



## 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: 092015-011 Project Number: 2014-08-023  
Installation Number: 021-0105

Parent Company: City of St. Joseph

Parent Company Address: 1100 Frederick Ave., Room 204, St. Joseph, MO 64501

Installation Name: St. Joseph Sanitary Landfill

Installation Address: 9431 SE 50th Rd., St. Joseph, MO 64507

Location Information: Buchanan County, S13, T56N, R35W

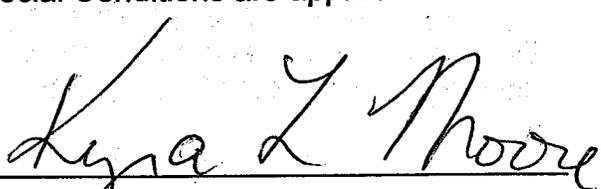
Application for Authority to Construct was made for:

This is a remedial permitting action to permit equipment installed between 1985 and 2011. The equipment includes a wood hog grinder, an air curtain burner, wood heater, and waste tire processor. 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.

SEP 21 2015

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. 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 these air contaminant sources.

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 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 at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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Permit No.	
Project No.	2014-08-023

#### 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."*

St. Joseph Sanitary Landfill  
Buchanan County, S13, T56N, R35W

1. PM<sub>10</sub> Emission Limitation
  - A. St. Joseph Sanitary Landfill shall emit a total of less than 10.0 tons of PM<sub>2.5</sub> combined in any consecutive 12-month period from the Wood Hog Grinder and it's associated engine.
  - B. St. Joseph Sanitary Landfill shall emit a total of less than 10.0 tons of PM<sub>2.5</sub> combined in any consecutive 12-month period from the Air Curtain Burner and it's associated engine.
  - C. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A. and 1.B.
2. Record Keeping and Reporting Requirements
  - A. St. Joseph Sanitary Landfill 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. Joseph Sanitary Landfill 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 show an exceedance of a limitation imposed by this permit.

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

Project Number: 2014-08-023  
Installation ID Number: 021-0105  
Permit Number:

St. Joseph Sanitary Landfill  
9431 SE 50th Rd.  
St. Joseph, MO 64507

Complete: August 15, 2014

Parent Company:  
City of St. Joseph  
1100 Frederick Ave., Room 204  
St. Joseph, MO 64501

Buchanan County, S13, T56N, R35W

REVIEW SUMMARY

- St. Joseph Sanitary Landfill has applied for a construction permit as a remedial action. During the Operating Permit technical review, it was determined that four pieces of equipment had been installed between 1985 and 2011. Two of these pieces of equipment required a construction permit, the wood hog grinder and the air curtain burner. The wood heater and the waste tire processor do not require a construction permit. Since the wood hog grinder and the air curtain burner were installed four years apart, they are considered two separate projects. To streamline permitting, these two separate projects are combined into this document.
- HAP emissions are expected from the proposed equipment. The HAPs emitted from these processes include those from combustion of diesel fuel and wood fuel.
- None of the NESHAPs apply to this installation.
- NSPS standard, 40 CFR part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, applies to the engine on the wood hog grinder. 40 CFR part 60 Subpart E, Standards of Performance for Incinerators and 40 CFR part 60 Subpart DDDD, Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration apply to the air curtain destructor (incinerator).
- MACT standard, 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines applies to the engines on the wood hog grinder, waste tire cutter, and air curtain destructor.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions are

conditioned to less than de minimis for all criteria pollutants for each project contained in this permit.

- This installation is located in Buchanan County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.
- Emission testing is not required for the equipment.
- The installation has submitted a renewal application for their current Part 70 Operating Permit. Updated application forms for these four units are required.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

St. Joseph Sanitary Landfill consists of a disposal area (consisting of disposal Areas 1, 2, and 3) of approximately 88 acres. Areas 1 and 2 are pre-Subtitle D areas of the landfill which continue to receive limited wastes as closure grades are approached. Most waste is currently being placed in the Subtitle D landfill portion of Area 3. The Free property, a permitted expansion to the south provides airspace for disposal through 2029. Emission sources include landfill fugitives, haul roads, fuel storage tanks, and the four pieces of equipment in this permit. Additionally, Kansas City Power and Light (KCP&L) operates a landfill gas to energy project onsite. The KCP&L operation includes two permitted engines (one of which has been installed) and a 2,200 scfm flare. The landfill operations and the KCPL operations are considered one installation for permitting purposes.

No construction permits have been issued to St. Joseph Sanitary Landfill from the Air Pollution Control Program. Construction permits have been issued to KCP&L and are listed in Table 1 because these are considered one installation.

Table 1: Permit History

Permit Number	Description
122010-016	Installation of 2 Caterpillar engines and a 1,300 scfm flare
122010-016	Amendment to account for as permitted vs. as built carbon monoxide release parameters for the projected emission units. Also amends the 1,300 scfm flare to a 2,200 scfm flare.

### PROJECT DESCRIPTION AND EMISSIONS EVALUATION

During the review of the current Part 70 Operating Permit renewal application, it was found that the installation had installed four pieces of equipment between 1985 and 2011 that had either never been evaluated for construction permitting or had been

evaluated incorrectly. The emission factors used in this analysis were obtained from the EPA's online emissions factor repository, WebFIRE. There are no control devices associated with this equipment.

Two of these pieces of equipment required a construction permit, the wood hog grinder and the air curtain burner. The wood heater and the waste tire processor do not require a construction permit. Since the wood hog grinder and the air curtain burner were installed four years apart, they are considered two separate projects. To streamline the permitting of the wood hog grinder and the air curtain burner, both limits have been included in this project.

This project is to evaluate and permit the following equipment:

1. Wood Hog Grinder with its' engine

This equipment was constructed in October 2011. The engine is a Caterpillar ACPX.18.1ESK, Model C18-3800 with a manufacture date of April 2011. The engine is a compression ignition, diesel fuel fired, 18.1L capacity unit rated at 746 horsepower and 5.222 MMBtu/hr. The wood grinding unit is a Morback, Model 3800 with a capacity of 50 tons/hour. Emissions for the engine were evaluated using SCC code 20200401, and wood grinding emissions were evaluated using SCC code 30700802.

2. Air curtain burner with its' engine

This unit was constructed in 2007, with the intent of using the incinerator for downed trees and other storm debris. It is an Air Burner Inc, Model S-220 unit. The overall size dimensions are 30'2" x 8'6" x 8'6", with firebox measurements of 19'8"x6'2"x7'1". The unit can incinerate 6 tons/hour. An engine is used to direct high velocity air over the firebox to encourage complete combustion. The engine is a 2007 Kubota, Model V2403-TE. It is a 2.434 L, 4 cylinder, diesel fuel fired unit rated at 59 HP and 2.5 gal/hr. Emissions for the engine were evaluated using SCC code 20300101, and incineration was evaluated using SCC code 50100510 and the Missoula study referenced in Permit Documents.

3. A wood fired space heater

This unit was constructed prior to 1985 and is rated to burn 18 lbs of wood per hour. It is used for climate control in a storage and maintenance area. Emissions were evaluated using SCC code 2104008051.

4. Waste tire processor with its' engine

This unit was constructed around 2000. At the time, a no construction permit required determination was made by the ACP, see project #2000-09-020. However, the determination only considered the emissions from the cutting of tires and did not consider emissions from the engine. This is a stationary unit and the engine emissions should have been included. The engine is a Kubota, compression ignition, 24 HP, 1L, 2.5 gal/hr, diesel fuel fired unit. This machine can cut a maximum of 40 tires an hour. Emissions for the engine were evaluated using SCC code 20300101. There are no published emission factors for the tire cutting. The unit operates such that the tire is placed on the cutting pedestal, which rotates for each cut. There is a large blade on the unit that slices the tire into large wedges, approximately 10 inches across. This unit does not shred or grind and is not expected to create measurable amounts of small particulate matter.

Table 2 provides an emissions summary for all four pieces of equipment. Unconditioned emissions reflect the potential emissions of the equipment, assuming continuous operation (8760 hours per year). Conditioned emissions reflect the emissions of those units scaled to their respective 10 ton PM<sub>2.5</sub>/year limitations established by Special Condition 1. Emissions for the space heater and waste tire processor are unconditioned, and are less than the de minimis values. Therefore no permit is required for those two units. Table 3 contains the regulatory de minimis levels and the installation's actual emissions, as reported in the 2014 EIQ.

Table 2: Emissions summary for the equipment contained in this permit (tons/year).

Pollutant	Project #1: Wood hog grinder with engine		Project #2: Air Curtain Burner with engine		Wood fired space heater	Waste tire processor with engine
	Unconditioned	Conditioned	Unconditioned	Conditioned		
PM	78.94	17.59	38.57	13.13	1.21	0.47
PM <sub>10</sub>	44.94	10.01	34.63	11.79	1.21	0.47
PM <sub>2.5</sub>	44.89	10.00	29.37	10.00	1.21	0.47
SOx	0.03	0.01	3.06	1.04	0.02	0.43
NOx	73.12	16.29	111.73	38.04	0.11	6.61
VOC	1.92	0.43	29.45	10.03	1.73	0.54
CO	19.37	4.31	69.75	23.75	9.10	1.42
GHG (CO <sub>2</sub> e)	3,777.74	841.64	96,195.75	32,749.30	4.73	247.47
GHG (mass)	3,773.29	840.65	95,312.74	32,448.69	0.19	247.47
HAPs	0.1	0.02	0.11	0.04	0.25	0.11

Table 3: Regulatory levels and actual emissions (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)
PM	25.0	ND	NR
PM <sub>10</sub>	15.0	ND	8.99
PM <sub>2.5</sub>	10.0	ND	3.44
SOx	40.0	ND	0.86
NOx	40.0	ND	14.52
VOC	40.0	ND	6.00
CO	100.0	ND	30.04
GHG (CO <sub>2</sub> e)	75,000 / 100,000	ND	NR
GHG (mass)	0.0 / 100.0 / 250.0	ND	NR
HAPs	10.0/25.0	ND	1.18

NR=not reported; ND = 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 PM<sub>2.5</sub> are conditioned below de minimis levels.

## APPLICABLE REQUIREMENTS

St. Joseph Sanitary Landfill 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
- *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

- *New Source Performance Regulations*, 10 CSR 10-6.070
  - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, 40 CFR Part 60, Subpart IIII;
  - *Standards of Performance for Incinerators*, 40 CFR part 60 Subpart E; and
  - *Emissions Guidelines and Compliance Times For Commercial and Industrial Solid Waste Incineration Units*, 40 CFR part 60 Subpart DDDD
- *MACT Regulations*, 10 CSR 10-6.075
  - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260

### 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.

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Nicole Weidenbenner, P.E.  
New Source Review Unit

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Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 5, 2014, received August 12, 2014, designating City of St. Joseph as the owner and operator of the installation.
- *Emission Factors Calculated for an Air Curtain Incinerator, Pile and Understory Burns with P. Pine as the Primary Type of Fuel*, by Ronald A. Susott et al., USDA Forestry Services, Rocky Mountain Research Station, Fire Sciences Laboratory, Missoula, MT

## Attachment A – PM<sub>2.5</sub> Compliance Worksheet

St. Joseph Sanitary Landfill  
 Project Number: 2014-08-023  
 Installation ID Number: 021-0105  
 Permit Number: \_\_\_\_\_

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.

Column 1	Column 2 (a)	Column 3 (b)	Column 4 (c)
Equipment Description	Emission Factor	Monthly throughput	PM <sub>2.5</sub> Emissions (tons)
<b>Wood Hog Grinder and Engine</b>			
Engine	6.5 lb/1000 gallons	(1000 gallons)	
Wood grinding	0.2 lb/ton	(tons)	
(d) Total for this unit:			
<b>Air Curtain Burner and Engine</b>			
Engine	42.5 lb/1000 gallons	(1000 gallons)	
Incineration	1.1 lb/ton	(tons)	
(d) Total for this unit:			
<b>Calculation of consecutive 12 Month Total for each piece of equipment</b>			
	Wood Hog Grinder and Engine	Air Curtain Burner and Engine	
(d) Total PM <sub>2.5</sub> Emissions calculated for this month (tons):			
(e) 12 Month Total PM <sub>2.5</sub> Emissions from Previous Month's Attachment A (tons):			
(f) Monthly PM <sub>2.5</sub> Emissions Total from Previous Year's Attachment A (tons):			
<b>(g) Current 12 Month Total of PM<sub>2.5</sub> Emissions (tons):</b>			

(a) Emission Factors are from the following sources:

Equipment	SCC code
Wood Hog engine	20200401
Wood Hog wood grinding	30700802
Air Curtain engine	20300101
Air Curtain incineration	Missoula Study

(b) Enter throughput in the units provided.

(c) Calculation of PM<sub>2.5</sub> Emissions in tons for this month:  $Column\ 4 = \left( \frac{Column\ 3 \times Column\ 2}{2000} \right)$

(d) Summation of Column 4 for each unit.

(e) 12 Month Total PM<sub>2.5</sub> Emissions from Previous Month's Attachment A (tons).

(f) Monthly PM<sub>2.5</sub> Emissions Total from Previous Year's Attachment A (tons).

(g) Calculate the new 12 month PM<sub>2.5</sub> Emissions Total. **A 12 month PM<sub>2.5</sub> Emissions Total of less than 10 tons for each unit indicates compliance.**

## APPENDIX A

### Abbreviations and Acronyms

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

Mr. Bill Blacketer  
Superintendent of Solid Waste/Recycling  
St. Joseph Sanitary Landfill  
9431 SE 50th Rd.  
St. Joseph, MO 64507

RE: New Source Review Permit - Project Number: 2014-08-023

Dear Mr. Blacketer:

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.

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 of 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, Truman State Office Building, Room 640, 301 W. High Street, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

Mr. Bill Blacketer  
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If you have any questions regarding this permit, please do not hesitate to contact Nicole Weidenbenner, P.E., 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:nw

Enclosures

c: Kansas City Regional Office  
PAMS File: 2014-08-023

Permit Number: