

FILE COPY

STATE OF MISSOURI

PERMIT BOOK



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: **09 2007 - 010** Project Number: 2007-01-063

Parent Company: L.G. Industries, Incorporated

Parent Company Address: P.O. Box 1058, Independence, MO 64051-0558

Installation Name: Aero Transportation Products, Inc.

Installation Address: 3300 E. Geospace Drive, Independence, MO 64051

Location Information: Jackson County, S32, T50, R31

Application for Authority to Construct was made for:
Increase the plant – wide styrene emissions usage. Concurrent with the styrene emissions increase, emissions of other air pollutants are also expected to increase: cyclohexane, toluene, and hexane. This review was conducted in accordance with Section (6), 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.

SEP 21 2007

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 start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up 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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Permit No.	
Project No.	2007-01-063

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."

Aero Transportation Products, Inc.
Jackson County, S32, T50, R31

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit (permit number 0198-010 with project number 095-0191-006 and permit number 0198-010A with project number 1998-04-189 and permit number 0889-007 with project number 2240-0013-005) from the Air Pollution Control Program.
2. **VOC and HAP Emission Limitation**
 - A. Aero Transportation Products, Inc. shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.
 - B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.. Aero Transportation Products, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this installation.
 - C. Aero Transportation Products, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B. indicate that the source exceeds the limitation of Special Conditions Number 2.A..
3. **Operational Condition**
Aero Transportation Products, Inc. shall keep the paints, solvents and cleaning solutions in sealed containers whenever the materials are not in use. Aero Transportation Products, Inc. shall provide and maintain suitable, easily read, permanent markings on all paints, solvent and cleaning solution containers used with this installation.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2007-01-063
Installation ID Number: 095-0191
Permit Number:

Aero Transportation Products, Inc.
3300 E. Geospace Drive
Independence, MO 64051-0558

Complete: July 09, 2007
Reviewed: July 26, 2007

Parent Company:
L.G. Industries, Inc.
P.O. Box 1058
Independence, MO 64051-0558

Jackson County, S32, T50, R31

REVIEW SUMMARY

- Aero Transportation Products, Inc. has applied for authority to increase the production levels of styrene per year.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are styrene (CAS # 108-88-3), cyclohexane (CAS # 110-82-7), toluene (CAS # 108-88-3), and hexane (CAS # 110-54-3).
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants and Reinforced Plastic Composites Production* applies to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new emission limits.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of volatile organic compounds and hazardous air pollutants are above de minimis levels.
- This installation is located in Jackson County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was performed to determine the ambient impact of pollutant styrene and toluene.
- Emissions testing is not required for the equipment/source.
- A revision to Part 70 Operating Permit application is required for this installation within 1 year of the issuance of this permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Aero Transportation Products, Inc. produces fiberglass hatch covers for rail cars and other fiberglass components at its facility in Independence, Missouri. This installation is a major source for HAPs and has a P70 operating permit.

Facility operations are conducted underground with two stacks exhausting processing areas to the atmosphere. Styrene, a HAP and VOC, is the primary pollutant emitted in the process.

Aero Transportation , Inc. manufactures fiberglass resin parts. A mold of the hatch cover is first sprayed with a polyester gel coat and allowed to cure. Chopped strand mat and structural woven glass saturated with resin are applied to the mold shape. After the layers are applied, any entrapped air is removed from the laminate by rolling. The laminate is then allowed to cure, after which it is removed from the mold, trimmed, fitted with the appropriate hardware (hinges, latches, etc.) and then shipped to the clients.

Aero Transportation Products, Inc. intends to increase their production by increasing the amount of material processed annually. The emissions generated are from one of four categories: 1) open face fiberglass lamination, 2) production painting, 3) tool clean up with solvents, and 4) resource recovery system for recycling acetone. VOC emissions come from Resin, gelcoat and catalyst. Table 1, 2, and 3 establish the maximum throughputs and maximum VOC potential to emit based on the products manufactured.

These emissions result from the following products listed in Table 1.

Table 1:Maximum Design Rate Analysis

	<u>Resin XC-1466</u>	<u>Gelcoat G325LP7079 8</u>	<u>Catalyst MEKP-900</u>	<u>Catalyst MEKP-9H</u>
AP11 cover (650-0033)				
(BOM) amount (lbs)	35.68	4.95	0.66	0.09
Mold Length (ft)	11.87	11.87	11.87	11.87
Usage lbs/ft	3.01	0.42	0.06	0.01
AP13 cover (650-0034)				
BOM amount (lbs)	43.49	5.85	0.78	0.10
Mold Length (ft)	13.87	13.87	13.87	13.87
Usage lbs/ft	3.14	0.42	0.06	0.01
AP11R cover (650-1245)				
BOM amount (lbs)	36.74	4.95	0.66	0.09
Mold Length (ft)	12.25	12.25	12.25	12.25
Usage (lbs/ft)	3.00	0.40	0.05	0.01
APK12 cover (650-0041)				
BOM amount (lbs)	38.5671	5.4	0.72	0.09
Mold Length (ft)	13	13	13	13
Usage per ft (lbs)	2.97	0.42	0.06	0.01
APK10 cover (650-0040)				
BOM amount (lbs)	32.41	4.50	0.60	0.08
Mold Length (ft)	11.3	11.3	11.3	11.3
Usage lbs/ ft	2.87	0.40	0.05	0.01
Totals				
BOM amount (lbs) - all 5 covers	186.88	25.65	3.42	0.45
Mold Length (ft) – all 5 covers	62.29	62.29	62.29	62.29
Average Usage (lbs/ft)	3.0002	0.4118	0.0549	0.0072

BOM = bill of materials

Table 2: Line Analysis

Line rate (ft/min)	6.25			
Minutes/Hour	60			
T-put Linear ft /Hour	375			
Maximum Design Rate/Hour	<u>Resin</u>	<u>Gelcoat</u>	<u>Catalyst-Red</u>	<u>Catalyst-Clear</u>
T-put Linear ft/Hour	375	375	375	375
Avg Wt of product/linear ft (lbs/ft)	3.0002	0.4118	0.0549	0.0072
Total T-put (lbs/hr)	1125.06	154.42	20.59	2.71
% Styrene or Lbs/Gal	32	29.6	9.597	9.263
Emission Rate or Lbs VOC/gal	0.107	0.445	1.935	0.279
Potential Emissions (lbs/hr)	38.522	20.340	4.151	0.082
Potential Emissions (tons/hr)	0.019	0.010	0.00208	0.00004

T-put implies throughput

Table 3 Maximum Design Rate/Hour

Resin/Gel Coat/Catalyst Emissions Tons/hr	0.03155
Other VOC Emissions Tons/hr	0.00642
Total Emission (tons/hr)	0.03797
Hours/Year	8760
Combined Emissions (tons/year)	332.58

The following permits have been issued to Aero Transportation Products, Inc. from the Air Pollution Control Program.

Table 4 Permits Issued to Aero Transportation Products

Permit Number	Description
OP	2004-12-099 Part 70 Operating Permit Renewal
0198-010A	1998-04-189 amendment to permit 0198-010
0198-010A	0950191006 production increase
OP2000-065	0950191020 part 70 operating permit
0889-007	22400013005 rail car covers

PROJECT DESCRIPTION

The installation has requested the gelcoat emission limit of 31.3 tons per 12 month rolling period be eliminated, the resin (lamination/impregnation) styrene emission limit of 17.4 tons (rolling 12-month period) be eliminated, and the total styrene emission limit increased from 48.7 to 162 tons/year. These limits were imposed because of modeling requirements showing increased concentration at the property boundary above the Risk Assessment Levels (RAL).

No new equipment is being installed. No control devices have been assumed in the calculations.

The primary pollutant of concern is styrene as it is both a volatile organic compound and a hazard air pollutant. Styrene is present in both the resin and the gelcoat used to make the fiberglass. Toluene, hexane and methyl methacrylate are present in the adhesive and the solvent cleanup in significant quantities. The emissions are from the hatch cover lamination manufacturing process.

Aero Transportation Products, Inc. and Missouri Department of Natural Resources used AP-42, Section 4.4 *Polyster Resin Plastic Products Fabrication* in preparing previous construction permits (permit number 0198-010 with project number 095-0191-006 and permit number 0198-010A with project number 1998-04-189 and permit number 0889-007 with project number 2240-0013-005). However, subsequent to the date the permit was issued, EPA posted a notice on their web site "Technology Transfer Network Clearinghouse for Inventories and Emission Factors". The notice stated that Section 4.4 of AP-42 had been removed from this website because of the emission factors presented in that section appeared to under predict styrene emissions from polyester resin operations. The EPA referred to CFA Emission Models for the reinforced Plastics Industries. Using the new emission factors, the uncontrolled potential emissions of VOC are estimated to exceed the major threshold of 250 tons per year.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the installation based on calculations of actual usage, evaporative rate, styrene percent and process throughput. Potential emissions of the application represent the potential of the existing equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 5: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	**Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	0.0	N/A	N/A
Sox	40.0	N/A	0.0	N/A	N/A
NOx	40.0	N/A	0.0	N/A	N/A
VOC	40.0	<250	14.25	332.58	<250
CO	100.0	N/A	0.0	N/A	N/A
HAPs	10.0/25.0	177.22	24.34	191.82	N/A
Styrene	10.0/25.0	81.14	N/D	163.48	N/A
Toluene	10.0/25.0	N/D	N/D	21.90	N/A
Hexane	10.0/25.0	N/D	N/D	1.50	N/A
Cyclohexane	10.0/25.0	N/D	N/D	0.50	N/A

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

**Existing potential emissions taken from permit number 0198-010 project number 095-0191-006.

Emissions are based on the amount of pollutants emitted from fabrication of a specific hatch cover including combustion emissions. No new equipment is associated with this permit and no control devices have been assumed in the calculations.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and HAPS are above de minimis levels.

APPLICABLE REQUIREMENTS

Aero Transportation Products, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Hazardous Air Pollutants and Reinforced Plastic Production*, 40 CFR Part 63, Subpart WWWW.
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was performed to determine the ambient impact of styrene and toluene emissions. Table 6 shows both the modeled concentrations along with the Risk Assessment Level (RAL) limits. The dispersion modeling results demonstrated that at the concentrations of styrene and toluene will not produce adverse human health effects at the property line at the new permit limits.

Table 6: Screen 3 Modeling Results

Pollutant	Modeled 24 Hr Impact ($\mu\text{g}/\text{m}^3$)	RAL 24 hour ($\mu\text{g}/\text{m}^3$)	Modeled Annual Impact ($\mu\text{g}/\text{m}^3$)	RAL Annual ($\mu\text{g}/\text{m}^3$)
Toluene	36.2	400	7.2	20
Styrene	591.2	2240	118.24	333

The calculated emission rate for toluene was 3.6 pounds per hour and 58.86 pounds per hour for styrene. The predicted concentrations of the toluene and styrene pollutants are in compliance with the RAL values.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Timothy Paul Hines
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 16, 2007, received January 22, 2007, designating Aero Transportation Products, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey.

Attachment A VOC Monthly Emissions Worksheet

Aero Transportation Products, Inc., Jackson County, S32, T50, R31

Project Number: 2007-01-063, Installation ID Number: 095-0191

This sheet covers the period from _____ to _____.

(month, year) (month, year)

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column J	Column K
Date	Raw	Product	Useage	Throughput	Throughput	Conv Factor	Amount Used	Emission Factor	VOC's Emittid
(Mo/Yr)	Material	Code	Code	(Note 1)	Unit of Measure	(Note 2)	(Note 3)	(Note 4)	(tons) (Note 5)
	Production Resin	XC-1466	C		lbs	1.00		0.017600	
	Production Gel Coat	G325LP70798	C		lbs	1.00		0.090280	
	Tooling Resin	VSXH-2200	P		lbs	1.00		0.018924	
	Tooling Gelcoat	965YJ071	P		lbs	1.00		0.112277	
	Catalyst - MEKP-900	090-0051	C		lbs	9.597		1.935	
	Catalyst - MEKP-9H	090-0055	C		lbs	9.263		0.279	
	Adhs - Con-Bond	773HB	C		gals	1.00		5.300	
	Adhs - Silaprene	M6306	P		gals	1.00		3.428	
	Lacquer Thinner	5450	P		gals	1.00		7.135	
	Acetone	N/A	P		gals	1.00		6.610	
	Frekote - FMS	38414	P		gals	1.00		6.250	
	Frekote - FRP-NC	38418	P		gals	1.00		6.290	
	Frekote - PMC	83561	P		gals	1.00		6.950	
	Propane (Lam line)	N/A	P	500	lbs	0.00024	0.118	0.500	0.00003
	Propane (Forklift)	N/A	P	0	lbs	0.00024	0.000	0.500	0.00000
	Toluene (Toluol)	154-8668	P		gals	1.00	0	7.180	0.000
						Total Monthly VOC Emissions (tons) (Note 6)			
						Reportable VOC Emissions (note 7)			

Note 1: Total amount of material used or purchased from all processes. C = Consumed, P= purchased

Note 2: Catalyst-MEKP 900 = (1.15 specific gravity) x (8.34504/gal H₂O)

Catalyst-MEKP-9H = (1.11 specific gravity) x (8.34504/gal H₂O)

Propane = (1lb/4.24 Lbs/gal) divided by 1000gals

Note 3: Resins and Gelcoats are in pounds. Catalysy MEKP-900 thru Toluene, except propane are in gallons. Propane in thousand gallons.

Note 4: Prod. Resin = Prod. Resin = (32.00% Styrene content) x (5.50% evaporation rate)

Tooling Resin = (34.41% Styrene content) x (5.50% evaporation rate)

Tooling Gelcoat = (36.81% Styrene content) x (30.50% evaporation rate)

Catalyst - MEKP-900 = 1.935 lbs VOC/gal

Catalyst - MEKP-9H = 0.279 lbs VOC/gal

Adhs - Con-Bond = 5.30 lbs VOC/gal (6.70283 lbs/gal x 79.01% volatile weight)

Adhs - Silaprene = 3.428 lbs VOC/gal

Lac Thin-5450 = 7.135 lbs VOC/gal

Acetone = 100% VOC content = (0.792 SG) x (8.3454 lbs/gal H₂O)

Note 4 (cont): Frekote-FMS = 6.25 lbs VOC/gal and Frekote-FRP-NC = 6.29 lbs VOC/gal

Frekote-PMC = 6.95 lbs VOC/gal and Propane Emission Factor is 0.50 lb VOC/kgallon

Propane combusted (Reference AP 42 Section 1.5) and Toluene = 7.18 lbs VOC/gal

Note 5: (Column H x Column J)/2000

Note 6: Summation of all materials or Total VOC's emitted for the month

Note 7: Total VOC's for the month less Acetone per SCAQMD Rule 1168 acetone exempt).

(Total VOC emissions) - (Acetone emissions)

Attachment B Running 12 month VOC Emissions Worksheet

Aero Transportation Products, Inc.
Jackson County, S32, T50, R31
Project Number: 2007-01-063
Installation ID Number: 095-0191
Permit Number:

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column J	Column K	Column L	Column M	Column N	Column P	Column Q	Column R	Column V	Column W
Date (Mo/Yr)	VOC's Emitted (tons)															Total VOC's Emitted (tons)	
	Prod.	Prod.	Tooling	Tooling	Catalyst		Adhesives		Lacquer	Acetone	Frekotes			Propane (Note 1)	Toluene	Mo. Emissions	Agg. Emissions
	Resin	Gelcoat	Resin	Gelcoat	900	9H	Con-Bond	Silaprene	Thinner		FMS	FRP-NC	PMC			(Note 2)	(Note 3)
											0.000	0.016	0.017	0.250	0.000		
											0.000	0.000	0.017	0.063	0.000		
											0.016	0.016	0.017	0.188	0.000		
											0.031	0.000	0.035	0.250	0.197		
											0.000	0.000	0.000	0.313	0.000		
											0.000	0.031	0.000	0.250	0.000		
											0.000	0.000	0.000	0.250	0.000		
											0.000	0.000	0.000	0.188	0.000		
											0.016	0.016	0.017	0.375	0.000		
											0.000	0.000	0.035	0.313	0.000		
											0.000	0.000	0.000	0.188	0.000		
											0.000	0.000	0.000	0.00003	0.000		

Note 1: Propane is a summation of emissions from the lamination line and forklift throughputs.

Note 2: Summation of Column B through Column R, less Acetone, Column L (per SCAQMD Rule 1168 - acetone exempt).

Note 3: Running 12 month total of VOC emissions (current month + previous 11 months). Not to exceed 250 tons in any concurrent 12 month period

Mr. Paul T. Lyon
Chairman and CEO
Aero Transportation Products, Inc.
P.O. Box 1058
Independence, MO 64051-0558

RE: New Source Review Permit - Project Number: 2007-01-063

Dear Mr. Lyon:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Tim Hines at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:thl

Enclosures

c: Kansas City Regional Office
PAMS File 2007-01-063
Permit Number: