Bureau of Air
Curtis State Office Building
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

Kansas

Phone: 785-296-1581
Fax: 785-291-3953
ttavener@kdheks.gov
www.kdheks.gov/bar

Robert Moser, MD, Secretary — Department of Health & Environment — Sam Brownback, Governor

AIR EMISSION SOURCE CONSTRUCTION PERMIT

Source ID No.: 1890231

Effective Date: January 22, 2013

Source Name: Abengoa Bioenergy Biomass of Kansas, LLC

NAICS Code: 325193; Ethyl Alcohol Manufacturing

SIC Code: 2869; Industrial Organic Chemicals Not Elsewhere Classified

Mailing Address: 16150 Main Circle Drive, Suite 200
Chesterfield, MO 63017

Source Location: Stevens County, Township 33 South, Range 37 West, Section 18
Hugoton, Kansas 67951

Contact Person: Robert Wildgen
Project Development Manager
Abengoa Bioenergy Biomass of Kansas, LLC
Telephone Number: (636) 728-4515

This permit is issued pursuant to K.S.A. 65-3008 as amended. This permit appends new regulations for four emergency generators to the construction permit issued on September 16, 2011. All conditions and applicable regulations listed in the September 16, 2011 permit remain in effect.

I. DESCRIPTION OF ACTIVITY SUBJECT TO AIR POLLUTION CONTROL REGULATIONS

On September 16, 2011, Abengoa Bioenergy Biomass of Kansas, LLC (ABBK) was issued a Prevention of Significant Deterioration (PSD) air quality permit for a biomass to ethanol and biomass-to-energy production facility near Hugoton, Kansas. This permit was based on an air quality impact analysis (AQIA) and a Best Available Control Technology (BACT) determination. The biomass to ethanol manufacturing component of the facility will employ an enzymatic hydrolysis alcohol production process and will utilize cellulosic feedstock (e.g. biomass). The biomass to energy cogeneration component of the facility will consist of one (1) steam turbine electrical generator nominally rated up to a total of 22 Megawatts that will supply all of the electrical power requirements of ABBK. No ABBK produced electric power will be provided to the power grid. Steam will be generated to run the steam turbine from one (1) water-cooled vibrating grate biomass-fired stoker boiler rated at 500 million British Thermal Units per hour (MMBtu/hr) maximum design heating input.

The September 16, 2011 permit established requirements in accordance with the provisions of K.A.R. 28-19-300 (Construction permits and approvals; applicability) because ABBK had the potential-to-emit oxides of nitrogen (NO_X), carbon monoxide (CO), sulfur dioxide (SO_2), volatile organic compounds (VOC), particulate matter (PM), particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), in excess of 40, 100, 40, 40, 25, 15 and 10 tons per year, respectively. The September 16, 2011 permit also established requirements in accordance with 40 CFR 52.21, *Prevention of Significant Deterioration (PSD)* as adopted under K.A.R. 28-19-350 since the facility was a major new stationary source for NO_x, CO, SO_2, VOC, PM, PM_{10}, $PM_{2.5}$ and Carbon Dioxide Equivalents (CO_2e) since they are emitted in excess of the PSD trigger level.

The September 16, 2011 permit is being appended to include the installation of four emergency generator engines. ABBK has determined that four (4) natural gas fired spark ignition emergency engines, connected to corresponding electrical power generators, will be required to support the steam turbine generator and auxiliary utility support systems during boiler start-up, shutdown and malfunction events. The emergency power generators will produce electrical power for critical equipment when biomass-fired boiler power operation is interrupted.

The four emergency generator engines are subject to BACT for air emissions of NO_x, CO, SO_2, VOC, PM, PM_{10}, $PM_{2.5}$ and CO_2e. The engines are also subject to the requirements of 40 CFR 60, Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. An AQIA and a BACT determination were conducted as a part of this appended permit application process.

II. SIGNIFICANT APPLICABLE AIR REGULATIONS

The project is subject to KDHE rules relating to air pollution control. The following significant air quality requirements were determined to be applicable to this source:

A. K.A.R. 28-19-11 Exceptions Due to Breakdown or Scheduled Maintenance – as applied to State regulations K.A.R. 28-19-650

B. KAR 28-19-300, Construction Permits and Approvals; Applicability

C. K.A.R. 28-19-302(a), Construction permits and approvals; additional provisions; construction permits.

D. K.A.R. 28-19-350, Prevention of significant deterioration of air quality which adopts by reference 40 CFR 52.21, Prevention of Significant Deterioration (PSD)

E. KAR 28-19-650(a)(3), Opacity Requirements

F. 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

G. KAR 28-19-720, New Source Performance Standards, which adopts by reference, 40 CFR Part 60, Subpart A, Standards of Performance for New Stationary Sources – General Provisions.

H. K.A.R. 28-19-750, Hazardous Air Pollutants, Maximum Achievable Control Technology, which adopts by reference, the following:

1. 40 CFR Part 63, Subpart A, National Emission Standards for Hazardous Air Pollutants for Source Categories – General Provisions.

2. 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

III. AIR EMISSION UNIT TECHNICAL SPECIFICATIONS

The following equipment or equivalent is approved:

Four (4) identical Cummins Power Generation model C1750 N6C natural gas fired, 4 cycle lean burn reciprocating engine generator sets for emergency plant power requirements, each rated at 2,463 brake horse power (bhp) (Manufacture dates: to be determined; Serial Numbers: to be determined; designated as EP-20010, EP-20020, EP-20030, and EP-20040)

IV. AIR EMISSIONS ESTIMATES FROM THE PROPOSED ACTIVITY

Table 1. Estimated Operating Emissions

POLLUTANT	Potential to Emit[1] Emissions (tons per year)			
	Pre-September 16, 2011 Permit	Post-September 16, 2011 Permit	Emission Increase due to Four Emergency Engine Gen-Sets*	Total Facility Emissions (September 16, 2011 Permit Plus Four Emergency Gen-sets)
PM	> 250	130.5	0.013	130.5
PM_{10}	> 250	118.6	0.013	118.6
$PM_{2.5}$	> 250	77.0	0.013	77.0
NO_x	> 250	668.5	0.96	669.5
CO	> 250	519.5	3.12	522.6
SO_2	> 250	483.4	0.00074	483.4
VOC	> 250	29.1	0.15	29.3
Lead	0.11	0.11	0	0.11
Sulfuric Acid (H_2SO_4)	67.7	3.0	0	3.0
Hydrogen Chloride (HCl)	569.5	5.7	0	5.7
Hydrogen Fluoride (HF)	0.66	0.01	0	0.01
CO_2e	> 100,000	590,297	147	590,444
Total HAPs	> 25	20.2	0.09	20.3
Largest Single HAP (HCl)	> 10	5.7	0	5.7

* Maintenance checks and readiness testing for each engine shall be limited to 100 hours per year.

[1] Potential-to-emit means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

V. PERMIT CONDITIONS FOR THE FOUR (4) IDENTICAL CUMMINS POWER GENERATION NATURAL GAS FIRED RECIPROCATING ENGINE GENERATOR SETS (EP-20010, EP-20020, EP-20030, AND EP-20040)

A. Plant-wide Permit Conditions from Dispersion Modeling Analysis

1. Air Emission Limitations

a. Stack parameters for all equipment listed under **Section III, Air Emissions Unit Technical Specifications**, including but not limited to stack heights, stack diameters, exhaust temperatures, emission rates, and exit velocities, shall be consistent with data provided for the dispersion modeling analysis. [K.A.R. 28-19-302(a)]

b. Actual operational conditions shall be consistent with data provided for the dispersion modeling analysis. [K.A.R. 28-19-302(a)]

2. Reporting Requirements

If significant changes are made, or modeling parameters are not representative of site conditions, the facility shall document compliance with the NAAQS and increments and submit documentation of compliance to KDHE prior to making the change(s). KDHE has final authority in determining what constitutes a significant change. If modeling indicates a potential NAAQS or increment violation, then mitigation shall be required. [K.A.R. 28-19-302(a)]

B. Air Emission Limitations

1. NSPS standards referenced in 40 CFR Part 60, Subpart JJJJ specify limitations to the emission of NO_x, CO and VOC for these engines. The BACT limitations expressed in Condition V.B.6, V.B.7 and V.B.8 are more restrictive than the NSPS requirement for NO_x, CO and VOC. Therefore the NSPS emission limitations for NO_x, CO and VOC are subsumed into the NO_x, CO and VOC BACT emission limitations for these units. However, recordkeeping, reporting and performance testing requirements applicable to the NSPS NO_x, CO and VOC limits still apply. Demonstrating compliance with the NO_x, CO and VOC NSPS limitations in addition to the BACT limitations is required. [K.A.R. 28-19-302(a)]

2. The engines shall comply with 40 CFR Part 63, Subpart ZZZZ by complying with the applicable requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements of 40 CFR Part 63, Subparts A and ZZZZ are applicable.

3. The engines shall be certified by the manufacturer to meet the guidelines of 40 CFR Part 60 Subpart JJJJ.

4. Good combustion practices shall be followed at all times, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

5. The engines shall fire pipeline quality natural gas only. [K.A.R.28-19-302(a)]

6. For each engine, BACT emission limitation for NO_x is 0.882 g/hp-hr, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

7. For each engine, BACT emission limitation for CO is 2.87 g/hp-hr, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

8. For each engine, BACT emission limitation for VOC is 0.136 g/hp-hr, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

9. For each engine, BACT emission limitation for $PM/PM_{10}/PM_{2.5}$ is 0.063 lb/hr, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

10. For each engine, BACT emission limitation for SO_2 is 0.0037 lb/hr, including periods of startup, shutdown, and malfunction. [K.A.R. 28-19-302(a)]

11. Emissions of NO_x for each engine shall not exceed 2.0 g/hp-hr. [40 CFR 60.4233(e) and Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency SI Engines $\geq$ 130 HP]

12. Emissions of CO for each engine shall not exceed 4.0 g/hp-hr. [40 CFR 60.4233(e) and Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency SI Engines $\geq$ 130 HP]

13. Emissions of VOC for each engine shall not exceed 1.0 g/hp-hr. [40 CFR 60.4233(e) and Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency SI Engines $\geq$ 130 HP]

14. The owner or operator shall operate and maintain the engines to achieve the emission standards over the entire life of the engine. [K.A.R. 28-19-302(a) and 40 CFR 60.4234]

15. Each emergency engine generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing for each engine is limited to 100 hours per year. Each engine may operate up to 50 hours per year in non-emergency situations, but those 50 hours shall be counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for the facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For each emergency engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, is prohibited. [40 CFR 60.4243(d)]

16. Maintenance and testing hours of operation, except for necessary operational demonstrations to prove completion of maintenance, shall occur between 9:00 AM and 6:00 PM, Monday through Friday.

17. The owner or operator of the stationary SI ICE shall comply with the applicable General Provisions (40 CFR Part 60, Subpart A) in Table 3 of 40 CFR Part 60 Subpart JJJJ. [40 CFR 60.4246]

18. Except as provided in K.A.R. 28-19-11, opacity of visible emissions from each engine is limited to less than 20%. [K.A.R. 28-19-650(a)(3)]

C. Monitoring Requirements

1. The owner or operator shall install, calibrate, maintain, and operate a non-resettable continuous monitoring system (or device) for each emergency engine to track the hours of operation. The owner or operator shall maintain documentation that demonstrates the reason each engine was in operation (emergency service or non-emergency service, maintenance and/or testing) [40 CFR 60.4237(a)]

2. For certified engines, initial compliance with NSPS JJJJ limits of NO_x, CO and VOC for each engine shall not be required through a performance test. [40 CFR 60.4243(a)(1)] However, BACT performance testing shall be required as below.

3. Initial compliance with BACT limits NO_x, CO and VOC shall be demonstrated through a performance test on one of the identical four emergency engines at steady state, full load operation. Continuous compliance shall be demonstrated as follows:

   a. If the initial performance test results indicate emission rates are less than 95% of the emission limitation, the frequency of subsequent performance testing shall be every 5 years. However, if any initial or any subsequent performance test conducted fails to demonstrate emission rates less than 95% of the emission limitation, then a more frequent testing schedule shall be required as described below.

   b. If performance test results indicate emission rates are greater than 95% of the emission limitation, subsequent testing on the same engine shall be conducted at least once every four (4) calendar quarters or until a subsequent performance test result indicates the emission rate is less 95% of the emission limitation, at which time the frequency of testing can be reduced to every five years. [K.A.R. 28-19-302(a)]

4. Initial compliance with BACT limits of SO_2 and $PM/PM_{10}/PM_{2.5}$ shall be demonstrated on one of the four emergency engines through a performance test at steady state, full load operation. Continuous compliance shall be demonstrated as follows:

   a. If the initial performance test results indicate emission rates are less than 95% of the emission limitation, the frequency of subsequent performance testing shall be every 5 years. However, if any initial or any subsequent performance test conducted fails to demonstrate emission rates less than 95% of the emission limitation, then a more frequent testing schedule shall be required as described below.

   b. If performance test results indicate emission rates are greater than 95% of the emission limitation, subsequent testing on the same engine shall be conducted at least once every four (4) calendar quarters or until a subsequent performance test result indicates the emission rate is less 95% of the emission limitation, at which time the frequency of testing can be reduced to every five years. [K.A.R. 28-19-302(a)]

5. The owner or operator shall maintain and operate the engines in a manner consistent with good air pollution control practice for minimizing emissions. [K.A.R. 28-19-302(a)]

D. Recordkeeping Requirements

The owner or operator shall maintain the records required by 40 CFR 60.4245.

E. Reporting Requirements

1. The owner or operator shall submit written notification of the information required in 40 CFR 60.7(a), including the date of manufacture and serial numbers for the engines.

2. The owner or operator shall notify KDHE whether the engine is certified or non-certified within 30 days after construction is complete.

3. KDHE shall be notified of the date that actual start-up of the engine commences, postmarked within 15 days after such date. [K.A.R. 28-19-302(a); 40 CFR 60.8(a)]

4. The owner or operator shall submit semiannual reports detailing compliance with the BACT emission limits. These reports shall be submitted within 30 days following the end of each calendar half and shall include:

   a. The company name and address of the affected facility.

   b. An identification of each unit being included in the semiannual report.

   c. Beginning and ending dates of the reporting period.

   d. A certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [K.A.R. 28-19-302(a)]

VI. PERMIT CONDITIONS FOR CO_2e GHG BACT

A. Air Emission Limitations

1. BACT GHG Emission Limits for the four (4) Cummins Power Generation Natural Gas Fired Reciprocating Engines (EP-20010, EP-20020, EP-20030, and EP-20040) are as follows:

Table 2 – GHG BACT Rates and Emission Limits - Each Engine

Emission Unit	Pollutant	BACT Emission Rate Lb/MMScf	BACT Limit Tons Per any Consecutive 12 Month Period*
Four (4) Cummins Power Generation Engines (EP-20010, EP-20020, EP-20030, and EP-20040)	CO_2	117.0	36.7
	CH_4	0.0022	0.0007
	N_2O	0.00022	0.00007
	CO_2e	117.0	36.7

* Maintenance checks and readiness testing for each engine shall be limited to 100 hours per year.

2. The owner or operator shall calculate the CO_2e emissions on a 12-month rolling average, based on the procedures and Global Warming Potentials (GWP) contained in Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1, as published on October 30, 2009. [K.A.R. 28-19-302(a)]

3. The engines shall be operated with good combustion practices at all times, including startup, shutdown and malfunction. [K.A.R. 28-19-302(a)]

4. The owner or operator shall follow the manufacturer guidelines on maintenance schedules for the reciprocating engines. [K.A.R. 28-19-302(a)]

5. The owner or operator shall only fire pipeline quality natural gas in the reciprocating engines. [K.A.R. 28-19-302(a)]

6. The high heat value (HHV) of the fuel shall be determined by the procedures contained in 40 CFR Part 98.34(a)(6). Records shall be maintained for a period of five years from the date of analysis or record. [K.A.R. 28-19-302(a)]

7. The owner or operator shall install a non-resettable flow fuel meter on each engine to measure the flow rate of the fuel combusted. [K.A.R. 28-19-302(a)]

8. The owner or operator shall record the amount of natural gas fired in the engines on a monthly basis for use in determining compliance on a 12 month rolling basis with the BACT GHG Emission limits listed in the GHG Emissions Limits Table 2 in **Section VI.A.1.** [K.A.R. 28-19-302(a)]

B. Monitoring Requirements

1. Initial compliance for the CO_2e BACT emission limitations for reciprocating engines shall be determined by an initial performance test conducted at steady state, full load operation. The results of the testing shall be used as follows: [K.A.R. 28-19-302(a)]

   a. The owner or operator shall multiply the CO_2e hourly average emission rate determined under maximum operating test conditions by the fuel combusted in the most recent 12 month consecutive period.

   b. If the above calculated CO_2e emission total does not exceed the tons per year (TPY) specified on Table 2 in **Section VI.A.1**, no compliance strategy needs to be developed.

   c. If the above calculated CO_2e emission total exceeds the tons per year (TPY) specified in Table 2 in **Section VI.A.1**, the owner or operator shall document the exceedance in the test report and explain within the report how the facility will assure compliance with the CO_2e emission limit listed in Table 2.[K.A.R. 28-19-302(a)]

2. Beginning on the 12th month of operations after startup of the facility and continuing monthly thereafter, the owner or operator shall calculate the actual CO_2e emissions from firing natural gas in the reciprocating engines from the previous 12 months records of natural gas fired and compare to the BACT emission limits found in the GHG Emission Limits Table 2 in **Section VI.A.1**. The actual tons per year of CO_2e emissions shall not exceed the BACT Emission Limits in any 12 month rolling period. [K.A.R. 28-19-302(a)]

3. The owner or operator shall develop an operations log which documents startup, shutdown, and malfunction conditions for the reciprocating engines. [K.A.R. 28-19-302(a)]

C. Recordkeeping Requirements

1. The owner or operator shall record and maintain records of the amount of fuel combusted in each engine on a monthly basis beginning at the startup of each unit. [K.A.R. 28-19-302(a)]

2. The owner or operator shall maintain records of the monthly and 12 month rolling CO_2e emission calculations for each engine for a period of five (5) years from the date of record. [K.A.R. 28-19-302(a)]

3. All records required to be maintained shall be kept in a readily accessible location for no less than two years from the date of record. [K.A.R. 28-19-302(a)]

D. Reporting Requirements

1. The owner or operator shall submit semiannual reports detailing compliance with the monthly recordkeeping and 12 month rolling BACT emission limits. These reports shall be submitted on a semiannual basis beginning 6 months after the initial startup date. The reports shall contain the following information:

a. The company name and address of the affected facility.

b. An identification of each affected facility being included in the annual report.

c. Beginning and ending dates of the reporting period.

d. Summary of compliance or noncompliance with the emission limitations, monitoring and recordkeeping requirements of **Section VI.** of this permit, including a summary of the records maintained for **Section VI.C.1 and 2.**

e. A certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [K.A.R. 28-19-302(a)]

VII. PERFORMANCE TESTING

In conducting the compliance performance tests required by this permit, the reference test methods and procedures outlined in K.A.R. 28-19-212, 40 CFR Part 60 Appendices and the methods required under the applicable Subpart of 40 CFR Part 60 shall be used to demonstrate compliance with the limitations and conditions set forth in this permit.

A. Within 60 days after achieving the maximum rate at which the reciprocating engines will be operated, but not later than 180 days after initial startup of such units, the owner or operator of such facility shall conduct performance tests. A written report of the results of the performance tests shall be provided to the KDHE. [40 CFR 60.8]

Performance tests shall be conducted on one of the Cummins Reciprocating Engine Generator Sets as follows:

1. Performance testing to determine compliance with the BACT emission limitations for NO_x, CO and VOC, the owner or operator shall follow the performance testing requirements outlined in *Table 2 to Subpart JJJJ of 40 CFR Part 60—Requirements for Performance Tests.*

2. Performance testing to determine compliance with the BACT emission limitations for SO_2, $PM/PM_{10}/PM_{2.5}$ and CO_2e shall follow K.A.R. 28-19-212 and approved EPA testing methods. [K.A.R. 28-19-302(a)]

3. All engine performance testing shall be performed while the engine is operating above 90% load capacity. [K.A.R. 28-19-302(a)]

4. The owner or operator shall submit a performance test protocol to the KDHE no later than 30 days prior to the test to allow review of the test plan and to arrange for an observer to be present at the test. [K.A.R. 28-19-302(a)]

VIII. NOTIFICATION

A. Notify the KDHE Southwest District Office Air Program Field Staff in Dodge City at (620) 225-0596 when the project is completed so that an evaluation can be conducted.

B. Notify KDHE of the schedule for the performance tests at least 30 days before the performance tests.

IX. GENERAL PROVISIONS

A. This document shall become void if the construction or modification has not commenced within 18 months of the effective date, or if the construction or modification is interrupted for a period of 18 months or longer.

B. A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes other than activities provided for under this approval which results in potential-to-emit increases equal to or greater than the thresholds specified at K.A.R. 28-19-300.

C. Upon presentation of credentials and other documents as may be required by law, representatives of the KDHE (including authorized contractors of the KDHE) shall be allowed to:

1. enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under conditions of this document;

2. have access to and copy, at reasonable times, any records that must be kept under conditions of this document;

3. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this document; and

4. sample or monitor, at reasonable times, for the purposes of assuring compliance with this document or as otherwise authorized by the Secretary of the KDHE, any substances or parameters at any location.

D. The emission unit or stationary source, which is the subject of this document, shall be operated in compliance with all applicable requirements of the Kansas Air Quality Act and the federal Clean Air Act.

E. This document is subject to periodic review and amendment as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and Regulations.

F. This document does not relieve the owner/operator of the obligation to obtain other approvals, permits, licenses, or documents of sanction, which may be required by other federal, state, or local agencies.

G. Issuance of this document does not relieve the owner or operator of any requirement to obtain an air quality operating permit under any applicable provision of K.A.R. 28-19-500.

Permit Engineer

Terry Tavener

Terry Tavener
Environmental Scientist
Air Permitting Section

1/22/13
Date Signed

TTT:lv
Enclosure
c: Ethel Evans, SWDO
C-10550