RATIONALE / STATEMENT OF BASIS
FOR HOT MIX ASPHALT GENERAL PERMIT

INTRODUCTION

On March 2, 2015, the Environmental Permits Division (EPD) of the Mississippi Department of Environmental Quality (MDEQ), Office of Pollution Control (OPC) issued the Hot Mix Asphalt General Permit. That permit expired February 29, 2020 and the proposed Hot Mix Asphalt General Permit will replace the expired general permit. General permits, as required by state and federal regulation, are issued for a 5-year period. This permit covers discharges of industrial stormwater and the construction and operation of air emissions equipment associated with hot mix asphalt facilities that fall under the Standard Industrial Classification (SIC) code of 2951 – Asphalt Paving Mixtures and Blocks. Typically, all state environmental approvals for facility construction and operation can be secured by receiving coverage under this single multi-media general permit, with exception of land-disturbing activities requiring coverage under the construction stormwater general permit.

We believe this has been a highly successful general permit that has reduced the administrative burden on the hot mix asphalt (HMA) industry, as well as MDEQ, with 60 active facilities currently covered under this general permit. Therefore, MDEQ proposes to continue offering coverage under a multimedia general permit for this industry sector.

MDEQ has been authorized by the U.S. Environmental Protection Agency (EPA) to administer the National Pollutant Discharge Elimination System (NPDES) Program in the State of Mississippi, including the issuance of general permits for categories of discharges under the provisions of 40 CFR 122.28, as adopted by reference in the "Mississippi Wastewater Regulations for National Pollutant Discharge Elimination System (NPDES) Permits, Underground Injection Control (UIC) Permits, State Permits, Water Quality Based Effluent Limitations and Water Quality Certification," (11 Miss. Admin. Code Pt. 6, Ch. 1.). Under this authority, MDEQ may issue a single general permit to a category of point sources located within the same geographic area whose discharges warrant similar pollution control measures. Specifically, MDEQ is authorized to issue a general NPDES permit if there are a number of point sources operating in a geographic area that:

1. involve the same or substantially similar types of operations;

2. discharge the same type of wastes;

3. require the same effluent limitations or operating conditions;

4. require the same or similar monitoring requirements; and

5. in the opinion of the Permit Board, are more appropriately controlled under a general permit than under individual permits.

The U.S. EPA has also authorized MDEQ to implement air regulations for the construction and operation of synthetic minor and minor sources of air pollution under the approved State

Implementation Plan (SIP). Specifically, Rule 2.12 of 11 Miss. Admin. Code Pt. 2, Ch. 2 for "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment" addresses the issuance of multi-media general permits by the Permit Board. This rule requires multi-media general permits address the requirements for a permit to construct air emissions equipment and a State permit to operate such equipment.

As in the case of individual permits, violation of any condition of a general permit constitutes a violation of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972) and subjects the coverage recipient to the penalties specified therein. Upon promulgation of the final general permit and complete request for recoverage, owners/operators qualified for recoverage are authorized to discharge stormwater and construct/operate air emissions equipment under this general permit.

HMA facilities which are granted a Certificate of Permit Coverage under this proposed multimedia general permit will have permission to:

- Construct/operate air emissions equipment as a synthetic minor source, complying with the emission limitations, monitoring requirements and other conditions set forth in the general permit; and

- Discharge stormwater associated with industrial activities in accordance with limitations, monitoring and inspection requirements and other conditions set forth in the general permit.

Changes to Permit MSR70 from the previous general permit include clarification of existing language, requirements and conditions; removal of provisions for construction stormwater coverage; and addition of requirements for sources that may otherwise be major air emissions sources. A list of the significant changes is included as Attachment D.

COVERED EMISSIONS AND DISCHARGES

This proposed general permit may cover all new and existing HMA facilities in the State of Mississippi which fall under the SIC code 2951 and have the following emissions and discharges:

1. Air emissions associated with the construction and operation of HMA facilities that are equipped with a baghouse (or other MDEQ approved devices) for control of air emissions from the dryer/mixer.

2. Air emissions from rock crushers and/or recycled asphalt pavement (RAP) crushers associates with HMA facilities.

3. Stormwater associated with industrial activity.

4. Allowable non-stormwater discharges.

CALCULATIONS OF POTENTIAL AIR EMISSIONS

EPA's AP-42 emission factors for HMA facilities found in Chapter 11.1 (Hot Mix Asphalt Plant) were last updated in April 2004. Based on the uncontrolled emissions calculated using AP-42 emission factors and the annual allowable tons per year (tpy) production for batch and drum mix asphalt plants allowed by the proposed general permit, facilities would exceed 250 tons per year of PM and PM_{10} emissions (i.e., the Prevention of Significant Deterioration major source threshold) and 100 tons per year of PM_{10} emissions (i.e., the Title V major source threshold). (See Appendix A for supporting calculations.) To allow such plants to obtain coverage under the general permit, the permit continues to limit annual production from plants to no more than 360,000 tons of asphalt for batch mix plants and 500,000 tons for drum mix asphalt plants. In addition, the dryer/mixer must be controlled by a baghouse (or another approved control device) when asphalt is being manufactured. This allows for a sufficient margin of compliance with both the PSD and Title V major source thresholds, while allowing for rock or RAP crushing of up to 600,000 tons of material crushed per year. Due to the low cost of natural gas, most HMA plants currently combust natural gas to provide heat in the dryers; however, the permit still allows for combustion of fuel oil, liquid bio-derived fuels, and on-spec used oil. To ensure the Title V major source threshold for SO_2 is not exceeded, a limit on the sulfur content and amount of liquid fuels combusted is also addressed in the proposed general permit.

Since the general permit covers moderate stationary sources for purposes of obtaining a permit to construct, as well as synthetic minor sources for purposes of obtaining a permit to operate, requirements in the general permit require a 30-day public notice prior to issuing coverage to an individual plant. This ensures the annual production limits and fuel specifications are federally enforceable.

The permit also allows for use of emergency stationary internal combustion engines, which include generators used to provide power to equipment during an electrical outage. Because the federal regulations consistently define an emergency stationary internal combustion engine and limit non-emergency operation to 100 hours per year, no additional requirements apart from those contained in the federal regulations are addressed in the general permit. Considering the 100 hour-per-year cap on non-emergency operation and federal requirements for fuel specifications, the potential emissions from emergency engines contribute very minimal amounts of particulate matter and other pollutants; therefore, no additional specific operating restrictions are included in the general permit. The proposed permit does not allow for use of non-emergency stationary internal combustion engines.

LIMITATIONS AND REQUIREMENTS

Opacity/Particulate Matter

HMA facilities are subject to an opacity limitation of 20% or less and a particulate matter emission limitation of 0.04 grains/dscf (dry standard cubic feet). Although these emission standards are derived from 40 CFR Part 60, Subpart I, all HMA facilities must comply with these standards, regardless of their applicability to Subpart I. Remaining sources of dust are subject to an opacity limitation of 40% or less, as required in 11 Miss. Admin. Code Pt. 2, R. 1.3.B. The permit requires

a performance test initially and every five years thereafter to determine emissions of filterable Particulate Matter using EPA Methods 1-5. Also, if the plant is moved to a new location, a PM performance test must be conducted within 180 days of startup at the new location. The permit also requires operation and maintenance of control equipment on the dryer and associated lime and fly ash silos. If control equipment is operated appropriately and truck unloading to the silos conducted at acceptable rates, there should be no exceedances of the PM or opacity limits.

Baghouse/Fabric Filter Control Equipment

The baghouse and fabric filters required to control emissions from the dryer and various silos must be inspected monthly for leaks and visible emissions of dust. Visible emission observations do not have to be performed according to any specific method or procedure but must be conducted while material is being transferred to the silo and material is being processed in the dryer. The permittee must also record the pressure drop across the dryer baghouse monthly and ensure it is within the manufacturer's range or a range established based on historical operation of the baghouse. Records of these inspections, monitoring, and any corrective measure taken shall be maintained on the Monthly Air Records Form provided by MDEQ for at least five (5) years or for the duration of facility operations, whichever is shorter.

Rock Crusher Requirements

A rock crusher may be installed and operated on site by the coverage recipient and may be subject to the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants found in 40 CFR Part 60, Subpart OOO. Many HMA plants use recycled asphalt pavement (RAP) crushers which are often subject to Subpart OOO; however, RAP crushers do not generally require control devices due to the nature and size of the RAP. Under Subpart OOO, such uncontrolled RAP crushers are only subject to an opacity standard and required to conduct a visible emissions evaluation using EPA Method 9 every five years. Regardless, the proposed general permit includes all potentially applicable requirements of Subpart OOO, including those for controlled crushers. If a third party will own and operate the rock/RAP crusher, the third party is responsible for obtaining any necessary air permit prior to operating the crusher at the HMA facility.

Emergency Stationary Internal Combustion Engine Requirements

Stationary engines may be installed and operated if they meet the definition of an emergency stationary internal combustion engine, as defined in the applicable federal regulations. Regulations pertaining to "stationary engines" (as opposed to portable "nonroad engines") include the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines and for Spark Ignition Internal Combustion Engines found in 40 CFR Part 60, Subparts IIII and JJJJ, respectively. Also, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines, found in 40 CFR Part 63, Subpart ZZZZ, apply to both existing and new stationary engines.

All three subparts have generally identical standards for emergency internal combustion engines. These provisions have been incorporated into the proposed general permit and include the following requirements:

- A time limit of 100 hours per year on operation during non-emergency situations, including maintenance and readiness testing;

- Installation of a non-resettable hour meter and records of the yearly hours of operation and reason for operation;

- Fuel specifications for diesel-fired engines;

- General operation and maintenance requirements; and

- Documentation of engine certification for engines considered "new" under Subpart IIII or JJJJ.

The proposed general permit does not allow for operation of non-emergency stationary internal combustion engines, which are those engines that remain in the same location at the site for 12 or more months and are used to operate equipment for non-emergency purposes.

Gasoline Dispensing Operations

The proposed general permit address the potential for HMA facilities to store and dispense gasoline, which is regulated under 40 CFR Part 63, Subpart CCCCCC (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities). The permit limits dispensing operations to less than 10,000 gallons per month of gasoline and addresses the work practice standards for minimizing emissions of hazardous air pollutants associated with gasoline dispensing operations.

Storm Water Discharges Associated with Industrial Activities

Section 405 of the Water Quality Act of 1987 (WQA) added section 402(p) of the Clean Water Act (CWA) which required the Environmental Protection Agency (EPA) to develop a phased approach to regulate stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) program. EPA published a final regulation on the first phase on this program on November 16, 1990, establishing permit application requirements for stormwater discharges associated with industrial activity. *Stormwater discharges associated with industrial activity* is defined in 40 CFR 122.26(b)(14) and includes, but is not limited to, stormwater discharges from industrial plant yards; material handling sites; sites used for the storage and maintenance of material handling equipment; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater.

Facilities falling under SIC Code 2951 for Asphalt Paving Mixtures and Blocks are required to obtain an NPDES permit for the discharge of stormwater from industrial activities, as required by 40 CFR 122.26(a)(1)(ii) and 122.26(b)(14)(ii).

APPENDIX A

The attached spreadsheet provides emission calculations for hot mix asphalt plants for both batch mix and drum mix operations, as well as emissions for rock crushers and other ancillary air emissions equipment. Since use of the PM standard (i.e., 0.04 gr/dscf) allowed by the permit provides a higher estimate of PM (filterable) emissions that the AP-42 factor for PM (filterable), a conservative flow rate used in previous rationales and further verified by a review of stack tests is used to estimate the potential emissions of filterable PM and PM_{10}. The spreadsheet addresses the potential based on the scenarios permitted by the general permit, including operation of a rock crusher processing up to 600,000 tons of material annually and combustion of up to 1,000,000 gallons per year of liquid fuel in the asphalt dryer with a 1.0% sulfur content.

Facility-Wide Emissions Inventory for Hot-Mix Asphalt Plant
Date: November 8, 2021

Parameter	Batch PTE (ton/yr)	Drum Mix PTE (ton/yr)
Particulate Matter (filterable)	63.58	63.62
Particulate Matter (less than 10 microns)	27.90	23.73
Carbon Monoxide	72.79	33.60
Nitrogen Oxides	21.60	13.75
Sulfur Dioxide	78.80	78.80
VOC	10.70	13.86
CO2	6,660	8,250
HAP	1.47	2.61

Assumptions:

PTE for Particulate Matter (filterable) from the asphalt plant baghouse is based on calculated NSPS allowable of 52.6 tpy.

PTE for PM-10 from the asphalt plant baghouse is the filterable PM calculated from the NSPS multiplied by the ratio of the AP-42 PM-10 (filterable) to PM (fitlerable) factors plus the condensable portion calculated using the AP-42 emission factor.

Annual capacity limited to 360,000 ton/yr for batch mix and 500,000 ton/yr for drum mix.

Only emergency engines allowed in general permit with no more than 100 hr/yr operation for non-emergency purposes. This results in minimial annual emissions, which are not reflected in PTE above.

Natural gas, fuel oil, or waste oil may be used in dryer. Liquid fuels limited to 1% sulfur and 1 million gallons per year.

EVALUATION OF HOT MIX ASPHALT POTENTIAL EMISSIONS
Date: November 8, 2021

AP-42 Table 11.1-1: Emissions for Batch Mix and Drum Mix Hot Mix Asphalt (April 2004)

Pollutant	Batch Hot Mix		Drum Mix		Load-Out			Silo Filling		
	EF (lb/ton)	ton/yr	EF (lb/ton)	ton/yr	EF (lb/ton)	Batch (tpy)	Drum Mix (tpy)	EF (lb/ton)	Batch (tpy)	Drum Mix (tpy)
Particulate Matter (filterable)	0.025	4.5	0.014	3.5	0.000181	0.03	0.05	0.000332	0.06	0.08
PM-10 (filterable)	0.0098	1.8	0.0039	1.0	0.000678	0.12	0.17	0.000702	0.13	0.18
PM-10 (condensable)	0.017	3.1	0.019	4.8						
Carbon Monoxide (CO)	0.40	72.0	0.13	32.5	0.001966	0.35	0.49	0.002421	0.44	0.61
Nitrogen Oxides (NOx)	0.12	21.6	0.055	13.8	-	-	-	-	-	-
Sulfur Dioxide (SO_2)	NA	78.8	NA	78.8	-	-	-	-	-	-
Volatile Organic Compounds (VOC)	0.036	6.5	0.032	8.0	0.005697	1.03	1.42	0.017758	3.20	4.44
CO2	37	6660	33	8250	-	-	-	-	-	-
HAPs	0.0077	1.386	0.010	2.5	0.00013364	0.02	0.03	0.00031088	0.06	0.08
Formaldehyde (large HAP)	0.0031	0.558	0.0031	0.775	-	-	-	-	-	-

(1) Only emission factors representing batch mix and drum mix plants controlled by baghouses (or fabric filters) are provided.

(2) Fugitive emissions from vehicle traffic, aggregate storage piles, and transfer operations are not included, since hot mix asphalt plants are not a listed source category required to include fugitive emissions.

(3) Emission factors are represented in lb/ton of HMA produced.

(4) Permit Limits: Batch mix limit (ton/yr): 360,000 Drum mix limit (ton/yr): 500,000 Liquid Fuel Limit (gal/yr): 1,000,000

(4) Particulate matter is defined as the filterable portion only. PM-10 includes both filterable of 10 microns and less and condensable PM.

(5) Emission factors for the waste oil-fired dryer is used since they are equivalent to No. 2 fuel oil and equivalent or more conservative than natural gas, with the exception of VOC for which No. 6 fuel oil was the most conservative EF. SO2 emissions are based on allowed sulfur of 1% by weight, liquid fuel limit, and density of 7.88 lb/gal (density for No. 6 fuel oil in AP-42, Ch. 1.3), assuming all sulfur is converted to SO2.

(6) For plant load-out and silo filling, the value for asphalt volatility is specified as the default values in AP-42 and temperature is specified as the upper of the typical range of 315-340 ^{o}F, as provided by APAC.

Volatility (%): -0.5 Temperature (^{o}F): 340

(7) For load-out and silo filling emission factors, the percentage of PAH-HAPs and other semi-volatile HAPs are multipled by the PM-10 EF and the percent volatile HAPs by the VOC EF.

Ancillary Equipment

Process	EF (lb/ton)		Batch Hot Mix (ton/yr)		Drum Mix (ton/yr)	
	PM	PM-10	PM	PM-10	PM	PM-10
Silos (Assume one lime and one fly ash)	0.00099	0.00034	0.009	0.003	0.012	0.004
Rock/RAP Crusher	0.0364	0.0133	10.920	3.990	10.920	3.990

(1) Typically one lime silo is present with an annual throughput of 1% of HMA production and a fly ash silo may also be used with an annual throughput of 4% of HMA production, based on MDOT specifications provided by APAC. The combined throughputs are evaluated using the controlled emission factor for "cement unloading to elevated storage silo" from AP-42, Table 11.12-2 (June 2006), which is a pneumatic transfer.
(2) The rock or RAP crusher throughput is based on that allowed by the permit of 600,000 tons per year. The emission factors are shown below from AP-42, Table 11/19.2-2 (Aug. 2004).
(3) Only emergency stationary engines may be used for backup power (i.e., no non-emergency engines are alloed by the general permit). Since these are limited by federal regulations to less than 100 hours per year of non-emergency operation, emissions of criteria pollutants are minimal and would not cause PTE to exceed the Title V thresholds.

Stone Crushing Processes[(1)]	Uncontrolled	
	PM	PM_{10}
	(lb/ton)	(lb/ton)
Tertiary Crushing (crush to <1")	0.0054	0.0024
Screening	0.025	0.0087
Conveyor Transfer Point (x2)	0.006	0.0022
Total (lb/ton)	**0.0364**	**0.0133**

(1) Assume only one crusher capable of crushing to <1" with one screening process and two conveyor transfer points to and from the crusher.

(2) Screening (non-fines) emission factor was used since stationary crushers are used for recycled asphalt, which generates very little dust since it has already been processed.

EVALUATION OF HOT MIX ASPHALT UNCONTROLLED EMISSIONS
Date: November 8, 2021

AP-42 Table 11.1-1: Emissions for Batch Mix and Drum Mix Hot Mix Asphalt (April 2004)

Pollutant	Batch Hot Mix		Drum Mix	
	EF (lb/ton)	ton/yr	EF (lb/ton)	ton/yr
Particulate Matter	32	5760.0	28	7000.0
PM-10	4.5	810.0	6.4	1600.0
Carbon Monoxide (CO)	0.40	72.0	0.13	32.5
Nitrogen Oxides (NOx)	0.12	21.6	0.055	13.8
Sulfur Dioxide (SO_2)	0.088	15.8	0.058	14.5
Volatile Organic Compounds (VOC)	0.036	6.5	0.032	8.0
CO2	37	6660	33	8250
HAPs	0.0077	1.386	0.010	2.5
Formaldehyde (large HAP)	0.0031	0.558	0.0031	0.775

(1) Emission factors shown above represent uncontrolled batch mix and drum mix plants.

(2) Fugitive emissions from vehicle traffic, aggregate storage piles, and transfer operations are not included, since hot mix asphalt plants are not a listed source category required to include fugitive emissions.

(3) Emission factors are represented in lb/ton of HMA produced.

Batch mix limit (ton/yr): 360,000 Drum mix limit (ton/yr): 500,000

(4) Particulate matter is defined as the filterable portion only. PM-10 includes both filterable of 10 microns and less and condensable PM.

(5) Emission factors for the waste oil-fired dryer is used since they are equivalent to No. 2 fuel oil and equivalent or more conservative than natural gas, with the exception of VOC for which No. 6 fuel oil was the most conservative EF. (Coal-fired dryers are not allowed by the general permit.)

PTE Based on NSPS Subpart I Emission Limit:

Pollutant	Batch Hot Mix		Drum Mix	
	EF (gr/dscf)	ton/yr	EF (gr/dscf)	ton/yr
Particulate Matter	0.04	52.6	0.04	52.6

(1) Emission factors shown above represent uncontrolled batch mix and drum mix plants.

(2) Fugitive emissions from vehicle traffic, aggregate storage piles, and transfer operations are not included, since hot mix asphalt plants are not a listed source category required to include fugitive emissions.

(3) Emission stadard for filterable PM from NSPS Subpart I. Continue using the origianal basis of 35,000 dscf/min, which continues to be conservative based on more recent stack tests.

Batch mix stack flow (dscf/min): 35,000 Drum mix stack flow (dscf/min): 35,000

Sample Stack Test Reports

Facility	Year	PM (gr/dscf)	Flow (dscfm)	PM (lb/hr)	Opacity (highest 6-min avg)	Rated Capacity (tph)	Actual Capacity (tph)	% Max Capacity
APAC - Vicksburg	2018	0.0046	16,154	0.64	0%			
APAC - Greenville	2017	0.0028	23,824	0.57	0%	325	318.6	98%
ADCAMP - Flowood	2012	0.002	27,603	0.47		300	200	67%
Mallette Brothers - Gautier	2017	0.002	18,005	0.31	0%	300	236	79%
Dunn Roadbuilders - Laurel	2016	0.00039	22,673	0.08		500	270	54%
APAC - Meridian	2019	0.007	32,387	1.94		400	?	
APAC - Guntown	2014	0.0098	27,370	2.30		350	320	91%
APAC - Tupelo	2016	0.02	24,469	4.19		?	270	
APAC - Greenwood	2017	0.0016	32,451	0.45	0%	400	?	
APAC - Columbus	2017	0.0031	15,464	0.41	0%	350	319.5	91%
Lehman Roberts - Oxford	2014	0.011	22,793	2.15	0%	?	304	
APAC - Canton	2016	0.0044	25,074	0.95		400	366	92%
APAC - Hamilton	2018	0.0044	26,997	1.02	0%	350	319	91%
Huey Stockstill - Picayune	2015	0.013	22,023	2.45		350	220	63%
Warren Paving - Hattiesburg	2014	0.002	22,609	0.39		350	288	82%
	MAX	0.02	32,451	4.19				
	AVG	0.0059	23,993	1.22				

APPENDIX B

The attached file contains a listing of the permitted facilities in Mississippi as of August 2022

APPENDIX: List of Permitted Hot Mix Asphalt Facilities in Mississippi

Agency Interest No.	HMAGP Number	Facility Name	Physical Address	City	State	Zip Code	Contact Name		Contact Phone
							First	Last	
4995	MSR700109	A J Construction, Gallatin Plant	1090 McDowell Road	Jackson	MS	39204	John	Harreld	(601) 540-5731
28	MSR700025	ADCAMP Inc	1353 Flowood Drive	Flowood	MS	39232	Ralph	Barnes	(601) 939-4493
2521	MSR700099	APAC MISSISSIPPI INC, Bailey Road Asphalt Plant	2050 Bailey Road	Georgetown	MS	39078	Brian	Moore	(601) 376-4000
9170	MSR700105	APAC MISSISSIPPI INC, Booneville Plant	1801 Chambers Drive	Booneville	MS	38829	Brian	Moore	(601) 376-4000
15782	MSR700030	APAC MISSISSIPPI INC, Canton	117 Tyler Drive	Canton	MS	39046	Brian	Moore	(601) 376-4000
201	MSR700043	APAC MISSISSIPPI INC, Cloverhill Mine	100 State Park Road	Natchez	MS	39120	Brian	Moore	(601) 376-4000
10272	MSR700007	APAC MISSISSIPPI INC, Columbus Asphalt Plant	462 Lake Norris Road	Columbus	MS	39701	Brian	Moore	(601) 376-4000
81882	MSR700111	APAC MISSISSIPPI INC, Durant Asphalt Plant	Industrial Park Road	Durant	MS	39063	Brian	Moore	(601) 376-4000
16748	MSR700044	APAC MISSISSIPPI INC, Glen	2700 Highway 72 East	Glen	MS	38846	Brian	Moore	(601) 376-4000
7573	MSR700052	APAC MISSISSIPPI INC, Greenville Asphalt Plant	2559 Harbor Front Road	Greenville	MS	38701	Brian	Moore	(601) 376-4000
55732	MSR700097	APAC MISSISSIPPI INC, Greenwood Asphalt Plant	Cypress Avenue	Greenwood	MS	39830	Brian	Moore	(601) 376-4000
10987	MSR700027	APAC MISSISSIPPI INC, Guntown Asphalt Plant	331 Messner	Guntown	MS	38849	Brian	Moore	(601) 376-4000
8102	MSR700074	APAC MISSISSIPPI INC, Hamilton Highway 45, Scribner Pit	40108 Flower Farm Road	Hamilton	MS	39746	Brian	Moore	(601) 376-4000
1504	MSR700011	APAC MISSISSIPPI INC, Meridian Interchange Road	4412 Interchange Road	Meridian	MS	39305	Brian	Moore	(601) 376-4000
18749	MSR700066	APAC MISSISSIPPI INC, Meridian Plant	Sellers Drive	Meridian	MS	39301	Brian	Moore	(601) 376-4000
987	MSR700091	APAC MISSISSIPPI INC, Meter Road	2902 Meter Road	Jackson	MS	39204	Brian	Moore	(601) 376-4000
3686	MSR700102	APAC MISSISSIPPI INC, Morton Asphalt Plant	2142 Highway 80 West	Morton	MS	39117	Brian	Moore	(601) 376-4000
1450	MSR700050	APAC MISSISSIPPI INC, Mount Olive Asphalt Plant	98 Pearce Road	Mount Olive	MS	39119	Brian	Moore	(601) 376-4000

Agency Interest No.	HMAGP Number	Facility Name	Physical Address	City	State	Zip Code	Contact Name		Contact Phone
							First	Last	
1386	MSR700047	APAC MISSISSIPPI INC, New Albany Plant	110 Gap Drive	New Albany	MS	38663	Brian	Moore	(601) 376-4000
72878	MSR700108	APAC MISSISSIPPI INC, Shannon Plant	5552 Highway 145	Shannon	MS	38868	Brian	Moore	(601) 376-4000
23169	MSR700078	APAC MISSISSIPPI INC, Starkville Asphalt Plant	Highway 82	Starkville	MS	39759	Brian	Moore	(601) 376-4000
2235	MSR700063	APAC MISSISSIPPI INC, Tupelo Asphalt Plant	459 North Eason Boulevard	Tupelo	MS	38802	Brian	Moore	(601) 376-4000
9099	MSR700012	APAC MISSISSIPPI INC, Vicksburg Rifle Range Road	4441 Rifle Range Road	Vicksburg	MS	39180	Brian	Moore	(601) 376-4000
64094	MSR700104	APAC MISSISSIPPI INC, Wynndale Asphalt Plant	I-55 Frontage Road	Byram	MS	39272	Brian	Moore	(601) 376-4000
16650	MSR700041	APAC MISSISSIPPI INC, Yazoo City Asphalt	Highway 3	Yazoo City	MS	39194	Brian	Moore	(601) 376-4000
18951	MSR700070	Asphalt Specialists Plant Number One	Highway 51	Grenada	MS	38901	Robert	Staten	(662) 226-6097
11744	MSR700056	Dickerson and Bowen Inc, Brookhaven Asphalt Plant Number 5	983 Old Highway 51 NE	Brookhaven	MS	39601	Lester	Williams	(601) 833-4291
7185	MSR700022	Dickerson and Bowen Inc, Carthage Plant	Highway 16 East	Carthage	MS	39051	Lester	Williams	(601) 833-4291
15674	MSR700029	Dickerson and Bowen Plant Number 6	2642 Gallatin Street	Jackson	MS	39204	Lester	Williams	(601) 833-4291
55262	MSR700094	Dickerson and Bowen Inc, McComb Asphalt Plant #2	Highway 98 East	McComb	MS	39648	Lester	Williams	(601) 833-4291
10696	MSR700009	Dunn Roadbuilders LLC, Columbia Plant	Highway 98 East	Columbia	MS	39429	Rick	Croy	(601) 649-4111
1621	MSR700051	Dunn Roadbuilders LLC, Laurel Plant	South Laurel Industrial Park	Laurel	MS	39441	Rick	Croy	(601) 649-4111
2635	MSR700061	Dunn Roadbuilders LLC, Petal Facility	153 Chevis Lee Road	Petal	MS	39465	Rick	Croy	(601) 649-4111
800	MSR700013	Falcon Contracting Company Inc, Houston Asphalt Plant	400 Industrial Park Road	Houston	MS	38851	Robert Neal	Coker	(662) 327-2053
6278	MSR700038	Huey P Stockstill LLC, Gautier Plant	2701 Old Spanish Trail	Gautier	MS	39553	Stephen	Niehaus	(228) 497-3226
12798	MSR700002	Huey Stockstill Inc	10130 Goldin Lane	Gulfport	MS	39503	Frank	Ford	(601) 798-2981

Agency Interest No.	HMAGP Number	Facility Name	Physical Address	City	State	Zip Code	Contact Name		Contact Phone
							First	Last	
911	MSR700098	Huey Stockstill Inc, Picayune Ready Mix and Asphalt Plant	815 North Beech Street	Picayune	MS	39466	Frank	Ford	(601) 798-2981
12878	MSR700005	Land Shaper Asphalt Plant Inc	14292-B Creosote Road	Gulfport	MS	39503	Robert	Parker	(228) 863-8996
8329	MSR700072	Lehman Roberts Company, Plant Number 7	1775 Farrish Gravel Road	Batesville	MS	38602	Alan	Parks	(901) 774-7874
10530	MSR700028	Lehman Roberts Company, Plant Number 10	161 Stonewall Road	Byhalia	MS	38611	Alan	Parks	(901) 774-7874
5648	MSR700036	Lehman Roberts Company, Plant Number 6	Highway 51 South	Hernando	MS	38632	Alan	Parks	(901) 774-7874
12879	MSR700006	Lehman Roberts Company, Plant Number 11	Old Highway 7 North	Oxford	MS	38655	Alan	Parks	(901) 774-7874
22813	MSR700077	Lehman Roberts Company, Plant Number 12	Highway 51 South	Senatobia	MS	38668	Alan	Parks	(901) 774-7874
15904	MSR700032	Lehman Roberts, Plant 1	Highway 82, East of Interstate 55	Winona	MS	38967	Alan	Parks	(901) 774-7874
56162	MSR700101	Mallette Brothers Construction Company, Lucedale Asphalt Plant #2	County Industrial Park Road	Lucedale	MS	39452	Frank	Mallette	(228) 497-2523
16862	MSR700046	Pandle Inc, Asphalt Paving Company	2401 Petit Bois Street	Pascagoula	MS	39581	Walter	Randle	(228) 762-3300
5635	MSR700096	Southeastern Concrete Company Inc, Plant Number 4	2611 Lakeview Road	Hattiesburg	MS	39401	Doug	Lambeth	(601) 544-7000
58185	MSR700103	Superior Asphalt Inc, Panola County Plant Number One	Buckhorn Road	Batesville	MS	38606	Hamp	Sterling	(601) 376-3000
20075	MSR700075	Superior Asphalt Inc, Noxubee County Plant Number 2	Highway 45 South	Brooksville	MS	39739	Hamp	Sterling	(601) 376-3000
54765	MSR700093	Superior Asphalt Inc, Scott County Plant Number One	1540 Highway 35 South	Forest	MS	39074	Hamp	Sterling	(601) 376-3000
36123	MSR700081	Superior Asphalt Inc, Gulfport	Goldin Lane	Gulfport	MS	39503	Hamp	Sterling	(601) 376-3000
17578	MSR700058	Superior Asphalt Inc, Hazlehurst Plant, Copiah County Number 1	Old Decell Lane	Hazlehurst	MS	39083	Hamp	Sterling	(601) 376-3000
19029	MSR700071	Superior Asphalt Inc, Clay Street Plant, Hinds County Number 2	111 Clay Street	Jackson	MS	39213	Hamp	Sterling	(601) 376-3000

Agency Interest No.	HMAGP Number	Facility Name	Physical Address	City	State	Zip Code	Contact Name		Contact Phone
							First	Last	
972	MSR700039	Superior Asphalt Inc, Jackson	6000 Interstate 55 South	Jackson	MS	39212	Hamp	Sterling	(601) 376-3000
11005	MSR700034	Superior Asphalt Inc, Louisville	Highway 25 Bypass	Louisville	MS	39339	Hamp	Sterling	(601) 376-3000
1151	MSR700035	Superior Asphalt Inc, Philadelphia	Highway 15 By-Pass	Philadelphia	MS	39350	Hamp	Sterling	(601) 376-3000
53368	MSR700090	Superior Asphalt Inc, Holmes County Plant Number Two	4397 Highway 17	Pickens	MS	39146	Hamp	Sterling	(601) 376-3000
1419	MSR700016	Warren Paving Inc, Hattiesburg Plant	562 Elks Lake Road	Hattiesburg	MS	39403	Tony	Broome	(601) 544-7811
37397	MSR700084	Warren Paving Inc, Moss Point Plant	Highway 63	Moss Point	MS	39562	Tony	Broome	(601) 544-7811
18756	MSR700068	Whitehead Construction Asphalt Plant	Highway 90 and Industrial Road	Pascagoula	MS	39567	Larry	Whitehead	(228) 762-6951

APPENDIX C

The attached file contains the April 2004 Section 11.1 of EPA's AP-42 Publication for Hot Mix Asphalt Plants

See EPA's website for a PDF of these factors.

APPENDIX D

Significant Changes to HMAGP

SIGNIFICANT CHANGES TO THE HOT MIX ASPHALT GENERAL PERMIT (HMAGP)

Changes to Permit MSR70 from the previous general permit include clarification of existing language, requirements and conditions; removal of provisions for construction storm water coverage; and addition of requirements for sources that may otherwise be major air emissions sources. The proposed general permit has the following significant changes:

- Construction storm water coverage for disturbance of one (1) acre or more was removed from this permit. Now facilities that conduct land disturbing activities have to obtain coverage and comply with the Small Construction Storm Water General Permit (SCSWGP) or the Large Construction Storm Water General Permit (LCSWGP), as applicable.

ACT2 (Obtaining Coverage, Recoverage and Requesting Termination)

- Contiguous Landowner Notification (Condition S-2, Page 5) – revised.

- Public Participation Requirements (Condition S-3, Page 7) – Revised to require all proposed new facilities or those undergoing a major modification (as defined in ACT6) to meet the public participation requirements.

- Facility Expansion and/or Modification Notification (Condition S-5, Page 7) – Revised to require notification if the asphalt plant is removed from the site even though the coverage will be retained. Must submit a Change Request Form for listed changes.

- Removal of Hot Mix Asphalt Plant (Condition S-8, Page 8) – Added to address the scenario where the hot mix asphalt plant and associated air emissions equipment is removed from the site but other industrial activities (e.g., material piles) remain on site. In this case, the air requirements no longer apply but the stormwater requirements continue to apply.

- Electronic Submittal of (Condition T-1, Page 9) – Includes option to submit electronic forms, in addition to hard copy.

ACT3 (Air Emissions Requirements)

- Air Stationary Source Designation (Condition L-1, Page 10) – Revised to designate HMA plants as synthetic minor operating sources, as well as moderate stationary sources for PSD purposes.

- Operational Limit on Crushed Material (Condition L-3(4), Page 11) – Revised to indicate that the 600,000 tons per year of crushed material only applies to crushers supplying crushed material to HMA plants located off-site.

- Operational Limitation on Liquid Fuel (Condition L-3(6), Page 11) – Liquid fuels shall be limited to 1,000,000 gallons per year during any consecutive 12-month rolling period. This language has been added to the permit.

- Non-Numeric Limitations (Condition L-4(1), Page 11) – Startup, Shutdown and Malfunction Requirement condition has been added to the permit.

- Hot Mix Asphalt Limitations, Monitoring and Testing (Condition L-5(5), Pages 12-13) – Control equipment inspection, maintenance, and monitoring requirements for silos, dryers and baghouses added to the permit.

- Particulate Matter and Opacity Performance Testing (Condition L-5(6), Pages 13-14) – Conduct performance testing initially within 180 days of startup of a new HMA plant or startup of a plant that has moved locations, and every five years thereafter. For an existing plant, if a performance test has not been conducted in the past five years, conduct a test within one (1) year of issuance of coverage and every five (5) years thereafter.

- Rock Crusher Requirements (Condition L-6, Page 14) – This condition has been added to the permit to address any potentially applicable federal New Source Performance Standards for rock crushers and affected equipment. Third parties that would own and operate a portable rock crusher at the HMA plant are responsible for obtaining any necessary air permits from MDEQ. Thus, the coverage recipient is not responsible for modifying their coverage to allow a third party to bring a rock crusher on site.

- Emergency Stationary Internal Combustion Engine Requirements (Condition L-7, Page 17) – This condition has been added to address requirements for emergency stationary internal combustion engines, such as those used to power emergency generators.

- Gasoline Dispensing Operation Requirements (Condition L-8, Page 18) – This condition was added for facilities that have gasoline dispensing stations on-site. A gasoline dispensing facility is any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

- Air Reporting Requirements (Condition S-1, Page 19) – All construction activity notifications shall be submitted on the Air Notification of Construction Form (formally the Notification of Construction / Modification of Air Emissions Sources form). If construction of the plant does not start within 18 months of coverage issuance or is suspended 18 months, the coverage recipient must notify the MDEQ using this form and

should also indicate if a one-time extension of 18 months is being requested. A Monthly Air Records Form (or equivalent) provided by MDEQ should be used and submitted annually to MDEQ.

- General Air Recordkeeping Requirements (Condition R-1(2), Page 21) - Records required under ACT 3, shall be maintained for at least five (5) years. Note: All other records required by the permit are still required to be maintained for at least three (3) years as required by ACT4, Condition R-2 on page 22.

ACT 4 (Industrial Storm Water Requirements)

- Minimum SWPPP Components (Condition T-2(4), Page 23) – A requirement to document spills and leaks on the Monthly Spill and Leak Log Sheet has been added to the proposed permit.

- Monthly Visual Site Inspections (Condition T-6, Page 27) – A Monthly Visual Site Inspection Form has been created for use in conducting monthly inspections.

- Annual SWPPP Evaluation (Condition T-7, Page 28) – An Annual SWPPP Evaluation Form has been created, and the requirement to submit the annual form has been removed.

ACT 5 (Standard Requirements Applicable to All ACTs)

- Maintaining Electronic Documents (Condition R-1, Page 29) – Any documents required by this permit may be kept electronically but must be readily available during site inspection or upon request.

- Notifications (Conditions S-1, S-2, and S-4, Pages 29 and 30) – Language has been added to the proposed permit to comply with the NPDES e-reporting rule, which will require the referenced notifications be submitted electronically.

- Personnel Training Program Requirements (Condition T-15, Page 35) – A Personnel Training Form has been created for use in complying with these requirements.

- Continuation of Expired General Permit (Condition T-25, Page 39) – This condition has been added to the proposed permit.

- Expiration of Coverage (Condition T-26, Page 39) – This condition was added to address the regulation regarding construction of air emissions equipment in 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1). and R. 2.5.C(4).

ACT 6 (Definitions)

Added the following definitions:

- T-1 Air Contaminant
- T-11 Gasoline Dispensing Facility
- T-15 Major Modification
- T-25 Severe Property Damage
- T-31 Submitted

Revised the following definitions:

- T-2 Air Emissions
- T-3 Baghouse or Fabric Filter

Removed the following definitions:

- CFR
- Clean Water Act
- Commencement of Construction
- Commission
- Construction Activity
- Final Stabilization
- Larger Common Plan of Development or Sale
- National Pollutant Discharge Elimination System
- New Source Performance Standards
- NOI
- Operator
- Particulate Matter
- Qualified Personnel
- Significant Minor Source
- State Law
- Successful Completion of All Permanent Erosion and Sediment Controls
- Synthetic Minor Source
- True Minor Facility

Some other unnecessary definitions were removed.