone, LLC

Parent Company Address: 6468 Hwy Y, PO Box 677, Chillicothe, MO 64601

Installation Name: Trager Limestone LLC (G2 Location)

Installation Address: 23297 Otter Ave, Gallatin, MO 64640

Location Information: Daviess County, S8 T59N R27W

Application for Authority to Construct was made for:

An existing stationary rock 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.

Kendall B. Hale for

Director or Designee
Department of Natural Resources

MAR 27 2020

Effective Date



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:

Project Number: 2020-01-041

Installation ID: 061-0024

Parent Company: Trager Limestone, LLC

Parent Company Address: 6468 Hwy Y, PO Box 677, Chillicothe, MO 64601

Installation Name: Trager Limestone LLC (G2 Location)

Installation Address: 23297 Otter Ave, Gallatin, MO 64640

Location Information: Daviess County, S8 T59N R27W

Application for Authority to Construct was made for:

An existing stationary rock 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.

Director or Designee
Department of Natural Resources

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/>

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."

1. Generic Plant Designation and Maximum Combined Hourly Design Rate
Trager Limestone LLC (G2 Location) has been designated to be a Generic Plant Operation. The combined MHDR of each of the following generic equipment types shall not exceed the rates and numbers listed in Table 1.

Table 1: Generic Equipment

Equipment Type	New or Existing	MHDR	Maximum Number of Units
Primary Unit(s) (Primary Crusher)	Existing	200 tons per hour	1
Secondary Crusher	Existing	200 tons per hour	1
Conveyor(s), Stacker(s)	Existing	2,000 tons per hour	10
Primary Screen	Existing	200 tons per hour	1
Diesel Generator	New	1,120 horsepower	1

2. Generic Plant Equipment Identification Requirement
 - A. Trager Limestone LLC (G2 Location) shall submit the following information to the Air Pollution Control Program's Permitting Section and the Northeast Regional Office within 15 days of actual startup.
 - 1) A master list of all equipment that will be permitted for use with the generic plant. This master list shall include at minimum the following information for each piece of equipment:
 - a) Manufacturer's name
 - b) Model number
 - c) Serial number
 - d) Actual MHDR
 - e) Date of manufacture
 - f) Any other additional information that is necessary to uniquely identify the equipment.
 - 2) A list of the core equipment that will always be utilized with the generic plant. The core equipment associated with the generic plant shall include at least one primary unit that controls the rate of the process flow (e.g., a primary crusher or primary screen).
 - 3) A determination of the applicability of 40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" for

SPECIAL CONDITIONS:

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

- each piece of equipment indicating whether each piece of equipment is subject to Subpart OOO and justification for this determination.
- 4) Trager Limestone LLC (G2 Location) shall notify the Air Pollution Control Program's Permitting Section and the Northeast Regional Office when new equipment is added to the master list and when core equipment is changed within 30 days of the change.
 - B. Trager Limestone LLC (G2 Location) shall maintain a list of the specific equipment currently being utilized with the generic plant. Any arrangement of the generic plant's equipment must be such that the core equipment is not bypassed in the process flow.
3. Undocumented Watering
Trager Limestone LLC (G2 Location) shall apply a water spray on all haul roads and vehicular activity areas whenever conditions exist that would allow visible emissions from these sources to leave the property.
 4. Annual Emission Limit
 - A. Trager Limestone LLC (G2 Location) shall emit less than 15.0 tons of PM₁₀ in any 12-month period from the entire installation which consists of the emission points listed in Table 2. The SSM 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* shall be included in the limit.

Table 2: Equipment List

Emission Point	Equipment List	True MHDR
EP-01	Loading Into crusher/grizzly	200 tph
EP-02	Primary Crusher	200 tph
EP-03 to EP-12	10 Conveyors	2,000 tph
EP-13	Secondary Crusher	200 tph
EP-14	Screening Unit	200 tph
EP-15a	Load-In Stockpile	200 tph
EP-15b	Load-out Stockpile	200 tph
EP-15c	Vehicular Activity (unpaved 175 feet)	1.47 VMT/hr
EP-15d	Wind Erosion	1.5 acres
EP-16	Haul Road from pit (unpaved 1,200 feet)	3.64 VMT/hr
EP-17	Haul Road to highway (unpaved 1,350 feet)	4.26 VMT/hr
EP-18	Diesel Generator	1,120 hp

SPECIAL CONDITIONS:

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

- B. Trager Limestone LLC (G2 Location) shall demonstrate compliance with Special Condition 4.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.
- 5. **Primary Equipment Requirement**
Trager Limestone LLC (G2 Location) shall process all rock through the primary crusher (EP-02). Bypassing the primary crusher is prohibited.
- 6. **Concurrent Operation Requirement**
Trager Limestone LLC (G2 Location) cannot operate with any other plants that have ambient impact limits based on the Air Pollution Control Program's nomographs. When other plants locate to the site, please refer to the special conditions of that plant's permit.
- 7. **Fuel Requirement-Diesel Generator**
 - A. Trager Limestone LLC (G2 Location) shall burn exclusively ultra low sulfur diesel in the diesel generator (EP-18) with a sulfur content less than or equal to 15 parts per million by weight (15 ppm).
 - B. Trager Limestone LLC (G2 Location) shall demonstrate compliance with Special Condition 7.A 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*.
 - C. Trager Limestone LLC (G2 Location) shall keep the records required by Special Condition 7.B with the unit and make them available for Department of Natural Resources' employees upon request.
- 8. Trager Limestone LLC (G2 Location) shall only operate its diesel engine (EP-18) to power equipment during production.
- 9. **Record Keeping Requirement**
Trager Limestone LLC (G2 Location) 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.
- 10. **Reporting Requirement**
Trager Limestone LLC (G2 Location) 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: 2020-01-041
Installation ID Number: 061-0024
Permit Number:

Trager Limestone LLC (G2 Location):
23297 Otter Ave
Gallatin, MO 64640

Complete: January 30, 2020

Parent Company:
Trager Limestone, LLC
6468 Hwy Y PO Box 677
Chillicothe, MO 64601

Daviess County, S8 T59N R27W

PROJECT DESCRIPTION

Trager Limestone LLC (G2 Location) has established a stationary rock crushing operation at 23297 Otter Ave, Gallatin, MO 64640. This permit is part of a remedial action by the Air Pollution Control Program to permit the equipment on site. The site has previously consisted of rock crushing operation and various portable asphalt plants owned by APAC – Grand River Quarry. All plants that have previously operated at this site were removed prior to Trager Limestone LLC establishing a stationary rock crushing operation with new equipment.

The stationary plant will be a generic rock crushing plant consisting of a primary crusher, secondary crusher, one screens, ten conveyors, and a 1,120 horsepower diesel generator. The maximum hourly design rate (MHDR) of the primary emission unit (primary crusher, EP-02) is 200 tons per hour. There will be one haul road approximately 1,200 feet long from the pit to the plant and customer haul road approximately 1,350 feet. Up to 1.5 acres of storage piles is expected. The plant will be powered with a diesel generator.

The applicant is using undocumented watering to control emissions from haul roads and vehicular activity areas.

This installation is located in Daviess County, an attainment/unclassifiable 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.

TABLES

The following is a list of stationary plants that have been issued for the address 23297 Otter Ave, Gallatin, MO 64640 from the Air Pollution Control Program. None of the plants described in the permits below remain at the site.

Table 3: Permit History

Permit Number	Description
0592-018	Stationary Rock Crushing Plant
032005-016	Quarry-electrosub
032005-016A	Concurrent operations

The table below summarizes the emissions of this project. The potential emissions of the process equipment exclude emissions from haul roads and wind erosion. No existing actual emissions were available since this is a newly permitted 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 include emissions from sources that will limit their production to ensure compliance with the annual PM₁₀ emission limit.

Table 4: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	^a Potential Emissions of Process Equipment	^b Potential Emissions of the Application	Conditioned Potential Emissions
PM	25.0	62.00	372.72	44.86
PM ₁₀	15.0	25.20	124.63	<15.0
PM _{2.5}	10.0	7.63	20.08	2.42
SO _x	40.0	0.05	0.05	0.01
NO _x	40.0	74.19	74.19	8.93
VOC	40.0	10.48	10.48	1.26
CO	100.0	91.93	91.93	11.06
Total HAPs	25.0	0.05	0.05	0.01

N/D = Not Determined

^aExcludes haul road and storage pile emissions

^bIncludes haul road and storage pile emissions

EMISSIONS CALCULATIONS

Emissions from the rock-crushing equipment:

- Calculated using emission factors from AP-42 Section 11.19.2 "Crushed Stone Processing and Pulverized Mineral Processing," August 2004.
- The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5 % by weight.

Emissions from aggregate handling:

- Calculated using emission factors from AP-42 Section 11.19.2 “Crushed Stone Processing and Pulverized Mineral Processing,” August 2004.
- The uncontrolled emission factors were used because the inherent moisture content of the crushed rock is less than 1.5% by weight.

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 50% control efficiency for PM and PM₁₀ and a 41% control efficiency for PM_{2.5} were applied to the emission calculations for the use of undocumented watering.

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 0.7% 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.”

Emissions from the diesel engines/generators:

- Calculated using emission factors from AP-42 Section 3.4 “Large Stationary Diesel and All Stationary Dual-fuel Engines,” October 1996.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with the annual PM₁₀ emission limit of 15.0 tons per year for stationary plants in order to avoid refined modeling. Potential emissions of PM are above de minimis but below major source levels. There are no modeling requirements for PM.

APPLICABLE REQUIREMENTS

Trager Limestone LLC (G2 Location) 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.
- *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

- 40 CFR Part 63 Subpart ZZZZ, “National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” applies to the diesel engine.
- 40 CFR 60 Subpart IIII, “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines”
- 40 CFR Part 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.
- *Control of Sulfur Dioxide Emissions*, 10 CSR 10-6.261. The rock crushing plant complies with 10 CSR 10-6.261 (3)(C) because it burns exclusively ultra-low sulfur diesel with a sulfur content of 15 ppm in its generator.

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 March 7, 2019, received January 28, 2020, designating Trager Limestone, LLC as the owner and operator of the installation.

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	SDS Safety 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	VMTvehicle 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	