

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: 092017-001

Project Number: 2017-05-057
Installation Number: 183-0259

Parent Company: Ground Effects, LLC

Parent Company Address: 320 Shockdrake Court, Wentzville, MO 63385

Installation Name: Ground Effects, LLC

Installation Address: 320 Shockdrake Court, Wentzville, MO 63385

Location Information: St. Charles County, Land Grant 02670

Application for Authority to Construct was made for:

The construction of a new spray-in bed liner operation. 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.

Hans Robinson

Prepared by
Hans Robinson
New Source Review Unit

Kyra Z Moore

Director or Designee
Department of Natural Resources

SEP 07 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/>

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."

Ground Effects, LLC
St. Charles County, Land Grant 02670

1. **Superseding Condition**
 - A. The conditions of this permit supersede all special conditions found in the previously issued construction permit 112014-006 issued by the Air Pollution Control Program.

2. **Capture Device Requirement - Spray Booth**
 - A. Ground Effects, LLC shall capture emissions from each of the spray applied surface coating operations (EP-02, EP-03, and EP-04) with three (3) totally enclosed spray booths and exhaust fan(s).

 - B. Ground Effects, LLC shall operate the surface coating booth's exhaust fan(s) at all times surface coating is spray applied.

 - C. Ground Effects, LLC shall maintain an operating and maintenance log for the spray booth and exhaust system 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.

3. **Control Device Requirement - Particulate Filters**
 - A. Ground Effects, LLC shall control particulate emissions from the EP-02, EP-03, and EP-04 sprays booth using particulate filters, as specified in the permit application.

 - B. The filters shall be operated and maintained in accordance with the manufacturer's specifications.

 - C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

 - D. All spray booth fabric filters 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

SPECIAL CONDITIONS:

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

Resources' employees may easily observe them. The pressure drop shall be measured and recorded at least once every 24 hours. 24-hour periods when spray applied surface coating or wood cutting equipment is non-operational shall be recorded. The pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

- E. Ground Effects, LLC shall maintain a copy of the filter manufacturer's performance warranty on site.
 - F. Ground Effects, LLC shall maintain an operating and maintenance log for the filters 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. **Operational Requirement - Solvent Cloths**
- A. Ground Effects, LLC shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use. Ground Effects, LLC shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.
5. **Record Keeping and Reporting Requirements**
- A. Ground Effects, LLC 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 MSDS for all materials used.
 - B. Ground Effects, LLC 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: 2017-05-057
Installation ID Number: 183-0259
Permit Number: 092017-001

Installation Address:

Ground Effects, LLC
320 Shockdrake Court
Wentzville, MO 63385

Parent Company:

Ground Effects, LLC
320 Shockdrake Court
Wentzville, MO 63385

St. Charles County, Land Grant 02670

REVIEW SUMMARY

- Ground Effects, LLC has applied for authority to construct a new spray-in bed liner operation (EP-04). This will include a new spray booth and a natural gas burner to heat the booth.
- The application was deemed complete on 6/6/2017.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are 4,4'-Diphenylmethane Diisocyanate (MDI), methyl isobutyl ketone, methanol, and 2-phenoxy ethanol. Some HAPs will result from the combustion of natural gas.
- None of the New Source Performance Standards (NSPS) apply to the installation. 40 CFR Part 60, Subpart MM Auto and Light Duty Truck Surface Coating Operations does not apply to the facility because the facility is not an assembly plant.
- None of the NESHAPs apply to this installation.
- None of the currently promulgated MACT regulations apply to the proposed equipment. 40 CFR Part 63, Subpart IIII Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does not apply because the facility is not a major source for HAPs. 40 CFR Part 63, HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does not apply to the facility (specifically EP-02, EP-03, and EP-04 spray coating) because coatings do not contain chromium, lead, manganese, nickel, or cadmium.
- Enclosed spray booths equipped with particulate filters are being used to control the particulate emissions from the spray guns.

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Controlled PM, PM₁₀, and PM_{2.5} emissions as well as potential emissions of all other pollutants are below de minimis levels.
- This installation is located in St. Charles County, a nonattainment area for the 8-hour ozone standard and the PM_{2.5} standard and an attainment area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not 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.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Ground Effects, LLC currently operates a spray coating facility which will provide protective coatings for truck bed-liners. Currently the facility operates two spray booths and two natural gas burners for spray booth heating. With the issuance of this permit the installation will remain below de minimis for all pollutants.

The following New Source Review permits have been issued to Ground Effects, LLC from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
112014-006	The construction of a new two booth spray-in bed liner operation

PROJECT DESCRIPTION

Ground Effects, LLC will construct a new spray coating operation (third spray booth, EP-04), which will provide protective coatings for truck bed-liners. The two-component coating consists of a urethane pre polymer, deemed Component A (UL MPL 55-COAT A), which reacts with the amines in Component B (UL MPL 55-COAT B) to form a thick coating. The primary HAP of concern within the coatings is 4,4'- Methylene diphenyl Diisocyanate (MDI) with CAS 101-68-8 and a SMAL of 0.1 tons per year. A single booth

is capable of coating five vehicles per hour, or 43,800 total vehicles per year. This coating rate translates into the maximum usage rates listed below: Component A (28.58 gallons/hour); Component B (28.58 lbs/hour); Ultimate linings bonding agent (0.013 gallons/hour); Inbound cleaning solvent (0.422 gallons/hour); Outbound cleaning solvent (0.653 gallons/hour); Gun cleaner (0.080 gallons/hour).

The process consists of several steps: First, the incoming vehicles are manually cleaned with solvent (GRO4223). Following cleaning, a coating of bonding agent (UL COS-351-QT) will be applied in the spray booth. After the bonding agent dries, Components A and B will be applied using a two-component spray gun inside the spray booth, now heated to 95°F by a direct natural gas fired burner (EP-07). Following this application, the vehicles will be cleaned for overspray with denatured alcohol, if necessary. Finally, the vehicles will be air dried and the equipment cleaned with All Solve. The spray booth will vent to stacks, which are fitted with particulate filters. The following table lists all emission points at the facility.

Table 2: Existing and Proposed Emission Units

Emission Point	Point Description	Pollutants	Status
EP-01	Inbound, outbound, equipment cleaning operations	VOC, HAP	Expanding ¹
EP-02	Spray Booth #1	Particulate, VOC, HAPs	Existing
EP-03	Spray Booth #2	Particulate, VOC, HAPs	Existing
EP-04	Spray Booth #3	Particulate, VOC, HAPs	New
EP-05	Natural Gas Burner #1	Particulate, NOx, VOC, CO, SOx, HAPs	Existing
EP-06	Natural Gas Burner #2	Particulate, NOx, VOC, CO, SOx, HAPs	Existing
EP-07	Natural Gas Burner #3	Particulate, NOx, VOC, CO, SOx, HAPs	New

¹Accounts for various cleaning operations. Cleaning solvents are already applied to the equipment and trucks but more cleaning solvents will be used as a consequence of coating more trucks with the new spray booth.

The special conditions in the previous construction permit 112014-006 are being superseded in order to establish a special condition requiring that all spraying activities take place inside the booths (the previous permit did not include an explicit condition for the spray booths). Additionally, many of the emissions calculations in the previous permit overestimated emissions such as VOC and MDI and omitted solvent components such as 2-Phenoxy Ethanol (a glycol ether compound). All processes from 112014-006 have been recalculated and are represented in the 'Existing Emissions' column of Table 3. The emissions of this project are considered only for the new equipment being installed (EP-04, EP-07, EP-01 expansion). The new spray booth, natural gas burner, and solvent usage will be identical to those that currently exist at Ground Effects.

EMISSIONS/CONTROLS EVALUATION

The emission factors used for natural gas in this analysis for natural gas combustion were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4 *Natural Gas Combustion* (July, 1998).

According to the EPA document entitled, *Sources and Control of Volatile Organic Air Pollutants*, APTI Course 482, Third Edition (November 2002) airless spray coating of large flat surfaces can achieve 75% transfer efficiency. The transfer efficiency of the air atomizing electrostatic spray gun was taken to be 75%. The solids composition (PM₁₀) of each sprayed component was taken to be the remaining percentage range after subtracting the lowest weight percent of the respective volatile components listed in the MSDS. Since component A and component B rapidly polymerize upon contact, and considering they are sprayed from the same air atomized gun, the resulting overspray particulate will be composed of 100% polyurethane solids that lock in any potential VOC emissions (such as 4-methyl-1,3-dioxolan-2-one, CAS 108-32-7). Additionally, the SDS for component A and component B lists that neither substance will emit VOC. Only component A contains HAPs which is listed as 57% MDI by weight. To account for the range of solids versus VOC in each compound, the highest values in the range for both solids content and for VOC content were used to calculate potential emissions. Although this encompasses an overlap of content, totaling over 100%, it is the only way to truly account for any worst case scenario of particulate and VOC emissions.

Isopropyl alcohol and denatured ethyl alcohol will be used as inbound and outbound cleaning solvents and are both considered 100% VOC. The Ethyl Alcohol cleaning solution contains 3.6% methanol and 1.9% MIBK (methyl isobutyl ketone) by weight. All Solve – Polyurethane remover will be used as a gun cleaner which is 100% VOC and contains Ethylene glycol monophenyl ether (2-Phenoxy Ethanol; CAS 122-99-6; 20% composition; glycol ether – ethylene – SMAL of 5.0 tpy).

The primer bonding agent (Ultimate Linings Bonding Agent) is 100% VOC with 13% MDI composition. The agent is applied to automobile surfaces before UL MPL 55-COAT A and B are applied. Information supplied by Ultimate Linings, LTD stated that observed evaporation for the bonding agent would be 2.0% of the VOC by weight (98% of the agent stays clings to the metal surface and may also partially bind with the UL MPL 55-COAT A/B). The A/B Coat is usually applied within a few minutes of the bonding agent in order for the A/B coating to set properly so not much evaporation from the agent is expected (i.e. the bonding agent is 'sealed' from evaporating from the metal surfaces within minutes by applying the A/B coat).

All VOC and HAP containing materials are applied by hand except the polyurethane component A and component B compounds which are sprayed (and therefore have potential particulate emissions).

The emissions for MDI were calculated using the spray coating equation found in *MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry* (May

2012) by Alliance for the Polyurethane Industry (API). Specific parameter values were provided by the manufacturer and the weight percent of ingredients listed in the MSDS.

The GFS particulate filters on the spray booth stacks were taken to have a control efficiency of 99%, as listed in the manufacturer's specifications.

The following table provides an emissions summary for this project. Existing potential emissions were recalculated since Ground Effects, LLC was able to provide actual maximum hourly usage rates for coatings and solvents (the emissions from Construction Permit No. 112014-006 are not as accurate because they were permitted with estimates for usage rates). Existing actual emissions were taken from the installation's 2015 EIQ. Potential emissions of the project represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels or <i>SMAL</i>	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	2.28	0.020	1.91	5.73
PM ₁₀	15.0	2.28	0.020	1.91	5.73
PM _{2.5}	10.0	2.28	0.020	1.91	5.73
SO ₂	40.0	0.01	0.001	0.01	0.02
NO _x	40.0	1.72	0.233	0.86	2.58
VOC	40.0	23.22	2.910	11.57	34.76
CO	100.0	1.44	0.047	0.72	2.16
HAPs	10.0/25.0	1.15	N/A	0.58	1.73
Methanol	10.0	0.46	N/A	0.23	0.69
Methyl Isobutyl Ketone	10.0	0.24	N/A	0.12	0.36
2-Phenoxy Ethanol ²	5.0	0.41	N/A	0.21	0.62
MDI	0.1	9.20E-04	N/A	4.60E-04	1.38E-03

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

¹The potential emissions of the project account for only the new equipment (EP-04 and EP-07) and the additional cleaning operations associated with EP-04.

²Also known as Ethylene glycol monophenyl ether (CAS 122-99-6), 2-Phenoxy Ethanol is a glycol ether (ethylene glycol ether) and a HAP.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Controlled PM, PM₁₀, and PM_{2.5} emissions as well as potential emissions of all other pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Ground Effects, LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *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

- *Control of Emissions from Solvent Metal Cleaning*, 10 CSR 10-5.300
- *Control of Emissions from Industrial Surface Coating Operations*, 10 CSR 10-5.330

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 5/17/2017, received 5/22/2017, designating Ground Effects, LLC as the owner and operator of the installation.

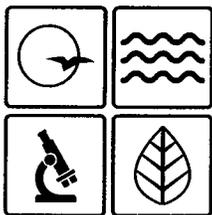
OTHER RELIED UPON DOCUMENTS

- GFS Particulate Filter Specifications, <http://www.globalfinishing.com/partsfilters/wavefiltertrial>
- E-mail Communications between Ground Effects and the Missouri Air Pollution Control Program between May, 2017 and July, 2017.
- E-mail Communication between Amit Joshi, Consultant for Conestoga-Rovers & Associates, and Barry J. McConway, Vice President of Ultimate Linings LTD, between February, 2010 to April 2010. This includes a letter from Barry McConway stating evaporation of the bonding agent would be 2.0% of VOC.

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal1,000 gallons
°Fdegrees Fahrenheit	MWmegawatt
acfmactual cubic feet per minute	MHDRmaximum hourly design rate
BACTBest Available Control Technology	MMBtuMillion British thermal units
BMPsBest Management Practices	MMCFmillion cubic feet
BtuBritish thermal unit	MSDSMaterial Safety Data Sheet
CAMCompliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPSNew Source Performance Standards
COcarbon monoxide	NSRNew Source Review
CO₂carbon dioxide	PMparticulate matter
CO_{2e}carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppmparts per million
dscfdry standard cubic feet	PSDPrevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTEpotential to emit
EPEmission Point	RACTReasonable Available Control Technology
EPAEnvironmental Protection Agency	RALRisk Assessment Level
EUEmission Unit	SCCSource Classification Code
fpsfeet per second	scfmstandard cubic feet per minute
ftfeet	SDSSafety Data Sheet
GACTGenerally Available Control Technology	SICStandard Industrial Classification
GHGGreenhouse Gas	SIPState Implementation Plan
gpmgallons per minute	SMALScreening Model Action Levels
grgrains	SO_xsulfur oxides
GWPGlobal Warming Potential	SO₂sulfur dioxide
HAPHazardous Air Pollutant	tphtons per hour
hrhour	tpytons per year
hphorsepower	VMTvehicle miles traveled
lbpound	VOCVolatile Organic Compound
lbs/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

SEP 07 2017

Ms. Marcy McElroy
Plant Manager
Ground Effects, LLC
320 Shockdrake Court
Wentzville, MO 63385

RE: New Source Review Permit - Project Number: 2017-05-057

Dear Ms. McElroy:

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

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

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to 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.



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Ms. Marcy McElroy
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If you have any questions regarding this permit, please do not hesitate to contact Hans Robinson 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:hrj

Enclosures

c: St. Louis Regional Office
PAMS File: 2017-05-057

Permit Number: **092017-001**