

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: 062020-008 Project Number: 2019-11-023
Installation Number: 069-0066

Parent Company: Associated Electric Cooperative Inc.

Parent Company Address: 2814 South Golden Ave, PO Box 754, Springfield, MO 65801

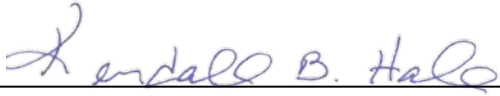
Installation Name: St. Francis Power Plant

Installation Address: Route 1, Box 441, Campbell, MO 63933

Location Information: Dunklin County, S3, T22N, R8E

Application for Authority to Construct was made for:
Modification of Unit 1 Combined Cycle Combustion Turbine #1 by increasing Compressor Mass Flow (CMF). This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*.

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



Director or Designee
Department of Natural Resources

June 5, 2020

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if modification is not started within two years after the effective date of this permit, or if modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this modified air contaminant source by e-mailing aircompliancereporting@dnr.mo.gov. The information must be made available within 30 days of actual startup. Also, you must notify the Department's Southeast Regional Office by e-mailing SERO.dnr.mo.gov within 15 days after the actual start up of this modified air contaminant source.

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review, your application, and associated correspondence constitutes your permit to construct. The permit allows you to modify and operate your air contaminant source, but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted to 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(3)(E) "Conditions required by permitting authority."

St. Francis Power Plant
Dunklin County, S3, T22N, R8E

1. **Superseding Condition**
The conditions of this permit supersede Special Conditions 2, 3.b, 5, and 7-10 of PSD Permit 0997-017A previously issued by the Air Pollution Control Program.
2. **Clarification of Applicability of Existing Limits**
St. Francis Power Plant shall continue to comply with Special Conditions 1, 3.a, 4, 6, 11-15 and 22-24 of PSD Permit 0997-017A after the modification of Unit 1. To demonstrate continued compliance with the limits in PSD Permit 0997-017A after the modification of Unit 1, new performance testing is being required by Special Condition 5.
3. **Fuel Limitation**
Unit 1 shall exclusively combust pipeline grade natural gas.
4. **Record Keeping and Reporting Requirements**
 - A. St. Francis Power Plant shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. St. Francis Power Plant shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
5. **Performance Testing**
 - A. PM₁₀ testing shall be conducted according to EPA Methods 201A and 202. PM₁₀ testing shall be conducted at greater than 90% load.
 - B. CO testing shall be conducted according to EPA Test Method 10. CO testing shall be conducted under three different scenarios:
 - 1) Scenario 1: Three test runs shall be conducted between 60% and 75% load.
 - 2) Scenario 2: Three test runs shall be conducted at greater than 90% load.

SPECIAL CONDITIONS:

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

- 3) Scenario 3: At least one test run shall be conducted for a complete startup cycle. The startup cycle is from not operating until the turbine reaches 60% load.
- C. VOC testing shall be conducted according to EPA Test Method 25A. VOC testing shall be conducted at greater than 70% load.
- D. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up for commercial operation and shall be conducted in accordance with the Stack Test Procedures outlined in Special Condition 5. Subsequent testing shall occur every 30,000 hours of operation or every 10 years, whichever comes first.
- E. St. Francis Power Plant may submit a written request to suspend further testing if two consecutive tests demonstrate compliance with all applicable limits.
- F. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- G. One electronic copy of a written report of the performance test results shall be submitted to StackTesting@dnr.mo.gov within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- H. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations, specifically:
 - 1) The load during each test run
 - 2) The heat input during each test run
 - 3) The ambient air temperature during each test run
 - 4) The ammonia injection rate (lb/hr) during each test run

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

Project Number: 2019-11-023
Installation ID Number: 069-0066
Permit Number: 062020-008

Installation Address:
St. Francis Power Plant
Route 1, Box 441
Campbell, MO 63933

Parent Company:
Associated Electric Cooperative Inc.
2814 South Golden Ave, PO Box 754
Springfield, MO 65801

Dunklin County, S3, T22N, R8E

REVIEW SUMMARY

- St. Francis Power Plant has applied for authority to modify Unit 1 Combined Cycle Combustion Turbine #1 by increasing Compressor Mass Flow (CMF).
- The application was deemed complete on November 20, 2019.
- HAP emissions are expected from the proposed equipment. Increased natural gas fuel flow will result in an increase in HAP emissions.
- 40 CFR Part 60, Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines* will apply to Unit 1 as the increased natural gas combustion will result in an increase in hourly NO_x emissions. The NO_x standard in NSPS KKKK applies at all times and at all loads, while the NO_x standard in PSD Permit 0997-017A only applies at loads above 60%.
- 40 CFR Part 60, Subpart TTTT – *Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units* will apply to Unit 1.
- 40 CFR Part 63, Subpart YYYY – *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* does not apply. The installation is an area source of HAP.
- Selective catalytic reduction and dry low-NO_x burners are used to comply with the NO_x standard in PSD Permit 0997-017A.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of each pollutant are below de minimis levels and the SMALs.
- This installation is located in Dunklin County, an attainment/unclassifiable area for all criteria pollutants.

- This installation is not listed under §52.21(b)(1)(i)(a); therefore, the installation's major source threshold is 250 tons per year. Combustion turbines were regulated under NSPS GG as of August 7, 1980; therefore, the installation is required to count fugitives towards major source applicability per §52.21(b)(1)(iii)(aa).
- Ambient air quality modeling was not performed as the project emission increase is below the de minimis levels and the SMALs.
- Emissions testing is required for the equipment as a part of this permit. Testing may also be required as part of other state, federal or applicable rules.
- St. Francis Power Plant shall include the provisions of this permit in their Part 70 operating permit renewal due by no later than October 28, 2020.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Associated Electric Cooperative Inc. operates two natural gas-fired combined cycle combustion turbines at St. Francis Power Plant in Dunklin County, Missouri. The installation also includes a heat recovery steam generator (HRSG), a natural gas-fired auxiliary boiler, two natural gas-fired water bath heaters, four diesel-fired emergency generators, and two cooling towers.

St. Francis Power Plant is an existing major NSR source for NO_x and CO. St. Francis Power Plant is an existing major Title V source of NO_x, CO, and PM₁₀.

The following NSR permits have been issued to St. Francis Power Plant by the Air Pollution Control Program:

Table 1: NSR Permit History

Permit Number	Description
PSD Permit 0997-017	Installation of Unit 1
Minor NSR Permit 0998-012	Installation of Auxiliary Boiler
PSD Permit 0799-012	Installation of Unit 2
0997-017A	True-up of Unit 1 PSD
Minor NSR Permit 042000-014	Installation of diesel generators

PROJECT DESCRIPTION

The Compressor Mass Flow (CMF) project will increase the amount of natural gas being fed to Unit 1 at peak loads by 88.995 MMBtu/hr. After the CMF project, Unit 1 will have a maximum hourly heat input of 1,820 MMBtu/hr and a maximum combined cycle output of 280 MW. The special conditions of this permit clarify that St. Francis Power Plant will continue to comply with the existing BACT limits on Unit 1 after the CMF project. Additional stack testing of PM₁₀, CO, and VOC is being required to ensure that Unit 1 continues to comply with the BACT limits after the CMF

project. Unit 1 no longer combusts fuel oil; therefore, the SO₂ limits and sulfur monitoring in Permit 0997-017A were deemed unnecessary and have been superseded. Compliance with the NO_x BACT limit will be demonstrated via CEMS. The installation is required to operate the CEMS by the Acid Rain Program. Operation below 60% load is limited to four hours per startup.

PSD Applicability

As Unit 1 is an existing emission unit, PSD applicability is determined using the actual-to-projected-actual applicability test in §52.21(a)(2)(iv)(c). See Table 2.

Projected Actual Emissions

St. Francis Power Plant has projected Unit 1 will combust a maximum of 2,642,543 MMBtu/year. Projected actual emission rates were conservatively determined based on the existing BACT limits and AP-42 emission factors.

- PM₁₀: BACT limit of 0.01 lb/MMBtu
- SO_x: AP-42 Section 3.1 "Stationary Gas Turbines" (April 2000) emission factor of 3.4E-3 lb/MMBtu
- NO_x: BACT limit of 4 ppmv based on a 30-day rolling average, corrected to 15% oxygen, at loads above 60% (equivalent to 1.67E-2 lb/MMBtu). For loads of less than 60%, the highest lb/MMBtu for an equivalent MMBtu for the same month during the baseline period. The PSD limit does not include SSM emissions; however, baseline actual emissions data included SSM emissions.
- VOC: BACT limit of 0.01 lb/MMBtu at loads above 60%
- CO: PSD limit of 10 ppmv at loads above 60% (equivalent to 3.41E-2 lb/MMBtu)

Baseline Actual Emissions

Baseline actual emissions were determined to be the average annual emissions from the baseline period of December 2017 to November 2019, during which Unit 1 combusted an average of 3,241,378 MMBtu/year¹.

- PM₁₀: February 2000 stack tested emission factor of 2.81E-3 lb/MMBtu at a CT load of 165 MW, applied at all loads
- SO_x: CEMS data
- NO_x: CEMS data
- VOC: February 2000 stack tested emission factors of 3.94E-3 lb/MMBtu at a CT² load of 114 MW, 1.33E-3 lb/MMBtu at a CT load of 132 MW, 1.54E-3 lb/MMBtu at a CT load of 158 MW, and 1.66E-3 at a CT load of 165 MW.
- CO: February 2000 stack tested emission factors of 1.36E-2 lb/MMBtu at a CT load of 114 MW, 1.54E-3 lb/MMBtu at a CT load of 132 MW, 7.56E-4 lb/MMBtu at a CT load of 158 MW, and 1.08E-3 lb/MMBtu at a CT load of 165 MW.

¹ The installation is projecting a decrease in heat input as additional wind generation within their power pool is projected to reduce the use of this peaking unit.

² CT stands for combustion turbine and represents the turbine alone without any heat recovery from the HRSG.

Table 2: PSD Applicability

Pollutant	Projected Actual Emissions	Baseline Actual Emissions	Actual-to-Projected Actual Emissions	PSD Significance Level
PM	Assumed equivalent to PM ₁₀			25
PM ₁₀	8.23	4.55	3.68	15
PM _{2.5}	Assumed equivalent to PM ₁₀			10
SO _x	2.80	0.97	1.83	40
NO _x	14.33	19.44	-5.11	40
VOC	8.23	2.84	5.39	40
CO	28.07	2.75	25.32	100

Minor NSR Applicability

The emission increase of the project was determined to be the sum of the post-project PTE of Unit 1 minus the pre-project PTE of Unit 1. Potential emissions were determined using the following emission factors:

- PM₁₀: BACT limit of 0.01 lb/MMBtu
- NO_x: 7.10E-2 lb/MMBtu at 20% load (based on CEMS data for the unit, 20% load is the worst-case load for NO_x resulting in the highest hourly emissions)
- VOC: BACT limit of 0.01 lb/MMBtu at loads above 60%
- CO: PSD limit of 10 ppmv at loads above 60% (equivalent to 3.41E-2 lb/MMBtu)
- Formaldehyde emissions were determined based on stack testing conducted on an identical unit at Associated Electric Cooperative Inc.'s Chouteau Power Plant in Locust Grove, OK
- SO_x and all other HAP emissions were determined using emission factors obtained from AP-42 Section 3.1 "Stationary Gas Turbines" (April 2000).

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Installation Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Minor NSR Project Emissions Increase
PM	25.0	249.36	N/A	3.90
PM ₁₀	15.0	147.67	14.26	3.90
PM _{2.5}	10.0	46.19	5.46	3.90
SO _x	40.0	31.92	1.92	1.33
NO _x	40.0	460.93	31.68	13.21
VOC	40.0	94.73	5.56	3.90
CO	100.0	377.67	33.82	13.29
HAPs	25.0	10.74	2.12	0.40
Toluene (108-88-3)	10.0 ³	1.98	N/D	0.05
Xylene (1330-20-7)	10.0 ³	0.97	N/D	0.02
Acetaldehyde (76-07-0)	10.0 ⁴	0.61	N/D	0.02

³ This value also represents the SMAL.

⁴ The SMAL is 9 tpy.

Pollutant	Regulatory De Minimis Levels	Installation Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Minor NSR Project Emissions Increase
Ethylbenzene (100-41-4)	10.0 ³	0.49	N/D	0.01
Formaldehyde (50-00-0)	10.0 ⁵	0.45	2.12	0.01
Propylene Oxide (75-56-9)	10.0 ⁶	0.44	N/D	0.01
Other Individual HAPs	10.0 each	<0.28 each	N/D	<0.01 each

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

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 all pollutants are below the de minimis levels and the SMALs.

APPLICABLE REQUIREMENTS

St. Francis Power Plant 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

- 10 CSR 10-6.065 *Operating Permits*
- 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*
- 10 CSR 10-6.110 *Submission of Emission Data, Emission Fees and Process Information*
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required every year for Part 70 installations
- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
- 10 CSR 10-6.165 *Restriction of Emission of Odors*

⁵The SMAL is 2 tpy.

⁶The SMAL is 5 tpy.

SPECIFIC REQUIREMENTS

- 10 CSR 10-6.070 *New Source Performance Regulations*
 - 40 CFR Part 60, Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines*

- 10 CSR 10-6.270 *Acid Rain Source Permits Required*
 - 40 CFR Part 72 *Permits Regulation*
 - 40 CFR Part 73 *Sulfur Dioxide Allowance System*
 - 40 CFR Part 75 *Continuous Emission Monitoring*
 - 40 CFR Part 76 *Acid Rain Nitrogen Oxides Emission Reduction Program*
 - 40 CFR Part 77 *Excess Emissions*
 - 40 CFR Part 78 *Appeal Procedures*

- 10 CSR 10-6.372 *Cross-State Air Pollution Rule NO_x Annual Trading Program*
 - 40 CFR Part 97, Subpart AAAAA – *CSAPR NO_x Annual Trading Program*

- 10 CSR 10-6.374 *Cross-State Air Pollution Rule NO_x Ozone Season Group 2 Trading Program*
 - 40 CFR Part 97, Subpart EEEEE – *CSAPR NO_x Ozone Season Group 2 Trading Program*

- 10 CSR 10-6.376 *Cross-State Air Pollution Rule Annual SO₂ Group 1 Trading Program*
 - 40 CFR Part 97, Subpart CCCCC – *CSAPR SO₂ Group 1 Trading Program*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 19, 2019, received November 20, 2019, designating Associated Electric Cooperative Inc. as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EIQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

June 5, 2020

Blake Pinkerton
Senior Environmental Analyst
St. Francis Power Plant
2814 South Golden Ave, PO Box 754
Springfield, MO 65801

RE: New Source Review Permit - Project Number: 2019-11-023

Dear Blake Pinkerton:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application, and submittal of an operating permit renewal 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to §§621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact



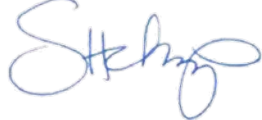
Blake Pinkerton
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information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Alana Hess, at the Department of Natural Resources' 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:aha

Enclosures

c: Southeast Regional Office
PAMS File: 2019-11-023

Permit Number: 062020-008