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: 102016-001

Project Number: 2016-07-015
Installation Number: 095-0011

Parent Company: Bayer CropScience LP

Parent Company Address: 2 T.W. Alexander Drive, Research Triangle Park, NC 27709

Installation Name: Bayer CropScience

Installation Address: 8400 Hawthorn Road, Kansas City, MO 64120

Location Information: Jackson County, S29. T50N, R32W

Application for Authority to Construct was made for:

Relocation of an existing product (Cyclanilide) from the Process Pilot Plant (PPP) to the High-Active Herbicide Plant (HAH). 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.

Prepared by
Young, Chia-Wei
New Source Review Unit

Carolyn Kuelhermes for Kyra Moore
Director or Designee
Department of Natural Resources

October 7, 2016
Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's 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 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 and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(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 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 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."

Bayer CropScience LP
Jackson County, S29. T50N, R32W

1. Superseding Condition
   The conditions of this permit supersede Special Condition No. 2 found in the previously issued Construction Permit 082015-014 issued by the Air Pollution Control Program.

2. VOC and HAPs Emission Limitations
   A. Bayer CropScience LP shall not exceed the annual plant-wide emission limits for any pollutant listed below in Table 1. All limits are based on a consecutive 12-month period. The limits apply to the emissions from all equipment/processes installed or permitted at Bayer CropScience as of the issuance date of this permit.

Table 1: Installation-Wide Emission Limits

Pollutants	Emission Limit (tpy)
PM_{10}	99.0
SO_X	99.0
NO_X	99.0
VOC	99.0
CO	99.0
Any Individual HAP	9.9
Combined HAPs	24.9

   B. Bayer CropScience shall develop and use forms to demonstrate compliance with Special Condition 2.A. The forms shall contain, at a minimum, the following information.
      1) Installation name
      2) Installation ID
      3) Permit number
      4) Current month
      5) Pollutant
      6) Emission units
      7) Each emission unit's respective current monthly throughput
      8) The emission factors and their sources or any other values used for the emissions calculations

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

9) An example of the method used to calculate emissions
10) Any control devices and efficiencies used in the calculations
11) Total pollutant emissions for the month
12) 12-month rolling total pollutant emissions
13) Compliance limit for that pollutant
14) Indication of compliance status with Special Condition 2.A.

C. As available, the emission factors and demonstrated control efficiencies developed from the most recent performance testing shall be used in the recordkeeping developed under Special Condition 2.B.

3. Control Device Requirements – Vent Gas Incinerator (VGI-01) and Thermal Oxidizer II (TOII, EP5)

A. Bayer CropScience LP shall control emissions from the Cyclanilide production process using either a Vent Gas Incinerator (VGI-01) or a Thermal Oxidizer II (EP5) as specified in the permit application.

B. Bayer CropScience LP shall operate the VGI using the minimum combustion chamber temperature and maximum natural gas flow rate determined by the performance testing required in Special Condition 4 and 8 in Permit No. 062015-006.

C. The VGI and TOII shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept onsite.

D. Bayer CropScience shall maintain an operating and maintenance log for the VGI and TOII (if used) that shall include, at a minimum, the following:
1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
2) Maintenance activities, with inspection schedule, repair actions, and replacement, etc.; and
3) Dates of all above schedule, incidents, activities, and actions.

4. Record Keeping and Reporting Requirements

A. Bayer CropScience LP 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. These records shall include SDS for all materials used.

B. Bayer CropScience LP shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, 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.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2016-07-015
Installation ID Number: 095-0011
Permit Number: 102016-001

Installation Address:
Bayer CropScience
8400 Hawthorn Road
Kansas City, MO 64120

Parent Company:
Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Jackson County, S29, T50N, R32W

REVIEW SUMMARY

- Bayer CropScience has applied for authority to move the manufacturing of an existing product (Cyclanilide) from the Process Pilot Plant (PPP) to the High-Active Herbicide Plant (HAH).

- The application was deemed complete on August 3, 2016.

- HAP emissions are expected from the Cyclanilide production process. HAPs emitted are methanol and xylene and are expected to be less than their respective SMAL.

- None of the New Source Performance Standards (NSPS) in 40 CFR Part 60 apply to the equipment involved in this project.
  - 40 CFR Part 60, Subpart E, *Standards of Performance for Incinerators,* applies to solid waste incinerators. It does not apply to Bayer's TOII or VGI.
  - 40 CFR Part 60, Subpart Ea and Eb, *Standards of Performance for Large Municipal Waste Combustors,* and 40 CFR Part 60, Subpart Ec, *Standards of Performance for Hospital/Medical/Infectious Waste Incinerators,* do not apply to the TOII or VGI because they do not combust the type of material regulated under these subparts.
  - 40 CFR Part 60, Subpart CCCC, *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units,* does not apply to the VGI because it does not combust solid wastes. This subpart does not apply to the TOII because this subpart exempts hazardous waste incineration units.

- 40 CFR 63 Subpart EEE, *National Emission Standard for Hazardous Air Pollutants from Hazardous Waste Combustors,* applies to the TOII.

- The control device requirements of 40 CFR 63, Subpart VVVVVV, *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources,* applies to the VGI based on chemical manufacturing process units (CMPUs) at the

- installation that are not part of this project. The production of Cyclanilide itself does not use and is not expected to emit any of the HAPs listed in this subpart.

- 40 CFR 63, Subpart MMM, *National Emission Standard for Hazardous Air Pollutants from Pesticide Active Ingredient (PAI) Manufacturing,* does not apply to this installation because it is not a major source for HAP.

- A vent gas incinerator (VGI) or a thermal oxidizer (TOII) is being used to control the VOC and HAP 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 emissions of all pollutants are below de minimis levels for this project.

- This installation is located in Jackson County, a maintenance area for ozone, and an attainment area for all other criteria pollutants.

- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 100 tons per year and fugitive emissions are counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

- A modification to your Part 70 Operating Permit application is required for this installation within 1 year of commencement of operations.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Bayer CropScience (Bayer) owns and operates a manufacturing plant in Jackson County, MO for the production of crop protection chemicals. The facility is composed of chemical manufacturing, chemical formulation, and auxiliary operations. The auxiliary operations include a wastewater treatment plant, a hazardous waste combustor, utilities, laboratories, and maintenance.

Bayer combusts the liquid hazardous wastes that results from the manufacture of agricultural chemicals. The combustor exhaust gas is controlled by a high-energy venturi wet scrubber, a low-energy packed bed wet scrubber, and a fiber bed mist eliminator. Bayer is a minor source for construction permits and a Part 70 source for Operating Permits.

Although the facility is a minor (area) source for construction permits, applicable rules for hazardous waste combustors (40 CFR 63, Subpart EEE) and for chemical manufacturing area sources (40 CFR 63, Subpart VVVVVV) requires sources to obtain a Part 70 Operating Permit. Previously, it had operated under a Part 70 Operating Permit for the TOII and a Basic Operating Permit for the rest of the installation. In 2013, the facility submitted a request to operate the entire installation under a Part 70 Operating Permit. The request is given project number 2013-12-029 and is still undergoing review by the Missouri Air Pollution Control Program.

The following New Source Review permits have been issued to Bayer CropScience LP from the Air Pollution Control Program.

Table 2: Permit History[1]

Permit Number	Description
082015-014	Wastewater treatment
062015-006	Vent Gas Incinerator
1425	Temporary thermal oxidizer
1398	Temporary boiler
1391	Temporary thermal oxidizer
1371	Temporary thermal oxidizer
1353	Temporary thermal oxidizer
1299	Correcting Permits 1123 and 1285
1285	JAU expansion project
1263	Herbicide production
1260	Temporary portable thermal oxidizer
1234	New products
1123	New backup thermal oxidizer
0697C	Rerouting oxidizer
1035	Production of Mesosulfuron (confidential)
1032	Production of Phenyl Aldol (confidential)
1024	New fungicide (confidential)
0976	New Metosulam (confidential)
0946	500 KW generator
0941	MKH manufacturing
0911	Pharmaceutical plant
0873	Construction of high active herbicide formulation plant
0836	Modification to the monochloropinaclone (MCP) process
0825	Construction of new herbicide formulation plant
0795	Catalytic oxidizer at liquid formulation plant
0781	Production of crop protection chemicals and intermediates.
0697A	The production of MDTC, TDA, TDA-sulfone, and FOE 5043
USEPA	Wastewater treatment

Note 1: The permit history listed in Table 1 may be incomplete as records for older permits may not have been retained.

PROJECT DESCRIPTION

Bayer CropScience proposes to move the manufacturing of an existing product (Cyclanilide) from the Process Pilot Plant (PPP) to the High-Active Herbicide (HAH) Plant.

Existing equipment within the HAH Plant will be used to produce the Cyclanilide. Three products are currently manufactured with the HAH plant: Tembotrione (AE747), Pyrasulfatole (AE309), and Propoxycarbazone-sodium (MKH6561). The three products are produced in three manufacturing trains, labeled A, B, and C. Cyclanilide will be produced in trains A and B as well as Tembotrione and Priopoxycarbazone-sodium. Trains A and B can only make the same product at the same time. Train C can be used to produce either Tembotrione or Pyrasulfatole. Two heat exchangers and one pump from the PPP will also be relocated to the HAH to supplement the Cyclanilide production process.

The maximum hourly design rate of the Cyclanilide at the new HAH location will be 0.10 tons per hour. Emissions from the manufacturing process will be routed to, and controlled by, a vent gas incinerator (VGI-01). A thermal oxidizer (TOII) will be used as a backup to control emissions whenever the vent gas incinerator is not available (i.e. during maintenance or malfunction). The vent gas incinerator is an existing unit from Permit 062015-006

Other information regarding the Cyclanilide production process (i.e. raw material, process flow, etc.) are not given in this permit because the facility has asked for confidentiality. The facility is required, per Special Condition 2.A. of Permit 082015-014 to limit its PM_{10}, SO_X, NO_X, VOC and CO emissions to no more than 99.0 tpy, individual HAP to no more than 9.9 tpy, and combined HAPs to no more than 24.9 tpy. In order to incorporate the emissions from this project into this limit, Special Condition 2 of Permit 082015-014 was superseded and restated in this permit.

EMISSIONS/CONTROLS EVALUATION

Emissions from the project include methanol, xylene, and formic acid. Methanol and xylene are considered both HAP and VOC. Formic acid is a VOC but not a HAP. Uncontrolled potential emissions were calculated using the formula

$$ER = Q_V \times \rho_{air} \times F_{flam} \times Y_i \times MW_i \times 60 \text{ min/hr.}$$

Where Q_V = Flow rate of vent stream (ft^3/min)
ρ_{air} = Density of Air (lbmol/ft^3)
F_{flam} = Fraction of vent stream containing flammable HAP components
Y_i = Molar fraction of component i based on relative vapor pressure of i
MW_i = Molecular weight of component i.

Y_i was determined by calculating the vapor pressures using the Antoine equation and using the ratio of the vapor pressures to determine the mole fraction. The facility does not have any data on Q_V and F_{flam} for the production of Cyclanilide at the HAH plant. However, the facility does have data for the production of Cyclanilide at the PPP plant. Therefore, the data from the PPP plant was used and scaled up to estimate emissions from the HAH plant.

The production of Cyclanilide does not emit any pollutants regulated under MACT 6V. However, the VGI controls other streams that are regulated under MACT 6V and the VGI is required by MACT 6V to maintain a minimum organic HAP destruction efficiency of 95%. Under Missouri State Rules 10 CSR 10-2.320, *Control of Emissions From Production of Pesticides and Herbicides,* the VGI is required to achieve a minimum VOC destruction efficiency of 99%. Therefore, a 99% control efficiency was used to estimate emissions since xylene, methanol, and formic acid are all considered VOC. The TOII is subject to MACT EEE, which requires the TOII to achieve 99.99% destruction efficiency while burning hazardous waste. However, since it is now only being used as a backup device and the VGI has a lower efficiency requirement, the efficiency of the VGI was used to calculate emissions during the entire year for a conservative analysis.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit 082015-014. Existing actual emissions were taken from the installation's 2015 EIQ. Potential emissions of the project represent the potential of the cyclanilide production process, assuming continuous operation (8760 hours per year). Because the vent gas incinerator is an existing unit, emissions from combustion are not counted in this project.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory *De Minimis* Levels	Existing Potential Emissions	[1]Existing Actual Emissions (2015 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	N/D	N/D	N/A	N/A
PM_{10}	15.0	<99.0	9.33	N/A	<99.0
$PM_{2.5}$	10.0	N/D	9.33	N/A	N/A
SOx	40.0	<99.0	2.01	N/A	<99.0
NOx	40.0	<99.0	59.48	N/A	<99.0
VOC	40.0	<99.0	13.03	0.16	<99.0
CO	100.0	<99.0	28.38	N/A	<99.0
GHG (CO_2e)	100,000	N/D	N/D	N/A	N/A
GHG (mass)	100.0	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	<9.9/24.9	4.50	0.16	<9.9/24.9
Methanol	10.0	N/D	N/D	0.09	<9.9
Xylene	10.0	N/D	N/D	0.2	<9.9

N/A = Not Applicable; N/D = Not Determined
Note 1: For VOC and HAP emissions, the values listed are not total values because the emissions are not double-counted.

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 pollutant are below de minimis levels.

APPLICABLE REQUIREMENTS

Bayer Cropscience LP 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
    - Per 10 CSR 10-6.110(4)(B)2.A. a full EIQ is required annually
- *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 10-6.165

SPECIFIC REQUIREMENTS

- *MACT Regulations*, 10 CSR 10-6.075
    - *National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors,* 40 CFR Part 63, Subpart EEE
    - *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Air Sources,* 40 CFR Part 63, Subpart VVVVVV
- *Control of Emissions from Production of Pesticides and Herbicides,* 10 CSR 10-2.320

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*, 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 June 28, 2016, received July 6, 2016, designating Bayer CropScience LP as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% ..... percent
°F ..... degrees Fahrenheit
acfm ..... actual cubic feet per minute
BACT..... Best Available Control Technology
BMPs..... Best Management Practices
Btu..... British thermal unit
CAM ..... Compliance Assurance Monitoring
CAS ..... Chemical Abstracts Service
CEMS ..... Continuous Emission Monitor System
CFR ..... Code of Federal Regulations
CO ..... carbon monoxide
CO_2..... carbon dioxide
CO_2e..... carbon dioxide equivalent
COMS..... Continuous Opacity Monitoring System
CSR..... Code of State Regulations
dscf..... dry standard cubic feet
EIQ ..... Emission Inventory Questionnaire
EP..... Emission Point
EPA ..... Environmental Protection Agency
EU..... Emission Unit
fps ..... feet per second
ft..... feet
GACT ..... Generally Available Control Technology
GHG ..... Greenhouse Gas
gpm ..... gallons per minute
gr..... grains
GWP ..... Global Warming Potential
HAP ..... Hazardous Air Pollutant
hr..... hour
hp ..... horsepower
lb ..... pound
lbs/hr..... pounds per hour
MACT ..... Maximum Achievable Control Technology
µg/m^3..... micrograms per cubic meter
m/s ..... meters per second
Mgal ..... 1,000 gallons
MW..... megawatt
MHDR..... maximum hourly design rate
MMBtu ... Million British thermal units
MMCF..... million cubic feet
MSDS..... Material Safety Data Sheet
NAAQS .. National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NO_x..... nitrogen oxides
NSPS..... New Source Performance Standards
NSR..... New Source Review
PM..... particulate matter
$PM_{2.5}$..... particulate matter less than 2.5 microns in aerodynamic diameter
PM_{10} ..... particulate matter less than 10 microns in aerodynamic diameter
ppm..... parts per million
PSD..... Prevention of Significant Deterioration
PTE ..... potential to emit
RACT ..... Reasonable Available Control Technology
RAL..... Risk Assessment Level
SCC..... Source Classification Code
scfm..... standard cubic feet per minute
SDS..... Safety Data Sheet
SIC ..... Standard Industrial Classification
SIP..... State Implementation Plan
SMAL..... Screening Model Action Levels
SO_x..... sulfur oxides
SO_2..... sulfur dioxide
tph..... tons per hour
tpy..... tons per year
VMT..... vehicle miles traveled
VOC..... Volatile Organic Compound

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

OCT 0 7 2016

Mr. Scott Munk
Senior Regulatory Affairs Consultant
Bayer Cropscience LP
P.O. Box 4913
Kansas City, MO 64120

RE: New Source Review Permit - Project Number: 2016-07-015

Dear Mr. Munk:

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, 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.

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 Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 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.oa.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young, 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:cyj

Enclosures

c: Kansas City Regional Office
PAMS File: 2016-07-015

Permit Number: 102016-001