

**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: 06 2017 - 002

Project Number: 2017-01-057  
Installation ID: 031-0002

Parent Company: Delta Companies Incorporated

Parent Company Address: PO Box 637, Cape Girardeau, MO 63701

Installation Name: Delta Asphalt Inc.

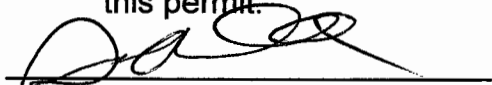
Installation Address: HWY 61 South, Cape Girardeau, MO 63701

Location Information: Cape Girardeau County, S13 T30N R13E

Application for Authority to Construct was made for:  
Installation of replacement drum dryer. 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.

  
Prepared by  
Sam Anzalone  
New Source Review Unit

  
Director or Designee  
Department of Natural Resources

JUN 06 2017

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 source(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 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 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/>

**SITE SPECIFIC 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."*

## 1. Annual Emission Limit

- A. Delta Asphalt Inc. shall emit less than 15.0 tons of PM<sub>10</sub> in any consecutive 12-month period from the following equipment listed in Table 1.

**Table 1: Equipment summary**

Emission Unit	Description
EU-01	Storage Piles
EU-02	Cold Aggregate Feed Bins
EU-03	Drum Dryer
EU-04	Haul Road in
EU-06	Mineral Storage Bins
EU-07	Haul Road out
EU-12	Hot Asphalt Silo
EU-13	Hot Asphalt Truck Load Out

- B. Delta Asphalt Inc. shall demonstrate compliance with Special Condition 1.A using Attachment A or another equivalent form that has been approved by the Air Pollution Control Program, including an electronic form.

## 2. Documented Haul Road Watering

- A. Delta Asphalt Inc. shall control dust from all haul roads at this site using water or surfactant spray consistently and correctly at all times to prevent visible fugitive emissions from entering the ambient air beyond the property boundary. The following conditions apply to haul road watering:
- 1) The water application rate shall be 100 gallons per 1000 square feet at least once every day.
  - 2) A quarter inch or more rainfall during the preceding 24 hours shall substitute for one daily water application
  - 3) Water/surfactant application shall not be required when the ground is frozen or when there will be no traffic on the roads.
- B. Delta Asphalt Inc. shall keep the following records on file and available for inspection:
- 1) A daily log initialed by the responsible facility operator of roads watered and quantity of water/chemical application used, or notation that there was a quarter inch or greater rainfall within the past 24 hours or that the facility was not in operation.

**SITE SPECIFIC SPECIAL CONDITIONS:**

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

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- 2) Water tank size, total area of roads to be watered, and the resultant number of fills necessary to accomplish the required application rate.
  - 3) Records of watering equipment breakdowns and repairs.
3. Control Device Requirement-Baghouse
- A. Delta Asphalt Inc. shall control particulate emissions from the drum dryer (EU-03) using a baghouse as specified in the permit application.
  - B. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse 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 Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
  - D. Delta Asphalt Inc. shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours when the baghouse is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
  - E. Delta Asphalt Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.
  - F. Delta Asphalt Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. Fuel Requirement-Drum Dryer
- A. Delta Asphalt Inc. shall burn exclusively low sulfur diesel fuel in their drum dryer (EU-3) with a sulfur content less than or equal to 500 parts per million by weight.
  - B. Delta Asphalt Inc shall demonstrate compliance with Special Condition 4.A by obtaining records of the fuel's sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040 *Reference Methods*.

**SITE SPECIFIC SPECIAL CONDITIONS:**

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

- C. Delta Asphalt Inc. shall keep the records required by Special Condition 4.B with the unit and make them available for Department of Natural Resources' employees upon request.
  
- 5. **Record Keeping Requirement**  
Delta Asphalt Inc. shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources' personnel upon request.
  
- 6. **Reporting Requirement**  
Delta Asphalt Inc. shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedances of the limitations imposed by this permit.

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

Project Number: 2017-01-057  
Installation ID Number: 031-0002

Permit Number: 062017-002

Delta Asphalt Inc.:  
HWY 61 South  
Cape Girardeau, MO 63701

Complete: February 21, 2017

Parent Company:  
Delta Companies Incorporated  
PO Box 637  
Cape Girardeau, MO 63701

Cape Girardeau County, S13 T30N R13E

PROJECT DESCRIPTION

Delta Asphalt Inc. has submitted an Application For Authority to Construction for the installation of a new drum dryer.

The new drum dryer has a MHDR of 300 tons of asphalt per hour. The facility will not be using BMPs. The particulate emissions from the drum dryer are controlled by a fabric filter required by Special Condition 3. The dryer is equipped with a 108 MMBtu per hour burner that can burn natural gas or waste oil and an electric asphaltic cement (AC) heater. The facility's electric power will be provided by the local utility. The worst-case fuel was used in the calculations to determine the worst-case PTE for each pollutant.

Raw materials for making asphalt will consist of limestone rock, sand, recovered asphalt product (RAP) and AC. The limestone, sand, RAP, and AC will be delivered by truck via an unpaved haul road (1600 ft) connecting the asphalt plant and Highway 61 South. This haul road will also be used for shipment of the asphalt. There is an unpaved haul road (50 ft) from the asphalt plant to the storage pile area. These haul roads will be controlled with documented watering. There are two storage piles. The first storage pile is for crushed limestone and has an area of 1 acres. The second storage pile is for sand and has an area of 0.15 acres.

This installation is located in Cape Girardeau County, which is in attainment of the NAAQS for all pollutants.

The pug-mill permit by 1196-004 is no longer located at this site.

This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. Hot mix asphalt plants fall under Category 27. Fugitive emissions are counted toward major source applicability. However, Category 27 does not apply to the 100 tons per year major source level thresholds for construction permits. Therefore, the major source threshold for this asphalt plant is 250 tons per year.

## TABLES

The following permits have been issued to Delta Asphalt Inc. from the Air Pollution Control Program.

**Table 2: Permit History**

Permit Number	Description
0473-004	New asphalt plant
1196-004	Addition of pug-mill
1196-004A	Add RAS and RAP as feed material

The table below summarizes all equipment at this facility.

**Table 3: Equipment summary**

Emission Unit	Description
EU-01	Storage Piles
EU-02	Cold Aggregate Feed Bins
EU-03	Drum Dryer
EU-04	Haul Road in
EU-06	Mineral Storage Bins
EU-07	Haul Road out
EU-12	Hot Asphalt Silo
EU-13	Hot Asphalt Truck Load Out

The table below summarizes the emissions of this project. The existing actual emissions were taken from the 2015 EIQ. The potential emissions of the application represent the emissions of all equipment and activities assuming continuous operation (8760 hours per year). The conditioned potential emissions include emissions from sources that will limit their production to ensure compliance with the annual emission limit.

**Table 4: Emissions Summary (tons per year)**

Air Pollutant	De Minimis Level/SMAL	<sup>a</sup> Existing Potential of Facility	Existing Actual Emissions (2015 EIQ)	<sup>b,c</sup> Controlled Potential Emissions of the Application	Conditioned Potential Emissions of the project
PM	25.0	N/D	N/D	221.8	35.39
PM <sub>10</sub>	15.0	47.5	2.36	94.0	<15.0
PM <sub>2.5</sub>	10.0	N/D	1.34	50.14	8.0
SO <sub>x</sub>	40.0	109.8	0.107	160.2	25.56
NO <sub>x</sub>	40.0	149.8	1.16	152.28	24.3
VOC	40.0	41.7	0.96	63.20	10.08
CO	100.0	502	18.6	41.98	6.70
GHG (CO <sub>2</sub> e)	75,000	N/D	N/D	78,595	12,486.4
GHG (mass)	0.0 / 100.0 / 250.0	N/D	N/D	78,264	12,487.5
Formaldehyde	10.0/2.0 <sup>d</sup>	N/D	N/D	4.19	0.67
2-methylnaphthalene <sup>e</sup>	10.0/0.01 <sup>d</sup>	N/D	N/D	0.10	0.04
Total HAPs	25.0	10.6	N/D	7.32	2.05

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

<sup>a</sup>Existing Potential Emissions taken from OP2013-048B

<sup>b</sup>Includes site specific haul road and storage pile emissions

<sup>c</sup>Drum Dryer (EU-03) emissions controlled by fabric filter

<sup>d</sup>SMAL

<sup>e</sup>2-methylnaphthalene is a member of the Polycyclic Organic Matter (POM) HAP group.

The plant's drum dryer (EP-03) was modeled using the AERSCREEN screen modeling software. The stack characteristic entered into the modeled are listed in Table 4.2-methylnaphthalene was the only pollutant modeled as conditioned emissions of all other pollutants are below the de minimis or SMALs levels.

**Table 5: AERSCREEN Input Parameters**

Equipment Description	Stack Height (m)	Stack Inside Diameter (m)	Stack Gas Exit Velocity (m/s)	Stack Gas Exit Temperature (K)	Dispersion Coefficient
Drum Dryer	10.67	1.52	14.23	383.15	Rural

Table 6 summarizes the ambient air quality impact analysis. The maximum modeled impact is the impact of each pollutant when the plant is operating continuously. The 24-hour impact and annual impact are based on compliance with the RAL for 2-methylnaphthalene.

**Table 6: Ambient Air Quality Impact Analysis**

Pollutant	RAL (µg/m <sup>3</sup> ) <sup>a</sup>	Averaging Time	Maximum Modeled Impact (µg/m <sup>3</sup> ) <sup>b</sup>
C <sub>11</sub> H <sub>10</sub> <sup>c</sup>	23	24-hour	0.1533
C <sub>11</sub> H <sub>10</sub> <sup>c</sup>	2.3	Annual	0.0256

N/A = Not Applicable



- <sup>a</sup> Risk Assessment Level (RAL)
- <sup>b</sup> Modeled impact at maximum capacity
- <sup>c</sup> 2-methylnaphthalene is a member of the polycyclic organic matter (POM) HAP group.

## EMISSIONS CALCULATIONS

Emissions for the project were calculated as described below and using emission factors found in the United States EPA document AP-42 *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition (AP-42).

Emissions from the drum mix asphalt plant:

- Calculated using emission factors from AP-42 Section 11.1 "Hot Mix Asphalt Plants," April 2004.
- Waste oil was used as worst case for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, VOC. Natural gas was used as worst case for CO.
- SO<sub>x</sub> emissions were calculated using the SO<sub>2</sub> and SO<sub>3</sub> emission factors from AP-42 Section 1.3 "Fuel Oil Combustion," September 1998 and assuming half of the sulfur up to 0.1 pound per ton of product is absorbed into the product.
- The asphalt plant is controlled by a baghouse, so the fabric filter controlled emission factor was used to calculate PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions.
- Emissions from plant load-out were calculated using predictive equations found in AP-42 Table 11.1-14. Default values were used for asphalt volatility and mix temperature.

Emissions from the asphalt heater:

- Calculated using emission factors from AP-42 Section 1.3. "Fuel Oil Combustion", May 2010

Emissions from haul roads and vehicular activity areas:

- Calculated using the predictive equation from AP-42 Section 13.2.2 "Unpaved Roads," November 2006.
- A 90% control efficiency for PM and PM<sub>10</sub> and a 40% control efficiency for PM<sub>2.5</sub> were applied to the emission calculations for the use of documented watering.

Emissions from storage piles:

- Load-in and load-out of storage piles were calculated using the predictive equation from AP-42 Section 13.2.4. "Aggregate Handling and Storage Piles", November 2006
- The moisture content of the aggregate is 0.7% by weight.
- Emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program's Emissions Inventory Questionnaire Form 2.8 "Storage Pile Worksheet."

## 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 PM<sub>10</sub> are conditioned below de minimis levels and potential emissions of PM are above the de minimis level, but below major source levels. The PM<sub>10</sub> limit also limits PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, VOC and CO below the de minimis levels and formaldehyde below the SMAL.

## APPLICABLE REQUIREMENTS

Delta Asphalt 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
  - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *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

- 40 CFR 60 Subpart I, "Standards of Performance for Hot Mix Asphalt Facilities" applies to the equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) or National Emission Standards for Hazardous Air Pollutants for Source Categories (MACTS) apply to the proposed equipment.
- *Control of Sulfur Dioxide Emissions*, 10 CSR 10-6.261

## 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*, it is recommended that this permit be granted with special conditions.

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

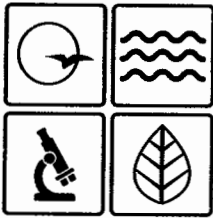
- The Application for Authority to Construct form, dated January, 24, 2017, received January, 24, 2017, designating Delta Companies Incorporated as the owner and operator of the installation.



## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....percent	<b>MMBtu</b> ....Million British thermal units
<b>°F</b> .....degrees Fahrenheit	<b>MMCF</b> ....million cubic feet
<b>acfm</b> .....actual cubic feet per minute	<b>MSDS</b> .....Material Safety Data Sheet
<b>BACT</b> .....Best Available Control Technology	<b>NAAQS</b> ....National Ambient Air Quality Standards
<b>BMPs</b> .....Best Management Practices	<b>NESHAPs</b> ..National Emissions Standards for Hazardous Air Pollutants
<b>Btu</b> .....British thermal unit	<b>NO<sub>x</sub></b> .....nitrogen oxides
<b>CAM</b> .....Compliance Assurance Monitoring	<b>NSPS</b> .....New Source Performance Standards
<b>CAS</b> .....Chemical Abstracts Service	<b>NSR</b> .....New Source Review
<b>CEMS</b> .....Continuous Emission Monitor System	<b>PM</b> .....particulate matter
<b>CFR</b> .....Code of Federal Regulations	<b>PM<sub>2.5</sub></b> .....particulate matter less than 2.5 microns in aerodynamic diameter
<b>CO</b> .....carbon monoxide	<b>PM<sub>10</sub></b> .....particulate matter less than 10 microns in aerodynamic diameter
<b>CO<sub>2</sub></b> .....carbon dioxide	<b>ppm</b> .....parts per million
<b>CO<sub>2e</sub></b> .....carbon dioxide equivalent	<b>PSD</b> Prevention of Significant Deterioration
<b>COMS</b> .....Continuous Opacity Monitoring System	<b>PTE</b> .....potential to emit
<b>CSR</b> .....Code of State Regulations	<b>RACT</b> .....Reasonable Available Control Technology
<b>dscf</b> .....dry standard cubic feet	<b>RAL</b> .....Risk Assessment Level
<b>EIQ</b> .....Emission Inventory Questionnaire	<b>SCC</b> .....Source Classification Code
<b>EP</b> .....Emission Point	<b>scfm</b> .....standard cubic feet per minute
<b>EPA</b> .....Environmental Protection Agency	<b>SDS</b> .....Safety Data Sheet
<b>EU</b> .....Emission Unit	<b>SIC</b> .....Standard Industrial Classification
<b>fps</b> .....feet per second	<b>SIP</b> .....State Implementation Plan
<b>ft</b> .....feet	<b>SMAL</b> .....Screening Model Action Levels
<b>GACT</b> .....Generally Available Control Technology	<b>SO<sub>x</sub></b> .....sulfur oxides
<b>GHG</b> .....Greenhouse Gas	<b>SO<sub>2</sub></b> .....sulfur dioxide
<b>gpm</b> .....gallons per minute	<b>tph</b> .....tons per hour
<b>gr</b> .....grains	<b>tpy</b> .....tons per year
<b>GWP</b> .....Global Warming Potential	<b>VMT</b> .....vehicle miles traveled
<b>HAP</b> .....Hazardous Air Pollutant	<b>VOC</b> .....Volatile Organic Compound
<b>hr</b> .....hour	
<b>hp</b> .....horsepower	
<b>lb</b> .....pound	
<b>lbs/hr</b> .....pounds per hour	
<b>MACT</b> .....Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> .....micrograms per cubic meter	
<b>m/s</b> .....meters per second	
<b>Mgal</b> .....1,000 gallons	
<b>MW</b> .....megawatt	
<b>MHDR</b> .....maximum hourly design rate	



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

**JUN 06 2017**

Mr. Jordan Janet  
Regional EHS Coordinator  
Delta Asphalt Inc.  
PO Box 637  
Cape Girardeau, MO 63701

RE: New Source Review Permit - Project Number: 2017-01-057

Dear Mr. Janet:

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](http://www.oa.mo.gov/ahc).



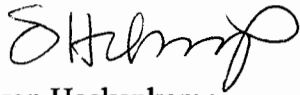
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Mr. Jordan Janet  
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If you have any questions regarding this permit, please do not hesitate to contact Sam Anzalone, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, 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:saj

Enclosures

c: Southeast Regional Office  
PAMS File: 2017-01-057

Permit Number: 06 2017 - 002