



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: 072013-012

Project Number: 2013-01-051

Installation Number: 163-0025

Parent Company: Bunge North America, Inc.

Parent Company Address: P.O. Box 490, Louisiana, MO 63353

Installation Name: Bunge North America, Inc.

Installation Address: 10305 Highway 79 South, Louisiana, MO 63353

Location Information: Pike County, S20, T54N, R1W

Application for Authority to Construct was made for:

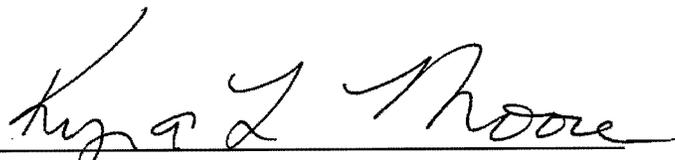
The installation of a new grain dryer and its associated grain handling equipment. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

JUL 18 2013

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.	2013-01-051

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."

Bunge North America, Inc.
Pike County, S20, T54N, R1W

1. PM₁₀ Emission Limitation
 - A. Bunge North America, Inc. shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the 72.9 MMBtu/hr grain dryer (EP-16) and its associated grain handling equipment (EP-07).
 - B. 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.
2. PM Emission Limitation
 - A. Bunge North America, Inc. shall emit less than 250.0 tons of PM in any consecutive 12-month period from the entire installation (See Table Below)

Table 1 – Bunge North America - Louisiana

Emission Point	Description:
EP-1	Grain Receiving
EP-2	Grain Receiving
EP-3	Internal Handling
EP-8	Barge Shipping
EP-9	Column Grain Dryer
EP-10	Bin Vents
EP-11	Haul Roads
EP-14	Truck Shipping
EP-15	Dust Tank Loading
EP-16	Dust Tank Unloading to Conveyor
EP-17	Dust Barge Loading

- B. Attachment B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.

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SPECIAL CONDITIONS:

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

3. Control Device Requirement-Baghouse

- A. Bunge North America, Inc. shall control emissions from the equipment listed below using baghouses as specified by the applicant.
 - 1) Grain Receiving (EP-1)
 - 2) Grain Receiving (EP-2)
 - 3) The following Internal Handling emission points (EP-3)
 - a) BES-1
 - b) BES-2
 - c) BES-3
 - d) BES-4
 - e) BC-1
 - f) BC-2
 - g) BC-3
 - h) BC-4
- B. The baghouses 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 the Department of Natural Resources' employees may easily observe them.
- C. Replacement filters for the baghouses 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. Bunge North America, Inc. shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours while the facility is in operation. The operating pressure drop shall be maintained within the range of 1.0 to 6.0 inches of water column. On days the facility is not in operation Bunge North America, Inc. shall note this on the records accordingly.
- E. Bunge North America, 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.

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SPECIAL CONDITIONS:

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

4. **Control Device Requirements – Barge Shipping**
Bunge North America, Inc. shall use a telescoping grain unloading spout end of the barge loading spouts. These telescoping spouts shall be used whenever grain is loaded into barges to reduce emissions from Barge Shipping (EP-8) as well as whenever dust from the Dust Tank is loaded into barge to reduce emissions from Dust Tank Barge Loading (EP-17).
5. **Control Device Requirements – Total Enclosure**
 - A. Bunge North America, Inc. shall enclose the following drag conveyors, for the purpose of maximizing the capture efficiency of particulate matter emissions, with duct work at each drop point.
 - 1) DC-1
 - 2) DC-2
 - 3) DC-3
 - 4) DC-3A
 - 5) DC-4
 - 6) DC-4A
 - 7) DC-5
 - 8) DC-6
 - 9) DC-7
 - 10) DC-8
 - 11) DC-9
 - 12) DC-10
 - 13) DC-11
 - 14) DC-12
 - B. Bunge North America, Inc. personnel shall inspect the enclosures listed in Special Condition 5.A. on a quarterly basis for any signs of a leak, based on sight or sound. The results of the inspection shall be recorded along with documentation regarding any necessary corrective action.
6. **Record Keeping Requirement**
Bunge North America, Inc. shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
7. **Reporting Requirement**
Bunge North America, Inc. shall report to the Air Pollution Control Program Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten 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: 2013-01-051
Installation ID Number: 163-0025
Permit Number:

Bunge North America, Inc.
10305 Highway 79 South
Louisiana, MO 63353

Complete: January 23, 2013

Parent Company:
Bunge North America, Inc.
P.O. Box 490
Louisiana, MO 63353

Pike County, S20, T54N, R1W

REVIEW SUMMARY

- Bunge North America, Inc. has applied for authority to install a new grain dryer and its associated grain handling equipment.
- HAP emissions are expected from the combustion of natural gas. However, the potential emissions of HAPs are expected to be below the SMAL for each respective HAP.
- 40 CFR 60 Standards of Performance for New Stationary Sources (NSPS), Subpart DD, "*Standards of Performance for Grain Elevators*" applies to this facility.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels. Potential emissions of particulate matter (PM) for the project remain at minor source levels. Bunge North America has also taken an installation wide 250 ton per year PM limit to be sure they are considered a minor source for PM and to avoid PSD review for this project for PM. PM_{2.5} was proportionately reduced below the de minimis levels.
- This installation is located in Pike County, an attainment area for all criteria pollutants.
- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2, Category 27. The installation's major source level is 250 tons

per year and fugitive emissions are counted toward major source applicability.

- PM does not have any ambient air quality standards and therefore modeling was not required. Ambient air quality modeling was not performed for all other pollutants since the potential emissions of all other pollutants for this project are below de minimis levels.
- Emissions testing is not required for the equipment.
- A submittal of a complete Basic Operating Permit application is required within 30 days of equipment startup which is to include justification that Bunge North America is a “country grain elevator” as defined in the EPA memorandum issued November 14, 1995, titled *Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities* and confirmation that the potential emissions of the facility for each criteria pollutant is below 100 tons per year based on the calculation method also found in EPA memorandum mentioned above. Otherwise an amendment to their current Intermediate Operating Permit within 180 days of equipment start up, or a new Part 70 Operating Permit application with 1 year of equipment start-up is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Bunge North America, Inc. (Bunge) operates a grain elevator in Louisiana, Missouri. This installation stores, dries, unloads, and loads mixed grains. This installation is a minor source under construction permit and an intermediate source under operating permits.

The following New Source Review permits have been issued to Bunge North America, Inc. from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0593-003	Modify their grain handling system
1099-006	Grain Transfer Conveyors

PROJECT DESCRIPTION

Bunge plans to replace their current 36.0 MMBtu/hr grain dryer (EP-09) and the grain transfer equipment used by the grain dryer with a new 72.9 MMBtu/hr natural gas fired grain dryer (EP-16) and new grain transfer equipment used by the new grain dryer (EP-07). The new grain dryer can handle 7000 bushels of grain per hour or 210 ton per hour. No control equipment is being used to control emissions from the new equipment.

Upon review of this project it was determined that the existing potential emission for PM would need to be calculated to determine if this facility was a major source for PM

because if this were the case Bunge would need to address this by either taking a PM de minimis limit for the project or limit the entire facility to below PM major source levels to avoid PSD review. The existing potential emissions were calculated and included all emission sources at the site and it was found that the facility was indeed above major source levels. To address this issue Bunge agreed to take an installation wide 250 ton per year PM limit in order to avoid PSD review. After reviewing the calculations it was also found that after taking the installation wide PM limit the PM₁₀ installation wide potential emission are proportionally reduced to below 100 tons per year. Currently Bunge has an Intermediate Operating permit with an installation wide 100 ton per year PM₁₀ limit. Upon the issuance of this permit Bunge no longer needs an Intermediate Operating Permit and can be downgraded to a Basic Operating Permit.

Also during the review of this project it was stated by Bunge that the storage capacity of their facility is greater than 2.5 million bushels therefore 40 CFR 60 Subpart DD, "*Standards of Performance for Grain Elevators*" applies to this facility. All facilities subject to subpart DD are considered named sources under 10 CSR 10-6.020(3)(B), Table 2, Category 27. Category 27 applies to any stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Clean Air Act. This also means that the major source level for criteria pollutants is 250 tons per year and fugitive source count toward major source applicability.

EMISSIONS/CONTROLS EVALUATION

The emission factors used for the grain handling associated with the new grain dryer were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.9.1, *Grain Elevators & Processes* (May 2003).

The filterable particulate matter emissions from the column grain dryer were calculated using the emission factors from AP-42 Section 9.9.1, *Grain Elevators & Processes*. The combustion emissions from the natural gas used to fuel the column grain dryer, which include condensable particulate matter, were calculated using AP-42 Section 1.4, *Natural Gas Combustion* (July 1998).

The following table provides an emissions summary for this project. Existing potential emissions were calculated as a part of this project to determine if the Bunge North America facility was a major source for PM. These calculations include all emission existing sources at the site and do not include any limits that have been taken in their most recent Intermediate Operating Permit OP2008-008. Existing actual emissions were taken from the installation's 2012 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	¹ Existing Potential Emissions	Existing Actual Emissions (2012 EIQ)	Potential Emissions of the Application	² Conditioned Potential of the Application	³ New Installation Conditioned Potential
PM	25.0	1048.94	N/A	205.16	57.06	<250.0
PM ₁₀	15.0	323.97	3.72	53.94	<15.0	75.75
PM _{2.5}	10.0	50.06	0.56	10.70	2.97	11.81
SOx	40.0	0.09	0.00	0.19	0.19	0.19
NOx	40.0	15.46	0.02	31.30	31.30	31.30
VOC	40.0	0.85	0.00	1.72	1.72	1.72
CO	100.0	12.99	0.02	26.30	26.30	26.30
*GHG (CO ₂ e)	75,000 / 100,000	18,663.48	N/A	37,793.56	37,793.56	37,793.56
*GHG (mass)	0.0 / 100.0 / 250.0	18,551.28	N/A	37,566.35	37,566.35	37,566.35
HAPs	10.0/25.0	0.29	0.00	0.59	0.59	0.59

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

*GHG Emissions are below 100,000 tpy for this modification therefore it does not trigger PSD review.

¹Existing Potential Emissions were calculated as a part of this project to determine if the Bunge North America facility was a major source for PM. These calculations include all emission sources at the site and do not include any limits that have been taken in their most recent Intermediate Operating Permit OP2008-008.

²Conditioned Potential Emissions of the Application include a 15.0 ton per year PM₁₀ project limit in order to avoid the modeling requirements found 10 CSR 6.060 Section (6). The PM₁₀ and PM_{2.5} potential emissions were proportionally reduced. The combustion potential emissions from the dryer remained as if operating 8760 hours as Bunge North America stated the dryer may continue to run even if no grain is being dried.

³New Installation Conditioned Potential represents the installation wide 250 ton per year PM limit taken in this permit with PM₁₀ and PM_{2.5} potential emissions proportionally reduced. The combustion potential emissions from the dryer remained as if operating 8760 hours as Bunge North America stated the dryer may continue to run even if no grain is being dried. Bunge North America currently has an application within the Air Pollution Control Program to renew their Intermediate Operating Permit. Upon completion of this permit this new equipment will be added to their Intermediate Operating Permit application. However during the calculation of the existing potential emissions of the entire installation it was found that with the installation wide 250 ton per year PM limit the potential emission of PM₁₀ are proportionally reduced below the major source level for operating permits. Therefore Bunge North America would now be considered a basic source for operating permits.

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 PM₁₀ are conditioned below de minimis levels. Potential emissions of particulate matter (PM) for the project remain at minor source levels. Bunge North America has also taken an installation wide 250 ton per year PM limit to be sure they are considered a minor source for PM and to avoid PSD review for this project for PM. PM_{2.5} was proportionately reduced below the de minimis levels.

APPLICABLE REQUIREMENTS

Bunge North America, 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
- *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 Grain Elevators*, 40 CFR Part 60, Subpart DD
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400. This rule applies to the bin vents at this facility. Bunge North America is in compliance with rule.
- *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-6.405

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*, I recommend this permit be granted with special conditions.

Gerad Fox
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 10, 2013, received January 23, 2013, designating Bunge North America, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Attachment B: PM Annual Emissions Tracking Sheet
 Bunge North America 163-0025
 Project Number: 2013-01-051
 Permit Number:

This sheet covers the period from _____ to _____ (Copy this sheet as needed.)
 (Month, Day Year) (Month, Day Year)

(a)	(b)		(c)	(d)	(e)	(f)	(g)	(h)
Month	Grain/Dust Handled (tons)		PM Emission Factor (lb/ton)	Monthly PM Emissions (pounds)	Monthly PM Emissions (tons)	Previous Month's 12-Month PM Emissions (tons)	Monthly PM Emissions from Previous Year (tons)	Current 12-Month PM Emissions (tons)
Example	Grain Received	7000	0.183	1281	1.04	20.50	0.56	20.98
	Grain Dried	3000	0.220	660				
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				
	Grain Received		0.183					
	Grain Dried		0.220					
	Dust Loaded into Barge	N/A	N/A	137				

- (a) Record the current date.
- (b) Record this month's grain handled that has been processed by the grain receiving pit, grain column dryer and dust barge loading.
- (c) PM emission factor for each process.
- (d) (d) = (b) x (c). Do this calculation for each process. The amount of dust loaded into the barge is not tracked individually by Bunge North America therefore all the potential emissions from these processes are included and hardcoded into the tracking sheet.
- (e) (e) = [(d) for grain receiving + (d) for grain drying + (d) for dust barge loading] / 2,000
- (f) Record the 12-month PM emissions (h) from last month.
- (g) Record the monthly PM emissions (e) from this month last year.
- (h) Calculate the new 12-month PM emissions. (h) = (e) + (f) - (g) A value less than 250.0 tons of PM indicates compliance

APPENDIX A

Abbreviations and Acronyms

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

Mr. Aaron Ball
Facility Manager
Bunge North America, Inc.
P.O. Box 490
Louisiana, MO 63353

RE: New Source Review Permit - Project Number: 2013-01-051

Dear Mr. Ball:

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 with your amended or new operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox, 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:gfl

Enclosures

c: Northeast Regional Office
PAMS File: 2013-01-051

Permit Number: