



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: 062012-007

Project Number: 2012-02-061

Installation ID: 051-0083

Parent Company: Wolfe Construction

Parent Company Address: P.O. Box 6007, Fulton, MO 65251

Installation Name: Wolfe Construction

Installation Address: 5007 Buffalo Road, Jefferson City, MO 65101

Location Information: Cole County, S4, T43N, R12W

Application for Authority to Construct was made for:

Stationary installation for filling volumetric concrete trucks using cement, aggregate, and sand transfer and associated activities. 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.

JUN 21 2012

EFFECTIVE DATE


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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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**
Wolfe Construction 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. **Control Device Requirement-Baghouse**
 - A. Wolfe Construction shall control emissions from the cement receiving into the silo (EU-01) using a baghouse as specified in the permit application.
 - B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept on site. 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. Wolfe Construction shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty, which shall be kept on site.
 - E. Wolfe Construction shall maintain an operating and maintenance log for the baghouse 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. **Control Device Requirement-Boot**
Wolfe Construction shall control emissions from cement loading from the silo to the truck (EU-02) using a flexible boot (i.e. enclosed sleeve) connected between the silo and truck as specified in the permit application.

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SITE SPECIFIC SPECIAL CONDITIONS:

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

4. **Minimum Distance to Property Boundary Requirement**
The cement silo shall be located at least 50 feet from the nearest property boundary.
5. **Concurrent Operation Restriction**
Wolfe Construction is prohibited from operating whenever other plants are located at the site.
6. **Record Keeping Requirement**
Wolfe Construction 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.
7. **Reporting Requirement**
Wolfe Construction 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 exceedance of a limitations imposed by this permit.

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

Project Number: 2012-02-061
Installation ID Number: 051-0083
Permit Number:

Wolfe Construction
5007 Buffalo Road
Jefferson City, MO 65101

Complete: February 21, 2012

Parent Company:
Wolfe Construction
P.O. Box 6007
Fulton, MO 65251

Cole County, S4, T43N, R12W

PROJECT DESCRIPTION

Wolfe Construction proposes to construct a stationary volumetric concrete truck filling installation near Jefferson City. Unlike a traditional central or truck mix concrete plant, this installation will not have a weigh hopper or one central concrete truck loading point. Cement, aggregate, sand, and water will be separately held in the volumetric concrete truck. The installation will pneumatically receive cement to an elevated silo (EU-01) and receive aggregate and sand to storage piles (EU-03 and EU-04, respectively). Cement will be gravity loaded from the silo into volumetric concrete trucks (EU-02). A front end loader will drop aggregate and sand into the trucks. Filled trucks will exit the installation and return empty. The production rate of the installation is dependent upon the cement receiving rate of 94 pounds per 28.5 seconds, for approximately 6 tons of cement, or 42.4 tons of concrete per hour. The cement silo is equipped with baghouse control for cement receiving and a rubber boot for truck filling. The installation is powered by grid electricity. No other plants are located at the site.

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 Cole 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. No permits have been issued to Wolfe Construction from the Air Pollution Control Program.

TABLES

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 (8,760 hours per year). For this review, the conditioned potential emissions are based upon control device requirements.

Table 1: Emissions Summary (tons per year)

Air Pollutant	De Minimis Level/SMAL	Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	Conditioned Potential Emissions of the Installation
PM	25.0	N/A	N/A	44.82	10.41
PM ₁₀	15.0	N/A	N/A	12.82	2.47
PM _{2.5}	10.0	N/A	N/A	8.05	1.33
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
Total HAPs	25.0	N/A	N/A	N/A	N/A

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

Table 2: Ambient Air Quality Impact Analysis

Pollutant	NAAQS (µg/m ³)	Averaging Time	^a Maximum Modeled Impact (µg/m ³)	Limited Impact (µg/m ³)	Background (µg/m ³)	^b Daily Limit (tons/day)
PM ₁₀	150.0	24-hour	127.61	N/A	20.0	N/A

^aModeled impact at maximum capacity with controls.

^bIndirect limit based on compliance with NAAQS.

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 plant were calculated using emission factors from AP-42 Section 11.12 *Concrete Batching*, June 2006. This section cites Equation (1) in Section 13.2.4 *Aggregate Handling and Storage Piles*, November 2006 for calculating the emissions from aggregate and sand transfer. The cement silo receiving is controlled with a baghouse, so the controlled emission factors were used. Cement transfer from the silo to the truck is controlled by a rubber boot, which was assigned 90 percent control using engineering judgment.

Emissions from haul roads and vehicular activity areas were calculated using the predictive equations from AP-42 Section 13.2.2 *Unpaved Roads*, November 2006 and Section 13.2.1 *Paved Roads*, January 2011. For unpaved surfaces and storage piles

90 percent control efficiency for PM and PM₁₀ and 40 percent control efficiency for PM_{2.5} 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 default moisture content of the aggregate and sand is 0.7 and 4.17 percent weight, respectively. 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. The maximum concentration that occurs at or beyond the site boundary was compared to the NAAQS. If during continuous operation the modeled concentration of a pollutant is greater than the applicable NAAQS, the plant's production is limited to show compliance with the standard. 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.

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 PM are conditioned below the de minimis level. Potential emissions of PM₁₀ and PM_{2.5} remain below de minimis levels.

APPLICABLE REQUIREMENTS

Wolfe Construction 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 for this installation.
- *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

- None of the New Source Performance Standards (NSPS) apply to the installation.
- 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.

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.

David Little
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 16, 2012, received February 21, 2012, designating Wolfe Construction 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 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 manufacture'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

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.)

Ms. Karen Wolfe
Owner
Wolfe Construction
P.O. Box 6007
Fulton, MO 65251

RE: New Source Review Permit - Project Number: 2012-02-061

Dear Ms. Wolfe:

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 and 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 David Little, 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:dll

Enclosures

c: Northeast Regional Office
PAMS File: 2012-02-061

Permit Number: