

PERMIT BOOK

STATE OF 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: **07 2008 - 012** Project Number: 2008-04-045

Parent Company: The Procter & Gamble Company

Parent Company Address: 2 P&G Plaza, Cincinnati, OH 45202

Installation Name: The Procter & Gamble Paper Products Company

Installation Address: 14484 State Highway 177, P.O. Box 400 Jackson, MO 63755

Location Information: Cape Girardeau County, S5, T32, R14

Application for Authority to Construct was made for:
Modification to 8 diaper lines by reducing a raw material and increasing another raw material and to increase the line speed capability of all diaper lines. 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.

JUL 30 2008

EFFECTIVE DATE


DIRECTOR OR DESIGNEE *for JLR*
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 departments' 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 within 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.

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

STATE OF 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.

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Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

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Permit No.	
Project No.	2008-04-045

SPECIAL CONDITIONS:

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

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."

The Procter & Gamble Paper Products Company
Cape Girardeau County, S5, T32, R14

1. Stack Testing Requirements

- A. The Procter & Gamble Paper Products Company (P&G) shall conduct performance testing to quantify the uncontrolled emission factors of particulate matter less than 10-micron in diameter (PM₁₀) and the control efficiencies of the control devices from the emission points listed in Table 1. This information shall be used to verify emission rates in Table 1. These tests shall be done in accordance with the procedures outlined below.

Table 1: Project Emission Points

Emission Point No.	Emission Point Description	Control Device No.	Control Device Description	Emission Rate (pounds/hour)
EP 02 A	A Module Dust Control	ECD 37* ECD 30*	53 FDS OLBG 52/55 OLBH	1.53
EP 03A	B Module Dust Control	ECD 70 ECD 18 ECD 20 ECD 25 ECD 26	57 On Line Baghouse 58 On Line Baghouse 59 On Line Baghouse 60 On Line Baghouse 61 On Line Baghouse	0.25
EP 08A	Process, B, D, F Final Filter	ECD 43 ECD 44 ECD 45 ECD 46 ECD 47	FSC Drum Filter 5 FSC Drum Filter 6 FSC Drum Filter 7 FSC Drum Filter 8 CSX Drum Filter 1	0.24
EP 11A	Process F Dust Control	ECD 28	CSX Baghouse	0.04

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Permit No.	
Project No.	2008-04-045

SPECIAL CONDITIONS:

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

Emission Point No.	Emission Point Description	Control Device No.	Control Device Description	Emission Rate (pounds/hour)
EP 24 A	Process B, Final Filter	ECD 38 ECD 39 ECD 40 ECD 41 ECD 42	CSX Drum Filter 1 FDS Drum Filter 1 FDS Drum Filter 2 FDS Drum Filter 3 FDS Drum Filter 4	0.29
EP 25A	CSX DF1	ECD 38	CSX Drum Filter 1	0.07
EP 26A	FSC DF1	ECD 39	FSC Drum Filter 1	0.31
EP 27A	FSC DF2	ECD 40	FSC Drum Filter 2	0.18
EP 28 A	FSC DF3	ECD41	FSC Drum Filter 3	0.32
EP 29A	FSC DF4	ECD42	FSC Drum Filter 4	0.28
EP 30A	FSC DF5	ECD 43	FSC Drum Filter 5	0.22
EP 31A	FSC DF6	ECD 44	FSC Drum Filter 6	0.29
EP 32A	FSC DF7	ECD 45	FSC Drum Filter 7	0.25
EP 33A	FSC DF8	ECD 46	FSC Drum Filter 8	0.27
EP 34A	CSX DF2	ECD 47	CSX Drum Filter 2	0.06
EP 35A	AGM FR1-4	ECD 48 ECD 49 ECD 50 ECD 51	Filter Receiver 1 Filter Receiver 2 Filter Receiver 3 Filter Receiver 4	0.17
EP 36A	AGM FR5-8	ECD 52 ECD 53 ECD 54 ECD 55	Filter Receiver 5 Filter Receiver 6 Filter Receiver 7 Filter Receiver 8	0.13
EP 37A	AGM FR15-18	ECD 62 ECD 63 ECD 64 ECD 65	Filter Receiver 15 Filter Receiver 16 Filter Receiver 17 Filter Receiver 18	0.15
EP 38A	AGM FR11-14	ECD 58 ECD 59 ECD 60 ECD 61	Filter Receiver 11 Filter Receiver 12 Filter Receiver 13 Filter Receiver 14	0.14

*These control devices do not require testing.

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Permit No.	
Project No.	2008-04-045

SPECIAL CONDITIONS:

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

- B. A completed Proposed Test Plan (form enclosed) must be submitted to the Air Pollution Control Program at least 30 days prior to the proposed test date of any such performance tests so that a pretest meeting may be arranged, if necessary, and to assure that the test date is acceptable for an observer to be present. The Proposed Test Plan must include specification of test methods to be used and be approved by the Director prior to conducting the required emissions testing. The testing required may be limited to conducting tests on a representative piece(s) of each type of equipment and/or control device. A minimum of ten percent (10%) of representative equipment and control devices must be tested in order to demonstrate compliance with Special Condition of 1.A. In addition, an alternate method(s) of quantifying the emission factors for PM₁₀ from these sources may be used in place of the above testing requirement if requested by P&G and approved by the Director.
- C. Within 60 days of achieving the maximum production rate of the new equipment, the owner/operator shall have conducted the required performance tests.
- D. Any required performance testing shall be conducted during periods of representative conditions and should also be conducted at the maximum process/production rates or within ten percent (10%) of this stated capacity, not to include periods of start-up, shutdown, or malfunction. However, if performance testing is conducted at a production rate which is less than 90% of the maximum stated capacity of the equipment, then ten percent (10%) above the production rate at which the performance test was conducted shall become the new maximum allowable hourly production rate for the unit.
- E. Two (2) copies of a written report of the performance test results must be submitted to the Director within 90 days of completion of the performance testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required Environmental Protection Agency (EPA) Method for at least one (1) sample run for each air pollutant tested. No later than thirty (30) days after the performance test results are submitted, P&G shall provide the Director with a report that establishes the potential emissions of PM₁₀ tested in Special Conditions No. 1.A. This report shall report the potential emission rates in pounds per hour, tons per year, pounds per ton

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Permit No.	
Project No.	2008-04-045

SPECIAL CONDITIONS:

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

of material feed and pounds per ton of material produced from the new equipment in order that the Air Pollution Control Program may verify the potential emissions from this project.

- F. If the results of the performance testing shows that the emission rates for PM₁₀ are greater than those stated in Table 1, then P&G shall evaluate what effects these higher emission rates would have had on the permit applicability of this project. P&G shall submit the results of any such evaluation for Air Pollution Control Program review and approval within 30 days of submitting the testing report.
 - G. The above time frames associated with this performance testing condition may be extended upon request of P&G and approval by the Director.
2. Control Device Requirements – Baghouses, Drum Filters and Filter Receivers
- A. P&G shall control emissions from the emission points listed in Table 1 using baghouses, drum filters and filter receivers as specified in the permit application. The baghouses, drum filters, and filter receivers shall be operated and maintained in accordance with standard operating procedures developed according to best engineering practices. All control devices 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. Replacement filters for baghouses, drum filters and filter receivers, sufficient to change one set of filters, shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - B. P&G shall monitor and record the operating pressure drop across the control devices at least once each operating day that the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - C. P&G shall maintain an operating and maintenance log for the each control device. The record can be maintained in hard copy or electronic form. The log(s) shall include the following:
 - A. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - B. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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

Project Number: 2008-04-045
Installation ID Number: 031-0053
Permit Number:

The Procter & Gamble Paper Products Company Complete: April 10, 2008
14484 State Highway 177
P.O. Box 400
Jackson, MO 63755

Parent Company:
The Procter & Gamble Company
2 P&G Plaza
Cincinnati, OH 45202

Cape Girardeau County, S5, T32, R14

REVIEW SUMMARY

- The Procter & Gamble Paper Products Company has applied for authority to modify eight (8) existing diaper lines by reducing a raw material and increasing another raw material and to increase the line speed capability of all diaper lines.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Baghouses, drum filters and filter receivers are being used to control the PM₁₀ emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential-minus-actual emissions of PM₁₀ are below de minimis levels.
- This installation is located in Cape Girardeau County, an attainment area for all criteria air pollutants.
- This installation is on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2] due to the combined boiler capacity which is greater than 250MMBtu/hr for all fossil-fired boilers.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is required for the equipment.
- A Part 70 Operating Permit amendment is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Procter & Gamble Paper Product Company (P&G) operates a sanitary disposable paper products manufacturing facility at Cape Girardeau, Missouri. This installation is considered an existing major source.

A Part 70 Operating Permit was issued by the Air Pollution Control Program on February 28, 2005 (OP2005-007). The following construction permits have been issued to P&G from the Air Pollution Control Program.

Table 2 Previously Issued Construction Permits

Permit Number	Description
0881-002A	Diaper production equipment
0585-003	Processes D and E, converting process
0785-003	Process F
0487-010	Modification of Processes C and E
1292-017	Delivery system for raw materials
0695-021	Increase in capacity of Process B
0198-037	PSD papermaking process
1198-023	Temporary boiler
0999-020	Diaper production lines
032002-009	Diesel generators and pumps
042002-003	Diaper lines
102002-019	Bleach usage
032003-041	A Section (8) modification of Permit Number 0198-037 and installation of two (2) new air handling units, an emergency generator, and four (4) natural gas-fired space heaters
112004-010	Addition of four (4) new diaper lines and one absorbent delivery system
052006-004	Construction of three (3) new diaper lines.
052007-011	Modification of paper machines 5G, 6G, and 7G
032008-008	Construction of 1 new diaper line.

PROJECT DESCRIPTION

P&G is seeking authority to modify eight (8) of 16 existing diaper lines by reducing a raw material and increasing another raw material. The construction will not require any new emission points or control devices. P&G also plans to increase their line speed capability of these 8 lines which will require some debottlenecking activities and air flow changes. Process air and dust control systems will be modified to provide the required process and dust control.

Diaper production consists of an assembly process and a packaging process. During the assembly process, fiber and absorbent materials are added to a plastic backsheet. A fabric cover along with elastic and adhesive tape are added before the diaper is folded. During packaging, the diapers are placed in plastic bags and then into boxes. The boxes are warehoused and shipped as needed.

The fiber and absorbent materials generate particulate. Baghouses, drum filters and filter receivers are used to collect the particulate before emitting the air to atmosphere.

P&G requested that the production throughputs, the maximum design rates, and the process flow diagrams submitted in this application to be treated as 'Confidential'. The company believes that the information identified as Confidential has competitive value since access to data would put the company at a competitive disadvantage.

EMISSIONS/CONTROLS EVALUATION

The pollutant of concern from this project is PM₁₀. Potential emissions were determined using the maximum hourly design rate of the diaper line and emission factors developed during stack testing at another plant in Mehoopany. The testing was conducted on similar equipment in April of 2003 by Kilkelly Environmental Associated. The emissions factors used for this project will be verified during stack testing as stated in the Special Conditions.

Potential emissions of the application represent the potential of the equipment at the new line speed and with the new raw material composition, assuming continuous operation (8760 hours per year). The potential emissions of PM₁₀ from this project are above de minimis levels, which are also the major source thresholds for a major source. Since this project consists of modifications to existing emissions units, the emission increase was determined by calculating the difference between the potential emissions and the baseline actual emissions. The baseline actual emissions can be determined by using any consecutive 24-month period in the past 10 years. P&G has requested to use the consecutive calendar years of 2006 and 2007. The emissions increase for PM₁₀ is below the de minimis level as shown in Table 3. This project is, therefore, not considered to be a major modification, according to the potential-to- actual-test per 40 CFR 52.21.

Table 3: Baseline Actual-to-Potential Evaluation

<i>Pollutant</i>	<i>PM₁₀</i>
Potential Emissions of the Application (tons/yr)	22.63
2006/2007 Baseline Emissions (tons/yr)**	15.56
Emissions Increase (tons/yr)	7.07
De Minimis Level (tpy)	15.0

Emissions for equipment listed in Table 1.

**The 2006 Emission Inventory Questionnaire (EIQ) was corrected to account for errors in the original submittal. These errors were outlined in a letter from P&G to the Department of Natural Resources dated September 19, 2007.

The following table provides an emissions summary for this project. Existing Actual Emissions were taken from the 2007 Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the total emissions of all equipment affected by the modification. The project increase reflects the potential emissions of the application minus the baseline actuals for the same equipment.

Table 4 Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2007 EIQ) ¹	Potential Emissions of the Application	Project Increase - Potentials Minus Baseline Actuals
PM ₁₀	15.0	Major	55.92	22.63	7.07
SO _x	40.0	N/D	1.25	N/A	N/A
NO _x	40.0	Major	172.9	N/A	N/A
VOC	40.0	Major	213.57	N/A	N/A
CO	100.0	Major	284.9	N/A	N/A
HAPs	10.0/25.0	N/D	7.53	N/A	N/A

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

Note 1: Existing actual emissions have been taken from the 2007 EIQ.

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-minus-actuals emissions of PM₁₀ are below de minimis levels.

APPLICABLE REQUIREMENTS

The Procter & Gamble Paper Products Company 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 June 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *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 10-3.090*

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*

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.

Susan Heckenkamp
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 14, 2008, received April 10, 2008, designating The Procter & Gamble Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated May 1, 2008.

Mr. Scott Smith
Environmental Manager
The Procter & Gamble Paper Products Company
14484 State Highway 177
P.O. Box 400
Jackson, MO 63755

RE: New Source Review Permit - Project Number: 2008-04-045

Dear Mr. Smith:

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 Susan Heckenkamp, at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:cwyl

Enclosures

c: Southeast Regional Office
PAMS File: 2008-04-045

Permit Number: