

Program Review

of

KDHE's Air Permitting Programs

Conducted: August 2020

U.S. EPA, Region 7

Air Permitting and Standards Branch
Air and Radiation Division

Kansas Bureau of Air Program Review Report Contents

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KS/KDHE AIR BUREAU
AIR PERMITTING PROGRAMS
PROGRAM REVIEW REPORT

A. INTRODUCTION

The comprehensive review of Kansas Department of Health and Environment's (KDHE's) air permitting programs was part of the Environmental Protection Agency (EPA) Region 7's efforts to fulfill the EPA's oversight responsibility to ensure adequate implementation of the Clean Air Act. The overall scope of this review included assessment of the state agency's performance regarding: 1) Prevention of Significant Deterioration (PSD)/New Source Review (NSR) construction permitting, 2) Title V operating permitting, 3) synthetic minor permitting [construction and/or operating], 4) New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) determinations, 5) the establishment of enforceable permit conditions and 6) the use of Title V operating permit fees.

The review was initiated by a letter to the department dated March 4, 2020, with a request for separate lists of construction and Class II operating permits issued over the previous two years and a request that questionnaires be completed and returned to the regional office prior to the on-site review of files. We also requested that the KDHE fill out Attachment C from the March 27, 2018 guidance "Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70." In March, both the KDHE and the EPA employees started working from home to mitigate the spread of COVID-19. The EPA and the KDHE discussed postponing the program review. The decision was made to proceed with the program review from remote work locations. Therefore, this review was accomplished using video meetings and reviewing electronic versions of files.

The program review entrance meeting was held virtually on July 28, 2020. Attachment E list the attendees of the meeting. An exit meeting was held virtually on August 12, 2020. At this meeting we discussed our initial findings and discussed the next steps for the review. Attachment F list the attendees of that meeting.

The following Region 7 staff participated in the review of files: Ward Burns, Bob Cheever, Keith Johnson, David Peter, Pat Scott, and Bob Webber. A total of 92 source files were reviewed regarding the above-mentioned actions (see **Appendix A**).

The review team appreciated the assistance of the KDHE staff in providing records and financial information, and answering questions related to the program review.

B. SUMMARY of FINDINGS and CONCLUSIONS

On balance, the department runs adequate construction and operating permit programs. In general, we found that all the projects we reviewed completed the proper level of permitting with the only major issues being 1) spending Title V fees on non-Title V activities and 2) the lack of verifying that construction projects would not interfere with the attainment or maintenance of any ambient air quality standard. The following observations are in no particular order and most are discussed in more detail later in the report.

Observations

The KDHE does appear to be collecting adequate funds to operate the Title V program. However, Title V funds are being used to fund other non-Title V air program activities.

No air dispersion modeling or other means is used to assure that new sources or modifications will not interfere with the attainment or maintenance of any ambient air quality standard except for when PSD applies. The KDHE staff have the technical ability to follow the requirements of 40 CFR Part 51 Appendix W.

The KDHE's electronic records systems, especially the new Kansas Environmental Information Management System (KEIMS) system, seem to work well and are extremely useful with employees teleworking. EPA was given access to KEIMS to retrieve records for the file reviews. The system seems easy to use and we had no issues accessing the records stored in the system. However, we did need to take some care to avoid accidentally downloading confidential business information.

We did not observe any incorrect NSPS/NESHAP applicability/non-applicability determinations. However, the files do not contain much documentation which support NSPS/NESHAP decisions. The application forms seemed well designed to collect information needed to determine NSPS/NESHAP applicability. In some cases, the description in the permit or the chronology log provided explanations for determinations.

K.A.R. 28-19-204(a) requires construction permits and Class I and Class II operating permits to have the opportunity for the public to participate in the permit development or modification process prior to issuance. The regulation appears to require public notice for all these permits. However, construction and Class II permits are being issued without public notice. The KDHE is following an internal guidance on which permits should be placed on public notice.

Kansas does not publish their final Class I permits online. This is not a requirement, but they are the only state in the Region that does not post their final permits.

Kansas has one local agency that issues permits on behalf of the state and that agency. The KDHE stated that the KDHE reviews all documents and draft permits before issuance (except for expedited permits and approvals). The files did not contain any record of these reviews.

Most permit limits appeared to be practically enforceable. However, we did note a few cases of 12-month rolling source-wide tons per year blanket emission limits.

Minor construction permits and Class II operating permits did not have a statement of basis or fact sheets. In some cases, a chronology log or the permit description did a good job documenting permit decisions. Also, Title V permits renewal's statement of basis only address renewal issues and facility changes.

The KDHE has a very low Title V backlog and issued construction permit timely. No variances are issued.

The KDHE uses standardized spreadsheets they created to calculate emissions from grain elevators. This eased the review of grain elevator emission calculations.

The KDHE was behind on entering Best Available Control Technology (BACT) decisions into the RBLC database. They have been working to catch up on this backlog and expect to be caught up by the end of September 2020.

The KDHE does a great job with early engagement with the EPA on Prevention of Significant Deterioration (PSD) permits including providing EPA with the modeling protocols and inviting the EPA to preapplication meetings.

C. CATEGORIZED COMMENTS

1. General

a. Staffing

The KDHE air permitting program has a total of 21 staff positions with 19 of the positions currently filled. This includes a Section Chief, three Unit Supervisors, two clerical staff and 13 permit writers and database staff. The average length of NSR permitting experience is over 5 years.

In 2017, the State of Kansas implemented a market adjustment on the salary of engineers for both Engineers-In-Training and Professional Engineers. This adjustment has helped with the retention of staff.

The KDHE expressed an interest in the EPA providing additional training opportunities.

b. Other General Observations

Kansas's normal practice for permits receiving public comment is to schedule a hearing and publish the hearing information in the public notice. If no hearing is requested, the KDHE will cancel the hearing. This reduces the time needed to issue a permit if a hearing is requested since they do not need additional time to publish the notice for the hearing. This practice assists in Kansas issuing timely permits and we recommend they continue this practice.

We did not notice any documentation on Environmental Justice (EJ) in the files we reviewed. From the Questionnaires, we understand that Kansas does not have any EJ legislation, policy, or general guidance related to permitting. We understand that the KDHE is not required by the Clean Air Act or their State Implementation Plan to address EJ in permitting actions. However, people can file complaints for violating Title VI of the Civil Rights Act of 1964 against the KDHE. This has happened in another state in Region 7 related to a minor construction permit with a city filing the complaint. Therefore, we encourage the KDHE to consider EJ issues and engage with communities.

It appears that Kansas does a good job finding sources that should have air permits. Also, we noted that permits, approvals, and inspections all remind sources that pre-construction permits are required. Kansas has done an excellent job in finding air curtain incinerators subject to Title V permit requirements.

K.A.R. 28-19-204(a) requires construction permits and Class I and Class II operating permits to have the opportunity for the public to participate in the permit development or modification process prior to issuance. The regulation appears to require public notice for all these permits. However, minor construction permits and Class II operating permits are being issued without public notice. The KDHE is following an internal guidance on which permits should be placed on public notice. The Class II program is a SIP approved operating permit program that the EPA approved following the guidance from the June 28, 1989 Federal Register. At 54 FR 27282 the EPA listed several criteria that a program would have to meet to create federally enforceable limits. The fifth is that permits be issued subject to public participation. For construction permits, 40 CFR §51.161 requires permits to have public notice and comment. Therefore, we believe these permits should all be public noticed. However, the Region understands that public noticing permits increase cost in Kansas since Kansas's regulations require newspaper publication. We also understand that not having public notice speeds permit issuance which can be important for construction permits. This is especially true in areas where newspapers only publish weekly. Many other states also do not require minor construction permits to have an opportunity for public notice which would put Kansas facilities at a disadvantage if Kansas public noticed all the construction permits. The EPA will likely need to address

this issue nationwide to create a level playing field. However, we would recommend Kansas changing their regulations to allow for electronic public notices. We also note that when Kansas does public notice a permit, in addition to the newspaper notice required by their regulations, Kansas publishes the notice on their website. We believe that is a good practice and encourage Kansas to continue it.

We also examined if limits established in permits are enforceable as a practical matter. Most of the permits in the files we reviewed that had limits were based on tracking parameters that could be tracked to verify compliance such as process throughput. However, we did find a few examples where estimates were based on the use of a control device with no parametric monitoring to assure the device was operating properly or blanket emission limits. For example, the permit for Element LLC in Colwich has a 12-month rolling emissions cap from the boiler and fermentation for hazardous air pollutants (HAPS). The permit does not specify how the emissions are to be calculated for compliance verification. The permit does require a stack test but does not specify the test method, run duration, or number of runs. In any event, short term tests would not allow verification of compliance with a 12-month rolling limit. Another example was Scout Energy Management's Lateral H-East Station. The permit limited PTE based on engine RPM but we did not see any correlation between engine RPM and emissions in the file.

2. Construction Permitting

a. Assuring Healthy Air Quality

We reviewed the construction permitting records for evidence that the KDHE was considering the impact to air quality when issuing permits.

40 CFR §51.160(a) says:

Each plan must set forth legally enforceable procedures that enable the State or local agency to determine whether the construction or modification of a facility, building, structure or installation, or combination of these will result in—

- (1) A violation of applicable portions of the control strategy; or
- (2) Interference with attainment or maintenance of a national standard in the State in which the proposed source (or modification) is located or in a neighboring State.

Kansas's regulations at K.A.R. 28-19-301(d) says:

No construction permit or approval shall be issued if the department determines that the air contaminant emissions from the source will interfere with the attainment or maintenance of any ambient air quality standard that has been established under the provisions of the federal clean air act, as amended, or under

the provisions of state law.

However, there was nothing in the permit records of the files we reviewed that would demonstrate that Kansas gives any consideration to ambient air quality when issuing construction permits. Kansas stated that no air modeling is required except for permits that trigger PSD. It is certainly likely that some new facilities or modifications to existing facilities have the potential to create unhealthy air quality exceeding the national ambient air quality standards. Assuring that unhealthy air quality is not created is the main purpose for minor construction permits. We recommend that the KDHE consider if construction permits would interfere with the attainment or maintenance of any ambient air quality standard. We suggest that Kansas document in each construction permit record its rationale for why the permit is not expected to interfere with the air quality standards.

b. Other Construction Permitting Observations

The Unified Government of Wyandotte County and Kansas City, Kansas issues permit on behalf of the KDHE. In the NSR Questionnaire, the KDHE stated that they review the draft permits before issuance except for expedited permits or approvals as part of their oversight of the local agency. We were not able to find any record in the file of this review occurring. We recommend that these reviews be documented.

The KDHE was behind on entering BACT decisions into the RACT/BACT/LAER Clearinghouse (RBLC). They have been working to catch up on this backlog and expect to be caught up by the end of September 2020. The EPA is required to have the clearinghouse by Section 108(h) of the Clean Air Act. It is widely relied on for researching other BACT determinations made in the nation when preparing and reviewing PSD permits. The EPA has started considering modernizing the clearinghouse but in recent years the current system has had no funding to fix errors and staffing has been reduced. The lack of staff is delaying entries in the system by permitting authorities like the KDHE from being reviewed and promoted from draft to final.

The KDHE staff have the technical ability to follow the requirements 40 CFR Part 51 Appendix W.

3. NSPS / NESHAP

We did not observe any incorrect NSPS/NESHAP applicability/non-applicability determinations in the files we reviewed. NSPS and NESHAP standards have been correctly incorporated in the Title V operating permits we have reviewed. The application forms seemed well designed to collect information needed to determine NSPS/NESHAP applicability.

We found that the files do not contain much documentation supporting NSPS/NESHAP decisions. In some cases, the description in the permit or the chronology log provided explanations for determinations. However, in many cases we did not see any record in the file explaining the rationale of the determination.

Kansas last adopted 40 CFR Part 60, 61 and 63 by reference as of July 1, 2010. We recommend that the KDHE update their adoptions of these standards in a timelier manner. Their current adoptions are a decade old. We know that the KDHE is working on updating these adoptions. The adoption of Part 60 has recently been public noticed by the KDHE and would update their adoption to July 1, 2017. The public hearing is scheduled for November 2020. The KDHE expressed some interest in updating our delegation agreement to clarify which authorities have been delegated to Kansas.

4. Operating Permits

a. Title V Fees

Section 502(b)(3)(A) of the Clean Air Act (Act) requires Title V operating permit programs to fund all “reasonable direct and indirect costs” of the permit programs through fees collected from Title V sources and requires the fees to be sufficient to cover all reasonable Title V permit program costs. 40 CFR §70.9(a) requires state Title V programs to collect fees sufficient to cover the permit program costs and “ensure that any fee required by this section will be used solely for permit program costs.”

In response to an EPA Office of Inspector General 2014 report, regarding the importance of enhanced EPA oversight of state, local, and tribal fee practices under Title V of the Act, the EPA issued a March 27, 2018 guidance titled “Program and Fee Evaluation Strategy Guidance for 40 CFR Part 70.” This guidance recommends the EPA seek internal assistance for fee evaluations from staff with governmental accounting, financial, or economics expertise, who work outside the Part 70 program. For this review, Kathy Finazzo from the EPA Region 7’s Resources and Financial Management Branch in the Mission Support Division provided assistance.

The Title V program is largely funded by annual emission fees. Currently, Title V sources pay the greater of a base fee of \$1,000 or \$53 per ton of actual “feeable” emissions. Feeable emissions are the total number of tons, rounded to the nearest ton, of each of the following pollutants combined: sulfur dioxide, nitrogen oxides, particulate matter sized 10 microns and less, volatile organic compounds, and hazardous air pollutants. Additionally, Title V fees are assessed for initial, renewal, and significant modification applications. Initial and renewal application fees are \$3,000 and significant

modification application fees are \$1,500. The EPA approved these Title V fees in a February 27, 2019 Federal Register notice, with a March 29, 2019 effective date. Fee revenue is tracked using KEIMS.

The Kansas fiscal year runs from July 1 to June 30. The EPA's presumptive Title V fee for the majority of Kansas's 2019 fiscal year was \$51.06 per ton. It was effective from September 1, 2018 to August 31, 2019. 40 CFR §70.9(b)(2)(v) requires a greenhouse gas cost adjustment. The KDHE calculated this cost adjustment to be \$22,350. During the Kansas 2019 fiscal year, total emissions for the presumptive fee calculation were 73,863 tons. Therefore, the presumptive minimum fee collection amount is calculated to be \$3,793,794.78 (73,863 tons*\$51.06/ton+\$22,350). Kansas actually collected \$4,240,754.35. Therefore, Kansas collected an amount greater than or equal to the presumptive fee required by the EPA and is presumed to have adequate fees to fund the Title V program.

However, Kansas does not currently have adequate resources to fund its non-Title V portion of the air program. In the 2019 fiscal year, Kansas used \$1,259,419.93 of Title V fees collected to help cover the cost of the non-Title V program. Deducting the \$1,259,419.93, which Kansas characterized as Fee Revenues Transferred Out, from the Title V program revenue of \$4,240,754.35, results in a remaining balance of \$2,981,334.42, to fund the Title V program, and this amount is less than the EPA's presumptive fee amount.

Additionally, under the current scenario, the amount of Title V funds spent is not sustainable. In the 2019 fiscal year, Kansas spent \$3,693,769.69 to fund the Title V program. These expenses should have resulted in a \$546,984.66 surplus in the Title V fund at the end of the year, yet instead, \$1,259,419.93 was also spent on non-Title V activities creating a \$712,435.27 deficit. This is not sustainable and we recommend that the KDHE find other sources of revenue to fund their non-Title V activities.

The KDHE recognizes the issues caused by not collecting adequate non-Title V fees. In addition to application fees, the KDHE plans to establish annual emission fee requirements for sources operating under the approved Federally Enforceable State Operating Permit (FESOP) program and all true minor and/or area source permitting programs that are not required to obtain a Title V operating permit.

The EPA also understands that for several years Kansas has allocated 30 percent of the Title V emission fees to fund the non-Title V program. This practice is inconsistent with the requirement in 40 CFR §70.9(a) to "ensure that any fee required by this section will be used solely for permit program costs." However, nothing prevents Kansas from collecting non-Title V fees from Title V sources. We recommend that in the future when Title V program revisions are submitted to the EPA for approval, if KDHE plans to collect non-Title V fees from Title V sources to help fund non-Title V fundable activities,

then KDHE make that clear in the Title V program revisions when submitting them to the EPA for approval.

As is expected, the largest expense of KDHE's permit program is personnel cost. The allocation of personnel costs and related benefits to individual sources of revenue (Title V or non-Title V) is through each employee's task profiles. Task profiles are established within a time management system, which coordinates with the official state accounting system. Managers establish employee profiles based on work expected to be completed and these can be adjusted as managers deem appropriate. Therefore, the task profiles and the resulting allocation of expenses is based on management's knowledge and expertise. We inquired as to whether the accuracy of the profiles could be supported and if they had been updated recently. Our understanding is that no recent study has been completed to verify the accuracy of the allocation methodology of personnel costs, and that the task profiles appear to be unsupported by any data. We suggest that the KDHE consider conducting a study to collect data to support the task profiles and then adjust profiles based on the study results. Alternatively, we understand that KEIMS may have the ability to track permit actions and allocate labor to the various Title V and non-Title V tasks, though that capability has not been implemented. Should the KDHE implement that module within KEIMS, then funding splits for salary and benefits could be based on actual work performed and would be adequately supported. Allocation of personnel costs to multiple funding sources should be adjusted to actual effort on a yearly basis.

Finally, it appears that the state's official accounting system does not track programmatic financial data to the level needed to track the revenue and spending of Title V versus non-Title V programs. Spreadsheets and other systems are used. The allocation method of non-personnel expenses to either the Title V or non-Title V programs is unclear. Further, there does not appear to be documented policies and procedures for cash management and receipt of "revenue." We recommend that KDHE document the procedures used for financial recording and tracking for succession planning.

b. Other Title V Observations

The EPA tracks Title V timely permit issuance with semiannual reports called the Title V Operating Permits System (TOPS). The TOPS report from the KDHE for the period of January 1, 2020 through June 30, 2020 demonstrated that the KDHE is issuing Title V permits in a timely manner even with the challenges of COVID-19. Kansas reports two initial Part 70 applications older than 18 months. They only have one renewal application for an expired permit that is older than 18 months or 0.4% of their Title V permit universe. In 2017, this backlog was as high as 20 or 7.0% of their Title V permit universe. This shows a significant improvement in reducing their backlog and issuing Title V permits timely. Out of the six Title V permitting agencies in Region 7, Kansas has the lowest percent backlog of renewal applications.

When Kansas issues renewal Title V permits the statement of basis for the permits only cover issues related to the renewal and any facility changes. This would prevent a member of the public from benefiting from the statement of basis when trying to understand the permit without getting access to all the past statement of basis. We recommend that the initial permit's statement of basis be carried forward and added to or items removed if they are no longer applicable to the permit so that the single document provides the basis for the entire permit. We believe this would also be useful to staff at the KDHE as they renew permits. It would provide a single document they could review to get an understanding of the existing permits terms and conditions.

Kansas sends reminders to facilities when it is time to renew their operating permit. Providing this reminder is not a requirement of the Title V program. We believe Kansas should continue this practice since it likely reduces the number of late renewal applications, is a nice compliance assistance service to the facilities, and puts Kansas in a better enforcement position if facilities fail to submit their renewal application timely.

Kansas is the only permitting authority in Region 7 that does not make their final Title V permits available on the Internet. Kansas does post their draft permits and applications on the Internet during the public notice period. There is no requirement to publish the final Title V permits on the Internet, but we would recommend it. Kansas could also consider using the EPA's Electronic Permit System and we could post the final permits online if Kansas wished.

ATTACHMENT A: List of Files Reviewed

Facility Name	Location
Southern Kansas Cotton Growers Co-op - B	19493 51ST RD., S2-T33S-R3E, KS, 67156
IACX Energy - PEAK Facility (helium recov) (incl 3 dehy)	S29-T24S-R16W, BELPRE, KS
Fort Hays State University	600 PARK ST., HAYS, KS, 67601
SCOUT ENERGY MGMT. - LATERAL H-EAST STATION	S35-T26S-R34W
Lyon-Coffey Electric Cooperative, Inc. - Thunderbird Substation	2100 Rd F5, Emporia, KS, 66801
Mid-Continent Fract. & Stor. - Conway East Fac. (flare)	1299 8th Avenue, McPherson, KS, 67460
Producer Ag - Canton Terminal	1407 25TH AVENUE, CANTON, KS, 67428
Pfizer Inc.	1776 N CENTENNIAL DR, MCPHERSON, KS, 67460
CHS McPherson - Conway Underground Storage Facility	775 LANDMARK LANE, McPherson 67460
MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 IOWA RD, MCPHERSON, KS, 67460
Hillsboro Industries	220 INDUSTRIAL ROAD, HILLSBORO, KS, 67063
FARMERS COOPERATIVE - FRANKFORT (TUMBLEWEED RD)	TUMBLEWEED RD S8-T4S-R9E, FRANKFORT, KS, 66427
Great Plains Mfg. - Tipton	607 N. MAIN STREET, TIPTON, KS, 67485
John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337
DCP Operating - Roxanne Station (dehy)	S25-T31S-R41W, ROXANNE STA., KS
Scoular Co. - Downs	709 Commercial St, Downs, KS, 67764
Prairie Horizon Agri-Energy	1664 E. 100 ROAD, PHILLIPSBURG, KS, 67661
Pratt Energy	S17-T29S-R24W, STATION 103, KS, 67865

Facility Name	Location
Scoular Co. - Pratt	10333 NE 30TH STREET, PRATT, KS, 67124
Lowen Corp.	1111 N AIRPORT RD, HUTCHINSON, KS, 67501
Tenawa Haven Processing - Haven Gas Plant	13114 S KENT RD, HAVEN, KS, 67543
Superior Pipeline - Reno Co. Gas Proc. Plant	SE 1/4 S33-T25S-R10W, TURON, KS
GEO Chemicals LLC	2506 E 14TH AVE, HUTCHINSON, KS, 67501
Nesika Energy (ethanol plant)	1020 70TH RD S13-T3S-R5W, SCANDIA, KS, 66966
MID-CONTINENT FRACT. & STOR. - MITCHELL FAC. (DEGAS FLR)	S27-T19S-R7W, MITCHELL STA., KS, 00000
CRCT - Plainville Station (crude stor)	3 MI. NORTH OF PLAINVILLE, PLAINVILLE, KS, 00000
IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS
Great Plains Mfg. (Land Pride) - Lucas	240 S. GREELEY, LUCAS, KS, 67648
Salina Reg. Health Center (incinerator)	400 S. SANTA FE, SALINA, KS, 67402
McConnell Air Force Base	57830 Pittsburg Street Suite 120, WICHITA, KS, 67221
IOLA MUN. POWER PLANT #2	1300 South Washington, Iola, KS 66749
East Kansas Agri-Energy	1304 S. Main Street, Garnett, KS 66032
Southern Star Central - Atchison Station	Section 12, T6S, R20E, Atchinson County, KS
TARGA PIPELINE MID-CONTINENT WESTOK - HAZELTON STA (DEHY)	Section 35, T3S, R11W, Hazelton, Barber County, KS
BOB BERGKAMP CONST. - SUN CITY QUARRY	2998 NW Sun City Road, Sun City, Barber County, KS
Kansas Brick & Tile	767 N. HWY 281, HOISINGTON, KS, 67544
NuStar Pipeline - El Dorado Products Pipeline Station	1624 SUNSET ROAD, EL DORADO, KS, 67042
DJ ENGINEERING	219 W 6TH AVE, AUGUSTA, KS, 67010
UTEC CORP. - HALLOWELL	2022 NW 110TH, HALLOWELL, KS, 66725
Great Plains Mfg -- Land Pride Abilene West	2150 NW 8th Street, Abilene, KS, 67410
CritiTech Drug Development Services LLC	1849 E 1450 ROAD, LAWRENCE, KS, 66044
IACX Energy - PEAK Facility (helium recov) (incl 3 dehys)	S29-T24S-R16W, BELPRE, KS
EnerSys	1 ENERSYS RD - S19-T13S-R18W, HAYS, KS, 67601

Facility Name	Location
Bonanza Bioenergy	2810 EAST US HIGHWAY 50, GARDEN CITY, KS, 67846
F & F Iron & Metal Co.	3710 Jones Avenue, Garden City, KS, 67846
CAMSO MANUFACTURING USA LTD	2925 INDUSTRIAL STREET, JUNCTION CITY, KS, 66441
Western Plains Energy	S2-T11S-R31W, CAMPUS, KS, 67752
DODGE CITY CO-OP EXCHANGE DBA PRIDE AG RESOURCES - ENSIGN	710 WEST TRAIL, DODGE CITY, KS, 67801
Southern Kansas Cotton Growers Co-op - A	32 SW 20 RD - S35-T33S-R7W, ANTHONY, KS, 67003
FREESTATE ELECTRIC COOPERATIVE - Oskaloosa Substation	13952 54TH ST, OSKALOOSA, KS, 66066
HONEYWELL INTERNATIONAL - OLATHE	23500 WEST 105TH STREET, OLATHE, KS, 66061
B/E AEROSPACE INTERIORS	10800 PFLUMM ROAD, LENEXA, KS, 66215
JOHNSON CO. WASTEWATER - TOMAHAWK CREEK PLANT	10701 LEE BLVD, LEAWOOD, KS, 66211
TOROTEL PRODUCTS	550 NORTH ROGERS ROAD, OLATHE, KS, 66062
SEATS INC	20241 WEST 207TH STREET, SPRING HILL, KS, 66083
NEVILLE WELDING	5581 SW 50TH ST, KINGMAN, KS, 67068
Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361
Hostess Brands - Emporia	1525 INDUSTRIAL RD, Emporia, KS 66801
SIMMONS PET FOOD	311 AVE. D, BISON, KS, 67520
John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337
Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661
Wagner Unit Waterflood Facility	S29-T18S-R16W, S29-T18S-R16W, KS, 67575
Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665
Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665
Great Plains Mfg. (Land Pride) - Kipp	244 N HUGH ST, KIPP, KS, 67401
ELEMENT LLC - COLWICH	1 Element Drive, COLWICH, KS, 67030
Form Systems	330 CAIN, HAYSVILLE, KS, 67060
Textron Aviation/Interiors Manufacturing Facility	1643 S. MAIZE ROAD, WICHITA, KS,

Facility Name	Location
	67209
Capps Mfg.	2120 SOUTH CUSTER, WICHITA, KS, 67213
FACC SOLUTIONS	800 E 37TH ST N, WICHITA, KS, 67219
Cintas Corporation	2050 East Kansas City Road, Olathe, KS, 66061
Arkalon Ethanol	8664 COUNTY ROAD P, LIBERAL, KS, 67901
Cargill Ag Horizons - Topeka (W Gordon)	1845 NW GORDON, TOPEKA, KS, 66608
PTMW Inc. - Topeka	5040 NW HWY 24, TOPEKA, KS, 66618
HEAVENLY PET MEMORIAL (ANIMAL INCINERATOR)	1137 SW GAGE BLVD, TOPEKA, KS, 66604
Arlwin Mfg.	720 E. HWY 36, Smith Center, KS 66967
MERIT ENERGY - MOSCOW BOOSTER COMPRESSOR SITE	S4-T31S-R37W, MOSCOW STATION, KS
NORTHWEST COTTON GROWERS CO-OP - MOSCOW	SW1/4 S4-T32S-R36W, MOSCOW, KS, 67952
Triumph Accessory Service	411 N West Rd, WELLINGTON, KS, 67152
Mid Kansas Co-op - Milan	1063 W 10th Ave, Milan, KS, 67105
Colby Mun. Power Plant	120 N STERLING, COLBY, KS, 67701
Buzzi Unicem USA - Bonner Springs	12200 KAW DRIVE, BONNER SPRINGS, KS, 66012
Procter & Gamble	1900 KANSAS AVE, KANSAS CITY, KS, 66105
Bartlett Grain - Kansas City (Kindleberger Rd)	940 KINDLEBERGER RD, KANSAS CITY, KS, 66115
Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106
Fuchs Lubricants - Kansas City	2140 S 88TH ST, KANSAS CITY, KS, 66111
Reconserve Inc.	41 NORTH JAMES ST., KANSAS CITY, KS, 66118
Kelloggs Snacks aka Keebler Co.	801 SUNSHINE ROAD, KANSAS CITY, KS, 66110
Atlas Molded Products - Kansas City (Kaw Dr) <i>formerly ACJ Foam Technologies, LLC</i>	4001 KAW DR, KANSAS CITY, KS, 66102
MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS
CORNEJO & SONS (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS
Black Jack Energy Services	NO STREET ADDRESS, PORTABLE, KS

ATTACHMENT B: Completed NSR Questionnaire

Returned by KDHE prior to Audit.

[see the attached copy]

NSR Program Self-Evaluation Questionnaire

Last Updated: December 5, 2006

Instructions for completing the New Source Review (NSR) Permit Program Self-Evaluation Questionnaire

- When answering Yes or No questions, please add explanation as appropriate to clarify your response.
- This self-evaluation questionnaire does not address implementation of changes made to the federal major NSR rules in EPA's rulemaking on December 31, 2002 (as amended November 7, 2003)
- Please skip any sections of the self-evaluation questionnaire that do not apply within your permitting jurisdiction rather than answering hypothetically. For example, skip the nonattainment major NSR sections if you do not have any nonattainment areas.
- If you have a written policy or guidance document that substantially answers any question in this self-evaluation questionnaire, please so indicate and either attach a hardcopy to your response or point to a specific URL on your public web server where the document may be found.
- This self-evaluation questionnaire was developed by EPA Headquarters and Regions to assist in the agency's NSR oversight program. As part of its peer review process, EPA sought review and comment from STAPPA-ALAPCO. While this questionnaire has undergone a make-over from the original, the scope and detail of the questions asked remains the same for all agencies.

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I. Overview of New Source Review (NSR) Permitting Program

A. NSR Permits

1. Permit Tracking

Y x N 1. Do you have an established procedure for tracking major NSR permits?

If yes, please describe how your permits are being tracked (e.g., in an electronic database)

Response: The major NSR permits are being tracked using Kansas Environmental Information Management System (KEIMS).

Y N x 2. Do you have an established procedure for tracking synthetic minor permits?

If yes, please describe how your permits are being tracked (e.g., in an electronic database)

Response: The synthetic minor permits for Title V and not for NSR are being tracked using Kansas Environmental Information Management System (KEIMS).

2. Permit Issuance Rates

1. How many PSD permits did you issue last year?

Response: In 2019, we issued three (3) PSD permits and two (2) PSD modification permits.

a. If none, when was the last PSD permit issued?

2. How many nonattainment major NSR permits did you issue last year?

Response: None

a. If none, when was the last nonattainment Major NSR permit issued?

Response: KDHE BOA has not issued any nonattainment major NSR permit in the past.

3. How many synthetic minor NSR permits did you issue last year?

Response: In 2019, there were 116 synthetic minor Title V permits issued.

4. How many true minor NSR permits did you issue last year?

Response: In 2019, there were 315 true minor permits issued.

5. How many “as built” NSR permits did you issue last year?

Response: KDHE BOA does not separately track “as built” permits at this time.

6. Did you issue any waivers or variances allowing a source to commence construction prior to receiving a permit?

Response: In 2019, there were no waivers or variance issued allowing a source to commence construction prior to receiving a permit.

Y N a. For any PSD projects?

If so, how many?

Response: Zero in 2019.

Y N b. For any major source non-attainment projects?

If so, how many?

Response: Zero in 2019.

Y N c. For any synthetic minor NSR projects?

If so, how many?

Response: Zero in 2019.

Y N d. For any true minor NSR projects?

If so, how many?

Response: Zero in 2019.

7. What is the average time, in months, it takes you to issue the following types of permits, starting from the time the application was determined complete?

a. PSD permits?

Response: 12 months

b. Nonattainment major NSR permits?

Response: n/a

c. Non-major/synthetic and minor permits?

Response: 2-3 months

d. "As built" permits?

Response: 2-3 months

8. Please provide an Excel spreadsheet listing all of the NSR projects permitted in the three calendar years preceding the program review. For example, if the review takes place in 2007, include data for calendar years 2004, 2005, and 2006. To the extent available, include 1) the source name, 2) general location, 3) general description of project, 4) standard industrial classification code (SIC), 5) date application received, 6) date permit issued, 7) the type of permit issued, 8) any identification codes (e.g. AFS source number, project number, permit number) that facilitate retrieval of the permit record, and 9) any NSPS, NESHAP, or MACT subparts triggered by the project. Also identify all projects where the permit was issued after the project had already commenced construction.

Response: Please see Attachment 1 in pdf format.

Y x N 1. In your opinion, is the NSR program (both PSD and nonattainment Major NSR) an incentive to reduce emissions below major source levels?

3. *Effective Permit Writing*

Do your NSR permits:

- Y x N 1. Identify each emissions unit regulated?
- Y x N 2. Establish emissions standards or other operational limits that must be met, including appropriate averaging times for numeric limits?
- Y x N 3. Include specific methods for determining compliance and excess emissions, including reporting, record keeping, monitoring, and testing requirements?
- Y x N 4. Outline procedures necessary to maintain continuous compliance with emission limits?
- Y x N 5. Establish specific, clear, concise, and enforceable permit conditions?
- Y x N 6. Include conditions necessary for a source to avoid otherwise applicable requirements (e.g., keeping a modification “minor”)?
- Y N x 7. Describe the consequences, if any, for failing to meet any permit limit taken to avoid a substantive requirement (e.g. an emission cap taken to avoid PSD, a number-of-hours restriction to avoid more stringent BACT)?

Response: The consequences would be difficult to put in the permit because our compliance section determines enforcement actions after the fact.

If so, describe the nature of the permit condition and what those consequences might be.

Response: Not applicable.

- Y x N 8. Establish the “enabling legislative” and “legal” basis to issue and enforce the conditions of the permit?

4. *Project Discovery System*

As a permitting program matures, it should have a comprehensive system in place for informing potential applicants about the NSR permitting process and for assuring that the bulk of applicants obtain permits prior to construction. “As built” permits, for example, are an indicator of gaps in this discovery system.

1. What steps does your program take to inform sources of the need to obtain permits prior to commencing construction?

Response: KDHE BOA has technical guidance posted on the website (<https://www.kdheks.gov/air-permit/indexPrmt.html>) about the need to obtain permits prior to commencing construction. During inspections, the inspectors also tell sources that they should obtain a permit every time they need to construct an emission unit.

Each construction permit/approval has a General Provision stating that “A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes which results in potential-to-emit increases equal to or greater than the thresholds specified at K.A.R. 28-19-300.”

Y N 2. Do you work with other agencies, for example economic development, zoning, or code departments to learn about the potential for new projects?

If so, please describe.

Response: KDHE BOA works with the Kansas Department of Commerce and various local agencies as requested.

Y N 3. Do you act on other information you might gather through newspaper articles or other trade press announcements?

If so, please describe.

Response: Before there are announcement in the newspaper or other trade press, the facility has already been in contact with us for obtaining a future permit. If they did not apply, then, the news would be helpful.

B. Staff and Training

1. What is the total number of staff dedicated to permitting for your NSR program? Please provide an organizational chart.

Response: The KDHE BOA Permitting staff does both construction and operating permits and is not specifically dedicated to either program. Please see Attachment 2 for the organizational chart.

1 – Section Chief
3 – Unit Supervisors
13 – Permit Writers/Database Staff
2 – Clerical Staff
19 – Total

2. For your NSR permitting program, please show a breakdown of staff by different job functions (e.g., number of modelers, review engineers, technicians, environmental scientists, clerical, supervisory, enforcement).

Response: Number of Modelers - 4
Review Engineers - 9
Technicians – 3 (2 permit writing positions and 1 technical support position)
Environmental Scientists/Specialists - 1
Clerical Staff - 2
Supervisory Staff - 4
Enforcement Staff - 1

3. Using the organizational chart provided above, please indicate the number of years of experience for each person involved with the NSR permitting program and summarize the total years of experience for your program.

Response: Please see Attachment 2 for organizational chart.

Y N 4. Does the department hire consultants or use other non-departmental staff to assist in permitting activities?

If yes, explain the scope of these activities including the types of projects reviewed, the fraction of time spent as a percentage of total resources dedicated to the state NSR program, the approximate cost to the department and whether these costs are recovered through permit fees.

Y N 5. Does staff turnover affect the ability of the department to issue timely permits?

If so, does the department have any initiatives underway to reduce the level of turnover?

Response: The State of Kansas has implemented a 2017 market adjustment on the salary of engineers for both Engineers-In-Training and Professional Engineers.

Y N 6. Is the NSR program fully funded and staffed?

If not, please indicate the current level of staffing (e.g. 80% staffed with 16 of 20 positions filled).

Response: KDHE BOA has 90% staffing level with 19 of 21 positions filled.

7. Please describe your training program for new and existing staff that work on NSR permitting and issues. List any materials you use or training courses you try to attend.

Response: KDHE BOA has internal trainings provided to new staff during on-boarding. The new and existing staff also attends CenSARA trainings and EPA trainings, whenever available.

KDHE BOA Internal Trainings: Please see Attachment 3.

CenSARA Trainings:

- PSD/NSR Workshop
- NSR-PSD (Advanced)
- APTI #423 – Air Pollution Dispersion Models Applications
- APTI #452 – Principles and Practices of Air Pollution
- NACT #220 Compliance Assurance Monitoring
- NACT #221 Continuous Emission Monitoring
- NACT #246 Aggregate, Concrete, and Hot Mix Asphalt Plants
- NACT #252 Fugitive Dust
- NACT #273 Industrial Boilers
- NACT #284 Volatile Organic Compound (VOC) Control Device
- NACT #288 – Petroleum Refinery
- NACT #299 – Air Pollution Control Devices
- NACT #325 Enforcement of NSR/PSD Requirements
- NACT 334 Permit Practices
- NACT #355 Advanced Inspector Training
- CenSARA 101 Clearing the Air
- CenSARA 110(a) Introduction to Drilling Rig Operations
- CenSARA 110(b) Quad O/Oa Regulation Workshop
- CenSARA 110(c) Introduction to Mid-Stream Oil and Gas Operations
- CenSARA 454 Effective Permit Writing

EPA Trainings:

- Draft Modeled Emission Rates for Precursors (MERPs) Guidance Webinar
- Draft Ozone and Fine Particle (PM_{2.5}) Significant Impact Levels (SILs) Guidance for Prevention of Significant Deterioration (PSD) Program
- Human Exposure Model (HEM3) & Multi-pathway Exposure Modeling Training
- EPA Fence Line Monitoring

8. Describe any additional training that you believe would be beneficial.

Response: Additional training on major and non-major NSR review is always helpful. Especially with all the new guidance now available from EPA.

Y x N a. Would it be helpful if EPA provided more NSR training?

Y N x 9. Do you provide NSR program training opportunities for the public, including the regulated community?

If yes, please describe.

C. NSR Implementation

Y x N 1. Do you implement EPA issued program guidance and policy for NSR?

If not, please explain.

Y x N 2. Are you familiar with EPA's web-based NSR Policy & Guidance Database < <http://www.epa.gov/region07/programs/artd/air/policy/search.htm> > and do you use it?

Y N x 3. Does the department implement any NSR-related policies or guidance that deviate substantially from EPA's?

a. If yes, do you seek peer review from staff, applicants, EPA and the public when developing the policy or guidance document?

b. How do you make these documents available to staff, applicants, EPA, and the public?

4. In general, how do you learn about rule changes in the Federal NSR program?

Responses: KDHE BOA learns about rules changes in the Federal NSR program from the EPA website, from our planning staff that email changes in the Federal NSR program, and from EPA Region 7 contacts.

Y x N a. Do you use EPA's website at <http://www.epa.gov/nsr/> to monitor NSR program changes and implementation issues?

D. Public Participation

1. What criteria are used to determine if a permit is public noticed?

Response: Please refer to KDHE BOA internal guidance for public notice as Attachment 4.

2. Identify which of the following types of permits are noticed:

- Y x N a. PSD permits
- Y x N b. major nonattainment NSR permits
- Y x N c. synthetic minor permits
- Y x N d. minor permits

Response: Depending on the KDHE BOA internal guidance for public notice.

Y x N 3. Do you publish notices on draft NSR permits in a newspaper of general circulation?

Y x N 4. Do you use a state or other publication designed to give general public notice?

If yes, please describe.

Response: KDHE BOA uses the Kansas Register, KDHE BOA website, and the local newspaper (in the area where the project will be located) to give general public notice.

Y N x 5. Do you have procedures for notifying the public when major NSR permit applications are received?

Y x N 6. Do you develop a mailing list of interested parties for NSR permit actions (e.g., public officials, concerned environmentalists, citizens)?

Response: The list only includes the affected states. The affected states are those areas within 50 miles of the source receiving the NSR permit.

If yes, how does someone get on the list?

Y x N 7. Aside from methods described above, do you use other means for public notification?

If yes, what are they (e.g., post notices on your webpage, email)?

Response: Public notices are posted on KDHE webpage under the Air Permit tab (<https://kdheks.gov/bar/publicnotice.html>). Additionally, KDHE BOA has implemented an electronic mailing list (listserv) to notify interested persons of proposed permit actions on public notice. Interested persons can subscribe to the KDHE-BOA-PERMITTS list group through a hyperlink sign-up function found under the Air Permit tab of the KDHE BOA public notice website; a list of subscribers is maintained by the bureau.

Y x N 8. Do your public notices clearly state when the public comment period begins and ends?

9. What is your opinion on the most effective ways to provide public notice?

Response: In the age of information technology, the internet seems to be the most effective way to provide public notice.

Y N x 10. Do you provide notices in languages besides English?

If yes, in which languages?

Y N x 11. Have you ever been asked by the public to extend a public comment period?

If yes, did you grant the extension?

If not, please explain why you didn't grant the extension?

12. What percentage (approximately) of your major NSR permits are revised due to public comments?

Response: In general, KDHE BOA does not receive public comments on proposed permit actions. However, the two major NSR permits from 2019 received comments from EPA.

13. If a draft permit is revised, what criteria do you use to determine if a permit should be re-issued in draft?

Response: If the permit revision significantly amends emission limitations, monitoring or reporting requirements the bureau would re-notice the document. These determinations are done on a case-by-case basis.

14. What type of comments or other concerns trigger a public hearing?

Response: A public hearing is triggered if requested with substantial comments that relate to the actual permit. For PSD permits we usually set a tentative public hearing.

15. How are public hearings noticed?

Response: The public hearing is noticed in the same document and at the same time as the public comment.

a. How much notice is given?

Response: Both the public hearing and request for comment period are a minimum of 30 days.

16. What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, monitoring reports) especially during the public comment period?

Response: The public can obtain permit-related information during the public comment period by requesting from the KDHE BOA central office or the local district office. Copies of the proposed permit, the application, all relevant supporting materials including any compliance plan and compliance certification, and all other materials available to the permitting authority that are relevant to the permitting decision shall, upon request, be furnished without charge to the USEPA and to any affected state. Any other person requesting copies of such documentation shall pay a fee equal to that regularly charged by the department for copying documents unless some other provision of law provides otherwise.

Y x N 17. Do you have a website for the public to get permit-related documents?

If yes, please answer the following:

a. What is available online?

Response: For PSD permits, the permit application, draft permit, and air quality impact analysis, including NAAQS and PSD increment analyses, and additional impact analysis are available online.

b. How often is the website updated?

Response: The website is updated every time there is a public notice document.

c. Is there information on how the public can be involved?

Response: The public notice document published on the website will give information on how the public can be involved during the permitting process.

Y N 18. Do you provide training to citizens on public participation in NSR?

If yes, approximately how many training opportunities have been provided in the last five years?

19. How do you notify affected States (including tribes) of draft major source permits?

Response: KDHE BOA sends notification letters to affected States (including tribes). Additionally, affected states are also notified through the KDHE-BOA-PERMITTS listserv email list.

Y x N 20. Do public notices for PSD permits specifically state the amount of increment consumed?

Y x N 21. Are public notices for PSD permits sent to each party identified in 40 C.F.R. §51.166(q)(2)(iv)?

Response: As per 40 C.F.R. §51.166(q)(2)(iv), we “send a copy of the notice of public comment to the applicant, the EPA and to officials and agencies having cognizance over the location where the proposed construction would occur as follows: Any other State or local air pollution control agencies, the chief executives of the city and county where the source would be located; any comprehensive regional land use planning agency, and any State, Federal Land Manager, or Indian Governing body whose lands may be affected by emissions from the source or modification”.

Pursuant to K.A.R. 28-19-350(k)(2) A copy of the public notice shall be mailed to the following:

- (A) The applicant;
- (B) the administrator of USEPA through the appropriate regional office;
- (C) any state or local air pollution control agency having jurisdiction in the air quality control region in which the new or modified installation will be located;
- (D) the chief executives of the city and county where the source will be located;
- (E) any comprehensive regional land use planning agency having jurisdiction where the source will be located; and

(F) any state, federal land manager, or Indian governing body whose lands will be affected by emissions from the new construction or modification.

E. Program Benefits

Y x N 1. In your opinion, is the NSR program (both PSD and nonattainment Major NSR) an incentive to reduce emissions below major source levels?

Y x N 2. In your opinion, have NSR permits been used as the authority to implement other priorities such as toxic emission reductions and improved monitoring and reporting?

Response: Yes, KDHE BOA uses the NSR program to issue federally enforceable limitations to avoid MACT requirements.

Y x N 3. In your opinion, does the case-by-case nature of a NSR permit allow you to implement emission reducing programs or controls more quickly than rulemaking?

Y x N 4. In your opinion, does the NSR program provide communities a mechanism to be involved in improving their own air quality?

Y x N 5. In your opinion, has the PSD program contributed to sustaining good air quality?

Y x N 6. In your opinion, have the nonattainment Major NSR requirements contributed to reducing emissions or avoiding emissions increases in nonattainment areas?

II. Major NSR Permitting

A. Applicability

1. Stationary Source Determinations

Y x N 1. Do your SIP-approved rules define fug source differently than 40 C.F.R. §51.165 or §51.166?

If yes, please explain.

Response: The definition of stationary source relies upon the definition of building, structure, facility or installation which was amended on June 3, 2016 [81 FR 35632] and has not yet been adopted in Kansas. The U.S. Environmental

Protection Agency (EPA) finalized a revision to regulations applicable to permitting of stationary sources of air pollution under the New Source Review (NSR) and title V programs in the Clean Air Act (CAA or Act). For sources in the oil and natural gas sector, this rule clarifies the meaning of the term “adjacent” that is used to determine the scope of a “stationary source” for purposes of the Prevention of Significant Deterioration (PSD) and Nonattainment NSR (NNSR) preconstruction permitting programs and the scope of a “major source” in the title V operating permit program in the onshore oil and natural gas sector.

Major NSR – PSD; K.A.R. 28-19-350 (PSD) adopts by reference all definitions for major NSR PSD permitting under 40 C.F.R. §52.21 including the definition of stationary source as revised on July 1, 2011 and as amended by 76 fed. reg. 43507 (2011) and 77 fed. reg. 65118-65119 (2012); therefore the current definition of “stationary source” for PSD permitting activities in Kansas is:

40 C.F.R. §52.21(b)(5) Stationary source means any building, structure, facility, or installation which emits or may emit a regulated NSR pollutant.

40 C.F.R. §52.21(b)(6)(i) Building, structure, facility, or installation means all of the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same “Major Group” (i.e., which have the same first two digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement (U. S. Government Printing Office stock numbers 4101–0066 and 003–005–00176–0, respectively).

Major NSR – NNSR; K.A.R. 28-19-16 – 16m rely upon the definitions under K.A.R. 28-19-16a, which unfortunately does not define “stationary source.” However, the following definition was amended to point to K.A.R. 28-19-200:

(d) “Building, structure, facility, or installation” shall have the meaning as defined in K.A.R. 28-19-200(j).

K.A.R. 28-19-16a, regarding new source permit requirements for designated nonattainment areas, was last amended (effective Oct. 10, 1997) to remove duplications of certain terms previously contained in K.A.R. 28-19-7 that now appear in K.A.R. 28-19-200; therefore we believe the intention was for the definition in K.A.R. 28-19-200(iii) to apply (see definition under Minor NSR).

Minor NSR and minor modifications of major stationary sources preconstruction Review; K.A.R. 28-19-300 relies upon the definition under K.A.R. 28-19-200:

(iii) “Stationary source” or “source” means any building, structure, facility, or installation that emits or may emit any air pollutant subject to any emission limitation or standard or that is required to obtain a permit pursuant to the Kansas air quality regulations.

(j) “Building, structure, facility, or installation” means all of the air pollutant emitting activities that belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person or persons under common control. Air pollutant emitting activities shall be considered as part of the same industrial grouping if they have the same two-digit code as described in the “standard industrial classification manual 1987,” as published by the U.S. governing printing office, as adopted at K.A.R. 28-19-301(f)(2).

Y N 2. When determining if emissions units are contiguous or adjacent, do you assess whether emissions units under common ownership or control may be a single stationary source regardless of the distance between the emissions units?

Response: KDHE BOA follows the EPA guidance on adjacent sources.

If yes, please explain.

Y N 3. Do you assess facilities’ financial, personnel, and contractual relationships to determine common ownership or control?

Response: Not anymore, KDHE BOA follows the EPA guidance on adjacent sources entitled, “Interpreting “Adjacent” for New Source Review and Title V Source Determinations in All Industries Other Than Oil and Gas” dated November 26, 2019.

Y N 4. Do you assess whether sources with different first two-digit SIC codes (*i.e.*, emissions units not in the same industrial grouping) may qualify as separate stationary sources?

Response: Yes, but if the facility claims one source, we generally accept that even though it has different SICs because a one source determination is more stringent.

2. PTE Calculations

1. How do you determine if emissions factors (e.g., AP-42) are acceptable for NSR applicability purposes?

Response: Emission factors are reviewed by the permit writer during the application review process.

Y x N 2. Does the department routinely require sources to document whether emissions factors are appropriate and representative of emissions from the actual emission unit being permitted?

Response: KDHE BOA asks for the most current performance test data if available or manufacturers specification sheets. If not, KDHE BOA uses AP-42 or WebFire emission factors.

If yes, how is this information documented in the permit record?

Response: It is documented in the permit (if needed) and in the administrative record dedicated to each permitting process.

If no, please explain why such documentation is not made.

Y x N 3. Do you include PM₁₀ condensable emissions in the total amount of PM₁₀ emissions when determining NSR applicability, BACT/LAER evaluations, PSD increment consumption, and compliance with the NAAQS?

Response: It depends on the project being evaluated. In many cases, we assume that PM₁₀ is equal to PM. If emission factor from AP-42 is used and emission factor for PM there has condensable, then we would include condensable for the PM and PM₁₀. If AP-42 is not used or AP-42 does not have condensable, KDHE BOA relies on what the facility provides. This might be stack testing, which in the case of EPA Method 5, the back half would include condensable. In other cases, in which condensable cannot be determined, KDHE BOA asks the facility and/or consult EPA.

Also, the PSD permit needs to address condensable particulate matter (CPM) if a proposed unit is a potential CPM emitter. The calculations for the proposed unit need to be differentiated, not just for total PM₁₀ but also for filterable and condensable portions.

Y x N ☐

a. When PM₁₀ testing is required do you include a permit condition that requires testing and specifies testing methods for PM₁₀ condensables?

Response: Yes, if PM₁₀ condensable emissions need to be addressed. It will depend on the permit application and applicable regulations. If testing for PM₁₀ is required, KDHE BOA consults with EPA. In most cases, condensable PM₁₀ (CPM₁₀) is equivalent to condensable PM (CPM). EPA Method 202 of 40 C.F.R. 60 Appendix M is used to determine CPM. Therefore, this would give CPM₁₀. If the stack temperature does not exceed 85 deg F, then Method 201A would give CPM also.

3. *Fugitive Emissions*

1. Please provide your regulatory definition of “fugitive” emissions for major NSR applicability purposes.

Response: **Major NSR – PSD** relies on the definition in K.A.R. 28-19-350, which adopts by reference as of July 1, 2011 the definition of 40 C.F.R. §52.21(b)(20) Fugitive emissions means those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

This definition of fugitive emissions and its use for applicability purposes is consistent with the most recent March 30, 2011 [76 FR 17548] EPA interim final rule to effectuate and extend a stay of the December 19, 2008 Fugitive Emissions Rule (FER). The FER under the Federal NSR program required that fugitive emissions be included in determining whether a physical or operational change results in a major modification only for sources in designated industries. EPA issued a stay of the FER on March 31, 2010, that was effective for 18 months through October 3, 2011. The current March 30, 2011 adopted final rule supersedes the stay and thereby corrects potential confusion caused by the stay by revising specific paragraphs in the NSR regulations that were affected by the FER.

KDHE believes the approval of our PSD program as codified at 40 C.F.R. §52.870 should be amended to remove the following underlined conditional approval statement listed under “explanation” for K.A.R. 28-19-350:

Provisions of the 2010 PM_{2.5} PSD-Increments, SILs and SMCs rule relating to SILs and SMCs that were affected by the January 22, 2013, U.S. Court of Appeals decision are not SIP approved. Provisions of the 2002 NSR reform rule relating to the Clean Unit Exemption, Pollution Control Projects, and exemption from recordkeeping provisions for certain

sources using the actual-to-projected-actual emissions projections test are not SIP approved. In addition, we have not approved Kansas rule incorporating EPA's 2008 "fugitive emissions rule" (published in the Federal Register on December 19, 2008).

Major NSR – NNSR uses the definition in K.A.R. 28-19-16a: "Fugitive emissions" shall have the meaning as defined in K.A.R. 28-19-200(ff).

K.A.R. 28-19-200(ff) "Fugitive emissions" means those emissions that directly result from operation of an emissions unit or stationary source but that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

Y N 2. Do you make a distinction between "fugitive" emissions and "uncontrolled" emissions?

Response: Uncontrolled emissions include fugitive emissions, but they also include emissions from a stack that does not have control equipment.

If yes, please explain.

Y N 3. Do you include fugitive emissions in major NSR applicability determinations for new sources?

Response: Yes, if the new source is a category of stationary sources listed under 40 C.F.R. §52.21(b)(1)(iii) for the definition of major stationary source.

Y N a. For modified sources?

If yes, please explain.

Response: Yes, if the new source is a category of stationary sources listed under 40 C.F.R. §52.21(b)(1)(iii) for the definition of major stationary source.

Y N 4. Do you allow major sources to use reductions in fugitive emissions for netting purposes?

If yes, please describe how you determine the fugitive emissions "baseline" used for netting.

Response: Fugitive emissions "baseline" used for netting is determined as specified in 40 C.F.R. §52.21(b)(48) and AP-42.

5. Please provide a description of your guidelines or calculation methodology used to quantify fugitive emissions.

Response: Fugitive emissions are quantified using AP-42 13.2.1 Paved Roads and 13.2.2 Unpaved Roads. KDHE BOA also evaluate emissions from other fugitive sources, e.g., VOC/HAPs from equipment leaks.

Y x N 6. Do your permits contain conditions for fugitive emissions consistent with requirements for BACT/LAER (*i.e.*, specific emission limits, control methods, and/or work practice standards)?

Response: It is evaluated on a case-by-case basis.

4. Debottlenecking/Increased Utilization

Y x N 1. When determining if proposed modifications are subject to major NSR, do you include emissions increases from existing emissions units that are not physically modified (*i.e.*, units that will be debottlenecked or have increased utilization such as boilers)?

2. What method is used to determine the emissions increase from these emissions units?

Response: Emissions increase from these emission units are determined on a case by case basis using the most current EPA guidance.

a. What EPA guidance do you consider for this issue?

Response: This issue is considered on a case by case basis using the most current EPA guidance.

Y x N 3. Do you train your permitting staff to include such emissions increases when determining if a modification is major for NSR?

5. Netting

Y x N 1. Is netting approved in your NSR SIP for determining whether modifications at major stationary sources are subject to major NSR (PSD or nonattainment Major NSR, as applicable)?

If not, please explain.

2. What is the contemporaneous time period for netting in your SIP?

Response: **PSD**; K.A.R. 28-19-350 adopts 40 C.F.R. §52.21. The following explains contemporaneous.
40 C.F.R. §52.21(b)(3)(ii)(a) and (b) states:
An increase or decrease in actual emissions is contemporaneous with the increase from the particular change only if it occurs between:
(a) The date five years before construction on the particular change commences; and
(b) The date that the increase from the particular change occurs.

NNSR; K.A.R. 28-19-16a(g) “Contemporaneous emission increase or decrease” as used in K.A.R. 28-19-16a, paragraph (s)(2) means emission changes from the source that have occurred since December 21, 1976 or since the most recent permit was issued under the provisions of K.A.R. 28-19-16b, whichever date is the most recent.

K.A.R. 28-19-16a(s) “Net emissions increase” means the amount by which the sum of the following exceeds zero: (1) any increase in actual emissions from a particular physical change or change in the method of operation at a stationary source; and (2) any other increases and decreases in actual emissions at the source that are contemporaneous with the particular change, and are otherwise creditable.

Y x N 3. For determining the baseline from which emission reductions are calculated, do you require the applicant to submit the actual emissions from the units along with any permit limits that apply?

Y N x 4. Do you allow an applicant to receive emission reduction netting credit for reducing allowable emissions instead of actual emissions?

Response: **KDHE does not do this because netting is actual to potential.**

If yes, please explain.

Y N x 5. Do you allow an applicant to receive emission reduction credit for reducing any portion of actual emissions that resulted because the source was operating out of compliance?

Response: **KDHE does not do this because 40 C.F.R. §52.21(b)(3)(vi)(a) states: A decrease in actual emissions is creditable only to the extent that:**
(a) The old level of actual emissions or the old level of allowable emissions, whichever is lower, exceeds the new level of actual emissions.

If yes, please explain.

Y N 6. Do you allow an applicant to receive emission reduction credit for an emissions unit that has not been constructed or operated?

Response: As far as we know, it is not done.

If yes, please explain.

Y N 7. Are emissions reductions to meet MACT requirements eligible for netting credits?

If yes, under what conditions? (See EPA's November 12, 1997 memo from John Seitz entitled "Crediting of Maximum Achievable Control Technology (MACT) Emission Reductions for New Source Review (NSR) Netting and Offsets".)

Response: Yes, the reduction (only when the pollutant, such as toluene, is a VOC and a HAP) may be available for NSR netting at the source (1) as long as the reduction has not been used to meet RACT or other attainment strategies (e.g., the 15 percent reduction requirement for certain ozone nonattainment areas) and, (2) the reduction is otherwise creditable under NSR.

Y N 8. When any emissions decreases are claimed as part of a proposed modification, do you require that all stationary, source-wide, creditable and contemporaneous emissions increases and decreases of the pollutant be included in the major NSR applicability determination?

If not, please explain.

Response: No. Under a recent EPA policy, project emission decreases are allowed without netting.

9. To avoid "double counting" of emissions reductions, what process do you use to determine if emissions reductions considered for netting have already been relied upon in issuing a major NSR permit for the source?

Response: 40 C.F.R. §52.21(b)(3)(iii) states:
An increase or decrease in actual emissions is creditable only if:
(a) The Administrator or other reviewing authority has not relied on it in issuing a permit for the source under this section, which permit is in effect when the increase in actual emissions from the particular change occurs; and ...

In order to determine what the underlined phrase above means, KDHE looked at an EPA memo dated 12/29/1989 from John Calcagni (EPA) to

Bruce Miller (EPA Region 4). When a PSD permit is issued and the source does a netting analysis in their application and the netting results are used when modeling to determine ambient air concentrations, then the netting has been relied on to issue the permit. From that point on, those emissions can no longer be used when netting.

When we issue a PSD permit, we do not require netting. If the source does submit netting, we would not use that in modeling. Our modeling is based the maximum emissions and does not rely on netting. Therefore, we do not track the netting emissions when a PSD permit is issued.

Y x N 10. Do you have a process to track projects that use credits to net out of major NSR?

If yes, please explain.

Response: File review of past actions (i.e., previous construction permits) is used to track projects that use credits to net out of major NSR. KDHE does not see the need for this. Just the fact that they are used for netting does not rule them out for future netting, unless they were relied on in issuing a permit. As stated in Section II.A.5.9 above, we do not rely on netting when a PSD permit is issued.

Y x N 11. Do you require that emissions reductions (e.g., reductions from unit shutdowns) must be enforceable to be creditable for netting?

If not, please explain.

Y N x 12. Have you had public concerns regarding the netting analysis and procedures used for any issued permits that avoided major NSR?

If yes, please describe.

Y N x 13. Do you allow inter-pollutant trading when netting (e.g., allow a source to use NO_x or PM credits for netting out of VOC increases)?

If yes, please explain.

14. What process do you have to verify that a source's emissions reductions considered for netting, including emissions reductions that may have been "banked," are not already used by the source, or another source, as nonattainment Major NSR offsets?

Response: This question has two parts. One is "already used by the source". We answered this in Section II.A.5.9 above. That is, we do not use the netting in later permits. The other is "offsets" which we don't have.

B. Prevention of Significant Deterioration (PSD) Permitting

1. BACT Determinations

Y x N 1. Do you require permit applicants to use the “top-down” method for determining BACT?

If no, what approach do you require?

Y x N 2. Do you commonly use information resources other than the RACT/BACT/LAER Clearinghouse to identify control options, costs, etc.?

If yes, what resources do you commonly use and rate the usefulness of each one?

Response: KDHE BOA also uses information from California Air Resources Board, South Coast Air Quality Management District, and other state agencies (e.g., Texas, Iowa, Nebraska, Missouri, Washington, Oklahoma, etc.)

Y x N 3. Do you provide a detailed documentation/explanation of draft BACT determinations in the public record?

Y x N 4. In your public record for draft BACT determinations, do you provide an economic rationale if a BACT option is rejected as being prohibitively expensive?

5. What procedures do you use to calculate baseline emission rates for calculation of cost effectiveness values?

Response: KDHE follows guidance in Section IV.D.2.b Cost Effectiveness of the EPA Puzzle Book (Draft Oct 1990).

Below are excerpts from this section of this document.

Average cost Effectiveness (dollars per ton removed) =
(Control option annualized cost) divided by (Baseline emissions rate - Control option emissions rate)

“The baseline emissions rate represents a realistic scenario of upper boundary uncontrolled emissions for the source.”

“...baseline emissions are essentially uncontrolled emissions, calculated using realistic upper boundary operating assumptions. When calculating the cost effectiveness of adding post process emissions controls to certain inherently lower polluting processes,

baseline emissions may be assumed to be the emissions from the lower polluting process itself.”

“Estimating realistic upper-bound case scenario does not mean that the source operates in an absolute worst-case manner all the time. For example, in developing a realistic upper boundary case, baseline emissions calculations can also consider inherent physical or operational constraints on the source. Such constraints should accurately reflect the true upper boundary of the source's ability to physically operate and the applicant should submit documentation to verify these constraints. If the applicant does not adequately verify these constraints, then the reviewing agency should not be compelled to consider these constraints in calculating baseline emissions. In addition, the reviewing agency may require the applicant to calculate cost effectiveness based on values exceeding the upper boundary assumptions to determine whether or not the assumptions have a deciding role in the BACT determination. If the assumptions have a deciding role in the BACT determination, the reviewing agency should include enforceable conditions in the permit to assure that the upper bound assumptions are not exceeded.”

“For example, VOC emissions from a storage tank might vary significantly with temperature, volatility of liquid stored, and throughput. In this case, potential emissions would be overestimated if annual VOC emissions were estimated by extrapolating over the course of a year VOC emissions based solely on the hottest summer day. Instead, the range of expected temperatures should be considered in determining annual baseline emissions. Likewise, potential emissions would be overestimated if one assumed that gasoline would be stored in a storage tank being built to feed an oil-fired power boiler or such a tank will be continually filled and emptied. On the other hand, an upper bound case for a storage tank being constructed to store and transfer liquid fuels at a marine terminal should consider emissions based on the most volatile liquids at a high annual throughput level since it would not be unrealistic for the tank to operate in such a manner.”

a. What do you view as “uncontrolled” emissions?

Response: KDHE follows the guidance in Section IV.D.2.b Cost Effectiveness of the EPA Puzzle Book (Draft Oct 1990). Controls required by state or federal regulations would not be used in calculating uncontrolled emissions.

Controls which are inherent to the process would be used in calculating uncontrolled emissions.

Y x N 6. Do you consider combinations of controls when identifying and ranking BACT options (e.g., low organic solvent coatings plus thermal oxidation)?

7. Do you ever re-group the emissions units included in a cost evaluation in either of the following ways?

Y x N a. If an applicant's approach is to evaluate the cost of controlling each unit separately, do you ever consider combining units for control by one control device?

Y x N b. If an applicant combines all units for control by one control device and concludes this approach is too expensive, do you ever consider controlling individual units or a small group of units that have the greatest percentage of total emissions?

Y x N 8. Do your PSD permits specify emissions limits and control methods consistent with the basis (and capabilities) of the selected BACT options?

9. How do you establish the compliance averaging times for BACT emissions limits?

Response: Based on how the emissions increases or the potential-to-emit is calculated. Compliance averaging times should be consistent with established reference test methods to be enforceable as a practical matter.

Y x N 10. Do you make sure that permit conditions impose restrictions consistent with BACT evaluation assumptions? (e.g., if the annual emissions used in a BACT cost evaluation are based on an assumption of less than continuous operation and/or operation at less than maximum capacity, do permit conditions contain limits based on the assumption used?)

2. BACT Cost Evaluations

Y N x 1. Do you allow deviation from EPA's recommended cost evaluation procedures?

If yes, please explain.

2. Do you place primary reliance on total or incremental cost effectiveness values?

Response: KDHE looks at the total cost per ton for each option.

a. If you give greatest (or equal) weight to incremental costs, what is your basis for doing so?

Response: The basis is cost per ton.

3. Do you place primary reliance on a comparative cost approach or a “bright line” test?

Response: The cost per ton is a moving target. BACT should be “Demonstrated control technologies” at a cost as applied to similar facilities in similar circumstances.

Y x N 4. If you place greatest importance on a comparative cost approach, do you try to obtain cost data for projects outside your permitting jurisdiction?

Response: Yes, we would try to obtain cost data for projects outside our permitting jurisdiction, if we use the comparative cost approach.

5. If you use what can be described as a “bright line” test, what is the basis of your “bright line” cost effectiveness value and do you change the value over time to account for inflation?

Response: As far as we know, we do not use the “bright line” test.

Y N x 6. Do you use a different cost approach for different pollutants?

Response: Not usually, unless the applicant has a strong reason. We evaluate the cost approach for different pollutants on a case-by-case basis.

If yes, please explain.

7. Under what circumstances do you conduct a BACT cost evaluation independent of the cost evaluation provided by the applicant? (An independent evaluation could entail obtaining additional vendor quotes.)

Response: Not usually.

Y x N 8. Are cost estimates required to be referenced to a common base year (e.g., 1998) so that cost estimates can be easily compared?

Y x N 9. Are other agencies contacted to determine if their cost estimates need to be normalized before comparisons can be made?

Response: KDHE BOA checks other agencies' websites.

Y x N 10. Do you perform a BACT assessment for all new/modified emissions units or activities emitting a pollutant subject to PSD review, no matter how small the emissions from an affected unit or activity?

Response: As long as the pollutant exceeds the PSD significant emission rate, a BACT analysis is performed for the particular pollutant.

Y x N 11. Do you consider increases or decreases in corollary toxic/hazardous air pollutants as part of a BACT evaluation? [This question addresses implementation of EPA's "North County Resource Recovery Remand" memo dated September 22, 1987.]

If yes, please give a specific example.

Response: We have not had pollutants that were not regulated by MACT or PSD.

Y x N 12. Do you provide BACT evaluation training to new (or newly-assigned) new source review (NSR) permitting staff (other than on-the-job training)?

If yes, describe the nature of the training provided.

Response: The new permitting staff has to attend a CenSARA training on PSD/NSR permitting in which training BACT analysis is discussed.

Y x N 13. Do you provide BACT evaluation refresher training to experienced NSR permitting staff?

If yes, how frequently do you provide this training and what is the nature of the training provided?

Response: The experienced NSR permitting staff can attend a refresher training, i.e., CenSARA training on PSD/NSR permitting in which training BACT analysis is discussed. It is often provided every two years.

Y N x 14. Do you provide an information outreach program on BACT evaluations for owners of regulated sources?

If yes, how frequently do you provide such information and how do you provide it?

Y N 15. Do you provide an information outreach program on BACT evaluations to the public?

If yes, how frequently do you provide such information and how do you provide it?

Y N 16. Do you enter each BACT determination in the RACT/BACT/LAER Clearinghouse?

Y N 17. Before establishing BACT as work practice, design, or operational standards, do you determine that emissions limits (e.g., lbs/mmBTU, lbs/hr) are not feasible?

If no, please explain.

Y N 18. Do you apply BACT to fugitive emissions?

Response: As far as we know, we may do this for VOC LDAR (e.g., NSPS VV) and watering dusty roads.

If no, please explain.

3. *Additional Impacts (soils, vegetation, visibility, growth)*

Y N 1. Do your PSD application forms specifically require information regarding additional impacts?

If yes, include a copy of the forms.

Y N 2. If no, do you require applicants to submit sufficient information necessary to complete an additional impact analysis?

3. What resources do you use for researching additional impacts?

Response:

- Federal Land Managers' Air Quality Related Values Work Group (FLAG) Phase I Report—Revised (2010)
- Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils, and Animals: Final Report

Y N 4. Do you include environmental justice issues in your analysis?

Response: Not usually, only if it applies.

Y N 5. Has an additional impact analysis in the last 5 years been a cause for concern in an issuance of a PSD permit?

If yes, please explain.

Y N 6. Do you generally allow arguments that the protection of the NAAQS will assure protection of vegetation?

If yes, please explain.

Response: This is usually mentioned as part of the explanation, but in general, KDHE would require a demonstration that vegetation is not harmed at the same levels.

Y N 7. Do you require that predicted short-term impacts (e.g., one hour NO_x impacts) be used to assess impacts on vegetation for pollutants which do not have short term ambient standards?

If no, please explain.

Response: KDHE would require a demonstration for each applicable pollutant and averaging period that vegetation is not impacted. Our understanding is that if there is no short-term standard for a pollutant, then there is no requirement for a demonstration that the pollutant would not have a short-term impact on vegetation.

Y N 8. Regarding visibility impacts, do you require assessments for vistas (e.g., parks, airports) near the proposed source or modification?

If no, please explain.

4. *Preconstruction Monitoring*

Y N 1. Do you have formal preconstruction monitoring requirements?

Y N 2. Do you have a formal public participation process regarding requirements for preconstruction monitoring for specific proposed projects?

Y N 3. Have you ever consulted with the Federal Land Manager (FLM) regarding preconstruction monitoring requirements for a proposed source or modification?

Y N 4. In the last five years have you ever required an applicant applying for a PSD permit to conduct preconstruction ambient monitoring or meteorological monitoring?

Response: Supposedly, Futamura will do this, but the facility has not submitted any PSD application yet.

Y N 5. Do you have a formal approval/denial process at the conclusion of preconstruction monitoring?

Y N 6. Do you have a formal process during preconstruction monitoring for resolving conflicts between the FLM and the applicant?

If yes, please explain.

Y N 7. Do you routinely provide ambient monitoring data in lieu of requiring applicants to perform preconstruction monitoring?

If yes, please briefly describe the monitoring network used and the basis for the monitoring value selected.

Response: KDHE BOA uses the agency's ambient air monitoring network, based on the National Ambient Air Quality Standards and the Code of Federal Regulations. For modeling data, KDHE BOA uses a 5-year average of pollutant concentration from the closest monitoring station to the modeled area. Parts per million (ppm) and parts per billion (ppb) concentrations are converted to microgram per cubic meter ($\mu\text{g}/\text{m}^3$).

Y N 8. Do you follow EPA guidance (e.g., siting, equipment, data validation, audits) regarding collection of preconstruction monitoring data?

9. Under what circumstances would you require post construction ambient monitoring as a condition of a PSD permit?

Response: This would be done on a case by case basis and depend on many factors.

C. Nonattainment Major NSR Permitting

1. Offsets

Y N 1. Do you have an emissions "bank" for offsets?

If no, go directly to 10.

Y N 2. Is the bank a database used for emissions trading?

If yes, please explain how the trading works.

- Y N 3. Do you, as the reviewing authority, control the trading of credits in the “bank”?

If no, who controls the trading?

- Y N 4. Are the credits certified “creditable” (including surplus for attainment planning purposes and other Clean Air Act requirements) by you at time of entry into the bank?

- Y N 5. Are the credits evaluated and certified “creditable” (including currently surplus) at the time of withdrawal and use?

If not, please explain.

6. How long are the “offsets” valid from time of reduction? [NA](#)

- Y N 7. Are the banked credits included in the attainment demonstration and inventory as “real emissions” (*i.e.*, emissions being emitted into the air)?

- Y N 8. Are the banked credits used for NSR offsets only?

If not, what are the other uses?

- Y N 9. Are the banked credits discounted with time?

If yes, please explain the discounting procedures.

10. How do you determine that the reductions being used are properly included in the attainment demonstration?

Response: [Not applicable](#)

- Y N 11. Are the emissions reductions available for NSR offsets only allowed from the same nonattainment area as the proposed source or modification?

Response: [Not applicable](#)

If not, please explain.

12. What procedures do you use to determine the baseline to quantify the reductions?

Response: Not applicable

a. How do you quantify the amount of creditable reduction?

Response: Not applicable

Y N 13. Are the records for determining actual emissions available for review by you?

Response: Not applicable

Y N 14. Are copies of permits required as part of the permit application to determine if the reductions from other sources being proposed as NSR offsets are federally enforceable?

Response: Not applicable

15. How do you verify that the reductions proposed for NSR offsets are “surplus” to other Clean Air Act requirements and are “real,” (*i.e.*, reductions in emissions that were actually emitted into the air)?

Response: Not applicable

16. What process do you use to verify that the reductions were not used in a previously issued permit?

Response: Not applicable

Y N 17. Do you allow inter-pollutant trading for NSR offsets?

Response: Not applicable

If yes, please describe this trading procedure (*e.g.*, pollutants allowed, ratio of reductions required, eligibility criteria, etc.).

Response: Not applicable

Y N 18. For serious and severe ozone nonattainment areas do you allow “internal offsets” instead of lowest achievable emissions rate (LAER)?

Response: Not applicable

If yes, what is the offset ratio?

Response: Not applicable

Y N 19. Do you allow credits used for netting to be used as nonattainment Major NSR offsets?

Response: Not applicable

Y N 20. Do your nonattainment Major NSR rules requires the offset ratios prescribed in the Clean Air Act?

Response: Not applicable

If no, please explain what other ratios are used?

Response: Not applicable

Y N 21. Do you require that applicants proposing to use NSR offsets include a “net air quality benefit” modeling analysis as part of their permit application?

Response: Not applicable

If yes, please describe what information is required.

Response: Not applicable

2. LAER Determinations

Y N 1. Do you require permit applicants to use a top-down approach to determine the most stringent control option available for LAER?

Response: KDHE BOA has not done any LAER determination.

If not, what approach do you require?

Response: KDHE BOA has not done any LAER determination.

Y N 2. Do you require a permit applicant to identify all available control options?

Response: KDHE BOA has not done any LAER determination.

If yes, do you require the applicant to identify control options as being:

Y N a. Achieved in practice?

Response: KDHE BOA has not done any LAER determination.

Y N b. Contained within the SIP of any other state or local reviewing authority?

Response: KDHE BOA has not done any LAER determination.

Y N c. Technologically feasible?

Response: KDHE BOA has not done any LAER determination.

Y N d. Cost effective?

Response: KDHE BOA shall follow the EPA's Memo entitled, "Guidance on Determining Lowest Achievable Emission Rate (LAER)" issued by John Calcagni on February 28, 1989, if there are nonattainment major NSR permit applications.

Y N 3. Do you use information sources other than the RACT/BACT/LAER Clearinghouse to identify control options?

Response: KDHE BOA has not done any LAER determination.

If yes, please describe what information sources you commonly use and the usefulness of each?

Response: KDHE BOA shall also use information from the California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD), and other states' PSD permits (e.g., Texas, Iowa, Nebraska, Missouri, Oklahoma, Washington, etc.), as we did for PSD permit.

4. Please describe under what circumstances you would conduct a LAER analysis independent of the analysis conducted by the permit applicant.

Response: KDHE BOA has not done any LAER determination.

Y x N 5. Do you submit your LAER determinations to the EPA's RACT/BACT/LAER Clearinghouse?

Response: Yes, if it will be available.

Y N 6. Do you consider technology transfer in your LAER determinations?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

7. If you consider cost effectiveness in LAER determinations, please describe the procedures used. (For example, describe the procedures used to calculate the baseline emission rate in the cost effectiveness determination.) For each criteria pollutant, provide the dollar/ton threshold used to determine whether a control option is cost effective (and state whether this is total or incremental cost).

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 8. Do you use a different cost approach for different pollutants?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

If yes, please explain.

Response: Not applicable.

Y N 9. Do you provide detailed documentation or explanations of proposed LAER determinations in the technical support document (TSD) or public record?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 10. Do you provide an economic rationale in the TSD or public record if a LAER option is rejected as being prohibitively expensive?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 11. Do you consider combinations of controls when identifying and ranking LAER options?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 12. Do you perform a LAER assessment for all new/modified emission units or activities emitting a nonattainment pollutant subject to major NSR review no matter how small the emissions from an affected unit or activity?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

13. Please describe how your LAER analysis includes “time of” considerations? (For example, if a new or modified source had constructed without a permit and at a later time went through nonattainment Major NSR review, would you consider LAER at the time of permit issuance or at the time of emission unit construction/ modification?)

Response: KDHE BOA has not done any nonattainment major NSR permitting process. But it should be at the time of the permit issuance, whichever is the later, for there may be a more effective LAER at a later time.

Y N 14. Do your permits contain conditions requiring specific emission limits/control method conditions/work practice standards consistent with the basis (and capabilities) of the selected LAER option?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

15. Please describe how you establish compliance averaging times for LAER emission limits.

Response: KDHE BOA has not done any nonattainment major NSR permitting process. But the compliance averaging times for LAER emissions limit shall be established based on how the emissions increase or potential emissions are calculated.

Y N 16. Do your permits contain conditions requiring emissions testing, monitoring, recordkeeping, and reporting so that inspectors and enforcement personnel can easily determine compliance with LAER requirements?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

If not, please explain.

Y N 17. Do you ensure that permit conditions impose restrictions consistent with the LAER determination? (For example, if emissions used in the LAER determination are based on an assumption of less than continuous operation and/or operation at less than maximum capacity, do permit conditions contain limits/restrictions based on the assumptions used?)

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

18. Please describe how you incorporate public comments into your LAER determinations.

Response: KDHE BOA has not done any nonattainment major NSR permitting process. But KDHE BOA evaluates public comments in a case-by-case basis whether they have merit.

Y x N 19. Do you provide LAER evaluation training to new (or newly-assigned) NSR permitting staff other than on-the-job training?

If yes, please describe the nature of the training provided.

Response: The new permitting staff has to attend a CenSARA training on PSD/NSR permitting in which LAER evaluation is discussed.

Y x N 20. Do you provide LAER evaluation refresher training to experienced NSR permitting staff?

If yes, how frequently do you provide this training and what is the nature of the training provided?

Response: The experience NSR permitting staff can attend a refresher training, i.e., CenSARA training on PSD/NSR permitting in which LAER evaluation is discussed. It is often provided every two years.

Y N 21. Do you provide an information outreach program on LAER evaluations for owners or operators of regulated sources?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

If yes, how frequently do you provide such information and how do you provide it?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 22. Do you provide an information outreach program on LAER evaluations to the general public?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

If yes, how frequently do you provide such information and how do you provide it?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

3. Alternatives Analysis

Y N 1. Does each nonattainment Major NSR permit action address the alternatives analysis as required by section 173(a)(5) of the Clean Air Act?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N If yes, is this alternatives analysis a specific requirement of your nonattainment Major NSR rules?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 2. Do you have criteria that would address the depth of analysis required for a specific project?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 3. Do you include project-specific environmental justice issues that are raised as part of this analysis?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

Y N 4. Do you know of any projects where this analysis resulted in changes to proposed projects?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

If yes, what changes resulted?

Response: KDHE BOA has not done any nonattainment major NSR permitting process.

4. Compliance

Y N 1. Do you require the permit applicant to demonstrate that all major stationary sources owned or operated by the applicant in your State are subject to emission limitations and are in compliance, or on a schedule for compliance, with all applicable emission limitations and standards? [NA](#)

2. Please describe the following:

a. the criteria used by an applicant in a statewide compliance demonstration [NA](#)

b. when in the permitting process you require the applicant to make the statewide compliance demonstration. [NA](#)

III. NSR Avoidance

A. RMRR (Routine Maintenance, Repair and Replacement) exemption

Y x N 1. Do you have knowledge of (a) the EPA letter dated May 23, 2000, to Henry Nickel of Hunton & Williams concerning Detroit Edison and (b) the Wisconsin Electric Power Company (WEPCO) case RMRR documents?

2. What other documents do you rely upon when making RMRR exemption determinations?

Response: [KDHE BOA uses EPA guidance and do case-by-case reviews.](#)

Y x N 3. Do you have a formal protocol for making RMRR exemption determinations?

If yes, describe the protocol.

Response: [These determinations are assigned to a permit writer for review.](#)

4. Approximately how many formal RMRR exemption determinations have you made in the last five years?

Response: [Zero](#)

a. Using any one such determination as an example, describe the example, state the conclusion you reached, and discuss how you reached the conclusion.

Y x N 5. Do you keep documentation of formal RMRR exemption determinations?

Response: [KDHE BOA would issue a response letter but our database would not indicate it as an RMRR determination.](#)

Y x N 6. Do you restrict the RMRR exemption to units being modified and exclude replacement of entire units from RMRR exemption consideration?

Y x N 7. Regarding the “purpose” evaluation factor in an RMRR exemption evaluation, do you exclude projects from the RMRR exemption that result in an increase in production capacity?

Response: KDHE BOA evaluates them on a case-by- case basis.

8. Regarding the “frequency” evaluation factor in an RMRR exemption evaluation, which of the following do you consider:

Y x N a. the history of the specific unit(s) in question.

Y x N b. the history of other similar units at the same facility.

Y x N c. the history of similar units at other facilities in the same industry.

Y x N d. some combination of these histories.

9. Regarding the “cost” evaluation factor in an RMRR exemption evaluation, what procedure do you follow to take cost into account?

Response: KDHE BOA would review the capital cost expenditure for the project. However, KDHE BOA has not done one of these reviews in the last 5 years.

Y x N 10. Do you provide RMRR exemption evaluation training to NSR permitting staff employees (other than on-the-job training)?

If yes, describe the nature of the training provided.

Response: The new permitting staff has to attend a CenSARA training on PSD/NSR permitting in which RMRR exemption evaluation is discussed.

Y x N 11. Do you provide an information outreach program on RMRR exemption evaluations for owners of regulated sources?

If yes, how frequently do you provide such information and how do you provide it?

Response: The experience NSR permitting staff can attend a refresher training, i.e., CenSARA training on PSD/NSR permitting in which RMRR exemption evaluation is discussed. It is often provided every two years.

B. PCP (Pollution Control Projects) Exemption

NOTE: Federal pollution control project (PCP) exemption rules and policies were vacated by the U.S. Court of Appeals for the District of Columbia as of June 24, 2005. Please address the following questions for projects approved prior to this decision.

Y N 1. Do you have standard permitting procedures or rules that allow for certain changes at non-utility emissions units to be designated as PCP, which are excluded from major NSR?

2. How many PCP exclusions have been granted for “feed” or “fuel” switches?

Response: Not applicable.

3. What process do you use to determine if the project is “environmentally beneficial” and not just “economically efficient”?

Response: Not applicable.

4. How are the collateral emission increases evaluated? Do you require a modeling analysis to demonstrate insignificant impacts from emissions increases?

Response: Not applicable.

5. How do you handle collateral increases in hazardous air pollutants (HAP)?

Response: Not applicable.

Y N 6. Are the emission reduction credits from PCP available for netting or NSR offsets? Please explain.

Response: Not applicable.

7. Which add-on control devices are most frequently involved in PCP exclusion requests?

Response: Not applicable.

8. Which types of industrial sources typically request PCP exclusions from major NSR?

Response: Not applicable.

Y N 9. Does your NSR SIP include the PCP exclusion for electric utility steam generating units (often referred to as the WEPCO exclusion)?

Response: K.A.R. 28-19-350 adopts by reference 40 C.F.R. §52.21 as in effect on July 1, 2011, which incorporates the June 13, 2007 (72 FR 32526) final rule addressing the June 24, 2005 United States Court of Appeals for the District of Columbia Circuit opinion vacating the portions of the December 31, 2002 (67 FR 80186) and the July 21, 1992 “WEPCO exclusion” (57 FR 32314) rules that pertained to Clean Unit and Pollution Control Project.

KDHE believes the approval of our PSD program as codified at 40 C.F.R. §52.870 should be amended to remove the following underlined conditional approval statement listed under “explanation” for K.A.R. 28-19-350:

Provisions of the 2010 PM_{2.5} PSD-Increments, SILs and SMCs rule relating to SILs and SMCs that were affected by the January 22, 2013, U.S. Court of Appeals decision are not SIP approved. Provisions of the 2002 NSR reform rule relating to the Clean Unit Exemption, Pollution Control Projects, and exemption from recordkeeping provisions for certain sources using the actual-to-projected-actual emissions projections test are not SIP approved. In addition, we have not approved Kansas rule incorporating EPA’s 2008 “fugitive emissions rule” (published in the Federal Register on December 19, 2008).

C. Circumvention/Aggregation

Y N 1. When you review a modification to determine if it is major for NSR, do you consider aggregating prior minor emissions increases at the stationary source?

2. Please provide any criteria you may use to determine if a series of minor modifications or projects needs to be aggregated for NSR applicability purposes?

Response: We try to reach a conclusion as to whether the projects could reasonably be parts of one project. Some specific criteria include the time between the projects, the overall effect on capacity (i.e. did one project de-bottleneck the process), the funding for the projects (if known), etc.

KDHE shall rely on the EPA aggregation ruling dated 11/7/2018. Excerpts from this ruling are shown below.

“It remains necessary to draw a line between those activities that are to be considered a single "physical or operational change" and those that are not. In this action, we are affirming that the 2009 NSR Aggregation Action’s "substantially related" test is an appropriate standard for project aggregation.”

“The 2009 NSR Aggregation Action outlined the role of timing – specifically, that timing alone is not determinative of whether activities are substantially related and that, as a policy matter, activities separated in time by three or more years may be presumed to be not substantially related.”

- Y x N
3. When requests are made to permit new or modified emissions units as separate minor changes over time, do you evaluate whether the permitting process is purposely staged as minor when the changes are really one permitting action subject to major NSR?

D. Synthetic Minor Permit Limits

- Y N x
1. Do you keep a list of synthetic minor sources (*i.e.*, sources that would otherwise be major for NSR but are considered minor because of emissions limits or other limiting conditions in their permits) that is available for review by the public and EPA?

If yes, please explain how.

2. Describe your formal process for establishing or designating a synthetic minor source.

Response: The request is reviewed by a permit writer including PTE calculations.

- Y x N
3. For synthetic minor sources, do your permits include enforceable limits to keep the sources minor?

If not, please explain why.

4. Please describe how compliance with the synthetic minor limits is tracked over time?

Response: Compliance is tracked in different ways depending on the equipment. Some source must track emission on a monthly basis and do rolling 12-month totals. Some source use performance testing on a required basis. All requires recordkeeping and reporting. In addition, sources must submit a report to BOA compliance if they are within 85% of their limit.

- Y x N 5. Are you satisfied that your tracking activities are sufficient to ensure that sources getting synthetic minor permits to avoid major NSR review are not actually operating above the applicable major source threshold?
- Y x N 6. Do you include in your synthetic minor permits conditions requiring sources to notify you if and when the major source threshold is reached?
- Y N x 7. Do you perform (or require) modeling for sources seeking synthetic minor permits to determine impacts on PSD increments?
- Y N x 8. Do you consider visibility issues in Class I areas, if applicable, when reviewing synthetic minor applications?
- Y x N 9. Do you include “prompt deviation” reporting requirements in synthetic minor source permits?

If yes, how do you define “prompt deviation”?

Response: Next business day after discovery. This may be true for Title V, Class II or synthetic minor sources. But we have other PSD synthetic minor permits for staying under 250 tpy that may not require next day reporting.

- Y x N 10. Do permit applications reviewed by your agency and permits issued identify the requirements (e.g., PSD, nonattainment Major NSR, Title V, NESHAP) being avoided by keeping the source minor?

E. Relaxation

1. Describe your knowledge of the “relaxation” regulatory provisions of 40 C.F.R. §§51.165(a)(5)(ii), 51.166(r)(2), and 52.21(r)(4).

Response: KDHE has seen a couple applications for relaxations citing 40 C.F.R. §52.21(r)(4). The recent Cargill PSD application relaxes a throughput limit. They claim that since they are now applying for a PSD permit, they can do this because of 40 C.F.R. §52.21(r)(4), which seems reasonable.

40 C.F.R. §52.21(r)(4) follows: At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements or paragraphs (j) through (s) of 40 C.F.R. §52.21 shall apply to the source or modification as though construction had not yet commenced on the source or modification.

2. What types of changes do you consider potentially subject to relaxation assessments?

Response: Relaxation of limitations, established to avoid PSD. Also, care must be exercised upon relaxation of limitations established to avoid Title V permits, i.e. synthetic minor operating limitations. The potential PSD impact of construction activities during the period of time of the operating permit limitation must be evaluated.

Y N 3. Do you have a written policy on relaxation assessments?

4. Approximately how many relaxation assessments have you made in the last five years?

Response: KDHE BOA does not track this in the database.

Y N 5. Do you include specific permit conditions to make potential future relaxation possibilities more identifiable?

6. What is your understanding of the appropriate circumstances under which an existing minor source is allowed a 100/250-tons-per-year emissions increase without triggering relaxation provisions?

Response: If a true minor source has a project which by itself is major (i.e., greater than or equal to 100/250 tpy), then a PSD permit is required.

Y N 7. Do you provide relaxation evaluation training to NSR permitting staff employees (other than on-the-job training)?

If yes, describe the nature of the training provided.

IV. Minor Source Construction Permitting Program

Y N 1. Do you require monitoring or reporting requirements for minor sources?

a. If so, do you establish these requirements based on a rule or a general policy of effective permit writing?

Y N 2. Does the application or permitting process require modeling for minor sources?

Y N 3. Does your minor source permit program include a technology component similar to BACT in the PSD program?

Y x N 4. Do you require minor sources with Federally applicable permit limits for MACT, NSPS, or NESHAP to report compliance?

Response: KDHE BOA requires them to report per the regulation. KDHE BOA does not have additional requirements outside the federal requirements.

V. Modeling

A. PSD Modeling

1. General

Y x N 1. Do you follow EPA's modeling guidelines in 40 C.F.R. Part 51 Appendix W?

Y x N 2. Are deviations from the modeling guidelines in Appendix W subjected to public comment and submitted to the regional EPA office for approval?

Y x N 3. Do you ask applicants to submit a modeling protocol for approval prior to submitting modeling?

Y x N 4. Is the protocol provided to other interested organizations (e.g., EPA, Federal Land Manager)?

Y x N 5. Is the effect of downwash modeled if stacks are less than good engineering practice (GEP) height?

Y x N 6. Are modeling analyses available for public review?

Y x N 7. Do you review modeling submittals to determine if option switches are correct?

8. When off-site meteorological data are used, what years are typically used?

Response: KDHE BOA provides the processed meteorological data to the facility and typically includes the last five years of data.

9. How do you train/re-train your modeling staff?

Response: The staff attends CenSARA training, EPA training (if available), and follows EPA guidance in modeling.

Y x N ☐

10. Do you follow The Air Quality Analysis, Additional Impacts Analysis, and Class I Area Impact Analysis guidance provided in the New Source Review Workshop Manual (Draft October 1990)?

11. For cumulative national ambient air quality standards (NAAQS) and PSD increment compliance assessment:

a. How are the appropriate emission inventories of other sources developed?

Response: The emission inventories of other sources came from KDHE BOA State and Local Emissions Inventory System (SLEIS), a web-based application that allows permitted facilities to compile and submit point source emissions inventory, stack characteristics, and location data in accordance with regulatory reporting.

b. What are the reasons used to identify and/or eliminate emission sources?

Response: KDHE BOA uses the EPA guidance, as well as consulting with EPA Region 7 staff, to identify and/or eliminate emission sources. Averaging time, emission rates, and distance from the impact of proposed source are considered.

c. How are PSD increment consuming/expanding sources identified and tracked?

Response: PSD increment consuming/expanding sources are not particularly tracked but are modeled every time a PSD permit application is received and the PSD project that will occur near those consuming/expanding sources.

12. What is the basis (e.g., allowable, maximum or average actual short-term emissions, last two year period, etc.) of the emission rates provided in the NAAQS and PSD increment consuming inventories of other sources?

Response: The appropriate basis depends largely upon the NAAQS or increment averaging time. KDHE BOA typically uses the higher value of (actual) emissions from the last two reported inventory years.

13. How do you ensure that the controlling concentrations reported by the applicant for each pollutant and averaging period were appropriately determined?

Response: KDHE BOA reviews the calculation and asks pertinent information such as basic design parameters and emission factors used in calculating the controlling concentrations reported by the applicant for each pollutant and averaging period.

Y x N 14. Are the impact modeling analyses reviewed to ensure that they are accurate and complete, and that appropriate modeling procedures (e.g., modeled to 100-m resolution, fence line and not property line, nearest modeled receptors, etc.) were followed?

Y N x 15. Is complex terrain an issue in your region?

If yes, what modeling procedures are used to address impacts in complex terrain?

Y x N 16. Are pollutants without NAAQS and/or PSD increments addressed in the air quality impact assessments?

If yes, what threshold concentrations (e.g., acceptable ambient concentrations) are used to evaluate impacts?

Response: Yes, for ozone and secondary PM_{2.5}, we use the EPA's "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program".

Y x N 17. Do you have written agency-specific air quality modeling guidance for use by applicants?

Y N x If yes, has the guidance been provided to other concerned organizations (e.g., regional EPA, appropriate FLM, etc.) for review and comment?

Response: No, but we can provide it to EPA for review.

Y x N If yes, is your guidance available on the internet?

18. How do you determine the appropriateness of proposed meteorological data for an application?

Response: KDHE BOA provides the processed meteorological data to the facility to be used for their modeling.

a. When are “on-site” meteorological data required for an application?

Response: On-site data has never been used in an application in this state.

Y N b. Are “on-site” meteorological data validated and accepted if recovery is less than 90 percent?

Response: On-site data has never been used in an application in this state.

19. When an applicant’s air quality modeling reveals NAAQS and/or PSD increment violations, what is required to grant the permit and how are the violations resolved?

Response: The applicant has to do culpability analysis to demonstrate that their particular project/facility is not the source of the NAAQS and/or PSD increment violations.

Y x N 20. Do your regulations include the federal definition of ambient air?

If no, what is your definition of ambient air?

Response: KDHE applies the federal definition of ambient air in 40 CFR 50.1(e) Ambient air means that portion of the atmosphere, external to buildings, to which the general public has access.

21. Discuss your procedures for modeling “hot spots,” including minimum receptor spacing?

Response: The modeling based on the protocol will be performed first. If we found a hot spot, then we will create a tighter receptor grid on that location. The minimum receptor spacing used is 50 meters.

22. How do you determine if background air quality data are representative?

Response: KDHE BOA provides the background air quality data to the permit applicant. The data came from KDHE BOA Monitoring and Planning Section.

Y x N 23. Do you use the same NAD for stack, receptor, and building UTM coordinates?

2. Class I Areas

1. How do you determine which proposed projects need a Class I impacts analysis, including consideration of distance of the source from Class I areas (e.g., maximum distance criteria)?

Response: KDHE BOA follows the guidance from the Federal Land Managers' Air Quality Related Values Work Group (FLAG) Phase I Report—Revised (2010).

Y x N 2. For new or modified sources within 10 kilometers of Class I areas, do you require sources to submit an impact analysis for all pollutants to determine if any have impacts greater than 1 ug/m³?

Y x N 3. Do you require applicants to submit a Class I increment analysis for each pollutant subject to PSD review for which an increment exists?

Response: Kansas does not have a Class I area, but if the proposed PSD project is near a Class I area outside Kansas, KDHE BOA requires Class I increment analysis from the applicant.

Y x N 4. Do you require applicants to identify and provide a cumulative impacts analysis (maximum impact within Class I areas) for all Class I areas impacted by the source?

Response: Kansas does not have a Class I area, but if the proposed PSD project is near a Class I area outside Kansas, KDHE BOA requires Class I increment analysis from the applicant.

Y N x 5. Do you have a formal procedure for notifying Federal Land Managers (FLMs)?

Response: No, but KDHE BOA sends notification letter to FLM if Class I areas will be affected by the proposed PSD project.

If yes, please explain.

Y N x 6. Do your permitting procedures require the applicants to notify Federal Land Managers?

If yes, please explain.

Y N x 7. Is there communication, consultation, and discussion between you and FLMs?

If yes, to what extent (e.g., high, moderate, minimal).

Y N 8. Is there communication, consultation, and discussion between the applicant and FLMs?

If yes, to what extent (e.g., high, moderate, minimal)?

Y N 9. Do you actively seek input from FLMs during the permitting process?

Response: There are no Class I areas in Kansas, but if Class I areas will be affected by a proposed PSD project, FLMs are sent notification letters.

Y N 10. Is the applicant required to address potential adverse impacts on air quality related values (AQRVs) that are identified by the FLM during the notification process?

Y N 11. Do you require prior approval of Class I area impact analysis procedures that applicants plan to use?

Y N 12. Do you require applicants to perform a visibility analysis for Class I areas?

Response: KDHE BOA also requires applicants to perform visibility analysis for Class II areas.

Y N 13. If visibility impairment is indicated, do you require the applicant to notify the appropriate FLM for the Class I area?

Y N 14. Is the applicant required to address potential effects on scenic vistas associated with Class I areas that may have been identified by the FLM during the notification process?

Y N 15. Do you have a formal process for handling Class I area increment violations if predicted?

Y N 16. Have you issued PSD permits where the FLM objected?

If yes, please explain and identify the projects.

B. Nonattainment Major NSR Modeling

Y N 1. Do you require modeling to ensure that emission offsets provide a positive net air quality benefit? (Only applies to sulfur dioxide, particulate matter, and carbon monoxide nonattainment areas.)

Response: Kansas has no nonattainment major NSR sources.

C. Minor Source Modeling

- Y N 1. Are minor permit actions (*i.e.*, proposed new and modified minor sources), evaluated to determine if modeling for PSD increments is needed?
- a. Under what circumstances is increment modeling triggered for these minor permit actions?

- Y N 2. Do you use modeling to assure that minor sources and minor modifications will not violate the NAAQS?

If so, at what emission thresholds?

- Y N 3. Based on any modeling results, do you require installation of air quality monitors or establish other permit conditions to assure protection of the NAAQS and increment?

- Y N 4. For the pollutants with PSD increments established do you have a list of areas where the minor source baseline has been triggered?

Response: Yes, we have a county-specific map that shows the areas where the minor source baseline has been triggered. The maps can be found at the following website (<https://www.kdheks.gov/air-permit/indexPrmt.html>) under Air Permit Modeling, Minor Source Baseline Dates.

- Y N 5. Do you model minor sources for PSD increments if the minor source baseline is triggered?

- Y N 6. Do you have procedures in place to identify minor sources that consume or expand PSD increment?

Response: No, this would only occur during PSD permit modeling. KDHE were historically including all minor sources in the inventory for every PSD modeling demonstration, but it has stopped including minor sources in inventory collection. KDHE is only including Title V and synthetic minor sources in the inventory collection. True minor sources are not included in the inventory collection, thus, they are not identified in PSD increment consumption.

D. Increment Tracking

1. What method do you use to assign baseline dates (e.g., county-specific, region-specific, or entire state)?

Response: It is county specific.

Y x N 2. Do you have a list of the minor source baseline dates for each area?
If yes, please provide a copy.

Response: KDHE BOA has a “minor source baseline date map” for each pollutant showing each county where the dates are triggered. The maps can be found at the following website (<https://www.kdheks.gov/air-permit/indexPrmt.html>) under Air Permit Modeling, Minor Source Baseline Dates.

Y N x 3. Do you have an understanding of receptor location dependence vs. source location dependence for increment tracking?

Response: We do not understand the question.

Y N x 4. Do you have a program for tracking increment consumption?

If yes, please describe the program and whether it is a formal or an informal program?

Y N x 5. Do you maintain and update a computerized emission source database for increment tracking that includes minor sources that affect increment?

If yes, does the database include the information needed for modeling (e.g., source locations, stack parameters, emissions)?

6. Do you use allowable or actual emissions for increment tracking purposes?

Response: Both.

a. If actual emissions, how do you calculate emissions for each averaging period covered by the increments?

Response: Actual is used for annual averaging times. Allowable for potential emission rates are used for short term averaging times.

Y x N 7. Are area sources included in increment tracking analyses (e.g., growth-related and transportation-related emissions)?

Response: A discussion of the anticipated effects of these types of emissions on increment is usually required.

8. How frequently is increment consumption evaluated - on a scheduled basis or just when occasioned by a new permit application?

Response: Increment consumption is evaluated only when occasioned by a new permit application.

9. How “transparent” (*i.e.*, understandable) is the emission source inventory used for PSD modeling? (*i.e.*, could an outside reviewer (such as a member of the public) clearly identify the sources included (e.g., name, location, stack parameters) and the sources excluded in a modeling analysis?)

Response: Name and Source ID are provided with the Kansas generated inventory. A member of the public may or may not have the resources to identify the source based on this information.

10. How do you handle interstate increment tracking (for state reviewing authorities) or inter-jurisdiction tracking (for local reviewing authorities), including consistency of tracking across jurisdiction boundaries?

Response: Neighboring states are provided copies of the application and modeling analysis when significant impacts cross state boundaries.

11. What procedure do you follow in planning for and incorporating new modeling tools?

Response: KDHE generally applies new modeling tools as they become available. EPA guidance using these tools is followed to the best of our ability.

Y N x 12. Do you provide increment tracking training to NSR permitting staff (other than on-the-job training)?

If yes, describe the nature of the training provided.

Y N x 13. Are mobile sources modeled for increment compliance?

14. How does the public access a list of sources that affect PSD increments?

VI. Other Program Elements

A. Environmental Justice (EJ)

Note: By EJ analysis we refer to any procedures applied during the permitting process, regardless of whether they are called EJ, that consider demographics (race, income, nationality, etc.), cumulative effects, (burden, exposure, risk), comparative effects or modifications to the public involvement processes to address unique characteristics of the project.

Y N 1. Do you consider EJ issues during the permitting process? If yes, please provide a description of the criteria, guidelines, or screening procedures used to address EJ issues.

Response: Kansas is directed to regulate the air quality of the state and implement laws and regulations that are applied equally and uniformly throughout the state and, in a manner, consistent with those of the federal Clean Air Act. As such, KDHE's current statutory authority does not provide for environmental justice considerations during the permitting process. More importantly, KDHE is not legally authorized to deny or delay the issuance of a permit required by federal or state law when statutory requirements have been met.

Considering citizens' role in the permitting decision-making process, KDHE's SIP approved New Source Review (NSR) preconstruction permitting programs include adequate procedural opportunities for informed public participation prior to the issuance of each construction permit. Furthermore, KDHE commits to maintaining a public information process that satisfies the requirements of CAA Section 127, which requires effective measures to notify the public during any calendar year on a regular basis of instances or areas in which any air quality standard is exceeded or was exceeded during any portion of the preceding calendar year to advise the public of the health hazards associated with such pollution, and to enhance public awareness of measures that can be taken to prevent such standards from being exceeded. KDHE accomplishes this by maintaining an air quality data website with links to the Kansas Air Quality Monitoring Network and to AIRNow for live monitoring data.

Y N 2. Regarding section 173(a)(5) of the Clean Air Act, do you conduct an alternatives analysis as part of your nonattainment area permitting process? If yes, please provide a description of the EJ criteria or guidelines used for this analysis.

Response: Kansas currently has a federally approved Nonattainment NSR preconstruction permitting program that applies to all major stationary

sources located in a nonattainment area in the state. There are no major stationary sources located in a nonattainment area in the state.

Y N 3. Regarding section 165(a)(2) of the Clean Air Act, does your NSR permitting program and public comment process for PSD regulated pollutants provide for consideration of alternatives?

Response: Kansas' federally approved PSD permitting program is implemented by K.A.R. 28-19-350 and applies statewide. Consistent with Title I, Part C of the CAA provisions and EPA's PSD implementing regulations at 40 C.F.R. Parts 51 and 52, KDHE consults with local governments, officials, and federal land managers before the issuance of a PSD permit through the application review and public participation process, thereby also satisfying the requirements of CAA Section 121.

With respect to public notification procedures for a proposed PSD action, notification of a public comment period (minimum of 30 days), including an opportunity for public hearing, is given through publication in a local newspaper and the Kansas Register, and posting on the KDHE public notice website. Any interested individual is also provided electronic notification through a listserv. Additionally, notification of the proposed action is provided to the following entities: applicant, appropriate district office or local agency, EPA, along with a proposed permit, city and county officials, regional land use planning agency, and any state, federal land manager, or Indian governing body whose lands will be affected from the action. KDHE commits to consider all timely and relevant comments received during the comment period and during any public hearing. More importantly, the public is further informed through review of comments, application materials, the proposed permit, and a summary analysis of the materials considered in establishing the proposed permit, which are made available at the appropriate district office/local agency and KDHE public notice website.

4. How are the demographics of the affected community taken into account in the permitting process?

Response: Public comments from interested persons are solicited.

5. How are cumulative effects and/or pre-existing burden addressed in the permitting process?

Response: Public comments from interested persons are solicited.

6. What additional community information and/or demographics (for example – children, the elderly) do you consider important for an EJ analysis?

Response: Public comments from interested persons are solicited.

- Y N 7. Do you allow public involvement during an EJ analysis? If yes,
- a. What stakeholder groups do you try to involve?
 - b. At what point in the EJ analysis or permitting process do stakeholders become involved?
 - c. To what degree and in what manner do stakeholders or the community influence the permit decision making process?
 - d. To what degree do you know about how stakeholders or the affected community participated in the permit decision making process?
 - e. Describe how you make information available to stakeholders and the affected community. (For example – translation of information, understandable and accessible materials, personal contacts, clearly explained technical information including potential risk, distribution of information, public meetings, etc.)
- Y N 8. In the EJ analysis, do you consider direct and indirect benefits and burdens from the proposed actions? If yes,
- a. Describe what benefits you consider in the EJ analysis. (For example – economic, social, cultural, health, environmental, etc.)
 - b. Describe what burdens you consider in the EJ analysis. (For example – economic, social, cultural, health, environmental, etc.)
- Y N 9. In the EJ analysis, do you consider comparative and disproportionate impacts? If yes,
- a. Describe the criteria or procedures used to determine any potential or actual adverse health or environmental effects or impacts.
 - b. Describe the criteria or procedures used to determine whether evidence exists to describe these effects or impacts.
 - c. Describe the criteria or procedures used to determine whether the proposed project complies with all applicable environmental laws.

B. Endangered Species Act (ESA)

Y N 1. If you have a delegated PSD program, do you notify PSD permit applicants of their ESA obligations?

If so, please provide a copy or description of your notice.

Y N 2. If you have a delegated PSD program, do you advise applicants, concerning their ESA obligations, to consult with a.) EPA; b.) The U.S. Fish and Wildlife Service; and/or c.) Federal Land Manager?

If yes, please explain, and describe what information you provide to applicants concerning their ESA obligations.

Response: No, not applicable because we do not have a delegated PSD program.

Y N 3. If you have a SIP approved PSD program, do you have any responsibilities under your state law to carry out an endangered species analysis?

If so, please briefly describe the scope of the program. If no, please so indicate.

Response: KDHE is legally authorized to promulgate rules and regulations establishing standards that are in compliance with the federal clean air act provisions but is statutorily prohibited from establishing standards that are more stringent, restrictive, or expansive than those required under the federal clean air act. Kansas' federally approved (SIP approved) PSD program aligns with Title I, Part C of the Clean Air Act (CAA) provisions and EPA's PSD implementing regulations at 40 C.F.R. Parts 51 and 52. With respect to the Endangered Species Act (ESA), CAA Section 110 SIP submittal criteria does not include consideration of endangered or threatened species, and for program approvability neither Title I, Part C of the CAA nor EPA's PSD implementing regulations explicitly state that consideration of the impacts on ESA-protected species is a required factor in PSD permitting decisions.

Pursuant to Kansas' federally approved PSD program, KDHE consults with local governments, officials, and federal land managers before the issuance of a PSD permit through the application review and public participation process, which provides a full opportunity for interested persons to comment on the potential impacts of a proposed PSD action.

While Section 7 of the ESA sets forth requirements for consultation between federal agencies and the U.S. Fish and Wildlife Service when any action the agency carries out, funds, or authorizes (such as through a

federally-issued PSD permit) may affect a listed endangered or threatened species, EPA's federal oversight of Kansas' PSD program could allow EPA, should they determine that the proposed action is likely to affect any listed species or critical habitat in the project area, to provide for such coordinated effort and consultation process to satisfy the requirements of the ESA.

Y N 4. If you carry out a federal or state ESA review, does the consultation affect the timing of your issuance of a proposed or final permit?

If yes, please explain.

C. State & Local Agency Coordination

1. How do the local and state agencies coordinate permitting-related responsibilities?

Response: Kansas only has one local agency that issues permits. KDHE BOA assigns their applications and reviews all documents before issuance (with the exception of expedited permits/approvals).

2. How does the department overview the local agency's permitting activities?

Response: KDHE BOA reviews the draft permits. They also submit to us a list of issued permits quarterly for review.

Y N 3. Does the local agency routinely send draft and final permits to the state agency for review, comment, and concurrence?

If yes, please explain the details.

4. How often does the local agency provide the state with information on its permitting activities?

Response: Often

5. Do you interact with other state environmental media programs (e.g. water, RCRA, waste) when permitting complicated projects?

Response: Occasionally

6. Please provide a copy of the most recent program review you have completed for each local agency with all or a portion of the NSR permitting responsibilities in the state.

Response: KDHE has cooperative agreements that establish formal partnerships between the Bureau of Air and local agencies who work together to develop and annually update strategic goals, objectives, and strategies for reducing emissions and improving air quality.

Specifically, KDHE oversees the following local agencies to implement the Kansas Air Quality Act and to provide air quality protection services: Johnson County Department of Health and Environment and Department of Air Quality (DAQ), Unified Government of Wyandotte County and Kansas City, Kansas Health Department. With respect to NSR permitting activities, staff from Wyandotte County DAQ assist with this process by reviewing air quality control permit applications and issuing construction permits for new or modified sources of air pollution in Wyandotte County. Among other things, staff also performs technical studies and evaluations, emission calculations, technology reviews, and regulatory applicability determinations. Wyandotte County DAQ acts as an agent of the state of Kansas to issue permits under state authority and in accordance with state and federal air quality regulations (Please see Attachment 5 for SFY2019 WYCO Work Plan Report).

Source ID	Facility Name	Location	Project	SIC Code	Permit Type	Permit Number	Application Received	Issue Date	Regulations
0770032	TARGA PIPELINE MID-CONTINENT WESTOK - FREEPORT STA (DEHY)	4.7 Miles Southwest of Freeport, Freeport, KS, 67003	ENGINE SWAP	1311	Construction Approval	CSA00539	1/5/2017	1/5/2017	
1730070	OxyChem - Wichita	6200 SOUTH RIDGE ROAD, WICHITA, KS, 67215	APPROVAL DETERMINATION	2812	Other Construction Permit	CSO01369	1/5/2017	1/6/2017	
1770030	Westar Energy - Tecumseh	5530 SE 2ND ST, TECUMSEH, KS, 66542	SO2 LIMIT	4911	Construction Permit	CSP00597	11/3/2016	1/9/2017	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	REFINERY OPTIMIZATION PROJECT	2911	Construction Approval	CSA00130	7/11/2016	1/10/2017	
1550159	Unit Petroleum - Urban 24-1H Station	S13-T25S-R10W, URBAN 24#1H, KS, 00000	OIL AND GAS SITE	1311	Construction Approval	CSA03847	1/6/2017	1/10/2017	
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	NEW CURING OVENS	3691	Construction Approval	CSA01315	8/5/2016	1/11/2017	
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	REVISE CURING OVENS	3691	Construction Permit	CSP00485	8/5/2016	1/11/2017	
0670182	Scout Energy - SLC A-70 (FORMERLY-MCCABE 1-3) STATION	S3-T29S-R35W, MCCABE 1-3, KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA03687	1/9/2017	1/18/2017	
0110041	OBRIEN ROCK - FT. SCOTT	2015 SIDNEY AVE, FT SCOTT, KS, 66701	CONCRETE BATCH PLANT	3273	Construction Approval	CSA03999	1/4/2017	1/19/2017	
0990071	OBRIEN ROCK - PARSONS	1528 2500 ROAD, PARSONS, KS, 67357	CONCRETE BATCH PLANT	3273	Construction Approval	CSA03998	1/4/2017	1/19/2017	
7770085	APAC-KANSAS KANSAS CITY DIV. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66053	ADD EQUIPMENT	1422	Construction Approval	CSA02090	1/3/2017	1/24/2017	
0877033	RENEWABLE POWER PRODUCERS (LFGTE)	338 RICE RD, LAWRENCE, KS, 66044	GAS PRODUCT ION PLANT	1311	Construction Approval	CSA03985	10/5/2016	1/24/2017	
2090046	General Motors - Kansas City	3201 FAIRFAX TRFCWY., KANSAS CITY, KS, 66115	MOD CITY AIR REPORT CRITERIA	3711	Construction Permit	CSP00691	1/23/2017	1/26/2017	
0050005	Cargill - Atchison	15662 SW 258TH US HWY 59, CUMMINGS, KS, 66016	LOADOUT INCREASE	5153	Other Construction Permit	CSO00053	1/5/2017	1/27/2017	
2090284	L.G. Everist	8440 GIBBS ROAD, KANSAS CITY, KS, 66111	ADDING FLYASH TRANSLOADING STA	4226	Construction Permit	CSP01092	1/23/2017	1/27/2017	
1030134	Henke Mfg.	3070 WILSON AVENUE, LEAVENWORTH, KS, 66048	PLASMA CUTTER	3531	Construction Approval	CSA03557	1/6/2017	1/30/2017	
0210046	Heartland Rural Electric - Weir	9130 NE 10TH ST, WEIR, KS, 66781	ENGINE SWAP	4911	Other Construction Permit	CSO03179	1/23/2017	1/31/2017	
1470004	Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661	TANK MODIFICATION	2952	Other Construction Permit	CSO01020	1/20/2017	1/31/2017	
0410026	Flint Hills Grain - Abilene South	513 W. 1ST STREET, ABILENE, KS, 67410	STORAGE BINS	5153	Construction Approval	CSA00309	1/26/2017	2/2/2017	
7770287	HARSHMAN CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 00000000	CONVEYORS	1422	Construction Approval	CSA02201	1/10/2017	2/2/2017	

1810021	OWN Resources - North Goodland Station	S8-T75-R39W, GOODLAND FIELD COMP STA., KS, 00000	ENGINE SWING	4922	Other Construction Permit	CSO02924	1/27/2017	2/3/2017
1050013	Lincoln Mun. Power Plant	405 W SOUTH ST, LINCOLN, KS, 67455	REPLACE ENGINE	4911	Construction Approval	CSA00766	1/11/2017	2/3/2017
2090046	General Motors - Kansas City	3201 FAIRFAX TRFCWY., KANSAS CITY, KS, 66115	MODIFY CONSTRUCTION PERMIT	3711	Construction Approval	CSA01796	2/6/2017	2/6/2017
1770017	BNSF Railway - Topeka	100 NE JEFFERSON TRAFFICWAY, TOPEKA, KS, 66607	PAINT BOOTH	4011	Construction Approval	CSA01595	10/31/2016	2/7/2017
1550089	Lowen Corp.	1111 N AIRPORT RD, HUTCHINSON, KS, 67501	PRINTING OPERATIONS	2759	Construction Permit	CSP00750	11/30/2015	2/8/2017
7770940	SCHMIDTLEIN EXCAVATING (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1422	Construction Permit	CSP02726	2/6/2017	2/10/2017
1110023	Cargill Feed & Nutrition - Emporia	841 GRAPHIC ARTS ROAD, EMPORIA, KS, 668010000	PET FOOD DRYER	2047	Other Construction Permit	CSO00778	1/4/2017	2/13/2017
1470004	Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661	TANK REPAIR	2952	Construction Approval	CSA01111	10/28/2016	2/14/2017
0010009	Monarch Cement	PO BOX 1000, HUMBOLDT, KS, 66748	REVISE C-9511	3241	Construction Approval	CSA00019	2/7/2017	2/15/2017
1850047	KANZA CO-OP ASSN. - STAFFORD (S MAIN)	700 S MAIN, STAFFORD, KS, 67578	GRAIN ELEVATOR	5153	Construction Approval	CSA04000	2/7/2017	2/16/2017
1590052	Jacam Mfg. - Chemical Processing	1656 Avenue Q, Sterling, KS, 67579	NEW PROCESSING EQUIPMENT	2899	Construction Permit	CSP02660	10/20/2015	2/20/2017
1110008	Bunge North America - Emporia (E 6th)	701 E. 6TH AVENUE, EMPORIA, KS, 66801	EMERGENCY GENERATOR	2075	Construction Approval	CSA00792	2/16/2017	2/20/2017
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	EMERGENCY GENERATOR	2873	Construction Approval	CSA00858	12/23/2016	2/21/2017
1870029	Scout Energy - South F Station	S17-T30S-R39W, SOUTH F COMPRESSOR, KS, 00000	NEW OIL AND GAS SITE	1311	Construction Permit	CSP02728	2/21/2017	2/22/2017
1550134	Williams Hutch Rail - Hutchinson Term. (NGL stor & load)	407 SOUTH OBEE ROAD, HUTCHINSON, KS, 67501	PERMIT MODIFICATION	5171	Construction Permit	CSP01841	1/27/2017	2/24/2017
1550134	Williams Hutch Rail - Hutchinson Term. (NGL stor & load)	407 SOUTH OBEE ROAD, HUTCHINSON, KS, 67501	RESPONSE	5171	Other Construction Permit	CSO03168	1/27/2017	2/24/2017
1590045	Kansas Ethanol	1630 AVENUE Q, LYONS, KS, 00000	GRAIN EXPANSION	2869	Other Construction Permit	CSO03056	2/3/2017	2/24/2017
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	MODIFY C-12733	1321	Construction Approval	CSA00374	6/4/2015	2/24/2017
0810092	Scout Energy - SLC A-58 Station	S30-T29S-R34W, SLC A-58, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA03715	2/8/2017	2/27/2017
0970054	WOOLSEY COMPANIES - KIOWA CO. STATION	S16-T28S-R19W, KIOWA COUNTY COMPRESSOR STA, KS, 00000	DEHYDRATION UNIT	4922	Construction Approval	CSA03831	1/17/2017	3/1/2017

0030009	Southern Star Central - Welda Station (dehy)	19209 SW MARYLAND RD, WELDA, KS, 66091	REPL GLYCOL REGENERATION UNITS	4922	Construction Approval	CSA00033	2/13/2017	3/3/2017
1730355	Pet Traditions Pet Loss Memorial Center (animal incin)	2260 N RIDGE ROAD, STE 120, WICHITA, KS, 67205	ANIMAL INCINERATOR	6553	Construction Permit	CSP02731	3/2/2017	3/6/2017
7770942	CONCRETE MATERIALS CO. (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRETE BATCH	3273	Construction Permit	CSP02732	3/3/2017	3/6/2017
1290039	DCP Operating - Richfield Station (dehy)	S1-T325-R42W, RICHFIELD STORAGE, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA01003	2/28/2017	3/7/2017
1230030	Central Valley Ag	300 S Hobart Street, Glen Elder, KS, 67446	NEW GRAIN BIN	5153	Other Construction Permit	CSO00868	2/23/2017	3/9/2017
1730354	CORANCO GREAT PLAINS - HAYSVILLE	140 NORTH MAIN, HAYSVILLE, KS, 67060	SOIL VENT	4959	Other Construction Permit	CSO03234	2/23/2017	3/9/2017
1650030	IACX Energy - Otis T Station	S26-T175-R16W, OTIS T COMPRESSOR, KS, 00000	NEW ENGINE	1311	Other Construction Permit	CSO03235	3/1/2017	3/9/2017
7770941	Dale Brothers (air curt comb) (portable)	NO STREET ADDRESS, PORTABLE, KS, 00000	AIR CURTAIN COMBUSTOR	1794	Construction Permit	CSP02729	3/1/2017	3/10/2017
0930010	Scout Energy - Ulysses North Main Station	S16-T265-R38W, Lakin, KS, 67860	ENGINE SWAP	1311	Other Construction Permit	CSO00663	2/7/2017	3/10/2017
2050053	RIVER ROCK OPERATING - 1-9 STATION	S18-T295-R17E, BOOSTER COMP STATION 1-9, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA03101	3/9/2017	3/14/2017
1550188	UNIT PETROLEUM - STROBER 24-1H STATION	S24-T255-R10W, STROBER 24 #1H, KS, 00000	OIL AND GAS SITE	1311	Construction Permit	CSP02724	1/17/2017	3/14/2017
1510067	SKYLAND GRAIN - ISABEL	60076 SE 100TH AVE, ISABEL, KS, 67065	GRAIN BINS	5153	Other Construction Permit	CSO03236	2/24/2017	3/15/2017
1290138	SKYLAND GRAIN - ROLLA	2385 BLVD D, ROLLA, KS, 67954	GRAIN BINS	5153	Other Construction Permit	CSO03237	2/24/2017	3/15/2017
0950068	SKYLAND GRAIN - CUNNINGHAM	308 S VALLEY, CUNNINGHAM, KS, 67035	GRAIN BINS	5153	Other Construction Permit	CSO03239	2/24/2017	3/15/2017
0950067	SKYLAND GRAIN - ZENDA (AKA CALISTA AKA SPIVEY)	9132 SW 70TH ST, ZENDA, KS, 67159	GRAIN BINS	5153	Other Construction Permit	CSO03238	2/24/2017	3/15/2017
0210033	Tamko Roofing Products - Columbus	600 EAST BETHLEHEM ROAD, COLUMBUS, KS, 66752	NO PERMIT DETERMINATION	2952	Other Construction Permit	CSO00227	3/8/2017	3/15/2017
1010005	BARTLETT GRAIN - HEALY	2000 S DODGE RD, HEALY, KS, 67850	FILTRATION SYSTEM	5153	Other Construction Permit	CSO00728	3/10/2017	3/16/2017
0570103	CITY OF DODGE CITY - Biogas Cleanup	11079 WARRIOR RD, DODGE CITY, KS, 67801	THERMAL OXIDIZER	4952	Construction Permit	CSP02725	1/30/2017	3/22/2017
2050045	RIVER ROCK OPERATING - FIRESIDE STATION	S17-T295-R17E, ALTOONA, KS, 66710	DEHY UNIT	1311	Construction Approval	CSA02752	3/9/2017	3/23/2017
1410008	Scouler Co. - Downs	709 Commercial St, Downs, KS, 67764	ADDITION EQUIPMENT	5153	Construction Approval	CSA01067	3/13/2017	3/24/2017
7770943	JKL CONST. (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRETE BATCH	3273	Construction Permit	CSP02734	3/20/2017	3/28/2017

0090005	ALFALFA PELLETS - GREAT BEND	379 NW 40 ROAD, GREAT BEND, KS, 67530	BAGHOUS 2048 E UPGRAD E	Other Construction Permit	CSO00076	3/29/2017	3/29/2017	
2057039	Systech Environmental	1420 S CEMENT RD, FREDONIA, KS, 66736	REPLACE TANKS	4953	Other Construction Permit	CSO02517	3/20/2017	3/30/2017
1770035	Futamura USA	6000 SE 2ND ST, TECUMSEH, KS, 66542	NEW CASTING MACHINE	2823	Other Construction Permit	CSO01546	8/8/2016	3/30/2017
0670049	Scout Energy - Satanta Gas Plant	S8-T30S-R35W, SATANTA GAS PLANT, KS, 67880	NSPS GG APPLICABILITY	1321	Other Construction Permit	CSO00481	3/17/2017	3/30/2017
7770944	GARDEN CITY READY MIX (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRETE BATCH	3273	Construction Permit	CSP02735	3/30/2017	3/31/2017
1590005	Compass Minerals America	1662 Avenue N, Lyons, KS, 67554	EMEERGE NCY GENERATOR	2899	Construction Approval	CSA01210	3/27/2017	3/31/2017
1590045	Kansas Ethanol	1630 AVENUE Q, LYONS, KS, 00000	GRAIN EXPANSION PROJECT	2869	Construction Permit	CSP01239	3/6/2017	4/3/2017
2090017	Grain Craft - Kansas City	56 SILVER AVE, KANSAS CITY, KS, 66103	INSTALL NEW HAMMER MILL FILTER	2041	Other Construction Permit	CSO01778	3/31/2017	4/3/2017
1250116	Gateway Resources USA - Kanmap Station	S20-T33E-R16E, KANMAP BOOSTER STATION, KS, 00000	MODIFY PERMIT	1311	Other Construction Permit	CSO03105	3/24/2017	4/6/2017
1250118	Gateway Resources USA - Liberty Station (dehy)	S30-T33S-R17E, LIBERTY BOOSTER STATION, KS, 64068	NEW ENGINE	1311	Construction Approval	CSA03508	3/29/2017	4/6/2017
1250136	GATEWAY RESOURCES USA - KIRK BOOSTER STATION	S13-T33S-R16E, KIRK BOOSTER STATION, KS, 00000	OIL AND GAS SITE	1311	Construction Approval	CSA04006	3/24/2017	4/6/2017
1730019	TEXTRON AVIATION - WEST CAMPUS	One Cessna Boulevard, Wichita, KS, 67215	PERMIT DETERMINATION	3721	Construction Approval	CSA01384	2/13/2017	4/7/2017
0510057	Midwest Energy - Hays (Goodman Energy Center)	1713 230TH AVE, HAYS, KS, 67601	MODIFY CONST PERMIT C-11921	4911	Construction Permit	CSP01266	11/8/2016	4/10/2017
1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337	COOLING TANK	2911	Other Construction Permit	CSO00873	3/30/2017	4/12/2017
0210026	Bagcraft Papercon	3400 BAGCRAFT BLVD., BAXTER SPRINGS, KS, 66713	PRINTING	2673	Other Construction Permit	CSO00211	2/17/2017	4/12/2017
0910083	Nazdar	8501 HEDGE LANE TERRACE, SHAWNEE, KS, 662273290	EMERGENCY GENERATOR	2893	Construction Approval	CSA00603	4/12/2017	4/14/2017
0450066	CritiTech Drug Development Services LLC	1849 E 1450 ROAD, LAWRENCE, KS, 66044	PHARMA CEUTICAL MANUFACTURING	2834	Construction Permit	CSP02733	3/8/2017	4/14/2017
1330053	RIVER ROCK OPERATING - BEACHNER 3-3 STATION	S13-T29S-R18E, BEACHNER BOOSTER STATION, KS, 66776	ENGINE SWAP	1311	Other Construction Permit	CSO02816	3/1/2017	4/14/2017
2030021	SCOLAR CO. - SELKIRK	1120 W COUNTY RD P 1/2, SELKIRK, KS, 67861	GRAIN STORAGE	5153	Construction Approval	CSA04005	3/15/2017	4/17/2017

1290059	MERIT ENERGY - SOUTH GREENWOOD STATION	S28-T32S-R43W, GREENWOOD SOUTH, KS, 00000	REPLACE ENGINE	4922	Construction Approval	CSA01009	3/27/2017	4/17/2017
7770945	BETTIS ASPHALT & CONST. (ASPHALT PLANT) (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	ASPHALT PLANT	2951	Construction Permit	CSP02736	4/6/2017	4/17/2017
1290057	MERIT ENERGY - SOUTH RIVER STATION	S19-T34S-R42W, SOUTH RIVER STA., KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA01004	3/27/2017	4/17/2017
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	PAINT BOOTH	3732	Other Construction Permit	CSO02247	1/26/2017	4/18/2017
7770946	PW FEENSTRA CONST. (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRET E BATCH	3273	Construction Permit	CSP02737	4/17/2017	4/18/2017
0030030	East Kansas Agri-Energy	1304 S MAIN ST, GARNETT, KS, 66032	MODIFY FEL	2869	Construction Permit	CSP01026	3/27/2017	4/18/2017
1770007	Goodyear Tire & Rubber	2000 NW US Hwy 24, Topeka, KS, 66601	MODIFY PSD PERMIT	3011	PSD Construction Permit	CSD00037	2/13/2017	4/19/2017
7770008	APAC-KANSAS SHEARS DIV. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66856	NEW CONVEYOR	1422	Construction Approval	CSA01943	4/7/2017	4/20/2017
0910117	Deffenbaugh Ind. - Johnson Co. Landfill	18181 W 53RD ST, SHAWNEE, KS, 66217	TEMPORARY FLARE	4953	Construction Permit	CSP00263	4/10/2017	4/24/2017
1290012	Merit Energy - South Rolla Station (dehy)	S1-T35S-R40W, SOUTH ROLLA BOOSTER STA., KS, 00000	REPLACE ENGINE	4922	Construction Approval	CSA00996	3/27/2017	4/24/2017
1330072	ORIZON AEROSTRUCTURES - CHANUTE	2522 W 21ST STREET, CHANUTE, KS, 66720	AEROSPACE FACILITY	3728	Construction Permit	CSP02727	2/10/2017	4/24/2017
2090323	INLAND PROPERTIES (CONCRETE BATCH PLANT)	6945 INLAND DRIVE, KANSAS CITY, KS, 66111	CONCRET E BATCH PLANT	3273	Construction Approval	CSA04008	4/24/2017	4/24/2017
1750114	Arkalon Ethanol	8664 COUNTY ROAD P, LIBERAL, KS, 67901	GRAIN STORAGE	2869	Other Construction Permit	CSO03037	4/17/2017	4/25/2017
1770246	KOCH CABINETS	3602 NW 16TH STREET, TOPEKA, KS, 66618	CABINET MANUFACTURING	2434	Construction Approval	CSA04001	3/2/2017	4/27/2017
1730075	TEXTRON AVIATION - PAWNEE	5800 E PAWNEE AVE, WICHITA, KS, 67218	NEW BURNERS	3721	Other Construction Permit	CSO01376	4/20/2017	5/1/2017
1730204	DOWNING & LAHEY MORTUARY (CREMATORY)		REPLACE CREMATORY	7261	Other Construction Permit	CSO03240	4/24/2017	5/2/2017
1730356	DOWNING & LAHEY MORTUARY (CREMATORY)		REPLACE CREMATORY	7261	Other Construction Permit	CSO03240	4/24/2017	5/2/2017
0670190	Scout Energy - SLC B-34 Station	S1-T30S-R36W, SLC B-34, KS, 00000	ENGINE SWING	1311	Construction Approval	CSA03702	5/3/2017	5/4/2017
1690083	SALINA SURGICAL HOSPITAL	401 SOUTH SANTA FE, SALINA, KS, 67401	EMERGENCY ENGINE	8069	Construction Approval	CSA04009	5/3/2017	5/8/2017
1710005	Scott Co-op Assn. - Scott City	EAST 1ST ST., SCOTT CITY, KS, 67871	NEW STORAGE	5153	Other Construction Permit	CSO01229	4/28/2017	5/8/2017
0050002	MGPI Processing	1300 MAIN ST, ATCHISON, KS, 66002	REPLACE CYCLONES	2085	Other Construction Permit	CSO00031	5/1/2017	5/8/2017
1670029	Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665	STORAGE TANKS & HAMMER MILL	2869	Construction Approval	CSA02696	3/13/2017	5/9/2017

1750109	ONEOK - Seward Co. #1 Station	S1-T33S-R33W, SEWARD COUNTY #1 COMP STATION, KS, 00000	ZZZZ RESPONSE	1311	Construction Approval	CSA03123	4/21/2017	5/11/2017
2090009	Amsted Rail	7111 GRIFFIN RD, KANSAS CITY, KS, 66111	ONE-TIME ORDER RUST PREVENTIVE	3325	Construction Approval	CSA01723	5/4/2017	5/15/2017
1750067	ONEOK - Seward Co. #2 Station	S23-T31S-R34W, SEWARD CO. #2, KS, 00000	ENGINE SWING	1311	Construction Approval	CSA01577	5/11/2017	5/15/2017
1110006	Southern Star Central - Americus Station	2143 COUNTY RD E S22-T18S-R10E, EMPORIA, KS, 668017653	EMERGENCY GENERATOR	4922	Construction Approval	CSA00782	5/16/2017	5/16/2017
2010001	Natural Gas Pipeline of America - Haddam Station 195	S16-T3S-R1E, STATION 195, KS, 66944	EMERGENCY GENERATOR	4922	Construction Approval	CSA01691	5/5/2017	5/22/2017
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337	1 SHOT BLAST/2 ENGINES	3566	Construction Permit	CSP00376	4/17/2017	5/22/2017
1590053	Jacam Mfg. - Organoclay Processing	1656 AVE Q, STERLING, KS, 67579	EXPANSION	3295	Construction Permit	CSP02692	1/12/2017	5/22/2017
1590053	Jacam Mfg. - Organoclay Processing	1656 AVE Q, STERLING, KS, 67579	REVISED CONSTRUCTION PERMIT	3295	Construction Permit	CSP02690	10/19/2015	5/22/2017
1750108	ONEOK - Seward Co. #3 Station	S16-T34S-R33W, SEWARD CO #3 COMPRESSOR STA, KS, 00000	637 HP ENGINE REPLACE	1311	Construction Approval	CSA03122	5/19/2017	5/22/2017
2090169	University of Kansas Medical Center	3901 RAINBOW BLVD., KANSAS CITY, KS, 66160	EXPANDED EMERGENCY GENERATOR	8062, 8221	Construction Approval	CSA01875	5/23/2017	5/23/2017
2090067	Geiger Ready-Mix - Kansas City	4203 SPEAKER ROAD, KANSAS CITY, KS, 66110	CONCRETE BATCH	3273	Construction Permit	CSP00704	5/23/2017	5/23/2017
1690083	SALINA SURGICAL HOSPITAL	401 SOUTH SANTA FE, SALINA, KS, 67401	BOILERS	8069	Other Construction Permit	CSO03241	5/3/2017	5/25/2017
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	CONVERTING IDLE BULK STORAGE	2843	Other Construction Permit	CSO01847	5/18/2017	5/30/2017
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	ADD FLOCCULATION&NEW SCRUBBER	2843	Other Construction Permit	CSO01849	5/12/2017	5/30/2017
0510057	Midwest Energy - Hays (Goodman Energy Center)	1713 230TH AVE, HAYS, KS, 67601	MODIFY CONSTRUCTION PERMIT	4911	Construction Permit	CSP01261	6/9/2016	5/31/2017
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	INSTALL UNLOADING STATION	2819	Other Construction Permit	CSO01817	5/23/2017	5/31/2017
0090080	Bartlett Grain - Great Bend	15 NE 60 AVENUE, GREAT BEND, KS, 67530	TEMP GRAIN STORAGE	5153	Construction Approval	CSA03903	5/23/2017	6/2/2017
1690037	Crestwood Inc.	601 E. WATER WELL RD., SALINA, KS, 67401	ADD EQUIPMENT	2434	Other Construction Permit	CSO01214	3/6/2017	6/2/2017
2090009	Amsted Rail	7111 GRIFFIN RD, KANSAS CITY, KS, 66111	UPGRADE DUST COLLECTOR SYSTEM	3325	Other Construction Permit	CSO01708	6/7/2017	6/7/2017

1110051	CITY OF EMPORIA - TRANSFER STATION (AIR CURT COMB)	3100 W SOUTH AVE, EMPORIA, KS, 66801	AIR CURTAIN COMBUST OR	4212	Construction Permit	CSP02741	5/15/2017	6/8/2017	
7770947	ALEWELT INC. - GOLD STANDARD FARMS (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRET E BATCH	3273	Construction Permit	CSP02742	6/6/2017	6/8/2017	
7770659	MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS, 00000	ADD EQUIPME NT	1422	Construction Approval	CSA03047	5/19/2017	6/8/2017	
1730069	Bartlett Grain - Wichita	3311 N. EMPORIA, WICHITA, KS, 672194020	ADDITION AL AIR FILTRATIO N SYS	5153	Other Construction Permit	CSO01361	6/6/2017	6/14/2017	
1690015	Scoular Co. - Salina	3339 E. COUNTRY CLUB RD., SALINA, KS, 67401	ADD 2 CONCRET E SILOS	5153	Other Construction Permit	CSO01187	5/24/2017	6/14/2017	
1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337	INCREASE THROUGH PUT	2911	Construction Approval	CSA00963	4/28/2017	6/14/2017	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	SEWER JUNCTION BOXES	2873	Other Construction Permit	CSO00790	5/17/2017	6/14/2017	
1630036	Tallgrass Terminals - Natoma Terminal (crude stor)	S4-79S-R16W, NATOMA TERMINAL, KS, 00000	TANKS	5171	Construction Approval	CSA04007	4/13/2017	6/15/2017	CAANSPSPKB
0370064	Scoular Co. - Pittsburg	3708 NORTH FREE KING HWY, PITTSBURG, KS, 66762	TEMPORA RY GRAIN	5153	Other Construction Permit	CSO03222	6/5/2017	6/15/2017	
1230029	CITY OF BELOIT (ANIMAL INCINERATOR)	3103 US 24 HWY, BELOIT, KS, 67420	INCINERATOR	4953	Construction Permit	CSP02740	5/11/2017	6/15/2017	
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	PAINT BOOTH	3721	Construction Approval	CSA03169	5/12/2017	6/15/2017	
0090083	GREAT BEND REGIONAL HOSPITAL	514 CLEVELAND ST, GREAT BEND, KS, 67530	BOILERS	8062	Other Construction Permit	CSO03242	6/12/2017	6/16/2017	
0550002	Windriver Grain - Garden City	2810 E US HWY 50, GARDEN CITY, KS, 67846	NEW GRAIN STORAGE	5153	Construction Approval	CSA00385	4/3/2017	6/16/2017	
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	SCRUBBE RS	3721	Other Construction Permit	CSO01257	5/11/2017	6/19/2017	
1470004	Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661	MODIFY MANUFA CTURING PROCESS	2952	Construction Approval	CSA01110	4/4/2017	6/19/2017	
1530014	Southern Star Central - Levant Station	S24-T5S-R35W, LEVANT STATION, KS, 67701	NO PERMIT NEEDED DETERMINATION	4922	Other Construction Permit	CSO01084	5/15/2017	6/20/2017	
1290139	MERIT ENERGY - JUANITA GREEN STATION	S5-T33S-R39W, JUANITA GREEN COMPRESSOR SITE, KS, 00000	NEW ENGINE	1311	Construction Approval	CSA04012	6/12/2017	6/20/2017	
1290140	MERIT ENERGY - NEWLIN 1-31 STATION	S31-T32S-R42W, NEWLIN 1-31, KS, 00000	NEW ENGINE	1311	Construction Approval	CSA04013	6/12/2017	6/20/2017	
1730075	TEXTRON AVIATION - PAWNEE	5800 E PAWNEE AVE, WICHITA, KS, 67218	MIST ELIMINATOR	3721	Other Construction Permit	CSO01378	6/12/2017	6/21/2017	
0910272	DeLong Co. - Edgerton	32612 W 191ST ST, EDGERTON, KS, 66021	NEW GRAIN STORAGE	5153	Other Construction Permit	CSO03150	6/13/2017	6/22/2017	
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	MELTING POTS	3691	Construction Permit	CSP00486	4/14/2017	6/23/2017	

0410011	Flint Hills Grain - Abilene	1915 NW 8TH STREET, ABILENE, KS, 67410	NO PERMIT NEEDED DETERMINATION	5153	Other Construction Permit	CSO00304	5/30/2017	6/27/2017
0410011	Flint Hills Grain - Abilene	1915 NW 8TH STREET, ABILENE, KS, 67410	MODIFY APPROVAL CONDITION	5153	Construction Approval	CSA00306	5/30/2017	6/27/2017
1670019	Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665	GRAIN UPGRADES & H2O TREATMENT	2046	Construction Approval	CSA01300	3/1/2017	6/27/2017
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	CAM	3721	Other Construction Permit	CSO03000	6/5/2017	7/3/2017
1730075	TEXTRON AVIATION - PAWNEE	5800 E PAWNEE AVE, WICHITA, KS, 67218	CONSTR APPRV DETERMINATION	3721	Other Construction Permit	CSO01377	5/30/2017	7/5/2017
2030022	MULL DRILLING CO.	S26-T165-R37W, LEOTI, KS, 67861	OIL AND GAS PRODUCTION	1311	Construction Approval	CSA04011	6/9/2017	7/5/2017
1890136	MERIT ENERGY - HUGS SATELLITE BOOSTER F STATION	S1-T335-R38W, HUGS BOOSTER F, KS, 00000	LIKE-FOR-LIKE ENG REPL	4922	Construction Approval	CSA01667	7/6/2017	7/7/2017
0430021	Altec Industries	1009 VERNON ROAD, WATHENA, KS, 66090	INFUSION MOLDING	3713	Construction Approval	CSA02603	6/23/2017	7/7/2017
7770920	Air Capitol Recycling (portable)	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1422	Construction Permit	CSP02699	7/11/2017	7/11/2017
0050036	ATCHISON TUBULAR SERVICES	8154 INDUSTRIAL PARK LANE, ATCHISON, KS, 66002	MODIFY FACILITY	3317	Construction Permit	CSP01334	3/23/2017	7/13/2017
0410033	AGRI TRAILS CO-OP - HOPE	508 N MAIN ST, HOPE, KS, 67451	EMERGENCY GENERATOR	5153	Construction Approval	CSA00312	7/10/2017	7/14/2017
1730059	CNH INDUSTRIAL - WICHITA (BURN-OFF OVEN)	3301 S. HOOVER RD., WICHITA, KS, 67215	RESPONSE	3531	Other Construction Permit	CSO01350	7/5/2017	7/14/2017
1330001	Ash Grove Cement - Chanute	1801 N. SANTA FE, CHANUTE, KS, 66720	PSD CONST PERMIT	3241	PSD Construction Permit	CSD00024	5/8/2017	7/14/2017
0510067	HAYSMED THE UNIVERSITY OF KANSAS HEALTH SYSTEM	2220 CANTERBURY DR, HAYS, KS, 67601	BOILERS & 4 EMGN LINE	8062	Construction Approval	CSA04016	6/29/2017	7/17/2017
1450043	PAWNEE VALLEY COMMUNITY HOSPITAL	923 CARROLL AVE, LARNED, KS, 67550	EMG AND BOILERS	8062	Construction Approval	CSA04018	7/6/2017	7/17/2017
0950037	ONEOK - Trenton Station	S28-T295-R7W, TRENTON STA., KS, 000000000	ENGINE REPLACEMENT	4922	Construction Approval	CSA00696	7/12/2017	7/18/2017
0090084	CLARA BARTON HOSPITAL	250 W 9TH STREET, HOSINGTON, KS, 67544	ENGINE AND BOILERS	8062	Construction Approval	CSA04019	7/7/2017	7/19/2017
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	RESIN EXTRUSION LINE	3275	Other Construction Permit	CSO00846	7/7/2017	7/19/2017
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	REMOVE PERMIT CONDITION	2911	Construction Approval	CSA00161	5/22/2017	7/19/2017
1730029	Cargill - Wichita (soybean mill)	1425 N. MOSLEY, WICHITA, KS, 67214	REVISE C-12809	2075	Construction Permit	CSP00520	7/6/2017	7/19/2017
0670191	Scout Energy - SLC B-30 Station	S2-T305-R36W, SLC B-30, KS, 00000	ENGINE SWING	1311	Construction Approval	CSA03707	7/13/2017	7/19/2017

0810112	CHS CRUDE TRUCKING - GREAT BEND	35 NE K-156 HWY, GREAT BEND, KS, 67530	NO PERMIT NEEDED DETERMINATION	4612	Construction Approval	CSA04014	6/23/2017	7/24/2017
1070035	U.S. Minerals	911 LINNCO DRIVE, LA CYGNE, KS, 66040	NEW BAGGING MACHINE AND LOADER	3295	Construction Permit	CSP01519	4/25/2017	7/24/2017
1590054	JACAM MFG. - SOUTH PLANT (TEMP)	425 S 11TH STREET, STERLING, KS, 67579	TEMPORARY PRODUCT ION LINE	2899	Construction Permit	CSP02743	6/15/2017	7/24/2017
0970063	J MARK RICHARDSON FAMILY TRUST - ELLER A STATION	S16-T30S-R19W, ELLER A FACILITY, KS, 00000	OIL AND GAS FACILITY	1311	Construction Approval	CSA04021	7/20/2017	7/24/2017
0350066	CRCT - HAWKINS STATION (CRUDE STOR)	S27-T32S-R6E, HAWKINS STATION, KS, 00000	CRUDE OIL STORAGE	4612	Construction Approval	CSA04010	6/5/2017	7/27/2017
1450043	PAWNEE VALLEY COMMUNITY HOSPITAL	923 CARROLL AVE, LARNED, KS, 67550	REVISE C-13948	8062	Construction Approval	CSA04017	7/19/2017	7/28/2017
0550073	ONEOK - FN2-06 Station	S19-T26S-R33W, FN2-06, KS, 00000	ENGINE REPLACEMENT	4922	Other Construction Permit	CSO02377	7/26/2017	7/28/2017
1730052	BOMBARDIER AEROSPACE LEARJET	One Learjet Way, WICHITA, KS, 67209	RESPONSE	3721	Other Construction Permit	CSO01326	1/18/2017	7/31/2017
1630037	CHS CRUDE TRUCKING - PLAINVILLE	980 RIVERVIEW RD, PLAINVILLE, KS, 67663	TANKS	4612	Construction Approval	CSA04022	7/27/2017	8/2/2017
1550089	Lowen Corp.	1111 N AIRPORT RD, HUTCHINSON, KS, 67501	PERMIT SETERMINATION	2759	Other Construction Permit	CSO02203	7/3/2017	8/3/2017
2090322	Road Builders Machinery	1000 S MILL ST, KANSAS CITY, KS, 66105	COATING OPERATIONS	5082	Construction Approval	CSA03994	11/22/2016	8/4/2017
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	SURGE TANK	2873	Other Construction Permit	CSO00791	7/6/2017	8/9/2017
1890143	MERIT ENERGY - CENTRAL STATION	S23, T33S, R38W, Stevens County, KS, 67951	ENGINE SWAP	4922	Construction Approval	CSA01673	8/4/2017	8/10/2017
1290141	MERIT ENERGY - GGGG #8 STATION	S30-T33S-R42W, GGGG #8 COMPRESSOR SITE, KS, 00000	NEW ENGINE	1311	Construction Approval	CSA04023	8/4/2017	8/10/2017
1290124	Merit Energy - Morton Co. #102 Station	S6-T35S-R40W, MC BOOSTER #102, KS, 00000	ENGINE AWAP	1311	Construction Approval	CSA02762	8/4/2017	8/10/2017
0910077	Vestcom New Century	301 GARDNER DRIVE, NEW CENTURY, KS, 66031	EMERGENCY GENERATOR	2759	Construction Approval	CSA00601	7/10/2017	8/11/2017
1730023	EVONIK CORP. - HAYSVILLE	6601 SOUTH RIDGE RD., HAYSVILLE, KS, 67060	MODIFY ISO STORAGE TANKS	2813, 2869	Construction Approval	CSA01414	6/20/2017	8/15/2017
1730349	Albers Finishing & Solutions	38628 W 15TH ST SOUTH, CHENEY, KS, 67025	BOILER	3479	Other Construction Permit	CSO03218	7/27/2017	8/16/2017
2050055	River Rock Operating - Jayhawk Station (dehy)	S21-T28S-R17E, JAYHAWK COMPRESSOR STATION, KS, 66720	AMINE UNIT	1311	Other Construction Permit	CSO03032	8/7/2017	8/16/2017
1730029	Cargill - Wichita (soybean mill)	1425 N. MOSLEY, WICHITA, KS, 67214	TEMP LIMIT	2075	Construction Permit	CSP00519	8/7/2017	8/17/2017
1290058	MERIT ENERGY - NORTH GREENWOOD STATION	S17-T32S-R43W, GREENWOOD FIELD, KS, 00000	TWO COMPRESSOR ENGINES	4922	Construction Approval	CSA01008	8/14/2017	8/18/2017

1890038	Merit Energy - Southwest Woods Booster Station	S9-T34S-R35W, SW WOODS STA., KS, 67951	REPLACE ENGINES	1311	Construction Approval	CSA01658	8/15/2017	8/18/2017
1130068	American Energies Pipeline - Canton-Leffler Station (dhy)	2921 MOCASSIN RD, CANTON, KS, 67428	ENGINE SWAP	1311	Construction Approval	CSA03066	7/28/2017	8/18/2017
1730232	Textron Aviation/Interiors Manufacturing Facility	1643 S. MAIZE ROAD, WICHITA, KS, 67209	SPRAY BOOTH	3728	Other Construction Permit	CSO02569	8/14/2017	8/23/2017
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	EMERGEN CY GENERATOR	3721	Construction Approval	CSA01401	8/23/2017	8/24/2017
1630036	Tallgrass Terminals - Natoma Terminal (crude stor)	S4-T9S-R16W, NATOMA TERMINAL, KS, 00000	TANK AND EMG	5171	Construction Permit	CSP02739	8/2/2017	8/28/2017
2050041	AMOCO (former refinery) (soil vent)	12TH & TANK AVE., NEODESHA, KS, 66757	NO PERMIT DETERMINATION	4959	Other Construction Permit	CSO02690	5/31/2017	8/28/2017
0370031	Kendall Packaging	1901 E. 27TH TERRACE, PITTSBURG, KS, 66762	NEW PRINTING PRESS	2759	Construction Permit	CSP00121	3/14/2017	8/29/2017
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	REPLACE EQUIPMENT	3275	Construction Approval	CSA00904	8/14/2017	8/31/2017
0050002	MGPI Processing	1300 MAIN ST, ATCHISON, KS, 66002	NEW TANK	2085	Other Construction Permit	CSO00028	8/24/2017	8/31/2017
0510053	CHS CRUDE TRUCKING - BEMIS STATION (CRUDE STOR)	S11-T11S-R17W, BEMIS STA., KS, 00000	TANKS	4612	Construction Approval	CSA03210	8/17/2017	9/1/2017
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337	2 SPRAY BOOTHS/ 2 SHOT BLASTS	3566	Construction Permit	CSP00377	4/17/2017	9/1/2017
0910177	Farmers Insurance Exchange	16850 W 119TH STREET, OLATHE, KS, 66061	EMERGEN CY GENERATOR	6411	Construction Approval	CSA02711	9/5/2017	9/6/2017
1270003	AGRI TRAILS CO-OP - WHITE CITY	501 COMMERCIAL ST, WHITE CITY, KS, 66872	GRAIN ELEVATOR	5153	Construction Approval	CSA00990	8/30/2017	9/6/2017
1250137	RANEWS TRUCK & EQUIP.	5184 D INDUSTRIAL STREET, COFFEYVILLE, KS, 67351	PAINTING & COATING FACILITY	5084	Construction Permit	CSP02744	8/14/2017	9/6/2017
0570030	CARGILL MEAT SOLUTIONS - DODGE CITY	3201 East Highway 154, Dodge City, KS, 67801	EMERGEN CY GENERATOR	2011	Construction Approval	CSA00434	9/6/2017	9/7/2017
0810048	Merit Energy - Dennis Station	S1-T29S-R34W, DENNIS STATION, KS, 00000	REPLACE ENGINES	1311	Construction Approval	CSA02455	8/14/2017	9/12/2017
0930039	MERIT ENERGY - BEATTY STATION	S34-T24S-R36W, BEATTY STA., KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA02428	8/14/2017	9/12/2017
1630036	Tallgrass Terminals - Natoma Terminal (crude stor)	S4-T9S-R16W, NATOMA TERMINAL, KS, 00000	ADMIN ADMENDMENT	5171	Construction Permit	CSP02738	9/7/2017	9/14/2017
0910117	Deffenbaugh Ind. - Johnson Co. Landfill	18181 W 53RD ST, SHAWNEE, KS, 66217	FLARE	4953	Construction Permit	CSP00264	9/8/2017	9/15/2017
2090202	Barton Solvents - Kansas City	901 S. 66TH TERRACE, KANSAS CITY, KS, 661110000	CHANGE IN MATERIAL STORAGE	5169	Other Construction Permit	CSO01932	9/13/2017	9/18/2017

7770110	NEOSHO CO. PUBLIC WORKS DEPT. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66733	ROCK CRUSHER	1422	Construction Approval	CSA02092	6/8/2017	9/18/2017
1070005	EVERGY - LA CYGNE	25166 East 2200 Road, La Cygne, KS, 66040	NO PERMIT NEEDED DETERMINATION	4911	Other Construction Permit	CSO00757	8/17/2017	9/20/2017
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	HEATER PROJECT	2911	Construction Approval	CSA00160	9/15/2017	9/21/2017
2090038	Rich Mix Products dba Quikrete - Kansas City	2430 SOUTH 88TH, KANSAS CITY, KS, 66111	REPLACE AND REPURPOSE BAGHOUSE	3272	Other Construction Permit	CSO01797	8/15/2017	9/26/2017
0950069	NINNESCAH VALLEY HEALTH - KINGMAN COMMUNITY HOSPITAL	750 W D AVE, KINGMAN, KS, 67068	TWO EMERGENCY GENERATORS	8062	Construction Approval	CSA04025	9/26/2017	9/27/2017
1490020	Onyx Collection	202 ANDERSON AVE., BELVUE, KS, 66407	2 EMERGENCY GENERATORS	3088	Construction Approval	CSA01120	9/25/2017	9/27/2017
1030128	Kansas Correctional Industries	301 E KANSAS, LANSING, KS, 66043	FURNITURE MANUFACTURING EQUIPMENT	2851	Other Construction Permit	CSO02842	8/21/2017	9/27/2017
1410008	Scouler Co. - Downs	709 Commercial St, Downs, KS, 67764	PERMIT DETERMINATION	5153	Construction Approval	CSA01068	8/31/2017	9/28/2017
1670019	Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665	INSTALL VACUUM SYSTEM	2046	Construction Approval	CSA01299	8/8/2017	9/28/2017
0410039	AGRI TRAILS CO-OP - WOODBINE	1 NE RAILWAY, WOODBINE, KS, 67492	GRAIN ELEVATOR	5153	Construction Approval	CSA00313	9/13/2017	9/29/2017
0410015	AGRI TRAILS CO-OP - CHAPMAN	302 E 3RD ST, CHAPMAN, KS, 67431	GRAIN ELEVATOR	5153	Construction Approval	CSA00307	9/13/2017	9/29/2017
0410033	AGRI TRAILS CO-OP - HOPE	508 N MAIN ST, HOPE, KS, 67451	GRAIN ELEVATOR	5153	Construction Approval	CSA00311	9/13/2017	9/29/2017
1150013	AGRI TRAILS CO-OP - LINCOLNVILLE	502 W 6TH ST, LINCOLNVILLE, KS, 66858	GRAIN ELEVATOR	5153	Construction Approval	CSA00897	9/13/2017	9/29/2017
1210041	KINCAID READY MIX - PAOLA	33120 LONESTAR RD, PAOLA, KS, 66071	CONCRETE BATCH PLANT	3273	Construction Permit	CSP02746	9/26/2017	9/29/2017
0910285	KINCAID READY MIX - OLATHE	15520 S 169 HWY, OLATHE, KS, 66062	CONCRETE BATCH PLANT	3273	Construction Permit	CSP02745	9/26/2017	9/29/2017
2090324	KINCAID READY MIX - KANSAS CITY	5615 WOLCOTT DR, KANSAS CITY, KS, 66109	CONCRETE BATCH PLANT	3273	Construction Permit	CSP02747	9/26/2017	9/29/2017
1890029	EQUITY EXCHANGE - PRAIREOLA	2592 RD J, HUGOTON, KS, 67951	ADDITIONAL OF SILOS	5153	Construction Approval	CSA01657	8/31/2017	10/2/2017
0370039	Oak Grove Landfill	1150 E 700 AVE, ARCADIA, KS, 66711	NEW WELLS	4953	Construction Approval	CSA00300	9/7/2017	10/2/2017
1290142	Pantera Energy Company - SERU TANK BATTERY	S10-T33S-R40W, SERU TANK BATTERY, KS, 00000	TANK BATTERY	1311	Construction Permit	CSP02748	9/29/2017	10/3/2017
1150017	AGRI TRAILS CO-OP - TAMPA	205 MAIN ST, TAMPA, KS, 67483	GRAIN ELEVATOR	5153	Construction Approval	CSA00898	9/18/2017	10/4/2017
1690030	AGRI TRAILS CO-OP - GYPSUM	515 EAST 6TH ST, GYPSUM, KS, 67448	GRAIN ELEVATOR	5153	Construction Approval	CSA01314	9/13/2017	10/4/2017

0210023	Jayhawk Fine Chemicals Corp	8545 SE JAYHAWK DRIVE, GALENA, KS, 66739	DRYER & VESSEL	2869	Construction Approval	CSA00209	8/9/2017	10/5/2017
1510067	SKYLAND GRAIN - ISABEL	60076 SE 100TH AVE, ISABEL, KS, 67065	EMERGENCY GENERATORS	5153	Construction Approval	CSA04002	5/5/2017	10/11/2017
0950068	SKYLAND GRAIN - CUNNINGHAM	308 S VALLEY, CUNNINGHAM, KS, 67035	EMERGENCY GENERATOR	5153	Construction Approval	CSA04004	5/5/2017	10/11/2017
0410011	Flint Hills Grain - Abilene	1915 NW 8TH STREET, ABILENE, KS, 67410	ADDITIONAL STORAGE PILE	5153	Other Construction Permit	CSO00305	9/20/2017	10/12/2017
0910249	Engineered Air	32050 WEST 83RD STREET, DESOTO, KS, 66018	CONSTRUCTION RESPONSE	3585	Other Construction Permit	CSO03090	8/23/2017	10/12/2017
1730349	Albers Finishing & Solutions	38628 W 15TH ST SOUTH, CHENEY, KS, 67025	ADD EQUIP TO FACILITY	3479	Construction Approval	CSA03930	8/31/2017	10/12/2017
1130086	E-M SAND & GRAVEL	2131 9TH AVE, MCPHERSON, KS, 67460	ENGINES	1442	Other Construction Permit	CSO03243	10/2/2017	10/12/2017
0950067	SKYLAND GRAIN - ZENDA (AKA CALISTA AKA SPIVEY)	9132 SW 70TH ST, ZENDA, KS, 67159	EMERGENCY GENERATOR	5153	Construction Approval	CSA04003	10/17/2017	10/17/2017
1730050	Dold Foods	2929 N. OHIO, WICHITA, KS, 67214	BACON PROCESSING EQUIPMENT	2013	Construction Permit	CSP00521	8/4/2017	10/17/2017
1810009	SCOLAR CO. - GOODLAND	17TH & CENTER, GOODLAND, KS, 67735	PERMIT DETERMINATION	5153	Other Construction Permit	CSO01564	8/31/2017	10/19/2017
1890177	ONEOK - STV2-03 Station	S28-T34S-R37W, STEVEN 2-03, KS, 00000	ENGINES	4922	Construction Approval	CSA02366	10/13/2017	10/19/2017
2090305	BNSF Railway - Kansas City	2210 ARGENTINE BLVD, KANSAS CITY, KS, 66106	EMERGENCY GENERATOR	4013	Construction Approval	CSA03390	10/18/2017	10/20/2017
2090069	Reconserve Inc.	41 NORTH JAMES ST., KANSAS CITY, KS, 66118	MULTIPLE EQUIP MODIFICATIONS	2048	Other Construction Permit	CSO01870	10/16/2017	10/23/2017
1730062	GAVILON GRAIN - WICHITA	5755 S HOOVER RD, WICHITA, KS, 67215	GRAIN LOADOUT	5153	Construction Approval	CSA01467	9/7/2017	10/26/2017
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337	NEW ENGINE	3566	Construction Approval	CSA00987	10/2/2017	10/26/2017
1550127	SIEMENS WIND POWER (SIEMENS ENERGY)	1000 COMMERCE ST, HUTCHINSON, KS, 67501	ENGINES	3511	Other Construction Permit	CSO03113	10/13/2017	10/26/2017
7770075	HAMM QUARRY (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 00000	MASTER EQUIPMENT LIST	1422	Construction Approval	CSA02075	9/28/2017	10/27/2017
0150024	UNION TANK CAR CO.	1802 N. STAR ST., EL DORADO, KS, 670420000	TANK CAR CLEANING	3743	Construction Approval	CSA00173	9/29/2017	10/30/2017
2057039	Systech Environmental	1420 S CEMENT RD, FREDONIA, KS, 66736	EMERGENCY GENERATOR	4953	Construction Approval	CSA02397	10/30/2017	10/31/2017
0450006	API AMERICAS	3841 GREENWAY CIRCLE, LAWRENCE, KS, 66046	NO PERMIT NEEDED DETERMINATION	3497	Other Construction Permit	CSO00330	10/11/2017	11/2/2017

1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	PAINT BOOTH	3721	Construction Approval	CSA01399	9/12/2017	11/3/2017
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	APPLICABILITY DETERMINATION	3721	Construction Approval	CSA01400	8/22/2017	11/3/2017
2090066	Exide Technologies - Kansas City	3001 FAIRFAX TRAFFICWAY, KANSAS CITY, KS, 66115	NEW SILOS	3691	Construction Approval	CSA01855	10/10/2017	11/3/2017
2090162	Advantage Metals - Kaw River Shredding Yard	1153 SOUTH 12TH ST, KANSAS CITY, KS, 66105	NOT REPL CNTRL EQUIPMENT	5093	Other Construction Permit	CSO01907	11/8/2017	11/8/2017
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	D-1 PROGRAM	3721	Construction Approval	CSA03170	9/22/2017	11/8/2017
0090076	Blizzard Energy (pyrolysis oil recovery)	C ST & 8TH ST (N OF AIRPORT), GREAT BEND, KS, 67530	DETERMINATION	1311	Other Construction Permit	CSO03199	9/26/2017	11/8/2017
1730062	GAVILON GRAIN - WICHITA	5755 S HOOVER RD, WICHITA, KS, 67215	PERMIT MODIFICATIONS	5153	Construction Approval	CSA01468	11/6/2017	11/9/2017
1550033	EVERGY - HUTCHINSON	3200 E 30TH ST, HUTCHINSON, KS, 67502	EMERGENCY GENERATOR	4911	Construction Approval	CSA01189	11/2/2017	11/9/2017
1730029	Cargill - Wichita (soybean mill)	1425 N. MOSLEY, WICHITA, KS, 67214	BIODIESEL PLANT	2075	Construction Permit	CSP00518	8/24/2017	11/13/2017
0230023	Priority Oil & Gas - Dent Station	S17-T4S-R40W, DENT COMP. STA., KS, 00000	ENGINE SWAP	4922	Construction Permit	CSP00924	11/8/2017	11/14/2017
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	EMERGENCY GENERATOR	8221	Construction Approval	CSA01257	11/3/2017	11/15/2017
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	NEW ENGINE	8221	Construction Permit	CSP00471	10/16/2017	11/17/2017
1730052	BOMBARDIER AEROSPACE LEARJET	One Learjet Way, WICHITA, KS, 67209	PAINT BOOTH	3721	Construction Approval	CSA01427	9/5/2017	11/21/2017
1690037	Crestwood Inc.	601 E. WATER WELL RD., SALINA, KS, 67401	NEW SANDER	2434	Other Construction Permit	CSO01213	8/22/2017	11/22/2017
2090008	Kansas City BPU - Nearman	4240 N 55TH, KANSAS CITY, KS, 66104	PERMIT MODIFICATION	4911	Construction Permit	CSP00671	10/19/2017	11/30/2017
2090014	Kansas City Readymix dba Talon Concrete & Aggregates	317 S. 3RD. ST., KANSAS CITY, KS, 66118	CONCRETE BATCH	3273	Other Construction Permit	CSO01777	12/1/2017	12/4/2017
1730029	Cargill - Wichita (soybean mill)	1425 N. MOSLEY, WICHITA, KS, 67214	VOID TEMPORARY PERMIT	2075	Other Construction Permit	CSO01296	9/11/2017	12/4/2017
1550189	UNIT PETROLEUM - GEESLING 16 1HXL STATION	S16-T26S-R10W, GEESLING 16 1HXL, KS, 00000	OIL AND GAS PROD	1311	Construction Permit	CSP02750	11/30/2017	12/5/2017
2057039	Systech Environmental	1420 S CEMENT RD, FREDONIA, KS, 66736	CONTAINER PROCESS	4953	Construction Approval	CSA02398	9/5/2017	12/6/2017
1330001	Ash Grove Cement - Chanute	1801 N. SANTA FE, CHANUTE, KS, 66720	LOADOUT CHUTE	3241	Construction Approval	CSA01056	10/26/2017	12/6/2017
7770008	APAC-KANSAS SHEARS DIV. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66856	NEW CRUSHER	1422	Construction Approval	CSA01944	12/5/2017	12/6/2017

1030012	Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361	EMERGENCY GENERATOR	9711	Construction Approval	CSA00756	12/8/2017	12/8/2017
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	SCRUBBER REPL NOTIFICATION	3691	Other Construction Permit	CSO01212	10/25/2017	12/8/2017
1670029	Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665	ANAEROBIC DIGESTION & FLARE	2869	Construction Approval	CSA02695	11/15/2017	12/18/2017
0450014	EVERGY - LAWRENCE	1250 N 1800 RD, LAWRENCE, KS, 66044	REPAIR DUCT BURNERS	4911	Other Construction Permit	CSO00356	11/29/2017	12/19/2017
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	OXYGENATE REMOVAL PROJECT	1321	Construction Permit	CSP00157	10/31/2017	12/21/2017
2090305	BNSF Railway - Kansas City	2210 ARGENTINE BLVD, KANSAS CITY, KS, 66106	EMG	4013	Construction Approval	CSA03389	12/21/2017	12/22/2017
1730019	TEXTRON AVIATION - WEST CAMPUS	One Cessna Boulevard, Wichita, KS, 67215	PERMIT NEEDED DETERMINATION	3721	Other Construction Permit	CSO01248	10/2/2017	12/26/2017
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	RESIN EXTRUDER LINES	3275	Other Construction Permit	CSO00848	12/18/2017	12/26/2017
1730070	OxyChem - Wichita	6200 SOUTH RIDGE ROAD, WICHITA, KS, 67215	EMERGENCY GENERATOR	2812	Construction Approval	CSA01479	12/28/2017	12/28/2017
1290111	Merit Energy - Greenwood Booster #6 Station	S33-T32S-R43W, GREENWOOD BOOSTER #6, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA02379	12/27/2017	12/29/2017
1730053	ELEMENT LLC - COLWICH	1 Element Drive, COLWICH, KS, 67030	ETHANOL MANUF.	2869	Construction Permit	CSP00530	2/10/2017	1/2/2018
1770247	HEAVENLY PET MEMORIAL (ANIMAL INCINERATOR)	1137 SW GAGE BLVD, TOPEKA, KS, 66604	PET CREMATORY	0742	Construction Permit	CSP02752	12/27/2017	1/2/2018
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	MODIFY CONSTRUCTION PERMIT LIMITS	3275	Construction Permit	CSP00337	9/11/2017	1/3/2018
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	PAINT BOOTH	3721	Construction Approval	CSA03171	12/14/2017	1/5/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	NEW STORAGE TANK	2911	Construction Approval	CSA00158	11/6/2017	1/9/2018
0210050	UTEC CORP. - HALLOWELL	2022 NW 110TH, HALLOWELL, KS, 66725	BONFIRE BURN PAD	8734	Construction Approval	CSA04027	11/27/2017	1/11/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	TEMP BOILERS	2911	Construction Approval	CSA00156	1/9/2018	1/11/2018
0210023	Jayhawk Fine Chemicals Corp	8545 SE JAYHAWK DRIVE, GALENA, KS, 66739	EMERGENCY GENERATOR	2869	Construction Approval	CSA00208	1/9/2018	1/11/2018
1430014	Mid-America Pipeline - Abilene Pump Station	S12-T12S-R1W, ABILENE STATION, KS, 000000000	LIKE FOR LIKE TURBINE REPL	4613	Other Construction Permit	CSO01012	11/14/2017	1/12/2018
1550022	Cargill (Salt Div.) - Hutchinson	609 E. AVE. G, HUTCHINSON, KS, 675010000	RENTAL BOILER	2899	Construction Approval	CSA01178	11/22/2017	1/12/2018
1290124	Merit Energy - Morton Co. #102 Station	S6-T35S-R40W, MC BOOSTER #102, KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA02761	11/7/2017	1/12/2018
1290141	MERIT ENERGY - GGGG #8 STATION	S30-T33S-R42W, GGGG #8 COMPRESSOR SITE, KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA04024	11/7/2017	1/12/2018

1290123	Merit Energy - Morton Co. #101 Station	S2-T355-R41W, MC-101, KS, 00000	REPLACE ENGINE	1311	Construction Approval	CSA02758	11/7/2017	1/12/2018
1650016	Southern Star Central - Otis Station	S11-T175-R16W, OTIS STATION, KS, 67565	NO PERMIT NEEDED DETERMINATION	4922	Other Construction Permit	CSO01173	12/12/2017	1/16/2018
0230013	Southern Star Central - St. Francis Station	Rt. 3, Box 168B, St. Francis, KS, 67756	NO PERMIT NEEDED DETERMINATION	4922	Other Construction Permit	CSO00229	12/12/2017	1/16/2018
1790011	Southern Star Central - Hoxie Station	S18-T9S-R28W, HOXIE STATION, KS, 67740	NO PERMIT NEEDED DETERMINATION	4922	Other Construction Permit	CSO01562	12/12/2017	1/16/2018
0550172	ONEOK - HOLCOMB #1 STATION	S10-T24S-R34W, HOLCOMB, KS, 00000	NEW COMPRESSOR STATION	1311	Construction Approval	CSA04029	12/18/2017	1/16/2018
1690058	Salina Reg. Health Center (incinerator)	400 S. SANTA FE, SALINA, KS, 67402	NEW BOILER	8062	Construction Approval	CSA02618	12/13/2017	1/17/2018
0150035	NuStar Pipeline - El Dorado Products Pipeline Station	1624 SUNSET ROAD, EL DORADO, KS, 670420000	NO PERMIT NEEDED DETERMINATION	4613	Construction Approval	CSA00182	11/6/2017	1/17/2018
0750012	ONEOK - Bradshaw Station (dehy)	S31-T21S-R40W, BRADSHAW STA., KS, 67878	EMERGENCY ENGINE SWING	1311	Construction Approval	CSA02679	1/19/2018	1/19/2018
1650031	Wagner Unit Waterflood Facility	S29-T18S-R16W, S29-T18S-R16W, KS, 67575	CRUDE OIL PRODUCT ION FACILITY	1311	Construction Permit	CSP02749	10/23/2017	1/19/2018
1770236	MARS CHOCOLATE NORTH AMERICA - TOPEKA	100 MARS BLVD, TOPEKA, KS, 66619	NO PERMIT REQ DETERMINATION	2064	Other Construction Permit	CSO03132	1/10/2018	1/22/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	MOD TO HGU3	2911	Construction Approval	CSA00159	12/8/2017	1/24/2018
0670024	Scout Energy - Ulysses West C Station	S9-T27S-R38W, WEST ULYSSES C, KS, 00000	ENGINE SWING	4922	Construction Approval	CSA00482	1/18/2018	1/25/2018
1290037	DCP OPERATING - JUDY BOOSTER STATION	S9-T31S-R41W, JUDY STA., KS, 00000	ENGINE SWING	4922	Construction Approval	CSA01001	1/25/2018	1/26/2018
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	EMERGENCY GENERATOR	3721	Construction Approval	CSA01402	12/8/2017	1/26/2018
0050002	MGPI Processing	1300 MAIN ST, ATCHISON, KS, 66002	PERMIT DETERMINATION	2085	Construction Approval	CSA00051	1/9/2018	1/29/2018
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	ENGINE	1321	Other Construction Permit	CSO00368	1/18/2018	1/29/2018
0090070	McDonald Tank & Equipment	620 MORTON STREET, GREAT BEND, KS, 67530	APPLICABILITY DETERMINATION	3089	Other Construction Permit	CSO03073	1/12/2018	1/30/2018
1250049	Emerald Transformer PPM LLC	2474 US HWY 169, COFFEYVILLE, KS, 67337	NO PERMIT NEEDED DETERMINATION	4953	Construction Approval	CSA00978	12/21/2017	1/31/2018
1730068	Coleman Co. - Wichita	3600 N. HYDRAULIC, WICHITA, KS, 67219	EMERGENCY GENERATOR	3999	Construction Approval	CSA01478	1/29/2018	1/31/2018

1730358	MAX AEROSTRUCTURES	8219 WEST IRVING STREET, WICHITA, KS, 67209	AIRCRAFT PARTS MANUF FACIL	3728	Construction Permit	CSP02751	12/18/2017	2/2/2018
1330050	Hi-Lo Industries - Chanute	3928 ROSS LANE, CHANUTE, KS, 66720	SPRAY MACHINE	2431	Other Construction Permit	CSO02702	1/3/2018	2/2/2018
0930013	Scout Energy Partners - Kendall Station (dehy)	S30-T24S-R38W, KENDALL STA., KS, 000000000	NEW COMPRESOR ENGINE	1311	Construction Permit	CSP00272	1/16/2018	2/2/2018
1550011	ONEOK Hydrocarbon - Hutchinson Fract. (amine)	1910 S BROADACRES RD, HUTCHINSON, KS, 67501	ENGINE	1321	Construction Approval	CSA01173	1/11/2018	2/8/2018
2090206	Plastic Packaging Technologies	750 S. 65TH ST., KANSAS CITY, KS, 66111	REPL EXISTING RTO W/ LARGER RT	2673	Construction Approval	CSA01890	1/30/2018	2/9/2018
1730197	TEXTRON AVIATION SERVICES - WICHITA (AIRPORT RD)	1980 AIRPORT RD, WICHITA, KS, 67209	PERMIT DETERMINATION	4581	Construction Approval	CSA01551	10/12/2017	2/12/2018
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	BOILER	3721	Other Construction Permit	CSO01258	1/31/2018	2/13/2018
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	FIBERGLASS OPERATIONS	3732	Construction Permit	CSP00757	9/7/2017	2/14/2018
0910165	Amos Family (crematory)	10901 JOHNSON DRIVE, SHAWNEE, KS, 66203	ANIMAL INCINERATOR	7261	Construction Permit	CSP00895	1/18/2018	2/15/2018
1730152	3P Processing	1702 S. KNIGHT, WICHITA, KS, 67213	PAINT BOOTH MODIFICATION	3471	Other Construction Permit	CSO01405	2/13/2018	2/16/2018
1330001	Ash Grove Cement - Chanute	1801 N. SANTA FE, CHANUTE, KS, 66720	APPLICABILITY DETERMINATION	3241	Other Construction Permit	CSO00987	1/9/2018	2/16/2018
1730357	KYODO YUSHI MFG. - MAIZE	12550 W LARSON RD, MAIZE, KS, 67101	STORAGE TANKS	2992	Construction Approval	CSA04028	12/5/2017	2/16/2018
1550133	Tenawa Haven Processing - Haven Gas Plant	13114 S KENT RD, HAVEN, KS, 67543	TURBINE	1321	Construction Approval	CSA03679	9/29/2017	2/16/2018
0770271	BCE-Mach - KENNEDY 14-34-92H PAD	1275 SW 50 RD, CORWIN, KS, 67061	OIL AND GAS PRODUCTION	1311	Construction Permit	CSP02755	2/16/2018	2/21/2018
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	MODELING PROTOCOL	3691	Other Construction Permit	CSO01211	2/26/2018	2/26/2018
1670029	Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665	LOADING OUT REQUEST	2869	Construction Approval	CSA02693	2/14/2018	2/26/2018
1890221	NORTHWEST COTTON GROWERS CO-OP - MOSCOW	SW1/4 S4-T32S-R36W, MOSCOW, KS, 67952	NEW COTTON GIN	0724	Construction Permit	CSP01002	1/31/2018	2/26/2018
1690084	GE OIL AND GAS COMPRESSION SYSTEMS	1648 W MAGNOLIA RD, SALINA, KS, 67401	TURBOCHARGER TEST SYSTEM	7699	Construction Approval	CSA04020	6/28/2017	2/28/2018
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	TWO NEW RESIN SYSTEMS	3732	Construction Permit	CSP00758	10/25/2017	2/28/2018
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	TWO RESIN SYSTEMS	3732	Construction Permit	CSP00756	9/25/2017	3/1/2018

1410023	Osborne Industries	120 N INDUSTRIAL AVE, OSBORNE, KS, 67473	PAINT LINE	3089	Construction Approval	CSA03332	11/29/2017	3/1/2018
7770287	HARSHMAN CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	ADD EQUIPMENT	1422	Construction Approval	CSA02200	2/19/2018	3/2/2018
0010048	CRCT - Humboldt Station (crude stor)	1/2 MI N COUNTY RD 2400 TK F R, HUMBOLDT, KS, 66748	NEW FRAC TANKS	4612	Construction Approval	CSA03283	2/2/2018	3/5/2018
0910287	NWI Kansas City LLC	31800 W 196TH STREET, EDGERTON, KS, 66021	AIRCRAFT PARTS	3728	Construction Approval	CSA04031	2/8/2018	3/5/2018
1470021	PHILLIPS CO. HOSPITAL (INCINERATOR)	1150 STATE STREET, PHILLIPSBURG, KS, 67661	EMERGENCY GENERATOR	8062	Other Construction Permit	CSO02429	3/1/2018	3/6/2018
0130038	Hiawatha Community Hospital	300 UTAH STREET, HIAWATHA, KS, 66434	EMERGENCY GENERATOR	8062	Construction Approval	CSA03436	2/9/2018	3/8/2018
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	RENEWABLE DIESEL TRANSLOADING	2843	Other Construction Permit	CSO01846	1/12/2018	3/8/2018
0090004	Kansas Brick & Tile	767 N. HWY 281, HOISINGTON, KS, 67544	ENGINE & DUST COLLECTION SYSTEMS	3251	Construction Approval	CSA00082	12/19/2017	3/9/2018
0910286	JOHNSON CO. WASTEWATER - TOMAHAWK CREEK PLANT	10701 LEE BLVD, LEAWOOD, KS, 66211	DIGESTER GAS EQUIP & BOILER	4952	Construction Approval	CSA04030	1/16/2018	3/13/2018
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337	NEW ENGINE	3566	Construction Approval	CSA00986	1/22/2018	3/13/2018
1350041	NESS COUNTY HOSPITAL	312 E CUSTER ST, NESS CITY, KS, 67560	ENGINES AND BOILER	8062	Construction Approval	CSA04033	1/25/2018	3/14/2018
1450044	IACX ENERGY - LARNED BOOSTER STATION	S1-T225-R16W, LARNED BOOSTER, KS, 00000	CONSTRUCTION APPROVAL DETERMINATION	1311	Other Construction Permit	CSO03244	3/6/2018	3/14/2018
1030012	Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361	ENGINE	9711	Construction Approval	CSA00757	12/4/2017	3/16/2018
1030020	Eisenhower VA Medical Center	4101 S 4TH ST TRAFFICWAY, LEAVENWORTH, KS, 66048	EMERGENCY GENERATOR	8062	Construction Approval	CSA00765	3/12/2018	3/16/2018
0910132	A & M Products Mfg.	705 N. LINCOLN, SPRING HILL, KS, 66083	PERMIT DETERMINATION	3295	Construction Approval	CSA00655	2/27/2018	3/16/2018
1110036	CAMSO MFG. USA	1601 E SOUTH AVE, EMPORIA, KS, 66801	RETRAINING OPERATION	3061	Construction Approval	CSA02463	2/8/2018	3/16/2018
0790045	Mid Continent Cabinetry	900 SOUTH MERIDIAN, NEWTON, KS, 67114	SEALER AND TOPCOAT BOOTHS	2434	Construction Approval	CSA00558	2/2/2018	3/16/2018
1550011	ONEOK Hydrocarbon - Hutchinson Fract. (amine)	1910 S BROADACRES RD, HUTCHINSON, KS, 67501	FLARE	1321	Construction Approval	CSA01172	12/26/2017	3/16/2018

2090009	Amsted Rail	7111 GRIFFIN RD, KANSAS CITY, KS, 66111	ADDITION TO CASTING PROCESS	3325	Other Construction Permit	CSO01707	3/14/2018	3/18/2018
0010052	Evergry - Dakota Microwave Site	4489 Dakota Rd, Moran, KS, 66755	EMERGEN CY GENERAT OR	4813	Construction Approval	CSA04038	3/15/2018	3/19/2018
0110014	Peerless Products (burn- off oven)	2403 S. MAIN, FORT SCOTT, KS, 667010000	BURNOFF OVEN	3442	Other Construction Permit	CSO00084	2/9/2018	3/19/2018
0770272	BCE-MACH - WARNER 11-34-9 1H PAD	S14-T34S-R9W, WARNER 11-34-9 1H PAD, KS, 00000	OIL AND GAS PRODUCT ION	1311	Construction Permit	CSP02758	3/15/2018	3/19/2018
0770273	BCE-MACH - PATTERSON 13-34-9 1H PAD	S24-T34S-R9W, PATTERSON 13-34- 9 1H PAD, KS, 00000	OIL AND GAS PRODUCT ION	1311	Construction Permit	CSP02759	3/15/2018	3/19/2018
7770018	MIDWEST MINERALS (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	ADD EQUIPME NT	1422	Construction Approval	CSA01998	2/20/2018	3/20/2018
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442	NEW PAINT BOOTH	9711	Other Construction Permit	CSO01153	3/1/2018	3/21/2018
0670159	Scout Energy - MTR 32 Station	S27-T29S-R37W, MTR 32, KS, 00000	ENGINE REPL LIKE- FOR-LIKE	1311	Construction Approval	CSA03271	3/20/2018	3/21/2018
2090008	Kansas City BPU - Nearman	4240 N 55TH, KANSAS CITY, KS, 66104	REMOVE DUST COLLECTO R	4911	Construction Permit	CSP00670	10/20/2017	3/22/2018
7770949	HAUPT CONST. (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1794	Construction Permit	CSP02757	3/14/2018	3/26/2018
1130087	MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 KIOWA RD, MCPHERSON, KS, 67460	NEW METER STATION	4619	Construction Approval	CSA04036	3/13/2018	3/27/2018
1670021	Great Plains Mfg. (Land Pride) - Lucas	240 S. GREELEY, LUCAS, KS, 67648	DISTILLER	3523	Other Construction Permit	CSO01182	12/20/2017	3/27/2018
7770659	MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS, 00000	ADD EQUIPME NT - WADE QUARRIES	1422	Construction Approval	CSA03046	2/27/2018	3/27/2018
2090009	Amsted Rail	7111 GRIFFIN RD, KANSAS CITY, KS, 66111	REPL HOT WHEEL GRINDER DUST CO	3325	Construction Approval	CSA01722	3/16/2018	4/2/2018
0470041	IACX Energy - PEAK Facility (helium recov) (incl 3 dehyS)	S29-T24S-R16W, BELPRE, KS, 00000	ENGINE	2813	Construction Approval	CSA03964	3/15/2018	4/2/2018
1550089	Lowen Corp.	1111 N AIRPORT RD, HUTCHINSON, KS, 67501	CLEAR COATER	2759	Other Construction Permit	CSO02202	2/6/2018	4/2/2018
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	ADD SEWER HUBS TO VACUUM UNIT	2873	Other Construction Permit	CSO00789	1/30/2018	4/3/2018
1550011	ONEOK Hydrocarbon - Hutchinson Fract. (amine)	1910 S BROADACRES RD, HUTCHINSON, KS, 67501	PUMP STATION PIPING MOD	1321	Construction Approval	CSA01171	2/26/2018	4/3/2018
1550011	ONEOK Hydrocarbon - Hutchinson Fract. (amine)	1910 S BROADACRES RD, HUTCHINSON, KS, 67501	PIPING MODIFICA TIONS	1321	Construction Approval	CSA01170	3/7/2018	4/3/2018

1890206	ONEOK - HUG-01 Station	S7-T335-R35W, HUG-01, KS, 00000	LIKE-KIND REPLACE MENT	1311	Construction Approval	CSA02582	4/2/2018	4/3/2018
1870022	Scout Energy - SCLC #2 Station	S21-T275-R40W, SCLC C-2, KS, 00000	ENGINE SWING	1311	Construction Approval	CSA03693	4/3/2018	4/3/2018
0210023	Jayhawk Fine Chemicals Corp	8545 SE JAYHAWK DRIVE, GALENA, KS, 66739	NEW REACTOR AND DRYER	2869	Other Construction Permit	CSO00185	2/14/2018	4/4/2018
1550144	Superior Pipeline - Reno Co. Gas Proc. Plant	SE 1/4 S33-T255-R10W, TURON, KS, 00000	ADD EQUIPMENT	1321	Construction Approval	CSA03796	1/23/2018	4/4/2018
0410056	Great Plains Mfg. (Land Pride) - Abilene	1100 N.W. 8TH, ABILENE, KS, 67410	NEW PAINT BOOTH	3523	Construction Approval	CSA00314	2/23/2018	4/6/2018
0110042	NIECE PRODUCTS OF KANSAS	3904 LIBERTY BELL RD, FORT SCOTT, KS, 66701	FUEL TANKS	3443	Construction Approval	CSA04032	2/2/2018	4/6/2018
1650023	KBK Industries	EAST OF K-96 , RUSH CENTER, KS, 67575	TANKS (MODIFIED C-9951)	3089	Construction Approval	CSA01295	3/26/2018	4/6/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	INSTALL NEW TANK	2911	Other Construction Permit	CSO00094	11/22/2017	4/6/2018
7770008	APAC-KANSAS SHEARS DIV. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66856	BELT CONVEYOR	1422	Construction Approval	CSA01945	3/30/2018	4/6/2018
1790015	SHERIDAN COUNTY HEALTH	826 18TH STREET, HOXIE, KS, 67740	EMERGENCY GENERATOR	8062	Construction Approval	CSA04034	3/1/2018	4/10/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	THIRD TEMP BOILER	2911	Construction Approval	CSA00157	1/22/2018	4/10/2018
1890206	ONEOK - HUG-01 Station	S7-T335-R35W, HUG-01, KS, 00000	REVISE C-14257	1311	Construction Approval	CSA02581	4/12/2018	4/12/2018
1290036	DCP Operating - Roxanne Station (dehy)	S25-T315-R41W, ROXANNE STA., KS, 00000	ENGINE SWAP	4922	Construction Approval	CSA001000	4/12/2018	4/13/2018
1550022	Cargill (Salt Div.) - Hutchinson	609 E. AVE. G, HUTCHINSON, KS, 675010000	REMOVE/REPLACE BOILERS	2899	Construction Approval	CSA01180	6/19/2017	4/16/2018
2090011	Procter & Gamble	1900 KANSAS AVE, KANSAS CITY, KS, 66105	TANK CHANGES	2841	Other Construction Permit	CSO01772	4/12/2018	4/16/2018
1130087	MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 KIOWA RD, MCPHERSON, KS, 67460	FLARE	4619	Construction Approval	CSA04037	4/9/2018	4/17/2018
1550033	EVERGY - HUTCHINSON	3200 E 30TH ST, HUTCHINSON, KS, 67502	EMERGENCY GENERATOR	4911	Construction Approval	CSA01188	4/13/2018	4/18/2018
1770247	HEAVENLY PET MEMORIAL (ANIMAL INCINERATOR)	1137 SW GAGE BLVD, TOPEKA, KS, 66604	ANIMAL INCINERATOR	0742	Construction Permit	CSP02753	4/12/2018	4/18/2018
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	EMERGENCY GENERATOR	3721	Construction Approval	CSA03172	4/19/2018	4/20/2018
1470026	Prairie Horizon Agri-Energy	1664 E. 100 ROAD, PHILLIPSBURG, KS, 67661	ADD EQUIPMENT	2869	Construction Permit	CSP02852	2/27/2018	4/20/2018
1470026	Prairie Horizon Agri-Energy	1664 E. 100 ROAD, PHILLIPSBURG, KS, 67661	TS4 & FOT Project & Change VOC Limit to remain Class II source	2869	Construction Permit	CSP02852	12/27/2019	4/20/2018

1770018	Frito-Lay - Topeka	4236 KIRKLAWN AVE., TOPEKA, KS, 66609	CONSTRUCTION RESPONSE	2096	Other Construction Permit	CSO01508	2/14/2018	4/20/2018
1890141	MERIT ENERGY - WEST MCATEE STATION	S15-T34S-R39W, MCATEE REMOTE FRONT END, KS, 00000	ENGINE REPLACE MENT	4922	Construction Approval	CSA01672	4/20/2018	4/23/2018
1290058	MERIT ENERGY - NORTH GREENWOOD STATION	S17-T32S-R43W, GREENWOOD FIELD, KS, 00000	ENGINE REPLACE MENT	4922	Construction Approval	CSA01006	4/20/2018	4/23/2018
1290109	Merit Energy - Greenwood Booster #4 Station	S20-T33S-R42W, GREENWOOD BOOSTER #4, KS, 00000	ENGINE REPLACE MENT	1311	Construction Approval	CSA02375	4/20/2018	4/23/2018
0810049	Merit Energy - Eubank B Station	S23-T28S-R34W, EUBANK B STA., KS, 00000	ENGINE REPLACE MENT	1311	Construction Approval	CSA02456	4/20/2018	4/23/2018
1290057	MERIT ENERGY - SOUTH RIVER STATION	S19-T34S-R42W, SOUTH RIVER STA., KS, 00000	ENGINE REPLACE MENT	1311	Construction Approval	CSA01005	4/20/2018	4/23/2018
7770952	VAN EATON READY MIX (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRETE BATCH	3273	Construction Permit	CSP02762	4/24/2018	4/30/2018
7770951	VAN EATON READY MIX (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRETE BATCH	3273	Construction Permit	CSP02761	4/23/2018	4/30/2018
2010001	Natural Gas Pipeline of America - Haddam Station 195	S16-T3S-R1E, STATION 195, KS, 66944	TURBINE REPLACE MENT	4922	Other Construction Permit	CSO01678	3/23/2018	5/1/2018
7770950	CORNEJO & SONS (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS, 00000	ASPHALT PLANT	1771	Construction Permit	CSP02760	4/13/2018	5/3/2018
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442	EMERGENCY GENERATOR	9711	Construction Approval	CSA01252	4/19/2018	5/4/2018
1770035	Futamura USA	6000 SE 2ND ST, TECUMSEH, KS, 66542	NEW CASTING MACHINE	2823	Other Construction Permit	CSO01547	2/26/2018	5/7/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	RESPONSE RE: APPROVAL C-12149	2911	Other Construction Permit	CSO00093	10/11/2017	5/8/2018
2090069	Reconserve Inc.	41 NORTH JAMES ST., KANSAS CITY, KS, 66118	ADMIN AMEND D-13704	2048	Construction Permit	CSP00705	2/16/2018	5/8/2018
0030009	Southern Star Central - Welda Station (dehy)	19209 SW MARYLAND RD, WELDA, KS, 66091	EMERGENCY GENERATOR	4922	Construction Approval	CSA00034	5/9/2018	5/11/2018
1730052	BOMBARDIER AEROSPACE LEARJET	One Learjet Way, WICHITA, KS, 67209	EMERGENCY GENERATOR	3721	Construction Approval	CSA01428	5/8/2018	5/11/2018
0570030	CARGILL MEAT SOLUTIONS - DODGE CITY	3201 East Highway 154, Dodge City, KS, 67801	EMERGENCY GENERATOR	2011	Construction Approval	CSA00435	4/27/2018	5/11/2018
1610002	FORT RILEY UTILITY SERVICES	8152 1ST DIVISON RD, FORT RILEY, KS, 66442	EMERGENCY GENERATORS (10)	1623	Construction Approval	CSA04035	4/25/2018	5/11/2018
1490001	EVERGY - JEFFREY	25905 JEFFREY RD, ST. MARYS, KS, 66536	CONSENT DECREE CONSTRUCTION PERMIT	4911	Construction Permit	CSP00414	1/18/2018	5/14/2018
1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337	APPLICABILITY DETERMINATION	2911	Other Construction Permit	CSO00874	11/22/2017	5/14/2018

1730346	Kansas Ready Mix - Park City	4850 N BROADWAY ST, PARK CITY, KS, 67219	REVISE C-11994	3273	Other Construction Permit	CSO03207	5/11/2018	5/15/2018	
0030030	East Kansas Agri-Energy	1304 S MAIN ST, GARNETT, KS, 66032	2ND ISOM REACTOR & EMG	2869	Construction Approval	CSA02882	11/8/2017	5/16/2018	CAAMACTIII
7770953	APAC Kansas Shears Div - PORTABLE CRUSHER #2	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1422	Construction Permit	CSP02763	5/17/2018	5/17/2018	
1290110	Merit Energy - Greenwood Booster #5 Station	S8-T335-R42W, GREENWOOD BOOSTER #5, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA02377	5/15/2018	5/21/2018	
0670147	Merit Energy - Gray Station	S3-T29-R35W, GRANT COUNTY, KS, KS, 00000	ENGINE SWAP	1311	Construction Approval	CSA03177	5/15/2018	5/21/2018	
0210050	UTEC CORP. - HALLOWELL	2022 NW 110TH, HALLOWELL, KS, 66725	UNDERWATER TEST FACILITY	8734	Construction Approval	CSA04026	11/27/2017	5/22/2018	
1250005	Southern Star Central - Grabham Station	3390 COUNTY ROAD 3400, INDEPENDENCE, KS, 67301	LIKE-KIND REPL STORAGE TANKS	4922	Other Construction Permit	CSO00904	5/16/2018	5/22/2018	
0710025	SCOULAR CO - TRIBUNE (INLAND)	395 STATE HWY 27, TRIBUNE, KS, 67879	TEMP STORAGE	5153	Other Construction Permit	CSO03246	5/17/2018	5/24/2018	
1070005	EVERGY - LA CYGNE	25166 East 2200 Road, La Cygne, KS, 66040	TWO EMERGENCY GENERATORS	4911	Construction Approval	CSA00779	5/24/2018	5/25/2018	
1810009	SCOULAR CO. - GOODLAND	17TH & CENTER, GOODLAND, KS, 67735	APPLICABILITY DETERMINATION	5153	Construction Approval	CSA01620	4/26/2018	6/1/2018	
1650023	KBK Industries	EAST OF K-96, RUSH CENTER, KS, 67575	MODIFY C-7014	3089	Construction Approval	CSA01296	5/17/2018	6/4/2018	
1670029	Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665	NEW LOADOUT SKID	2869	Construction Approval	CSA02697	5/15/2018	6/4/2018	
7770953	APAC Kansas Shears Div - PORTABLE CRUSHER #2	NO STREET ADDRESS, PORTABLE, KS, 00000	NEW EQUIPMENT	1422	Construction Approval	CSA04041	6/4/2018	6/6/2018	
0350031	GE Engine Services - Strother South	STROTHER FIELD, ARKANSAS CITY, KS, 67005	REVISE C-13137	3724	Construction Approval	CSA00285	2/13/2018	6/8/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	TURNAROUND PROJECTS	2873	Construction Approval	CSA00859	2/8/2018	6/11/2018	
1770202	PTMW Inc. - Topeka	5040 NW HWY 24, TOPEKA, KS, 66618	EQUIPMENT	3441	Construction Permit	CSP00934	3/23/2018	6/12/2018	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	PERMIT DETERMINATION	2911	Other Construction Permit	CSO00095	2/20/2018	6/12/2018	
1650029	IACX Energy - Otis Station (dehys)	S27-T175-R16W, OTIS, KS, 00000	PERMIT DETERMINATION	4922	Other Construction Permit	CSO03097	4/11/2018	6/13/2018	
1730328	Premier Processing	3002 W PAWNEE AVE, WICHITA, KS, 67213	VAPOR DEGREASER	3471	Construction Permit	CSP01411	1/8/2018	6/13/2018	
0910288	HEALTH CENTER-OVERLAND PARK	7820 W 165TH STREET, OVERLAND PARK, KS, 66223	EMG	8062	Construction Approval	CSA04043	6/5/2018	6/15/2018	
1170035	FARMERS COOPERATIVE - FRANKFORT (TUMBLEWEED RD)	TUMBLEWEED RD S8-T45-R9E, FRANKFORT, KS, 66427	MODIFY PERMIT CONDITIONS	5153	Construction Permit	CSP02645	3/27/2018	6/15/2018	

1770004	Cargill Ag Horizons - Topeka (W Gordon)	1845 NW GORDON, TOPEKA, KS, 66608	APPLICABILITY DETERMINATION	5153	Other Construction Permit	CSO01482	6/7/2018	6/19/2018
0970010	Northern Natural Gas - Mullinville Station	14049 17TH AVE, MULLINVILLE, KS, 67109	TURBINE REPLACE MENT	4922	Other Construction Permit	CSO00688	6/15/2018	6/19/2018
0870030	KLM Exploration - Seaver Station	S18-T10S-R20E, SEAVER LEASE, KS, 66066	APPLICABILITY DETERMINATION	4922	Construction Approval	CSA03521	5/30/2018	6/19/2018
1730097	Quikrete - Wichita	2806 N. RIDGE ROAD, WICHITA, KS, 67205	LIME SILO	3272	Construction Approval	CSA01516	5/17/2018	6/19/2018
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	MODIFY EQUIPMENT	1321	Construction Approval	CSA00381	5/22/2018	6/19/2018
1650029	IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS, 00000	MODIFY C-14262	4922	Other Construction Permit	CSO03096	6/22/2018	6/22/2018
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	ADD PORATABLE PAINT BOOTHS (3)	3721	Construction Approval	CSA03173	6/13/2018	6/22/2018
0350067	WEBSTER COMBUSTION TECHNOLOGY	619 INDUSTRIAL ROAD, WINFIELD, KS, 67156	BOILERS	3433	Construction Permit	CSP02754	1/10/2018	6/22/2018
0690003	DODGE CITY CO-OP EXCHANGE DBA PRIDE AG RESOURCES - ENSIGN	710 WEST TRAIL, DODGE CITY, KS, 67801	GRAIN STORAGE	5153	Construction Approval	CSA00524	5/21/2018	6/26/2018
1290058	MERIT ENERGY - NORTH GREENWOOD STATION	S17-T32S-R43W, GREENWOOD FIELD, KS, 00000	ENGINE SWAP	4922	Construction Approval	CSA01007	6/21/2018	6/26/2018
1890026	MERIT ENERGY - MCATEE BOOSTER STATION	S23-T34S-R39W, MCATEE BOOSTER STA., KS, 000000000	ENGINE SWAP	4922	Construction Approval	CSA01654	6/21/2018	6/26/2018
1910107	BNSF-WELLINGTON	1315 EAST 1ST STREET, WELLINGTON, KS, 67152	EMG	4011	Construction Approval	CSA04044	6/22/2018	6/26/2018
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	EMERGENCY GENERATOR	8221	Construction Approval	CSA01255	6/14/2018	6/27/2018
1510018	Northern Natural Gas - Cunningham Station (dehy)	S24-T27S-R11W, CUNNINGHAM, KS, 67035	EMERGENCY GENERATOR	4922	Construction Approval	CSA01137	6/27/2018	6/28/2018
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	NOx LIMIT	2911	Construction Permit	CSP00075	4/13/2018	6/28/2018
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442	EMERGENCY GENERATOR	9711	Construction Approval	CSA01253	3/29/2018	7/3/2018
1650029	IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS, 00000	LIKE KIND REPLACE MENT	4922	Construction Approval	CSA03481	6/26/2018	7/6/2018
2090077	Kelloggs Snacks aka Keebler Co.	801 SUNSHINE ROAD, KANSAS CITY, KS, 66110	PROD OF AMMONIUM BICARBONATE	2052	Construction Permit	CSP00708	6/13/2018	7/9/2018
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	ADD 3 TRANSLOADING STATIONS	2843	Construction Approval	CSA01837	4/16/2018	7/10/2018
0910106	Bayer Healthcare - Animal Health - Shawnee	12707 Shawnee Mission Parkway, SHAWNEE, KS, 66216	EMERGENCY GENERATOR	2834	Construction Approval	CSA00617	6/29/2018	7/16/2018

1810018	ADM Northern Sun - Goodland	6425 COUNTY ROAD 14, GOODLAND, KS, 67735	CONSTRU TION APPROVA L	2076	Construction Approval	CSA01625	7/2/2018	7/16/2018
1590031	Lyons Salt Company	1660 AVE. N, LYONS, KS, 67554	NEW LOADING SYSTEM & SALT BIN	1479	Construction Approval	CSA01226	5/29/2018	7/16/2018
0010009	Monarch Cement	PO BOX 1000, HUMBOLDT, KS, 66748	NO PERMIT NEEDED DETERMI NATION	3241	Construction Approval	CSA00021	6/12/2018	7/18/2018
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	MODIFY APPROVA L CONDITIO NS	8221	Construction Approval	CSA01256	6/18/2018	7/19/2018
7770287	HARSHMAN CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 00000	ADD EQUIPME NT	1422	Construction Approval	CSA02204	7/17/2018	7/23/2018
7770659	MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS, 00000	ADD EQUIPME NT	1422	Construction Permit	CSP01088	7/19/2018	7/23/2018
1670019	Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665	INCREASE THROUGH PUT	2046	Construction Approval	CSA01298	5/8/2018	7/24/2018
1070035	U.S. Minerals	911 LINNCO DRIVE, LA CYGNE, KS, 66040	NEW BAGHOUS E	3295	Construction Approval	CSA03611	5/31/2018	7/25/2018
1670033	Purina Animal Nutrition	1224 E. 15TH STREET, RUSSELL, KS, 67665	NEW BOILER	2048	Construction Approval	CSA03358	4/30/2018	7/25/2018
1730360	FACC SOLUTIONS	800 E 37TH ST N, WICHITA, KS, 67219	NEW PAINT BOOTH/O VEN	3728	Construction Approval	CSA04040	5/11/2018	7/27/2018
1730348	FACC SOLUTIONS		NEW PAINT BOOTH/O VEN	3728	Construction Approval	CSA04040	5/11/2018	7/27/2018
1290128	Colorado Interstate Gas - Boehm Dehy Station	S15-T33S-R42W, BOEHM DEHY PLANT, KS, 00000	MODIFY C- 6091	1311	Construction Approval	CSA02789	5/23/2018	7/27/2018
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	CONST APPROVA L REVISES C-14137	3275	Construction Approval	CSA00906	4/23/2018	7/30/2018
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	MODIFY C- 14271 APPROVA L	2843	Construction Approval	CSA01836	7/27/2018	7/31/2018
0710018	Tumbleweed Midstream - North Tribune Booster Station (dehy)	S22-T17S-R40W, TRIBUNE, KS, 67879	LIKE KIND REPLACE MENT	1311	Construction Approval	CSA02425	8/1/2018	8/3/2018
2090212	Atlas Molded Products - Kansas City (Kaw Dr)	4001 KAW DR, KANSAS CITY, KS, 66102	REROUTE PECS & INSTALL CHILLER	3086	Other Construction Permit	CSO01948	8/3/2018	8/6/2018
1730062	GAVILON GRAIN - WICHITA	5755 S HOOVER RD, WICHITA, KS, 67215	ADD TEMP STORAGE	5153	Other Construction Permit	CSO01351	6/21/2018	8/7/2018
1030132	KLM Exploration - Bankers Life Station	S3-T10S-R20E, BANKERS LIFE LEASE, KS, 66054	NEW COMPRES SOR ENGINE	1311	Construction Approval	CSA03522	7/9/2018	8/14/2018
1790016	HOXIE FEEDYARD	1014 S RD 10W, HOXIE, KS, 67740	BOILER	0211	Construction Approval	CSA04047	7/30/2018	8/14/2018
1030012	Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361	EMERGEN CY GENERAT OR	9711	Construction Approval	CSA00758	3/26/2018	8/15/2018

2090063	Sinclair Transportation - Kansas City Prod. Brkout Term.	3401 FAIRBANKS AVE, KANSAS CITY, KS, 66106	INSTALL 2 NEW STORAGE TANKS	5171	Construction Approval	CSA01842	7/23/2018	8/15/2018	
2050076	RADIANT ELECTRIC	9426 JEWELL RD, FREDONIA, KS, 66736	INSTALL ENGINE	4911	Construction Approval	CSA04045	7/16/2018	8/15/2018	
7770956	HAMMERSON	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRET E BATCH	3273	Construction Permit	CSP02766	8/15/2018	8/15/2018	
7770916	Flint Hills Materials (asphalt plant) (portable)	NO STREET ADDRESS, PORTABLE, KS, 00000	ADDITION AL EQUIPME NT	2951	Construction Approval	CSA03959	7/30/2018	8/15/2018	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	PERMIT DETERMI NATION - Response	2911	Other Construction Permit	CSO00096	8/6/2018	8/15/2018	
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	MODIFY C- 14021	3275	Construction Approval	CSA00905	5/17/2018	8/16/2018	
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	ADD NEW VENT LINE	2819	Other Construction Permit	CSO01818	8/14/2018	8/17/2018	
7770957	CONCRETE INDUSTRIES	NO STREET ADDRESS, PORTABLE, KS, 00000	CONCRET E BATCH PLANT	3273	Construction Permit	CSP02767	8/16/2018	8/20/2018	
1730223	Form Systems	330 CAIN, HAYSVILLE, KS, 67060	PERMIT DETERMI NATION	3086	Construction Permit	CSP00776	3/28/2018	8/20/2018	
1130081	Pfizer Inc.	1776 N CENTENNIAL DR, MCPHERSON, KS, 67460	PERMIT DETERMI NATION- Response	2833	Other Construction Permit	CSO03210	7/23/2018	8/20/2018	
0070045	National Gypsum - Sun City (quarry)	20672 NW WHITE SANDS, SUN CITY, KS, 67143	NEW EQUIPME NT	1422	Construction Permit	CSP00047	4/24/2018	8/21/2018	
7770958	Black Jack Energy Services	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1422	Construction Permit	CSP02768	8/20/2018	8/22/2018	
7770959	Heartstone Inc. (portable)	NO STREET ADDRESS, PORTABLE, KS, 00000	ROCK CRUSHER	1422	Construction Permit	CSP02769	8/20/2018	8/22/2018	
0110014	Peerless Products (burn-off oven)	2403 S. MAIN, FORT SCOTT, KS, 667010000	INDUSTRI AL A/C UNITS (2)_	3442	Other Construction Permit	CSO00085	8/1/2018	8/27/2018	
7770955	BOB BERGKAMP CONSTRUCTION CO. PORTABLE - MEL	NO STREET ADDRESS, PORTABLE, KS, 00000	MASTER EQUIPME NT LIST	1422	Construction Approval	CSA04049	8/6/2018	8/27/2018	CAANSPSOOO
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	MODIFY C- 13987	3275	Other Construction Permit	CSO00845	8/24/2018	8/29/2018	
2090313	International Food Products - Muncie	6721 GRIFFIN ROAD, KANSAS CITY, KS, 66111	INSTALL ADD'L NAT GAS-FIRED BO	2099	Construction Approval	CSA03844	7/27/2018	8/31/2018	
1550133	Tenawa Haven Processing - Haven Gas Plant	13114 S KENT RD, HAVEN, KS, 67543	HELIUM EXTRACTI ON PROJECT	1321	Construction Permit	CSP01646	5/17/2018	9/6/2018	
1550133	Tenawa Haven Processing - Haven Gas Plant	13114 S KENT RD, HAVEN, KS, 67543	NO PERMIT NEEDED DETERMI NATION	1321	Other Construction Permit	CSO03154	2/19/2018	9/6/2018	
1510061	Scouler Co. - Pratt	10333 NE 30TH STREET, PRATT, KS, 67124	APPLICABI LITY DETERMI NATION	5153	Other Construction Permit	CSO03164	8/24/2018	9/10/2018	

0950070	NEVILLE WELDING	5581 SW 50TH ST, KINGMAN, KS, 67068	PAINT AND COATING PROCESSE S	3715	Construction Permit	CSP02756	2/27/2018	9/11/2018	CAAGACTM6X
1570028	Nesika Energy (ethanol plant)	1020 70TH RD S13- T3S-R5W, SCANDIA, KS, 66966	REVISE LIMIT	2869	Construction Approval	CSA02739	5/3/2018	9/11/2018	
1510021	Northern Natural Gas - Cunningham Liquids Station (flare)	S1-T28S-R11W, CONNINGHAM LIQUIDS ST., KS, 000000000	APPLICABI LITY DETERMI NATION	1311	Construction Approval	CSA01138	4/13/2018	9/18/2018	
1290059	MERIT ENERGY - SOUTH GREENWOOD STATION	S28-T32S-R43W, GREENWOOD SOUTH, KS, 00000	ENGINE REPLACE MENT	4922	Construction Approval	CSA01010	8/14/2018	9/19/2018	
1290124	Merit Energy - Morton Co. #102 Station	S6-T35S-R40W, MC BOOSTER #102, KS, 00000	ENGINE REPLACE MENT	1311	Construction Approval	CSA02763	8/14/2018	9/19/2018	
0150024	UNION TANK CAR CO.	1802 N. STAR ST., EL DORADO, KS, 670420000	PAINT BOOTH	3743	Construction Approval	CSA00172	8/23/2018	9/21/2018	
1130088	MID-CONTINENT FRACTIONATION AND STORAGE LLC	839 KIOWA ROAD, MCPHERSON, KS, 67460		4619	Construction Approval	CSA04092	10/30/2018	9/24/2018	
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	ADD NAT GAS FIRED BOILER	2843	Construction Approval	CSA01835	8/8/2018	9/24/2018	
0550023	Sunflower Electric - Holcomb	2440 S. Hocomb Lane Ave., Holcomb, KS, 67851		4911	Construction Approval	CSA04064	8/29/2018	9/25/2018	
1550190	Stutzman Refuse Disposal	215 N Walnut, S. Hutchinson, KS, 67505	Surface Coating Operation s	4953	Construction Approval	CSA04565	3/11/2020	9/26/2018	
1750098	DCP OPERATING - MILLER STATION	S36-T33S-R34W, MILLER COMPRESSOR STATION, KS, 00000		4922	Construction Approval	CSA04067	9/26/2018	9/26/2018	
1730359	SEDGWICK CO. ELEC. CO-OP - CHENEY SUBSTATION	1355 S 383RD ST W, CHENEY, KS, 67025	DIESEL ENGINE	4911	Construction Approval	CSA04039	4/17/2018	9/27/2018	
0910106	Bayer Healthcare - Animal Health - Shawnee	12707 Shawnee Mission Parkway, SHAWNEE, KS, 66216		2834	Construction Approval	CSA04066	9/26/2018	10/1/2018	
1310007	Fairview Mills - Seneca	314 S. 6TH, SENECA, KS, 665380000	RESPONS E	5153	Other Construction Permit	CSO00982	2/16/2018	10/2/2018	
1590007	Northern Natural Gas - Bushton Station (dehy amine)	790 AVE A, BUSHTON, KS, 67427		4922	Construction Approval	CSA04069	10/2/2018	10/2/2018	
2090309	Z W TECH	3901 FAIRBANKS AVE, KANSAS CITY, KS, 661061247	CHANGES ASSOC NEW OWNERS HIP	2869	Other Construction Permit	CSO03124	8/30/2018	10/2/2018	
1890134	MERIT ENERGY - HUGS H COMPRESSOR STATION	S24-T32S-R39W, HUGS H COMPRESSOR STATION, KS, 00000		4922	Construction Approval	CSA04074	10/4/2018	10/4/2018	
0810054	Merit Energy - Green (former HFC #20) Station	S31-T28S-R34W, GREEN STA., KS, 00000		1311	Construction Approval	CSA04076	10/4/2018	10/4/2018	
1290125	Merit Energy - Morton Co. #103 Station	S6-T34S-R40W, MC BOOSTER #103, KS, 00000		1311	Construction Approval	CSA04075	10/4/2018	10/4/2018	
0910158	Intervet - DBA MERCK ANIMAL HEALTH	35500 W 91ST ST, DE SOTO, KS, 66018		8731	Construction Approval	CSA04081	10/8/2018	10/8/2018	

0570062	Pet Haven Cemetery (animal incinerator)	1920 EAST TRAIL STREET, DODGE CITY, KS, 67801		7261	Construction Permit	CSP02770	10/5/2018	10/8/2018	
2090060	Magellan Pipeline - Kansas City Products Breakout Terminal	401 E. DONOVAN ROAD, KANSAS CITY, KS, 66115	ADMIN AMENDMENT TO C-13217	5171	Other Construction Permit	CSO01845	7/30/2018	10/8/2018	CAANSPSXX,CA AMACT6B
0670090	Merit Energy - Fort Station	S18-T27S-R35W, FORT COMPRESSOR STATION, KS, 00000		4922	Construction Approval	CSA04079	10/5/2018	10/8/2018	
0910079	Sprint - Lenexa OSSC (W 99th)	15201 WEST 99TH ST., LENEXA, KS, 66219	RECIPROCATING ENGINES	4813	Construction Approval	CSA04053	10/25/2002	10/8/2018	
0910285	KINCAID READY MIX - OLATHE	15520 S 169 HWY, OLATHE, KS, 66062		3273	Construction Approval	CSA04068	9/28/2018	10/8/2018	
0910289	LIMITLESS BREWING LLC	9765 WIDMER RD, LENEXA, KS, 66215		2082	Other Construction Permit	CSO03247	9/4/2018	10/8/2018	
0910179	B/E AEROSPACE INTERIORS	10800 PFLUMM ROAD, LENEXA, KS, 66215	PAINTING AND COATING OPERATION	3728	Construction Approval	CSA02753	5/21/2018	10/9/2018	
2090023	Bartlett Grain - Kansas City (Kindleberger Rd)	940 KINDLEBERGER RD, KANSAS CITY, KS, 66115		5153	Other Construction Permit	CSO03252	9/7/2018	10/10/2018	
0070097	TARGA PIPELINE MID-CONTINENT WESTOK - HAZELTON STA (DEHY)	S35-T33S-R11W, HAZELTON, KS, 00000		1311	Construction Approval	CSA04080	10/5/2018	10/10/2018	
0770241	BCE-MACH - Roberts 22-34-9 1H/Roberts 27-34-9 1H St	S7-T34S-R9W, Roberts 22-34-9 1H/Roberts27-34-9 1H Pad, KS, 67150		1311	Construction Approval	CSA04220	9/25/2018	10/12/2018	
0450067	LAWRENCE PAPER COMPANY	2801 LAKEVIEW ROAD, LAWRENCE, KS, 66049		2653	Construction Approval	CSA04063	9/26/2018	10/17/2018	
0450067	LAWRENCE PAPER COMPANY	2801 LAKEVIEW ROAD, LAWRENCE, KS, 66049	EMERGENCY GENERATORS & BOILER	2653	Construction Approval	CSA04042	5/30/2018	10/17/2018	
1730232	Textron Aviation/Interiors Manufacturing Facility	1643 S. MAIZE ROAD, WICHITA, KS, 67209		3728	Construction Approval	CSA04061	9/24/2018	10/18/2018	
1370020	DEFENSE INFORMATION SYSTEMS AGENCY	1200 NORTH STATE STREET, NORTON, KS, 67654		9711	Construction Approval	CSA04085	10/19/2018	10/19/2018	
1750009	MERIT ENERGY - SANTA FE BOOSTER STATION	Section 27, T33S, R33W, Liberal, KS, 67905		4922	Construction Approval	CSA04087	10/19/2018	10/19/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	EMERGENCY ENGINE	2873	Construction Approval	CSA00863	8/30/2018	10/19/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	REVISION OF C-7017	2873	Construction Approval	CSA00860	6/15/2018	10/19/2018	
1890166	ONEOK - STV7-01 Station	S18-T32S-R37W, STV7-01, KS, 00000	REPLACE ENGINE	1311	Other Construction Permit	CSO02455	6/4/2018	10/19/2018	
0410011	Flint Hills Grain - Abilene	1915 NW 8TH STREET, ABILENE, KS, 67410	NO PERMIT NEEDED DETERMINATION	5153	Other Construction Permit	CSO00306	6/26/2018	10/23/2018	
0950037	ONEOK - Trenton Station	S28-T29S-R7W, TRENTON STA., KS, 00000000	STORAGE TANK	4922	Construction Approval	CSA00697	8/9/2018	10/23/2018	

1330001	Ash Grove Cement - Chanute	1801 N. SANTA FE, CHANUTE, KS, 66720	PERMIT DETERMINATION	3241	Other Construction Permit	CSO00986	4/30/2018	10/23/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	CATALYST CHANGE	2873	Construction Approval	CSA00862	8/15/2018	10/23/2018	
0330156	ONEOK - Coldwater PLD Station	S2-T315-R17W, COLDWATER PLD STATION, KS, 00000		1311	Construction Approval	CSA04089	10/23/2018	10/23/2018	
0070065	ONEOK - Lendon Station	S7-T325-R15W, LENDON STA., KS, 00000	STORAGE TANK	1311	Construction Approval	CSA03176	8/9/2018	10/23/2018	
0070063	ONEOK - Ram Station	S36-T345-R13W, RAM COMP. STA., KS, 00000	STORAGE TANK	1311	Construction Approval	CSA03072	8/9/2018	10/23/2018	
1370020	DEFENSE INFORMATION SYSTEMS AGENCY	1200 NORTH STATE STREET, NORTON, KS, 67654		9711	Construction Approval	CSA04086	10/19/2018	10/24/2018	
2090060	Magellan Pipeline - Kansas City Products Breakout Terminal	401 E. DONOVAN ROAD, KANSAS CITY, KS, 66115		5171	Construction Approval	CSA04088	10/17/2018	10/24/2018	
0450068	POLYMERIC LABELS INC	1021 E 31ST STREET, LAWRENCE, KS, 66046		2759	Construction Approval	CSA04062	9/25/2018	10/24/2018	
1910108	PROGRESSIVE AG CO-OP - SOUTH HAVEN (north of town)	S14-T345-R1W, SOUTH HAVEN, KS, 00000	GRAIN ELEVATOR	4221	Construction Approval	CSA04051	8/22/2018	10/26/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	REQUEST FOR COMMENT HCEP	2873	Other Construction Permit	CSO00794	10/12/2017	10/26/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	REVISION TO C-12342	2873	Construction Approval	CSA00861	6/15/2018	10/26/2018	
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337		3566	Construction Approval	CSA04065	9/26/2018	10/29/2018	
0450065	Kansas EPS	908 E 28TH STREET, LAWRENCE, KS, 66046		3086	Construction Approval	CSA04070	10/3/2018	10/29/2018	
0450065	Kansas EPS	908 E 28TH STREET, LAWRENCE, KS, 66046		3086	Construction Approval	CSA04071	10/3/2018	10/29/2018	
0937055	Colorado Interstate Gas - Lakin Station	S29-T245-R36W, LAKIN STA., KS, 67860		4922	Construction Approval	CSA04083	10/16/2018	10/31/2018	
1430027	US CELLULAR	2281 NORTH 80TH ROAD, DELPHOS, KS, 67450		4812	Construction Approval	CSA04094	10/31/2018	10/31/2018	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042		2911	Construction Approval	CSA04091	10/25/2018	10/31/2018	
0910291	RR DONNELLEY	14702 WEST 105TH STREET, LENEXA, KS, 66215		2759	Construction Approval	CSA04078	10/5/2018	10/31/2018	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	APPLICATION DETERMINATION GGG	2873	Other Construction Permit	CSO00792	10/12/2017	11/6/2018	CAANSPSPKB, CAANSPSKPA
1530028	BLACK OAK EXPLORATION - KRUEGER GENERATOR SITE	S6-T25-R36W, KRUEGER GENERATOR SITE, KS, 00000		1389	Construction Approval	CSA04077	10/4/2018	11/6/2018	
0070097	TARGA PIPELINE MID-CONTINENT WESTOK - HAZELTON STA (DEHY)	S35-T335-R11W, HAZELTON, KS, 00000		1311	Construction Approval	CSA04093	10/31/2018	11/7/2018	

0570012	Natural Gas Pipeline of America - Minneola Station 103	S17-T29S-R24W, STATION 103, KS, 67865	4922	Other Construction Permit	CSO03251	10/31/2018	11/8/2018	CAANSPSGG
0510036	CRCT - Bemis Station (crude stor)	S11-T11S-R17W, BEMIS STA., KS, 67663	4612	Construction Approval	CSA04082	10/15/2018	11/8/2018	
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	FUSELAGE 3721 MANUFACTURE	Construction Approval	CSA03174	5/18/2018	11/8/2018	CAAMACTGG
0910290	TOROTEL PRODUCTS	550 NORTH ROGERS ROAD, OLATHE, KS, 66062	3677	Construction Permit	CSP02776	11/15/2018	11/8/2018	
1890242	MERIT ENERGY - MOSCOW STATION (EX-CHEVRON)	S29-T31S-R36W, MOSCOW COMPRESSOR STATION, KS, 00000	1311	Construction Approval	CSA04103	11/7/2018	11/8/2018	
1290121	Merit Energy - Renshaw Station	S8-T32S-R39W, EKGGS COMPRESSOR SITE, KS, 00000	1311	Construction Approval	CSA04102	11/7/2018	11/8/2018	
0990010	DAY & ZIMMERMANN KANSAS (AMMUNITION PLANT)	23102 RUSH ROAD, PARSONS, KS, 67357	3483, 3489	Other Construction Permit	CSO03253	11/2/2018	11/9/2018	
0550003	CARGILL ANIMAL NUTRITION - GARDEN CITY	W. HWY 50, GARDEN CITY, KS, 000000000	PERMIT 2048 DETERMINATION	Other Construction Permit	CSO00381	7/23/2018	11/9/2018	
7770065	BAYER CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	1422	Construction Approval	CSA04104	11/8/2018	11/9/2018	CAANSPSOOO
1670005	Russell Mun. Power Plant #1	823 N ELM ST, RUSSELL, KS, 67665	4911	Other Construction Permit	CSO03250	10/30/2018	11/13/2018	CAANSPSJJJ
1670028	Russell Energy Center	1250 EAST 15TH STREET, RUSSELL, KS, 67665	4911	Other Construction Permit	CSO03249	10/30/2018	11/13/2018	CAANSPSIII
1790017	VERIZON WIRELESS-KS01 HOXIE	COUNTY ROAD 503, HOXIE, KS, 67740	4899	Construction Approval	CSA04106	11/14/2018	11/14/2018	
0610031	CAMSO MANUFACTURING USA LTD	2925 INDUSTRIAL STREET, JUNCTION CITY, KS, 66441	3061	Construction Approval	CSA04084	10/9/2018	11/14/2018	
0790045	Mid Continent Cabinetry	900 SOUTH MERIDIAN, NEWTON, KS, 67114	2434	Construction Approval	CSA04072	10/3/2018	11/15/2018	
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	3721	Other Construction Permit	CSO03256	11/7/2018	11/16/2018	CAAMACTN
1290143	VERIZON WIRELESS - KS11 Richfield	1975 COUNTY ROAD S, RICHFIELD, KS, 67953	4899	Construction Approval	CSA04108	11/15/2018	11/26/2018	CAANSPSJJJ
1130087	MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 KIOWA RD, MCPHERSON, KS, 67460	4619	Construction Approval	CSA04110	11/15/2018	11/26/2018	
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	3275	Construction Permit	CSP02771	10/8/2018	11/26/2018	CAANSPSOOO
1770007	Goodyear Tire & Rubber	2000 NW US Hwy 24, Topeka, KS, 66601	3011	Construction Approval	CSA04112	11/16/2018	11/28/2018	
0670157	Scout Energy - MTR 30 Station	S15-T30S-R37W, MTR 30, KS, 00000	1311	Other Construction Permit	CSO03260	11/28/2018	11/28/2018	
1130089	VERIZON WIRELESS-KS08 CANTON	2531 HIGHWAY 56, CANTON, KS, 67428	4899	Construction Approval	CSA04116	11/28/2018	11/30/2018	CAANSPSDPC
0910296	VERIZON WIRELESS-KCYC MAN	1401 S MUR-LEN ROAD, OLATHE, KS, 66062	4899	Construction Approval	CSA04123	11/30/2018	11/30/2018	CAANSPSJJJ

1750123	VERIZON WIRELESS-KS11 LIBERAL #2	9464 ROAD 2, LIBERAL, KS, 67901		4899	Construction Approval	CSA04115	11/28/2018	11/30/2018	CAANSPSJJJ
1610004	CGAHR USDA AG RESEARCH SERVICE	1515 COLLEGE, MANHATTAN, KS, 66502	ENGINES, BOILERS & GRAIN ELEV	8733	Construction Approval	CSA01254	5/24/2018	12/4/2018	CAAMACTZZZ, CAANSPSIII
2090326	T-MOBILE - EVANGELISTIC CENTER ASD0295	S33-T105-R25E, KANSAS CITY, KS, 66223		4899	Construction Approval	CSA04125	12/4/2018	12/4/2018	
2090325	T-MOBILE-BPU 21ST AND RIDGE ASD0278	S17-T115-R25E, KANSAS CITY, KS, 66102		4899	Construction Approval	CSA04126	12/4/2018	12/4/2018	
910150	St. Lukes South-St. Lukes Hospital - Shawnee Mission	12300 METCALF AVE., OVERLAND PARK, KS, 66211		8062	Construction Approval	CSA04191	12/31/2018	12/7/2018	CAANSPSIII
0910150	St. Lukes South-St. Lukes Hospital - Shawnee Mission	12300 METCALF AVE., OVERLAND PARK, KS, 66211		8062	Construction Approval	CSA04192	12/31/2018	12/7/2018	
0910304	SAINT LUKE'S HEALTH SYSTEM - SOUTH HOSPITAL	S19-T135-R25E, OVERLAND PARK, KS, 66213		8062	Construction Approval	CSA04150	12/7/2018	12/7/2018	
0910304	SAINT LUKE'S HEALTH SYSTEM - SOUTH HOSPITAL	S19-T135-R25E, OVERLAND PARK, KS, 66213		8062	Construction Approval	CSA04149	12/7/2018	12/7/2018	CAAMACTZZZ, CAANSPSIII
0910305	CHARTER COMMUNICATIONS - SHAWNEE	17704 W 66TH TERRACE, SHAWNEE, KS, 66217		4899	Construction Approval	CSA04162	12/10/2018	12/11/2018	
0910308	CHARTER COMMUNICATIONS-GARDNER	29669 W 167TH STREET, GARDNER, KS, 66030		4899	Construction Approval	CSA04158	12/11/2018	12/11/2018	CAANSPSIII
0910306	CHARTER COMMUNICATIONS-OVERLAND PARK	8221 W 119TH STREET, OVERLAND PARK, KS, 66213		4899	Construction Approval	CSA04161	12/10/2018	12/11/2018	CAANSPSIII
1950024	VERIZON WIRELESS-KS07 RANSOM	S21-T155-R23W, RANSOM, KS, 67572		4899	Construction Approval	CSA04147	12/7/2018	12/11/2018	CAANSPSIII
0910309	CHARTER COMMUNICATIONS-STANLEY	7359 W 162ND TERRACE, STANLEY, KS, 66085		4899	Construction Approval	CSA04164	12/11/2018	12/11/2018	
1030138	CHARTER COMMUNICATIONS-LEAVENWORTH	541 MCDONALD ROAD, LEAVENWORTH, KS, 66048		4899	Construction Approval	CSA04159	12/11/2018	12/11/2018	CAANSPSIII
0910307	CHARTER COMMUNICATIONS-LENEXA	9160 RENNEN BOULEVARD, LENEXA, KS, 66219		4899	Construction Approval	CSA04160	12/11/2018	12/11/2018	CAAMACTZZZ, CAANSPSIII
0510066	CHS CRUDE TRUCKING - HAYS	1615 NORFOLK ROAD, HAYS, KS, 67601	CHS crude trucking - werth station -	4612	Construction Approval	CSA04100	11/2/2018	12/11/2018	CAANSPSPKB
1930007	Colby Mun. Power Plant	120 N STERLING, COLBY, KS, 67701		4911	Construction Permit	CSP02781	11/29/2018	12/12/2018	
0910310	VERIZON - ATC VZW NEW COLLO: ATC 371457, KCYC GARDNER	760 E WARREN ST, GARDNER, KS, 66030		4899	Construction Approval	CSA04169	12/12/2018	12/12/2018	CAANSPSIII
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042		2911	Construction Approval	CSA04055	9/18/2018	12/12/2018	CAAMACTCC
1690037	Crestwood Inc.	601 E. WATER WELL RD., SALINA, KS, 67401	Crestwood - Proposed Beise Drill and Dowel Machine	2434	Other Construction Permit	CSO03254	11/1/2018	12/12/2018	
2090329	CHARTER COMMUNICATIONS - 79TH STREET	1120 N 79TH STREET, KANSAS CITY, KS, 66112		4899	Construction Approval	CSA04163	12/10/2018	12/13/2018	
0630023	VERIZON WIRELESS-KS06 GOVE	S12-T135-R29W, GOVE CITY, KS, 67736		4899	Construction Approval	CSA04168	12/11/2018	12/13/2018	CAANSPSJJJ

2090330	CHARTER COMMUNICATION-GIBBS ROAD	4224 GIBBS ROAD, KANSAS CITY, KS, 66106	4899	Construction Approval	CSA04165	12/11/2018	12/13/2018		
2090331	CHARTER COMMUNICATIONS-40TH ST.	246 N 40TH STREET, KANSAS CITY, KS, 66102	4899	Construction Approval	CSA04166	12/11/2018	12/13/2018		
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Tanks 651 and 653 - MACT CC	2911	Construction Approval	CSA04056	9/17/2018	12/13/2018	CAAMACTCC
0877033	RENEWABLE POWER PRODUCERS (LFGTE)	338 RICE RD, LAWRENCE, KS, 66044	MODIFICATION OF PROCESS EQUIPT	1311	Other Construction Permit	CSO03232	12/20/2017	12/13/2018	
0877033	RENEWABLE POWER PRODUCERS (LFGTE)	338 RICE RD, LAWRENCE, KS, 66044	MODIFICATION OF PROCESS EQUIPT	1311	Other Construction Permit	CSO03257	12/20/2017	12/13/2018	
0830029	DODGE CITY COOP DBA PRIDE AG RESOURCES-HANSTON	202 S LOGAN, HANSTON, KS, 67849		5153	Construction Approval	CSA04144	12/6/2018	12/17/2018	
0830002	Dodge City Coop dba Pride Ag Resources - Jetmore	1220 S Main St, JETMORE, KS, 00000		5153	Construction Approval	CSA04143	12/4/2018	12/17/2018	
2090328	T-MOBILE CENTRAL - BPU TOWER	S11-T11S-R23E, KANSAS CITY, KS, 66111		4899	Construction Approval	CSA04145	12/7/2018	12/17/2018	
2090327	T-MOBILE CENTRAL -- BPU COMM TOWER	S10-T11S-R24E, KANSAS CITY, KS, 66102		4812	Construction Approval	CSA04146	12/7/2018	12/17/2018	
2090305	BNSF Railway - Kansas City	2210 ARGENTINE BLVD, KANSAS CITY, KS, 66106		4013	Construction Approval	CSA04119	11/29/2018	12/18/2018	
2090305	BNSF Railway - Kansas City	2210 ARGENTINE BLVD, KANSAS CITY, KS, 66106		4013	Construction Approval	CSA04118	11/29/2018	12/18/2018	
2090305	BNSF Railway - Kansas City	2210 ARGENTINE BLVD, KANSAS CITY, KS, 66106		4013	Construction Approval	CSA04117	11/29/2018	12/18/2018	
0910158	Intervet - DBA MERCK ANIMAL HEALTH	35500 W 91ST ST, DE SOTO, KS, 66018		8731	Construction Approval	CSA04179	12/17/2018	12/19/2018	
0450014	EVERGY - LAWRENCE	1250 N 1800 RD, LAWRENCE, KS, 66044		4911	Construction Approval	CSA04177	12/13/2018	12/19/2018	
0450014	EVERGY - LAWRENCE	1250 N 1800 RD, LAWRENCE, KS, 66044		4911	Construction Approval	CSA04178	12/13/2018	12/19/2018	
1930039	VERIZON WIRELESS-KS01 BREWSTER	350 COUNTY ROAD G, BREWSTER, KS, 67732		4899	Construction Approval	CSA04176	11/29/2018	12/19/2018	CAANSPSJJJ,CAAMACTZZZZ
0210052	VERIZON WIRELESS - KS15 GALENA	S26-T34S-R25E, GALENA, KS, 66739		4899	Construction Approval	CSA04152	12/7/2018	12/19/2018	CAAMACTZZZZ, CAANSPSIIII
0090085	VERIZON WIRELESS-KS07 ALBERT	370 NW 140TH AVENUE, ALBERT, KS, 67530		4899	Construction Approval	CSA04121	11/29/2018	12/19/2018	CAAMACTZZZZ, CAANSPSIIII
1550191	T-MOBILE CENTRAL - ARLINGTON	S10-T25S-R8W, ARLINGTON, KS, 67514		4899	Construction Approval	CSA04180	12/7/2018	12/19/2018	CAAMACTZZZZ, CAANSPSIIII
1730362	T-MOBILE CENTRAL-235 135	S17-T26S-R1E, KECHI, KS, 67204		4899	Construction Approval	CSA04157	12/6/2018	12/19/2018	CAAMACTZZZZ, CAANSPSIIII
1730363	T-MOBILE CENTRAL-TYLER	S31-T27S-R1W, WICHITA, KS, 67212		4812	Construction Approval	CSA04155	12/6/2018	12/19/2018	CAAMACTZZZZ, CAANSPSIIII
0490015	T-MOBILE CENTRAL-SEVERY	S19-T28S-R11E, SEVERY, KS, 67349		4812	Construction Approval	CSA04156	12/6/2018	12/19/2018	CAANSPSIIII
1590057	CITY OF LYONS	1535 AVE O, LYONS, KS, 67554		9221	Construction Approval	CSA04109	11/15/2018	12/20/2018	CAANSPSIIII
1590056	CITY OF LYONS	319 E MAIN, LYONS, KS, 67554		4952	Construction Approval	CSA04107	11/15/2018	12/20/2018	CAAMACTZZZZ

1910109	Evergy - Wild Plains	152 N Webb Rd, Oxford, KS, 67119		4911	Construction Approval	CSA04173	12/18/2018	12/20/2018	CAANSPSJJJ
1850049	AT&T Mobility - Stafford Austin Farm 2	636 East Vickers Avenue, Stafford, KS, 67578		4899	Construction Approval	CSA04175	12/18/2018	12/20/2018	CAAMACTZZZZ, CAANSPSIII
0770274	T-MOBILE CENTRAL - HARPER	S31-T31S-R6W, HARPER, KS, 67058		4899	Construction Approval	CSA04153	12/7/2018	12/20/2018	CAANSPSIII
0530025	AT&T MOBILITY- WARTA	S15-T15S-R8W, ELLSWORTH, KS, 67439		4899	Construction Approval	CSA04174	12/18/2018	12/20/2018	CAAMACTZZZZ, CAANSPSIII
2050078	T-MOBILE CENTRAL - FREDONIA	S13-T29S-R14E, CENTER, KS, 66736		4812	Construction Approval	CSA04154	12/7/2018	12/20/2018	
0630022	MULL DRILLING COMPANY	S31-T15S-R26W, CBC UNIT #1-31H, KS, 00000	CBC Unit 1-31H	1311	Construction Approval	CSA04120	11/29/2018	12/20/2018	
1590055	LYONS VET CLINIC	816 N GRAND AVE, LYONS, KS, 67554		0742	Construction Permit	CSP02774	11/14/2018	12/20/2018	
0570012	Natural Gas Pipeline of America - Minneola Station 103	S17-T29S-R24W, STATION 103, KS, 67865		4922	Other Construction Permit	CSO03264	12/18/2018	12/26/2018	CAAMACTGG
1690035	Exide Technologies - Salina	413 E. BERG ROAD, SALINA, KS, 67401	NEW PRODUCT ION EQUIPME NT	3691	Construction Approval	CSA01316	6/21/2018	12/27/2018	CAAMACT6P,C AANSPSKK
0570012	Natural Gas Pipeline of America - Minneola Station 103	S17-T29S-R24W, STATION 103, KS, 67865		4922	Other Construction Permit	CSO03266	12/28/2018	12/28/2018	CAANSPSGG
2090111	Standard Motor Products - Edwardsville	845 S. 9TH STREET, EDWARDSVILLE, KS, 66113		3714	Other Construction Permit	CSO03262	12/7/2018	12/28/2018	
1770030	Westar Energy - Tecumseh	S17-T29S-R24W, STATION 103, KS, 67865		4911	Construction Approval	CSA04187	12/26/2018	12/31/2018	CAAMACTZZZZ
1510054	Pratt Energy	S17-T29S-R24W, STATION 103, KS, 67865	MODIFY CONDITIO NS	2869	Construction Permit	CSP01069	7/10/2018	12/31/2018	CAAMACTZZZZ, CAANSPSIII,CA ANSPSVV,CAAN SPSKPB,CAANS PSDPC
1730014	Westar Energy - Murray Gill	S17-T29S-R24W, STATION 103, KS, 67865		4911	Construction Approval	CSA04195	1/3/2019	1/3/2019	CAAMACTZZZZ
0350068	CRCT - BROTHERS STATION (NEW SITE) (CRUDE STOR)	S17-T29S-R24W, STATION 103, KS, 67865	CRUDE OIL STORAGE	4612	Construction Approval	CSA04046	7/24/2018	1/3/2019	
2050077	VERIZON WIRELESS- KS15 FREDONIA #3	1001 SOUTH 15TH STREET, FREDONIA, KS, 66736		4899	Construction Approval	CSA04196	1/3/2019	1/4/2019	
1730326	Capps Mfg.	2120 SOUTH CUSTER, WICHITA, KS, 67213		3471	Construction Approval	CSA04060	9/21/2018	1/4/2019	
1470004	Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661	NEW EQUIPME NT	2952	Construction Permit	CSP00405	8/27/2018	1/4/2019	CAANSPSUU
1490028	PARKER HANNIFIN	1501 HAYES DR, MANHATTAN (POT. COUNTY), KS, 66502		3052	Construction Approval	CSA04190	12/26/2018	1/7/2019	CAANSPDPC
0770229	BCE-Mach - Ralph 36-34- 9 1H Station	S36-T34S-R9W, RALPH 36-34-9 1H STATION, KS, 00000		1311	Construction Approval	CSA04188	12/26/2018	1/7/2019	
1210043	T-MOBILE CENTRAL - OSAWATOMIE	S11-T18S-R22E, OSAWATOMIE, KS, 66064		4899	Construction Approval	CSA04128	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0450069	CROWN CASTLE- 822504 CELL TOWER SITE	509 E 1300 ROAD, BALDWIN CITY, KS, 66006		4899	Construction Approval	CSA04098	11/1/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII

0910293	CROWN CASTLE-827668 CELL TOWER SITE	11730 KANSAS CITY ROAD, OLATHE, KS, 66063	4899	Construction Approval	CSA04097	11/1/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
1070039	T-MOBILE CENTRAL - GARRETT BOSTWICK	S30-T19S-R25E, LACYGNE, KS, 66040	4899	Construction Approval	CSA04135	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0590045	CROWN CASTLE-828275 CELL TOWER SITE	2879 ALLEN ROAD, RICHMOND, KS, 66080	4899	Construction Approval	CSA04096	11/1/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
1770250	T-MOBILE CENTRAL - MERCANTILE BANK	S31-T11S-R16E, TOPEKA, KS, 66612	4899	Construction Approval	CSA04131	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0910294	CROWN CASTLE-877772 CELL TOWER SITE	7355 WEST 162ND TERRACE, OVERLAND PARK, KS, 66223	4899	Construction Approval	CSA04095	11/1/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0910301	T-MOBILE CENTRAL - N PAIR VIL AND MISSION H	S2-T12S-R25E, MISSION WOODS, KS, 66205	4899	Construction Approval	CSA04130	12/4/2018	1/8/2019	CAANSPSIII
0910298	T-MOBILE CENTRAL DE SOTO SSD	S35-T12S-R22E, DE SOTO, KS, 66018	4899	Construction Approval	CSA04139	12/3/2018	1/8/2019	
0210051	T-MOBILE CENTRAL - DUNGAN	S2-T35S-R24E, BAXTER SPRINGS, KS, 66713	4899	Construction Approval	CSA04137	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
1070040	T-MOBILE CENTRAL - HEITZ	S25-T22S-R24E, PLEASANTON, KS, 66767	4899	Construction Approval	CSA04134	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0910292	CROWN CASTLE-822173 CELL TOWER SITE	211TH AND METCALF, STILWELL, KS, 66085	4899	Construction Approval	CSA04099	11/1/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0010053	T-MOBILE CENTRAL - DAUGHARTHY	S14-T24S-R18E, IOLA, KS, 66749	4899	Construction Approval	CSA04140	12/3/2018	1/8/2019	CAANSPSIII
0910300	T-MOBILE CENTRAL - LOMA VISTA	S3-T14S-R24E, OLATHE, KS, 66213	4899	Construction Approval	CSA04132	12/4/2018	1/8/2019	CAANSPSIII
0130042	T-MOBILE CENTRAL - HORTON	S34-T4S-R16E, HORTON, KS, 66439	4899	Construction Approval	CSA04133	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0910297	T-MOBILE CENTRAL - BRUNER TOWER	S13-T12S-R24E, MERRIAM, KS, 66203	4899	Construction Approval	CSA04141	12/3/2018	1/8/2019	CAANSPSIII
0910302	T-MOBILE CENTRAL - OLATHE SERVICE CENTER	S23-T13S-R23E, OLATHE, KS, 66061	4899	Construction Approval	CSA04129	12/4/2018	1/8/2019	CAANSPSIII
1210044	T-MOBILE CENTRAL - PAOLA	S16-T17S-R23E, PAOLA, KS, 66071	4899	Construction Approval	CSA04127	12/4/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0910311	T-MOBILE CENTRAL- WEST 90TH ST AT RENNER RD	S31-T12S-R24E, LENEXA, KS, 66219	4812	Construction Approval	CSA04182	12/20/2018	1/8/2019	CAANSPSIII
0170018	T-MOBILE CENTRAL - BAZAAR WARREN	S35-T20S-R9E, COTTONWOOD, KS, 66845	4812	Construction Approval	CSA04142	12/3/2018	1/8/2019	CAAMACTZZZZ, CAANSPSIII
0450070	T-MOBILE CENTRAL - EUDORA WATER TOWER	S8-T13S-R21E, EUDORA, KS, 66025	4812	Construction Approval	CSA04136	12/4/2018	1/8/2019	CAANSPSIII
0910299	T-MOBILE CENTRAL - DELMAR WATER TOWER	S21-T12S-R25E, PRAIRIE VILLAGE, KS, 66208	4812	Construction Approval	CSA04138	12/4/2018	1/8/2019	CAANSPSIII
1890058	MERIT ENERGY - MOSCOW BOOSTER COMPRESSOR SITE	S4-T31S-R37W, MOSCOW STATION, KS, 00000	4922	Construction Approval	CSA04197	1/8/2019	1/9/2019	
1730012	EVERGY - GORDON EVANS	6001 N 151ST ST W, COLWICH, KS, 67030	4911	Construction Approval	CSA04198	1/8/2019	1/9/2019	
1210045	CROWN CASTLE-82665 PHILLIPS	39901 STANTON RD, OSAWATOMIE, KS, 66064	4899	Construction Approval	CSA04181	12/19/2018	1/9/2019	CAAMACTZZZZ, CAANSPSIII

1050025	CROWN CASTLE-829034 WESTERMAN CELL TOWER	1.3 MILES EAST OF 23RD ROAD, ELLSWORTH, KS, 67439	4899	Construction Approval	CSA04193	12/31/2018	1/9/2019	CAAMACTZZZZ, CAANSPSIII
1690804	CROWN CASTLE - 823175 CLAUSSEN	NW CORNER OF STIMMEL AND HEDVIL, SALINA, KS, 67401	4899	Construction Approval	CSA04151	12/7/2018	1/9/2019	CAAMACTZZZZ, CAANSPSIII
1490042	T-MOBILE CENTRAL - WAMEGO	S6-T10S-R10E, WAMEGO, KS, 66547	4899	Construction Approval	CSA04124	12/4/2018	1/9/2019	CAAMACTZZZZ, CAANSPSIII
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	3275	Construction Approval	CSA04105	11/14/2018	1/10/2019	
0910295	SEATS INC	20241 WEST 207TH STREET, SPRING HILL, KS, 66083	3086	Other Construction Permit	CSO03258	11/16/2018	1/10/2019	
1990010	WHITE CLIFFS PIPELINE LLC	S34-T11S-R40W, SHARON SPRINGS, KS, 67758	4619	Construction Approval	CSA04057	9/21/2018	1/11/2019	
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	3721	Construction Approval	CSA04200	1/11/2019	1/14/2019	
0950054	Rose Rock Midstream - Cunningham Station (crude stor)	S20-T27S-R10W, CUNNINGHAM, KS, 67035	5171	Construction Approval	CSA04058	9/21/2018	1/15/2019	
0510068	ONEOK-VINCENT AVE PIGGING STATION	N/A, Pfeifer, KS, 67671	4922	Construction Approval	CSA04201	1/14/2019	1/15/2019	
0550036	Reeve Agri-Energy	5665 S Old Highway 83, Garden City, KS, 67846	FERMENT 2869 ATION PROCESS	Construction Approval	CSA00399	2/2/2018	1/25/2019	CAAGACTM6C, CAANSPSPKB,C AANSPSVVPA
2090046	General Motors - Kansas City	3201 FAIRFAX TRFCWY., KANSAS CITY, KS, 66115	3711	Construction Approval	CSA04172	12/18/2018	1/28/2019	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	2911	Construction Permit	CSP02782	11/29/2018	1/29/2019	
1250138	BERG REINVIGORATIONS	1629 CR 3700, COFFEYVILLE, KS, 67337	2421	Construction Approval	CSA04113	11/21/2018	1/29/2019	
1690067	KANSAS STATE UNIVERSITY POLYTECHNIC	2307 HEIN AVE, SALINA, KS, 67401	EXISTING 4581 EQUIPMENT	Construction Approval	CSA02849	2/6/2018	1/30/2019	CAANSPSJJJ,CAAMACT6C,CAAMACTZZZZ
1670019	Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665	2046	Construction Permit	CSP00482	1/10/2019	1/30/2019	CAANSPSPDC
0350059	Cornejo & Sons - Oxford Sand Plant	1438 122ND RD, OXFORD, KS, 67119	1442	Construction Approval	CSA04122	11/30/2018	1/31/2019	
1450016	Northern Natural Gas - Macksville Station	S12-T23S-R15W, MACKSVILLE, KS, 67557	APPLICABILITY 4922 DETERMINATION	Other Construction Permit	CSO01017	6/14/2018	2/1/2019	
1330074	AT&T MOBILITY-KSL05629 PARSONS	1228 QUEEN RD, PARSONS, KS, 67357	4899	Construction Approval	CSA04207	2/1/2019	2/1/2019	CAANSPSIII
1370021	AT&T MOBILITY-KSL05179 NORTON	17883 ROAD Q, NORTON, KS, 67654	4812	Construction Approval	CSA04208	2/1/2019	2/1/2019	CAANSPSIII
0210033	Tamko Roofing Products - Columbus	600 EAST BETHLEHEM ROAD, COLUMBUS, KS, 66752	2952	Construction Approval	CSA04204	1/28/2019	2/1/2019	
1650032	SUMMIT OPERATING LLC	1400 E LOGAN AVE, EMPORIA, KS, 66801	2813	Construction Approval	CSA04167	12/11/2018	2/6/2019	CAAMACTZZZZ, CAANSPSOOOO PA,CAANSPSJJJ
1110040	SIMMONS PET FOOD	311 AVE. D, BISON, KS, 67520	2047	Construction Approval	CSA04090	10/23/2018	2/6/2019	
1930040	ONEOK-COLBY PUMP STATION	S31-T6S-R32W, COLBY, KS, 67701	4922	Construction Approval	CSA04203	1/23/2019	2/15/2019	

0730032	Evergry - Eureka Service Center	902 N Elm, Eureka, KS, 67045	4911	Construction Approval	CSA04216	2/13/2019	2/20/2019	CAAMACTZZZZ, CAANSPSIII
0410080	RAWHIDE PORTABLE CORRAL	900 N WASHINGTON ST, ABILENE, KS, 67410	PAINITIN G & COATING OPERATIO N 3523	Construction Permit	CSP02764	6/21/2018	2/22/2019	CAAMACTHH
0030009	Southern Star Central - Welda Station (dehy)	19209 SW MARYLAND RD, WELDA, KS, 66091	4922	Construction Approval	CSA04194	1/2/2019	2/25/2019	
1510068	PRAIRIECHAR LLC	30412 RUNWAY DRIVE, PRATT, KS, 67124	2873	Construction Approval	CSA04209	2/5/2019	2/26/2019	
1890181	ONEOK - STV1-02 Station	S3-T33S-R37W, STV 1-02, KS, 00000	4922	Construction Permit	CSP00783	1/14/2019	2/27/2019	CAAMACTZZZZ
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	1321	Construction Approval	CSA04206	1/31/2019	2/27/2019	CAANSPSOOOO PA
1890057	ONEOK - STV8-01 Station	S14-T32S-R37W, STV 8-01, KS, 00000	1311	Construction Permit	CSP00630	1/14/2019	2/27/2019	
1890178	ONEOK - STV4-01 Station	S34-T34S-R36W, STV 4-01, KS, 00000	1311	Construction Permit	CSP00781	1/14/2019	2/27/2019	CAAMACTZZZZ
0810113	Pantera Energy Company - Eubank North Unit (ENU) Tank Battery	S4-T29S-R34W, Haskell, KS, 67870	4899	Construction Permit	CSP02800	2/27/2019	2/28/2019	CAANSPSOOOO PA
0370012	Masonite Corporation	911 E. JEFFERSON ST., PITTSBURG, KS, 66762	3442	Construction Approval	CSA04189	12/26/2018	2/28/2019	
0670087	Merit Energy - Adams Station	S2S-T27S-R36W, ADAMS STA., KS, 00000	4922	Other Construction Permit	CSO03271	1/31/2019	3/1/2019	
0510022	EnerSys	1 ENERSYS RD - S19-T13S-R18W, HAYS, KS, 67601	3691	Construction Approval	CSA04205	1/30/2019	3/1/2019	CAANSPSKK, CAAMACTPPPPP
1810030	GOODLAND REGIONAL MEDICAL CENTER	220 W 2ND AVE, GOODLAND, KS, 67735	8062	Construction Approval	CSA04199	1/9/2019	3/7/2019	
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	1321	Construction Permit	CSP02775	11/15/2018	3/7/2019	CAAGACTM6J, CAAMACTOOOOO, CAANSPSVVPA
0910312	BriovaRx Specialty Pharmacy	11142 Renner Blvd., Lenexa, KS, 66219	5912	Construction Approval	CSA04232	2/15/2019	3/8/2019	CAANSPSIII
1390032	SOLOMON CORPORATION	6910 W 229TH STREET, OSAGE CITY, KS, 66523	5093	Other Construction Permit	CSO03281	11/21/2018	3/8/2019	
0910295	SEATS INC	20241 WEST 207TH STREET, SPRING HILL, KS, 66083	3086	Construction Permit	CSP02797	2/13/2019	3/8/2019	
1470004	Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661	2952	Construction Approval	CSA04230	3/8/2019	3/8/2019	CAANSPSJJJ
0450055	Chemtrade Phosphorus Specialties	440-B N. 9TH, LAWRENCE, KS, 66044	2819	Other Construction Permit	CSO03263	12/13/2018	3/8/2019	
1890199	Merit Energy - Hinshaw Booster Station (dehy)	S34-T34S-R39W, HINSHAW BOOSTER STATION, KS, 00000	1311	Construction Permit	CSP02798	2/13/2019	3/8/2019	CAANSPSJJJ, CAAMACTZZZZ
0070051	ONEOK - Glenn Rupe Station	S4-T30S-R12W, GLEN RUPE STA., KS, 00000	4922	Construction Permit	CSP02799	2/19/2019	3/11/2019	
2090332	Verizon Wireless - KCYC Kansas Speedway DAS	1601 Phoenix Drive, Kansas City, KS, 66109	4899	Construction Approval	CSA04223	3/1/2019	3/11/2019	
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	3275	Construction Permit	CSP02773	11/14/2018	3/11/2019	

0810114	Merit Energy - Enterprise Hall Central Tank Battery	S16-T30S-R32W, Haskell County, KS, 00000	1311	Construction Approval	CSA04231	3/8/2019	3/11/2019	
0710026	T-MOBILE TRIBUNE KS2	CR 22, TRIBUNE, KS, 67879	4899	Construction Approval	CSA04186	12/26/2018	3/12/2019	CAANSPSIII
1250139	T-MOBILE USA ELK CITY	5068 CR 1700, ELK CITY, KS, 67344	4899	Construction Approval	CSA04185	12/26/2018	3/12/2019	CAANSPSIII
1590058	T-Mobile Bushton / WI01172A	699 Avenue F, Bushton, KS, 67427	4812	Construction Approval	CSA04212	2/12/2019	3/12/2019	CAANSPSIII
0990037	CST Storage	2101 S. 21ST ST., PARSONS, KS, 673570996	3443	Other Construction Permit	CSO03280	12/26/2018	3/13/2019	
0210033	Tamko Roofing Products - Columbus	600 EAST BETHLEHEM ROAD, COLUMBUS, KS, 66752	2952	Other Construction Permit	CSO03272	1/31/2019	3/13/2019	
0970070	J MARK RICHARDSON FAMILY TRUST-BENDER A #1 FACILITY	S16-T30S-R19W, BENDER A #1, KS, 00000	1311	Construction Approval	CSA04239	12/17/2018	3/14/2019	CAAMACTZZZ
0910315	Marillac Campus - University of Kansas Health System	8000 W 127th St, Overland Park, KS, 66213	8062	Construction Approval	CSA04227	3/4/2019	3/15/2019	
1230030	Central Valley Ag	300 S Hobart Street, Glen Elder, KS, 67446	5153	Construction Approval	CSA04219	2/15/2019	3/18/2019	CAANSPSDD
1730232	Textron Aviation/Interiors Manufacturing Facility	1643 S. MAIZE ROAD, WICHITA, KS, 67209	3728	Other Construction Permit	CSO03273	2/13/2019	3/18/2019	
0970069	J MARK RICHARDSON FAMILY TRUST-BENDER C #1 FACILITY	S21-T30S-R19W, BENDER C #1, KS, 00000	1311	Construction Approval	CSA04238	12/17/2018	3/18/2019	CAAMACTZZZ
1650029	IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS, 00000	4922	Construction Approval	CSA04171	12/13/2018	3/20/2019	
0970066	J MARK RICHARDSON FAMILY TRUST-HARPER FARMS A AND B FACILITY	S19-T27S-R15W, HARPER FARMS A AND B FACILITY, KS, 00000	1311	Construction Approval	CSA04235	12/13/2018	3/20/2019	CAAMACTZZZ
0790084	INDUSTRIAL METAL FABRICATION	1401 S SPENCER, NEWTON, KS, 67114	3443	Construction Approval	CSA04114	11/21/2018	3/21/2019	CAAGACTM6X
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	2819	Construction Approval	CSA04202	1/17/2019	3/21/2019	
0970068	J MARK RICHARDSON FAMILY TRUST-BLASIER #1 FACILITY	S21-T30S-R19W, BLAISER #1 FACILITY, KS, 00000	1311	Construction Approval	CSA04237	12/17/2018	3/21/2019	CAAMACTZZZ
0970067	J MARK RICHARDSON FAMILY TRUST-FANKHOUSER FACILITY	S32-T27S-R19W, FANKHOUSER FACILITY, KS, 00000	1311	Construction Approval	CSA04236	12/13/2018	3/21/2019	CAAMACTZZZ
0970065	J MARK RICHARDSON FAMILY TRUST-NEIER A FACILITY	S8-T29S-R20W, NEIER A FACILITY, KS, 00000	1311	Construction Approval	CSA04234	12/13/2018	3/21/2019	
0970064	J MARK RICHARDSON FAMILY TRUST-RALBECK/HAYSE B FACILITY	S35-T28S-R20W, RALBECK/HAYSE B FACILITY, KS, 00000	1311	Construction Approval	CSA04233	12/13/2018	3/21/2019	CAAMACTZZZ
1390033	T-Mobile Osage City P/A 5J0043A	402 North 6th Street, Osage, KS, 66523	4899	Construction Approval	CSA04214	2/11/2019	3/22/2019	CAANSPSIII
0390020	T-Mobile Oberlin KS SQA/ON02006B	5 mi S of US Hwy 36, Oberlin, KS, 67749	4812	Construction Approval	CSA04213	2/12/2019	3/22/2019	CAANSPSIII
0350041	Southern Kansas Cotton Growers Co-op - B	19493 51ST RD., S2-T33S-R3E, KS, 671560000	0724	Construction Permit	CSP02793	1/16/2019	3/25/2019	
0770036	Southern Kansas Cotton Growers Co-op - A	32 SW 20 RD - S35-T33S-R7W, ANTHONY, KS, 67003	0724	Construction Permit	CSP02794	1/16/2019	3/25/2019	

1290012	Merit Energy - South Rolla Station (dehy)	S1-T355-R40W, SOUTH ROLLA BOOSTER STA., KS, 00000	4922	Other Construction Permit	CSO03287	3/25/2019	3/26/2019	
1890192	MERIT ENERGY - WEST SOUTH BREECH STATION	S6-T355-R38W, WEST SOUTH BREECH STA., KS, 00000	4922	Other Construction Permit	CSO03288	3/25/2019	3/26/2019	
0310021	Wolf Creek Nuclear Operating Corp.	1550 Oxen Ln NE, Burlington, KS, 66839	4911	Construction Approval	CSA04242	3/14/2019	3/26/2019	CAAMACTZZZ, CAANSPSIII
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	3732	Other Construction Permit	CSO03269	1/16/2019	3/27/2019	
2090001	CertainTeed LLC	103 FUNSTON RD, KANSAS CITY, KS, 66115	3296	Construction Approval	CSA04210	2/5/2019	3/27/2019	
0510060	Hess Services - Hays (230th Ave)	1789 230TH AVENUE, HAYS, KS, 67601	3089	Construction Permit	CSP02803	4/19/2018	3/27/2019	CAAMACTMM MM
0330175	AT&T Mobility - Coldwater Cary	932 E Fourth Street, Coldwater, KS, 67029	4899	Construction Approval	CSA04241	3/12/2019	3/28/2019	CAANSPSIII
1030140	AT&T Mobility - Vertical Development	Dempsey Road and 175 Street, Leavenworth, KS, 66048	4899	Construction Approval	CSA04246	3/28/2019	3/28/2019	CAANSPSIII
1030139	AT&T Mobility - Williams	17320 Donahoo Road, Basehor, KS, 66607	4899	Construction Approval	CSA04244	3/28/2019	3/28/2019	CAANSPSIII
0710027	AT&T Mobility - Thirteen Mile Road Schneider Property	1701 Road C, Tribune, KS, 67879	4899	Construction Approval	CSA04247	3/28/2019	3/28/2019	
0530025	AT&T MOBILITY-WARTA	S15-T155-R8W, ELLSWORTH, KS, 67439	4899	Construction Approval	CSA04245	3/28/2019	3/28/2019	CAANSPSIII
1790018	AT&T Mobility - Kanorado Beeson	6416 Road 3, Kanorado, KS, 67741	4899	Construction Approval	CSA04240	3/12/2019	3/28/2019	CAANSPSIII
1850049	AT&T Mobility - Stafford Austin Farm 2	636 East Vickers Avenue, Stafford, KS, 67578	4899	Construction Approval	CSA04248	3/28/2019	3/28/2019	
0810068	Merit Energy - Garrison Compressor Station	S21-T275-R34W, GARRISON COMPRESSOR STATION, KS, 00000	4922	Other Construction Permit	CSO03292	4/2/2019	4/3/2019	
1890058	MERIT ENERGY - MOSCOW BOOSTER COMPRESSOR SITE	S4-T315-R37W, MOSCOW STATION, KS, 00000	4922	Other Construction Permit	CSO03294	4/2/2019	4/3/2019	
1890016	MERIT ENERGY - PANOMA COMPRESSOR STATION	S4-T325-R38W, PANOMA BOOSTER STA., KS, 000000000	4922	Other Construction Permit	CSO03293	4/2/2019	4/3/2019	
0810069	Merit Energy - Fletcher Station	S4-T285-R34W, FLETCHER STA., KS, 00000	4922	Other Construction Permit	CSO03274	2/19/2019	4/3/2019	
7770287	HARSHMAN CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	1422	Construction Approval	CSA04251	4/2/2019	4/3/2019	
1890139	MERIT ENERGY - HUGS A Compressor	S3-T335-R39W, HUGS A BOOSTER STATION, KS, 00000	1311	Other Construction Permit	CSO03295	4/2/2019	4/3/2019	
1290065	MERIT ENERGY - WEESE COMPRESSOR STATION	S1-T345-R40W, WEESE/MCCARTH Y, KS, 00000	1311	Other Construction Permit	CSO03291	4/2/2019	4/3/2019	
2090065	Fuchs Lubricants - Kansas City	2140 S 88TH ST, KANSAS CITY, KS, 66111	2992	Construction Approval	CSA04228	3/7/2019	4/4/2019	
2090333	Crown Castle - Painter	23001 139th Street, Kansas City, KS, 66109	4899	Construction Approval	CSA04257	4/3/2019	4/5/2019	

1930041	AT&T Mobility - Rexford Johnson	540 Center Street, Rexford, KS, 67753		4899	Construction Approval	CSA04259	4/3/2019	4/8/2019	CAANSPSJJJ,CA AMACTZZZZ
0070127	AT&T Mobility - Gypsum Mazeine Property	22000 NW US Highway 160, Sun City, KS, 67143		4899	Construction Approval	CSA04262	4/3/2019	4/8/2019	CAANSPSIII
0130043	AT&T Mobility - Fairview Schmitt	2255 Coralberry Road, Fairview, KS, 66425		4899	Construction Approval	CSA04263	4/3/2019	4/8/2019	CAANSPSIII
1030141	AT&T Mobility - MW Towers	25100-25104 211th Street, Leavenworth, KS, 66048		4899	Construction Approval	CSA04260	4/3/2019	4/8/2019	CAANSPSIII
1830023	AT&T Mobility - Lebanon KS Befort	28011 150 Rd, Lebanon, KS, 66952		4812	Construction Approval	CSA04261	4/3/2019	4/8/2019	CAANSPSIII
0410081	AT&T Mobility - Deer Rd & 2500 Ave	Deer Road, Abliene, KS, 67410		4812	Construction Approval	CSA04258	4/3/2019	4/8/2019	CAANSPSIII
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427		1321	Construction Approval	CSA04215	2/12/2019	4/8/2019	CAANSPSOOOO PA
1030012	Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361		9711	Other Construction Permit	CSO03283	2/15/2019	4/9/2019	
1890234	Scout Energy - MTR 09 STATION	S29-T31S-R37W, MTR 9, KS, 67880		1311	Construction Approval	CSA04266	4/5/2019	4/9/2019	
0870035	FREESTATE ELECTRIC COOPERATIVE - Oskaloosa Substation	13952 54TH ST, OSKALOOSA, KS, 66066		4911	Construction Permit	CSP02778	11/16/2018	4/12/2019	CAAMACTZZZZ
0870034	FREESTATE ELECTRIC COOPERATIVE - Lake Wood Substation	7832 FERGUSON RD, OSKALOOSA, KS, 66066		4911	Construction Permit	CSP02777	11/16/2018	4/12/2019	CAAMACTZZZZ
1770251	Philip Billard Airport - WSP USA, Inc.	3600 NE Sardou Ave, Topeka, KS, 66616		4581	Other Construction Permit	CSO03289	3/26/2019	4/12/2019	
0570003	KOCH FERTILIZER DODGE CITY	11559 E. US HWY 50, DODGE CITY, KS, 67801		2873	Other Construction Permit	CSO03279	3/7/2019	4/12/2019	
1250079	CRNF - Coffeyville	701 EAST MARTIN STREET, COFFEYVILLE, KS, 67337	NO PERMIT NEEDED DETERMI NATION	2873	Other Construction Permit	CSO02194	7/27/2018	4/12/2019	
1250079	CRNF - Coffeyville	701 EAST MARTIN STREET, COFFEYVILLE, KS, 67337	PERMIT DETERMI NATION	2873	Other Construction Permit	CSO02195	2/12/2018	4/12/2019	
1630020	CRCT - Plainville Station (crude stor)	3 MI. NORTH OF PLAINVILLE, PLAINVILLE, KS, 00000	INCREASE THROUGH PUT	4612	Other Construction Permit	CSO03297	2/27/2018	4/15/2019	
0910313	Eye Clinc - University of Kansas Health System	7400 State Line Road, Prairie Village, KS, 66208		8062	Construction Approval	CSA04225	3/4/2019	4/16/2019	CAANSPSIII
0910314	Women's Health Specialty Center - University of Kansas Health System	10777 Nail Avenue, Overland Park, KS, 66221		8062	Construction Approval	CSA04226	3/4/2019	4/16/2019	CAANSPSIII
1330023	OBrien Rock - Chanute	302 E. ASH GROVE, CHANUTE, KS, 66720		3273	Construction Permit	CSP02805	4/4/2019	4/16/2019	
1590039	MID-CONTINENT FRACT. & STOR. - MITCHELL FAC. (DEGAS FLR)	S27-T19S-R7W, MITCHELL STA., KS, 00000		1321	Construction Approval	CSA04270	3/18/2019	4/16/2019	CAANSPSJJJ
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210		3721	PSD Construction Permit	CSD00075	11/5/2018	4/17/2019	CAAMACTGG,C AAMACTDDDD D
0670007	BIRLA CARBON USA	3500 SOUTH RD S, ULYSSES, KS, 67880		2895	Other Construction Permit	CSO03276	2/21/2019	4/17/2019	

7770960	APAC Kansas Inc., Shears Division - Portable Crusher #3	NO STREET ADDRESS, PORTABLE, KS, 00000	Portable Rock Crusher	1422	Construction Permit	CSP02808	4/17/2019	4/17/2019	CAANSPSOOO
0950070	NEVILLE WELDING	5581 SW 50TH ST, KINGMAN, KS, 67068		3715	Construction Permit	CSP02756	4/5/2019	4/18/2019	CAAMACTZZZZ, CAANSPSIII,CA AGACTM6H,CA AMACTZZZZ
1590053	Jacam Mfg. - Organoclay Processing	1656 AVE Q, STERLING, KS, 67579	EQUIPME NT NOTIFICA TION	3295	Construction Approval	CSA03958	2/28/2018	4/18/2019	CAANSPSUUU,C AANSPSOOO
1130058	Mid-Continent Fract. & Stor. - Conway West Fac. (flare)	S24, CONWAY STA., KS, 00000		1321	Construction Approval	CSA04252	4/2/2019	4/18/2019	
1970015	Crown Castle - Stice	304 S Washington, Alta Vista, KS, 66834		4899	Construction Approval	CSA04256	4/3/2019	4/19/2019	
1770253	Crown Castle - East Topeka	3346 SE Paulen Road, Topeka, KS, 66605		4899	Construction Approval	CSA04254	4/3/2019	4/19/2019	
1670036	Crown Castle - Wilson	19668 Highway 40, Dorrance, KS, 67634		4899	Construction Approval	CSA04264	4/3/2019	4/19/2019	
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442		9711	Construction Approval	CSA04267	4/5/2019	4/23/2019	
1190039	Verizon Wireless - KS12 Fowler DT	25040 G Road, Fowler, KS, 67844		4899	Construction Approval	CSA04268	4/5/2019	4/23/2019	
0970010	Northern Natural Gas - Mullinville Station	14049 17TH AVE, MULLINVILLE, KS, 67109		4922	Construction Approval	CSA04271	4/16/2019	4/24/2019	CAANSPSKKKK
1770254	Crown Castle - 877881 F1 Mission TWSP Fire Dept Cell Tower	3101 Urish Rd, Topeka, KS, 66614		4899	Construction Approval	CSA04275	4/19/2019	4/24/2019	CAANSPSIII
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	Response applicatio n	2819	Other Construction Permit	CSO03299	4/17/2019	4/24/2019	
0670032	Scout Energy - Ulysses West Main Station	S28-T285-R38W, WEST ULYSSES STA., KS, 00000		1311	Construction Approval	CSA04272	4/17/2019	4/24/2019	
0130044	AT&T Mobility - Reserve KS Sac and Fox Nation Property 2	3227 US 73 highway, Reserve, KS, 66434		4899	Construction Approval	CSA04281	4/23/2019	4/29/2019	CAANSPSIII
1730365	AT&T Mobility - 874419 K2 Cell Tower Site	245 North Kansas Ave, Wichita, KS, 67214		4899	Construction Approval	CSA04274	4/19/2019	4/29/2019	CAAMACTZZZZ, CAANSPSIII
1770255	AT&T Mobility - Dornwood Park Kaiser	2446 Southeast 29th Street, Topeka, KS, 66605		4899	Construction Approval	CSA04280	4/23/2019	4/29/2019	CAANSPSIII
1090026	AT&T Mobility - Winona KS Stricker	2602 County Road 230, Wiona, KS, 67764		4899	Construction Approval	CSA04277	4/23/2019	4/29/2019	CAANSPSIII
0410082	AT&T Mobility - Abilene Southwest	519-T135-R2E, Abilene, KS, 67410		4812	Construction Approval	CSA04282	4/23/2019	4/29/2019	CAANSPSIII
0550174	AT&T Mobility - Garden City North Cornett	3333 North 3rd Street, Garden City, KS, 67846		4812	Construction Approval	CSA04279	4/23/2019	4/29/2019	CAAMACTZZZZ, CAANSPSIII
1350042	AT&T Mobility - Ness City	14049 T Road, Ness City, KS, 67560		4812	Construction Approval	CSA04284	4/23/2019	4/29/2019	CAAMACTZZZZ, CAANSPSIII
0210053	AT&T Mobility - Towerco Opolis	10750 Northwest Highway 171, Pittsburg, KS, 66762		4812	Construction Approval	CSA04278	4/23/2019	4/29/2019	CAAMACTZZZZ, CAANSPSIII
0070128	AT&T Mobility - Kiowa KS Diels	18736 SE Hillside Road, Kiowa, KS, 67070		4812	Construction Approval	CSA04283	4/23/2019	4/29/2019	CAANSPSIII

0550116	Bonanza Bioenergy	2810 EAST US HIGHWAY 50, GARDEN CITY, KS, 67846		2869	Other Construction Permit	CSO03278	2/27/2019	5/1/2019	
0150027	Sherwin-Williams - Andover	630 E. 13TH STREET, ANDOVER, KS, 67002		2851	Other Construction Permit	CSO03275	2/19/2019	5/2/2019	CAAMACTHHH HH
1770229	American Phoenix	7215 SW TOPEKA BLVD, BLDG 9A, PAULINE, KS, 66619		2899	Construction Approval	CSA04273	4/17/2019	5/6/2019	
1830022	Applequist Mfg, Inc.	616 US-36, Smith Center, KS, 66967		3523	Construction Permit	CSP02801	2/28/2019	5/9/2019	
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442		9711	Other Construction Permit	CSO03302	4/5/2019	5/13/2019	
0910158	Intervet - DBA MERCK ANIMAL HEALTH	35500 W 91ST ST, DE SOTO, KS, 66018		8731	Construction Approval	CSA04297	5/10/2019	5/13/2019	
1130090	Verizon Wireless - KS08 Groveland	State Route 445, Groveland, KS, 67546		4899	Construction Approval	CSA04295	5/9/2019	5/13/2019	CAAMACTZZZZ, CAANSPSIII
0290034	Verizon Wireless - KS03 Meredith	398 130th Road, Glasco, KS, 67445		4899	Construction Approval	CSA04296	5/9/2019	5/13/2019	CAAMACTZZZZ, CAANSPSIII
1130079	Producer Ag - Canton Terminal	1407 25TH AVENUE, CANTON, KS, 67428		4221	Construction Permit	CSP02309	1/31/2019	5/17/2019	CAANSPSDD
1110052	Lyon-Coffey Electric Cooperative, Inc. - Thunderbird Substation	2100 Rd F5, Emporia, KS, 66801	Replace engine	4911	Construction Permit	CSP02813	5/9/2019	5/20/2019	CAAMACTZZZZ
1330050	Hi-Lo Industries - Chanute	3928 ROSS LANE, CHANUTE, KS, 66720		2431	Other Construction Permit	CSO03290	3/26/2019	5/20/2019	
0570013	National Beef Packing - Dodge City	2000 EAST TRAIL, DODGE CITY, KS, 67801		2011	Construction Approval	CSA04298	5/10/2019	5/20/2019	
7770042	MARTIN MARIETTA MATERIALS (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000		1422	Construction Approval	CSA04299	5/20/2019	5/21/2019	
1310032	Koch & Co. - Seneca (111 N 1st)	111 N. 1ST STREET, SENECA, KS, 66501		2434	Construction Permit	CSP02809	4/19/2019	5/22/2019	
0550175	ONEOK - Spratt #2 Compressor Station	NW/4 S19-T24S-R33W, Spratt #2, KS, 00000		1311	Construction Approval	CSA04306	5/22/2019	5/22/2019	CAANSPSOOOO, CAANSPSJJJ
1930040	ONEOK-COLBY PUMP STATION	S31-T6S-R32W, COLBY, KS, 67701		4922	Construction Approval	CSA04308	5/22/2019	5/23/2019	
1030139	AT&T Mobility - Williams	17320 Donahoo Road, Basehor, KS, 66007		4899	Construction Approval	CSA04301	5/22/2019	5/23/2019	
0110014	Peerless Products (burn-off oven)	2403 S. MAIN, FORT SCOTT, KS, 667010000		3442	Construction Approval	CSA04304	5/22/2019	5/23/2019	
7770042	MARTIN MARIETTA MATERIALS (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000		1422	Construction Approval	CSA04309	5/22/2019	5/23/2019	
0550176	ONEOK - Spratt #15 Compressor Station	SE/4 S20-T24S-R33W, Spratt #15, KS, 00000		1311	Construction Approval	CSA04307	5/22/2019	5/23/2019	CAANSPSOOOO, CAANSPSJJJ
0030030	East Kansas Agri-Energy	1304 S MAIN ST, GARNETT, KS, 66032		2869	Construction Approval	CSA04229	3/8/2019	5/28/2019	CAANSPSRRR
1650029	IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS, 00000		4922	Construction Approval	CSA04217	2/15/2019	5/29/2019	
0470041	IACX Energy - PEAK Facility (helium recov) (incl 3 dehys)	S29-T24S-R16W, BELPRE, KS, 00000		2813	Construction Approval	CSA04221	2/25/2019	5/31/2019	CAAMACTZZZ
0570013	National Beef Packing - Dodge City	2000 EAST TRAIL, DODGE CITY, KS, 67801		2011	Construction Approval	CSA04312	5/23/2019	5/31/2019	CAANSPSJJJ

1770256	AT&T Mobility - Western and 6th Brennen Funeral Home	519 SW Taylor St, Topeka, KS, 66603	EMG	4899	Construction Approval	CSA04290	5/3/2019	6/3/2019	
0450071	AT&T Mobility - Greg Wilson 2 Eudora	N 1000 Rd , Eudora, KS, 66025		4899	Construction Approval	CSA04291	5/3/2019	6/3/2019	
0150081	AT&T Mobility - Staple Farm 1	4819 SW Santa Fe Lake Road, Towanda, KS, 67144		4899	Construction Approval	CSA04293	5/3/2019	6/3/2019	
1030142	AT&T Mobility - Pritchard	17737 182nd Street, Tonganoxie, KS, 66086		4812	Construction Approval	CSA04292	5/3/2019	6/3/2019	
1250092	Webb & Rodrick Funeral Home (crematory)	306 WEST MAIN STREET, INDEPENDENCE, KS, 67301		7261	Other Construction Permit	CSO03305	5/23/2019	6/4/2019	
0470041	IACX Energy - PEAK Facility (helium recov) (incl 3 dehy)	S29-T24S-R16W, BELPRE, KS, 00000		2813	Construction Approval	CSA04305	5/22/2019	6/4/2019	
1550192	Verizon - Pretty Prairie	4719 W Pretty Prairie Rd, Pretty Prairie, KS, 67570		4899	Construction Approval	CSA04311	5/23/2019	6/6/2019	CAANSPSIII
7770961	Astra Readymix	No Street Address, Portable, KS, 00000		3273	Construction Permit	CSP02821	6/6/2019	6/6/2019	
1310032	Koch & Co. - Seneca (111 N 1st)	111 N. 1ST STREET, SENECA, KS, 66501		2434	Construction Permit	CSP02809	5/23/2019	6/6/2019	CAAMACTJJ
1810021	OWN Resources - North Goodland Station	S8-T7S-R39W, GOODLAND FIELD COMP STA., KS, 00000		4922	Construction Approval	CSA04314	5/30/2019	6/10/2019	CAAMACTHH, CAAMACTZZZ
0150041	Butler Co. Sanitary Landfill	2963 SW 40 ST, ELDORADO, KS, 67042		4953	Construction Approval	CSA04303	5/17/2019	6/11/2019	CAANSPSWWW
7770962	Koss Plant - 253	No street address, Portable, KS, 00000		3273	Construction Permit	CSP02825	6/11/2019	6/11/2019	
1770252	Bettis Contractors, Inc.	1800 NW Brickyard Rd, Topeka, KS, 66618		3441	Construction Approval	CSA04250	4/1/2019	6/12/2019	
0010009	Monarch Cement	PO BOX 1000, HUMBOLDT, KS, 66748		3241	Construction Approval	CSA04313	5/30/2019	6/18/2019	
0670032	Scout Energy - Ulysses West Main Station	S28-T28S-R38W, WEST ULYSSES STA., KS, 00000		1311	Construction Approval	CSA04322	6/7/2019	6/18/2019	
0910319	Karbank Holdings - Shawnee Mission Parkway Building	1900 Shawnee Mission Parkway, Mission Woods, KS, 66205		6512	Construction Approval	CSA04324	6/21/2019	6/21/2019	CAANSPSJJJ
7770963	3MK Construction LLC	No street address, Portable, KS, 00000		3273	Construction Permit	CSP02828	6/21/2019	6/21/2019	
0570013	National Beef Packing - Dodge City	2000 EAST TRAIL, DODGE CITY, KS, 67801	Boiler	2011	Construction Permit	CSP02814	5/10/2019	6/21/2019	CAANSPSDPC
7770964	QBQ INDUSTRIES LLC	No street address, Portable, KS, 00000		1422	Construction Permit	CSP02829	6/21/2019	6/24/2019	CAANSPSOOO
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	No permit needed determination	3275	Other Construction Permit	CSO03303	5/14/2019	6/26/2019	
0630019	Western Plains Energy	S2-T11S-R31W, CAMPUS, KS, 67752	Modify permit	2869	Construction Permit	CSP01028	5/3/2019	6/26/2019	CAANSPSVVPA, CAANSPSPKB

0750012	ONEOK - Bradshaw Station (dehy)	S31-T21S-R40W, BRADSHAW STA., KS, 67878	REPLACE ENGINE	1311	Construction Permit	CSP02779	7/3/2018	6/27/2019	CAAMACTZZZ
0970071	Verizon Wireless - KS13 Greensburg	L Street, Greensburg, KS, 67054		4899	Construction Approval	CSA04321	6/10/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
0150082	Verizon - KS14 Whitewater	305 W 2nd Street, Whitewater, KS, 67154		4899	Construction Approval	CSA04325	6/21/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
0370066	Verizon Wireless - KS15 Arma	199 E Oak Street, Arma, KS, 66712		4899	Construction Approval	CSA04320	6/10/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
0370065	AT&T Mobility - CCT_Arcadia West-12569574	911 East 710 Avenue, Arcadia, KS, 66711		4899	Construction Approval	CSA04331	6/7/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
0850021	AT&T Mobility - Hoyt-10134113	13596 110th Road, Hoyt, KS, 66440		4899	Construction Approval	CSA04316	6/7/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
1910110	AT&T Mobility - Belle Plaine-10094345	910 E 70th Avenue North, Belle Plaine, KS, 67013		4812	Construction Approval	CSA04317	6/7/2019	6/28/2019	CAAMACTZZZ, CAANSPSIII
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042		2911	Construction Approval	CSA04288	4/26/2019	6/28/2019	CAAMACTCC,C AANSPSKPB
1530030	AT&T MOBILITY - ATWOOD	18838 ROAD 21, ATWOOD, KS, 67730		4899	Construction Approval	CSA04330	6/27/2019	7/1/2019	CAAMACTZZZ, CAANSPSIII
0350069	Verizon - KS14 Winfield South	2201 Broadway St, Winfield, KS, 67156		4899	Construction Approval	CSA04319	6/10/2019	7/1/2019	CAAMACTZZZ, CAANSPSIII
0170019	VERIZON WIRELESS - KS09 THURMAN CREEK	433 R ROAD, MATFIELD GREEN, KS, 66862		4899	Construction Approval	CSA04328	6/27/2019	7/1/2019	CAAMACTZZZ, CAANSPSIII
0390021	AT&T MOBILITY - OBERLIN	1490 L LANE, OBERLIN, KS, 67749		4812	Construction Approval	CSA04329	6/27/2019	7/1/2019	CAAMACTZZZ, CAANSPSIII
1550134	Williams Hutch Rail - Hutchinson Term. (NGL stor & load)	407 SOUTH OBEE ROAD, HUTCHINSON, KS, 67501	Install Flare	5171	Construction Permit	CSP02826	5/22/2019	7/2/2019	
0910006	Magellan Pipeline - Olathe Products Breakout Terminal	13745 WEST 135TH STREET, OLATHE, KS, 66061	Approval	5171	Construction Approval	CSA04224	3/4/2019	7/2/2019	
1270012	AGRI TRAILS CO-OP - COUNCIL GROVE	1216 OLD US HWY 56, COUNCIL GROVE, KS, 66846		5153	Construction Approval	CSA04315	6/6/2019	7/3/2019	
1110007	Panhandle Eastern Pipe Line - Olpe Station	985 ROAD 90, OLPE STATION, KS, 668659367	Turbine Replacement	4922	Construction Approval	CSA04327	4/17/2019	7/3/2019	
1330001	Ash Grove Cement - Chanute	1801 N. SANTA FE, CHANUTE, KS, 66720		3241	PSD Construction Permit	CSD00023	4/8/2019	7/3/2019	
0810115	MERIT ENERGY - BOCK JACQUART CTB	S15-T28S-R34W, BOCK JACQUART, KS, 00000		1311	Construction Approval	CSA04340	7/3/2019	7/3/2019	CAAMACTZZZ
1730223	Form Systems	330 CAIN, HAYSVILLE, KS, 67060	New pre-expander	3086	Construction Permit	CSP02807	4/17/2019	7/8/2019	
0150083	CROWN CASTLE - 873855 ROY ANDOVER CELL TOWER	11970 SW 70TH ST, AUGUSTA, KS, 67010		4899	Construction Approval	CSA04342	7/8/2019	7/9/2019	
1290123	Merit Energy - Morton Co. #101 Station	S2-T35S-R41W, MC-101, KS, 00000		1311	Other Construction Permit	CSO03314	7/8/2019	7/9/2019	
0530022	Great Plains Mfg. - Ellsworth	910 E. 8TH STREET, ELLSWORTH, KS, 67439		3523	Construction Approval	CSA04265	4/4/2019	7/12/2019	
0710028	Scouler Co - Horace	S24-T18S-R41W, Horace, KS, 66033		5153	Other Construction Permit	CSO03310	6/25/2019	7/16/2019	
0670074	ONEOK - Tate Unit TE-02 Station	S16-T27S-R37W, TATE TE-02, KS, 00000		1311	Other Construction Permit	CSO03282	3/8/2019	7/16/2019	

1730053	ELEMENT LLC - COLWICH	1 Element Drive, COLWICH, KS, 67030	2869	Construction Permit	CSP02810	4/26/2019	7/17/2019	
0410083	Great Plains Mfg -- Land Pride Abilene West	2150 NW 8th Street, Abilene, KS, 67410	3523	Construction Permit	CSP02830	6/25/2019	7/19/2019	
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	2843	Other Construction Permit	CSO03318	7/19/2019	7/22/2019	
0510001	Fort Hays State University	600 PARK ST., HAYS, KS, 67601	8221	Construction Permit	CSP02824	6/10/2019	7/23/2019	CAAMACTZZZZ, CAANSPSIII
1930002	Cornerstone Ag - Colby (Cnty Rd Q)	2148 COUNTY ROAD Q, COLBY, KS, 67701	5153	Construction Approval	CSA04318	6/10/2019	7/23/2019	CAANSPSDD
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	8221	Construction Approval	CSA04339	7/3/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
0450073	AT&T MOBILITY - CING10098775	4921 WAKARUSA COURT, LAWRENCE, KS, 66045	4899	Construction Approval	CSA04337	7/2/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
0550177	AT&T Mobility - Garden City - Colony Street	2502 East Spruce Street, Garden City, KS, 67846	4899	Construction Approval	CSA04359	7/23/2019	7/24/2019	CAANSPSIII
1930042	SOUTHWESTERN BELL - CLBYKS05	280 E 5TH STREET, COLBY, KS, 67701	4899	Construction Approval	CSA04335	7/2/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
2090335	KCYC Merriam	2933 S 47th Street, Kansas City, KS, 66106	4899	Construction Approval	CSA04349	7/18/2019	7/24/2019	
0450072	AT&T MOBILITY - CING10553641	1736 ENGEL ROAD, LAWRENCE, KS, 66045	4899	Construction Approval	CSA04336	7/2/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
0130045	AT&T Mobility - Whiting	889 K 20 Highway, Horton, KS, 66439	4899	Construction Approval	CSA04354	7/23/2019	7/24/2019	CAANSPSIII
1810031	AT&T Mobility - Kanorado	6416 Road 3, Kanorado, KS, 67741	4899	Construction Approval	CSA04355	7/23/2019	7/24/2019	CAANSPSIII
1770257	AT&T Mobility - Topeka Landon MS	730 SW Fairlawn Rd, Topeka, KS, 66606	4899	Construction Approval	CSA04356	7/23/2019	7/24/2019	
0450074	AT&T Mobility - Hesper	2146 North 1000 Road, Eudora, KS, 66025	4899	Construction Approval	CSA04358	7/23/2019	7/24/2019	CAANSPSIII
2090334	Verizon Wireless - KCYC Quindaro	1500 N 38th Street, Kansas City, KS, 66102	4899	Construction Approval	CSA04348	7/18/2019	7/24/2019	
0850022	AT&T Mobility - Prairie Band	16210 L Road, Mayetta, KS, 66509	4899	Construction Approval	CSA04353	7/23/2019	7/24/2019	CAANSPSIII
0410084	SOUTHWESTERN BELL - HNTNKSNA	1 N A STREET, HERINGTON, KS, 67449	4899	Construction Approval	CSA04334	7/2/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
1030143	AT&T Mobility - Dempsey	23666 175th Street, Leavenworth, KS, 66048	4899	Construction Approval	CSA04357	7/23/2019	7/24/2019	CAANSPSIII
1230031	SOUTHWESTERN BELL - BELTKS02	214 E 2ND STREET, BELOIT, KS, 67420	4899	Construction Approval	CSA04338	7/2/2019	7/24/2019	CAAMACTZZZZ, CAANSPSIII
0910320	AT&T Corp - OLTHKSRS	15085 W 116TH ST, OLATHE, KS, 66062	4812	Construction Approval	CSA04333	7/2/2019	7/24/2019	
1110036	CAMSO MFG. USA	1601 E SOUTH AVE, EMPORIA, KS, 66801	3061	Construction Approval	CSA04361	4/9/2019	7/24/2019	
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427	1321	Construction Approval	CSA04341	7/8/2019	7/24/2019	CAANSPSOOOO PA
0710014	Tumbleweed Midstream - Bradshaw Station (dehy)	S24-T20S-R40W, BRADSHAW BOOSTER STATION, KS, 00000	1311	Other Construction Permit	CSO03316	4/3/2019	7/24/2019	CAAMACTZZZZ

1550171	ONEOK NGL PIPELINE - HUTCHINSON JUNCTION STATION	S20-T23S-R6W, HUTCHINSON JUNCTION BOOSTER, KS, 00000	Pipeline tie-in	4619	Construction Approval	CSA04286	4/25/2019	7/25/2019	
0670032	Scout Energy - Ulysses West Main Station	S28-T28S-R38W, WEST ULYSSES STA., KS, 00000		1311	Construction Approval	CSA04346	7/18/2019	7/25/2019	CAAMACTZZZZ
0210054	US Cellular - McCune	10961 NW 110th Street, McCune, KS, 66753	EMG	4899	Construction Approval	CSA04379	7/26/2019	7/26/2019	CAANSPSJJJ
0510001	Fort Hays State University	600 PARK ST., HAYS, KS, 67601		8221	Construction Permit	CSP02820	4/19/2019	7/29/2019	CAAMACTZZZZ, CAANSPSIII, CAANSPDP
0250038	AT&T Mobility - Ashland KS	521 East 12th Avenue, Ashland, KS, 67831		4899	Construction Approval	CSA04378	7/26/2019	7/29/2019	CAAMACTZZZZ, CAANSPSIII
1110053	AT&T Mobility - Road E & Road 190	400 Road 190, Emporia, KS, 66801		4899	Construction Approval	CSA04377	7/26/2019	7/29/2019	CAAMACTZZZZ, CAANSPSIII
1770258	Crown Castle - Fairlawn/Dudley	5921 Fairlawn, Topeka, KS, 66619		4899	Construction Approval	CSA04374	7/26/2019	7/29/2019	CAANSPSIII
1730372	AT&T Mobility - High Park	9628 Meadowlark Blvd., Derby, KS, 67037		4812	Construction Approval	CSA04376	7/26/2019	7/29/2019	CAAMACTZZZZ, CAANSPSIII
1030142	AT&T Mobility - Pritchard	17737 182nd Street, Tonganoxie, KS, 66086		4812	Construction Approval	CSA04375	7/26/2019	7/29/2019	CAAMACTZZZZ, CAANSPSIII
0150077	DJ ENGINEERING	219 W 6TH AVE, AUGUSTA, KS, 67010	AEROSPACE MANUFACTURING	3728	Construction Permit	CSP02765	7/9/2018	7/29/2019	CAAMACT6X
1250064	John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337		3566	Other Construction Permit	CSO03315	7/11/2019	7/30/2019	
2090060	Magellan Pipeline - Kansas City Products Breakout Terminal	401 E. DONOVAN ROAD, KANSAS CITY, KS, 66115		5171	Construction Approval	CSA01811	5/24/2019	7/31/2019	
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	APPL DETERMINATION MACT 5D	2873	Construction Permit	CSP02827	10/12/2017	7/31/2019	CAAMACTDDD DD
1730370	City of Wichita - Hess	1401 Museum Blvd, Wichita, KS, 67226		4941	Construction Approval	CSA04352	7/22/2019	8/1/2019	CAANSPSIII
1730369	City of Wichita - Cheney Pump Station	39500 W 21st St N, Wichita, KS, 67025		4941	Construction Approval	CSA04351	7/22/2019	8/1/2019	CAANSPSIII
1730368	City of Wichita - Webb Rd Pump Station	2233 N Webb Rd, Wichita, KS, 67226		4941	Construction Approval	CSA04350	7/22/2019	8/1/2019	CAANSPSIII
0010054	AT&T Mobility - CCT Humboldt	7530 West 399th Street, La Cygne, KS, 66040		4899	Construction Approval	CSA04372	7/26/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
1210047	AT&T Mobility -- CCT Osawatome West	39700 Stanton Road, Osawatome, KS, 66064		4899	Construction Approval	CSA04370	7/25/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
0590046	AT&T Mobility - CCT Pomona	315 West Franklin, Pomona, KS, 66076		4899	Construction Approval	CSA04369	7/25/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
0730033	AT&T Mobility - CCT Severy	152 South Road, Severy, KS, 67137		4899	Construction Approval	CSA04368	7/25/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
0350070	AT&T Mobility - UDAL	2694 K55, Udall, KS, 67146		4899	Construction Approval	CSA04373	7/26/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
0570104	AT&T Mobility - Wright KS Rost Farm 3	11680 Highway 50, Wright, KS, 67882		4899	Construction Approval	CSA04366	7/25/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII
1210046	AT&T Mobility - Bill Jones	Highway 68, Paola, KS, 66071		4899	Construction Approval	CSA04367	7/25/2019	8/2/2019	CAAMACTZZZZ, CAANSPSIII

1730371	Verizon Wireless - WICC Hidden Lakes	6210 S 127th Street East, Derby, KS, 67037		4899	Construction Approval	CSA04360	7/10/2019	8/2/2019	CAAMACTZZZ, CAANSPSIII
1070041	AT&T Mobility - CCT Linn Valley	1324 Florida Road, Humboldt, KS, 66748		4899	Construction Approval	CSA04371	7/25/2019	8/2/2019	CAAMACTZZZ, CAANSPSIII
0210053	AT&T Mobility - Towerco Opolis	10750 Northwest Highway 171, Pittsburg, KS, 66762		4812	Construction Approval	CSA04364	7/25/2019	8/2/2019	CAAMACTZZZ, CAANSPSIII
0410081	AT&T Mobility - Deer Rd & 2500 Ave	Deer Road, Abilene, KS, 67410		4812	Construction Approval	CSA04365	7/25/2019	8/2/2019	CAAMACTZZZ, CAANSPSIII
0410082	AT&T Mobility - Abilene Southwest	S19-T13S-R2E, Abilene, KS, 67410		4812	Construction Approval	CSA04363	7/25/2019	8/2/2019	
1890243	Merit Energy - HUGS E	S4-T33S-R38W, HUGS E, KS, 00000	Oil and Gas	1311	Construction Permit	CSP02836	8/2/2019	8/5/2019	CAAMACTZZZ
1730005	McConnell Air Force Base	57830 Pittsburg Street Suite 120, WICHITA, KS, 67221		9711	Other Construction Permit	CSO03319	7/24/2019	8/6/2019	
1730005	McConnell Air Force Base	57830 Pittsburg Street Suite 120, WICHITA, KS, 67221		9711	Construction Permit	CSP02832	7/8/2019	8/6/2019	CAAMACTZZZ, CAANSPSIII
0670024	Scout Energy - Ulysses West C Station	S9-T27S-R38W, WEST ULYSSES C, KS, 00000	New Engines	4922	Construction Approval	CSA04380	7/26/2019	8/6/2019	CAAMACTZZZ
0930017	ETC TEXAS PIPELINE - HUGOTON #7 STATION	S27-T26S-R35W, Lakin, KS, 00000	Engine Swing	4922	Construction Approval	CSA04381	7/23/2019	8/6/2019	
1910064	Triumph Accessory Service	411 N West Rd, WELLINGTON, KS, 67152	New paint booth	3728	Construction Approval	CSA04294	5/9/2019	8/8/2019	
0930010	Scout Energy - Ulysses North Main Station	S16-T26S-R38W, Lakin, KS, 67860	New engine	1311	Construction Approval	CSA04383	7/29/2019	8/8/2019	
1690037	Crestwood Inc.	601 E. WATER WELL RD., SALINA, KS, 67401		2434	Other Construction Permit	CSO03301	5/6/2019	8/9/2019	
2090002	Buzzi Unicem USA - Bonner Springs	12200 KAW DRIVE, BONNER SPRINGS, KS, 66012		3273	Construction Approval	CSA04345	7/8/2019	8/12/2019	
1730052	BOMBARDIER AEROSPACE LEARJET	One Learjet Way, WICHITA, KS, 67209		3721	Construction Permit	CSP02833	7/18/2019	8/19/2019	CAAMACTGG
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042		2911	Construction Approval	CSA04289	4/26/2019	8/19/2019	CAAMACTCC,C AANSPSKPB
7770659	MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS, 00000	Adding equipment to MEL	1422	Construction Approval	CSA04388	8/15/2019	8/19/2019	CAANSPSOOO
0230035	STONES THROW COMPRESSOR STA - Foundation Energy	S33-T3S-R42W, STONES THROW COMPRESSOR STA, KS, 00000	Modify construction approval language	1311	Construction Approval	CSA04287	4/25/2019	8/19/2019	CAAMACTHH
0230045	Scouler - Goodland	Hwy 27 & County Rd E, Goodland, KS, 67735	Permit determination - grain facility		Other Construction Permit	CSO03320	7/22/2019	8/20/2019	
0470012	Natural Gas Pipeline of America - Kinsley Station 193	S27-T24S-R20W, KINSLEY, KS, 67547	EMG	4922	Construction Approval	CSA04396	8/19/2019	8/21/2019	
0670188	Scout Energy - SLC B-36 Station	S13-T30S-R36W, SLC B-36, KS, 00000	Replace engine	1311	Construction Approval	CSA04392	8/19/2019	8/21/2019	
0910006	Magellan Pipeline - Olathe Products Breakout Terminal	13745 WEST 135TH STREET, OLATHE, KS, 66061	Approval	5171	Construction Approval	CSA04224	3/4/2019	8/22/2019	

0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Approval	2911	Construction Approval	CSA04362	7/23/2019	8/22/2019	
0950071	Skyland Grain - Kingman	4400 NW 50th St., Kingman, KS, 67068	Grain storage	5153	Construction Approval	CSA04391	8/2/2019	8/23/2019	
1410008	Scoular Co. - Downs	709 Commercial St, Downs, KS, 67764	Dryer	5153	Construction Approval	CSA04389	8/15/2019	8/23/2019	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	TK-159 and TK-167	2911	Construction Approval	CSA04382	8/1/2019	8/23/2019	
7770018	MIDWEST MINERALS (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	MEL updates	1422	Construction Approval	CSA04398	8/16/2019	8/23/2019	
7770625	WHITAKER COMPANIES (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 66720	MEL update	1422	Construction Approval	CSA04399	8/16/2019	8/23/2019	
0670030	Scout Energy - Ulysses South Main Station	S5-T30S-R38W, ULYSSES SOUTH M STA., KS, 00000	Replace engine	1311	Construction Approval	CSA04393	8/20/2019	8/23/2019	
7770287	HARSHMAN CONST. (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 000000000	New equipment	1422	Construction Approval	CSA04397	8/19/2019	8/26/2019	CAANSPSOOOO
1890057	ONEOK - STV8-01 Station	S14-T32S-R37W, STV 8-01, KS, 00000	New tank & FEL	1311	Construction Permit	CSP02839	8/23/2019	8/29/2019	
7770965	Sunbelt Rock	NO STREET ADDRESS, PORTABLE, KS, 00000	Portable rock crusher	1422	Construction Permit	CSP02840	8/29/2019	9/4/2019	CAANSPSOOO
1610007	Kansas State University - Manhattan	FACILITIES POWER PLANT, MANHATTAN, KS, 66506	EMG	8221	Construction Approval	CSA04405	8/28/2019	9/6/2019	CAAMACTZZZZ, CAANSPSIII
2090336	Strawberry Hill - The University of KS Health System	901 N 5th Street, Kansas City, KS, 66101	EMG	8063	Construction Approval	CSA04387	8/12/2019	9/6/2019	
1590015	Southern Star Central - Lyons Station	1746 Ave M, Lyons, KS, 67554	EMG	4922	Construction Approval	CSA04408	8/27/2019	9/6/2019	CAAMACTZZZZ, CAANSPSJJJ
1850003	Southern Star Central - Stafford Station	909 SE 60th St., Stafford, KS, 67578	EMG	4922	Construction Approval	CSA04418	8/27/2019	9/6/2019	CAAMACTZZZZ, CAANSPSJJJ
0210002	Empire District Electric - Riverton	7240 SE HWY 66, RIVERTON, KS, 66770	EMG	4911	Construction Approval	CSA04410	9/3/2019	9/6/2019	CAAMACTZZZZ, CAANSPSJJJ
0530027	Verizon Wireless - KS08 Wilson DT	213 Avenue D, Wilson, KS, 67490	EMG	4899	Construction Approval	CSA04401	8/19/2019	9/6/2019	CAANSPSIII
0570105	AT&T Mobility - KSL05178 Dodge City North RS Candidate A	10825 104 Road, Dodge City, KS, 67801	EMG	4812	Construction Approval	CSA04390	8/12/2019	9/6/2019	CAAMACTZZZZ, CAANSPSJJJ
1210048	Crown Castle - Spring Hill Cell Tower	22172 Lone Elm Road, Spring Hill, KS, 66083	EMG	4812	Construction Approval	CSA04406	8/27/2019	9/6/2019	
0910148	HONEYWELL INTERNATIONAL - OLATHE	23500 WEST 105TH STREET, OLATHE, KS, 66061	VOC Limit	3812	Construction Permit	CSP02811	5/3/2019	9/6/2019	
1730107	Wesley Medical Center	550 N. HILLSIDE, WICHITA, KS, 672140000	2 EMGs	8062	Construction Approval	CSA04407	8/28/2019	9/10/2019	CAANSPSIII
1730309	Spirit Aerosystems - Wichita	3801 S OLIVER ST, WICHITA, KS, 67210	EMG	3721	Construction Approval	CSA04385	8/6/2019	9/10/2019	CAAMACTZZZZ, CAANSPSIII
0370012	Masonite Corporation	911 E. JEFFERSON ST., PITTSBURG, KS, 66762	Construction Response	3442	Other Construction Permit	CSO03311	7/1/2019	9/10/2019	
0390022	Decatur County Beef, LLC	2361 HWY 83, Oberlin, KS, 67749	Natural gas fired boiler	0211	Construction Approval	CSA04404	8/20/2019	9/10/2019	CAANSPSDPC

0910322	Southlake Investments SPE, LLC	11300 Corporate Ave, Lenexa, KS, 66219	EMG		Construction Approval	CSA04394	8/20/2019	9/10/2019	
0910321	Verizon Wireless - Lenexa MTSO	9725 Pflumm Road, Lenexa, KS, 66215	EMG	4899	Construction Approval	CSA04384	8/5/2019	9/11/2019	CAAMACTZZZZ, CAANSPSIIII
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	Response	2819	Other Construction Permit	CSO03325	8/12/2019	9/12/2019	
0670190	Scout Energy - SLC B-34 Station	S1-T30S-R36W, SLC B-34, KS, 00000	Replace engine	1311	Construction Approval	CSA04420	9/4/2019	9/12/2019	CAAMACTZZZZ, CAANSPSJJJJ
0670196	Scout Energy - SLC A-51 Station	S25-T29S-R35W, SLC A-51, KS, 00000	Replace engine	1311	Construction Approval	CSA04421	9/3/2019	9/12/2019	CAAMACTZZZZ, CAANSPSJJJJ
0330176	Southwestern Bell - CDWRKSLU	303 North Central Ave, Coldwater, KS, 67029	EMG	4899	Construction Approval	CSA04435	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0390023	Southwestern Bell - OBRLKSHA	125 E Hall St, Oberlin, KS, 67749	EMG	4899	Construction Approval	CSA04428	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1590059	Southwestern Bell - CHASKSWE	200 East Carpenter Ave, Chase, KS, 67524	EMG	4899	Construction Approval	CSA04434	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0470042	Southwestern Bell - KNSLKSNI	716 Niles Ave, Kinsley, KS, 67547	EMG	4899	Construction Approval	CSA04431	9/9/2019	9/13/2019	
0170020	Southwestern Bell - CTFLKSBR	201 Broadway St, Cottonwood Falls, KS, 66845	EMG	4899	Construction Approval	CSA04433	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0890018	Southwestern Bell - MNKTKSCO	212 N Commercial Street, Mankato, KS, 66956	EMG	4899	Construction Approval	CSA04438	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1830024	Southwestern Bell - SMCTKSMA	216 S Main Street, Smith Center, KS, 66967	EMG	4899	Construction Approval	CSA04430	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0070129	Southwestern Bell - MDLKS01	200 W 1st Ave, Medicine Lodge, KS, 67104	EMG	4899	Construction Approval	CSA04432	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0150085	Southwestern Bell - TWNDKSJERLO	213 N 6th Street, Towanda, KS, 67144	EMG	4899	Construction Approval	CSA04427	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1150052	Southwestern Bell - MARNKSLA	704 E Lawrence St, Marion, KS, 66861	EMG	4812	Construction Approval	CSA04429	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0150084	Southwestern Bell - WCHTKSRH	120 E Silknitter St, Rose Hill, KS, 67133	EMG	4812	Construction Approval	CSA04425	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1450045	Southwestern Bell - LRNDKSBRRS0	802 Broadway Street, Larned, KS, 67550	EMG	4812	Construction Approval	CSA04439	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
0770276	Southerwestern Bell - ANTHKSWS	224 W Steadman Street, Anthony, KS, 67003	EMG	4812	Construction Approval	CSA04437	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1250140	Southwestern Bell - CHVAKSEM	200 E Main St, Cherryvale, KS, 67335	EMG	4812	Construction Approval	CSA04426	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1570035	Southwestern Bell - BLVKSMS	2205 M Street, Belleville, KS, 66935	EMG	4812	Construction Approval	CSA04436	9/9/2019	9/13/2019	CAAMACTZZZZ, CAANSPSIIII
1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337	Gasoline Tank Replacement	2911	Construction Approval	CSA04422	7/19/2019	9/13/2019	
1130055	Mid-Continent Fract. & Stor. - Conway East Fac. (flare)	1299 8th Avenue, McPherson, KS, 67460	Approval	1321, 4925	Construction Approval	CSA04403	8/22/2019	9/13/2019	

1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337	Administrative amendment - modification to construction approval	2911	Construction Approval	CSA04422	9/19/2019	9/19/2019	CAAMACTCC
0910330	Saint Luke's Community Hospital - South Overland Park	7651 West 119th St, Overland Park, KS, 66085	EMG	8062	Construction Approval	CSA04456	9/3/2019	9/20/2019	CAAMACTZZZ, CAANSPSIII
1250097	REP KANSAS GATHERING	S26-T31S-R16E, BOORIGIE COMPRESSOR STATION, KS, 00000		4922	Construction Approval	CSA04211	2/11/2019	9/20/2019	
1750009	MERIT ENERGY - SANTA FE BOOSTER STATION	Section 27, T33S, R33W, Liberal, KS, 67905	Engine & Dehydrator	4922	Construction Permit	CSP02841	9/3/2019	9/20/2019	CAAMACTHH, CAAMACTZZZ
1550193	Verizon Wireless - KS14 Cheney Lake	9718 E Boundary Road, Mt. Hope, KS, 67108	EMG	4899	Construction Approval	CSA04386	8/9/2019	9/20/2019	CAANSPSIII
0910323	Verizon Wireless - KCYC Shawnee PD	11665 65th Street, Shawnee, KS, 66216	EMG	4899	Construction Approval	CSA04423	9/4/2019	9/20/2019	CAANSPSIII
1630038	AT&T Mobility - Palco RS	255 West Road, Palco, KS, 67657	EMG	4899	Construction Approval	CSA04441	9/9/2019	9/20/2019	CAANSPSIII
0050041	AT&T Mobility - Effingham RS Candidate C	7308 Dickinson Road, Effingham, KS, 66023	EMG	4899	Construction Approval	CSA04443	9/9/2019	9/20/2019	CAAMACTZZZ, CAANSPSJJJ
0150086	AT&T Mobility - Potwin RS Candidate B	7963 NW 80th Street, Potwin, KS, 67123	EMG	4899	Construction Approval	CSA04442	9/9/2019	9/20/2019	CAAMACTZZZ, CAANSPSIII
1670037	AT&T Mobility - Waldo	18906 US Highway 281, Waldo, KS, 67673	EMG	4812	Construction Approval	CSA04440	9/9/2019	9/20/2019	
0550173	F & F Iron & Metal Co.	3710 Jones Avenue, Garden City, KS, 67846		3341	Construction Approval	CSA04249	4/1/2019	9/20/2019	CAAMACTRRR
1130003	CHS McPherson Refinery	1391 IRON HORSE ROAD, MCPHERSON, KS, 67460	EMG	2873	Construction Approval	CSA04419	9/10/2019	9/20/2019	CAAMACTZZZ, CAANSPSIII
0470041	IACX Energy - PEAK Facility (helium recov) (incl 3 dehy)	S29-T24S-R16W, BELPRE, KS, 00000	Engine	2813	Construction Approval	CSA04417	9/5/2019	9/20/2019	
1250097	REP KANSAS GATHERING	S26-T31S-R16E, BOORIGIE COMPRESSOR STATION, KS, 00000		4922	Construction Approval	CSA04459	2/11/2019	9/23/2019	CAAMACTZZZ
0910328	Saint Luke's Community Hospital - North Overland Park	7246 W 75th St, Overland Park, KS, 66204	EMG	8062	Construction Approval	CSA04453	9/3/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0910325	Saint Luke's Community Hospital - Roeland Park	4720 Johnson Dr, Roeland Park, KS, 66205	EMG	8062	Construction Approval	CSA04450	9/3/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0910329	Saint Luke's Community Hospital - Shawnee	14950 W 67th St, Shawnee, KS, 66216	EMG	8062	Construction Approval	CSA04454	9/3/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0910326	Saint Luke's Community Hospital - Leawood	13200 State Line Rd, Leawood, KS, 66209	EMG	8062	Construction Approval	CSA04452	9/3/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0430029	AT&T Mobility - White Cloud Edie North	410 N Q St, White Cloud, KS, 66094	EMG	4812	Construction Approval	CSA04461	9/20/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0870036	Verizon Wireless - Grantville	2881 31st St, Grantville, KS, 66617	EMG	4812	Construction Approval	CSA04447	9/5/2019	9/27/2019	CAAMACTZZZ, CAANSPSIII
0450066	CritiTech Drug Development Services LLC	1849 E 1450 ROAD, LAWRENCE, KS, 66044		2834	Construction Permit	CSP02822	6/6/2019	9/27/2019	
2090337	Saint Luke's Community Hospital - Legends	10544 Parallel Parkway, Kansas City, KS, 66109	EMG	8062	Construction Approval	CSA04455	9/3/2019	9/30/2019	

0670032	Scout Energy - Ulysses West Main Station	S28-T28S-R38W, WEST ULYSSES STA., KS, 00000	Engine swing	1311	Construction Approval	CSA04462	9/25/2019	9/30/2019	CAAMACTZZZZ
1730374	Verizon Wireless - WICC Sedgwick County Park	1101 N Dougherty Avenue, Wichita, KS, 67212	EMG	4899	Construction Approval	CSA04445	9/6/2019	10/1/2019	CAANSPSIII
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	Response - 2843 STMP Process	2843	Other Construction Permit	CSO03332	9/6/2019	10/1/2019	
2090062	Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106	Response - 2843 installing fume hood	2843	Other Construction Permit	CSO03322	7/23/2019	10/1/2019	
0910327	Saint Luke's Community Hospital - Olathe	13405 S Black Bob Rd, Olathe, KS, 66062	EMG	8062	Construction Approval	CSA04451	9/3/2019	10/2/2019	CAAMACTZZZZ, CAANSPSIII
1130091	Bluestem Pipeline LLC - Conway Pump Station	S25-T19S-R5W, McPherson, KS, 67460	National Gas Pump Station	4923	Construction Approval	CSA04416	9/3/2019	10/3/2019	
0670182	Scout Energy - SLC A-70 (FORMERLY-MCCABE 1-3) STATION	S3-T29S-R35W, MCCABE 1-3, KS, 00000	Engine swing	1311	Construction Approval	CSA04467	10/2/2019	10/3/2019	CAANSPSJJJ
1130092	Bluestem Pipeline LLC	839 Kiowa Road, McPherson, KS, 67460	New natural gas pipeline connections	4923	Construction Approval	CSA04457	9/16/2019	10/4/2019	
0950010	Farrar Corp. - Norwich	142 WEST BURNS, NORWICH, KS, 67118	Permit determination	3321	Construction Approval	CSA04444	4/17/2019	10/4/2019	CAAMACTZZZZ
7770004	ASH GROVE AGGREGATES (MASTER EQUIP LIST)	NO STREET ADDRESS, PORTABLE, KS, 00000	MEL	1422	Construction Approval	CSA04468	10/2/2019	10/4/2019	CAANSPSOOO
1030144	Saint Luke's Cushing Hospital	711 Marshall St, Leavenworth, KS, 66048	EMG	8062	Construction Approval	CSA04449	9/3/2019	10/7/2019	
7770966	IEA Constructors	11120 Harper Rd, Thayer, KS, 66776	Portable rock crushers	1422	Construction Permit	CSP02843	10/4/2019	10/7/2019	CAANSPSOOO
0470041	IACX Energy - PEAK Facility (helium recov) (incl 3 dehy)	S29-T24S-R16W, BELPRE, KS, 00000	Engine	2813	Construction Approval	CSA04460	9/20/2019	10/8/2019	CAAMACTZZZZ, CAANSPSJJJ
1250049	Emerald Transformer PPM LLC	2474 US HWY 169, COFFEYVILLE, KS, 67337		4953	Construction Permit	CSP02792	12/27/2018	10/9/2019	
1750050	DCP OPERATING - HITCH STATION	S36-T32S-R34W, HITCH COMP. STA., KS, 00000		4922	Other Construction Permit	CSO03313	7/3/2019	10/9/2019	
1130087	MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 KIOWA RD, MCPHERSON, KS, 67460	OPPL meter upgrades	4619	Construction Approval	CSA04458	9/16/2019	10/11/2019	
0030009	Southern Star Central - Welda Station (dehy)	19209 SW MARYLAND RD, WELDA, KS, 66091	Response	4922	Other Construction Permit	CSO03335	9/27/2019	10/14/2019	
0530002	ONEOK Hydrocarbon - Bushton Complex (fractionator)	777 Ave Y, Bushton, KS, 67427		1321	Construction Permit	CSP02834	7/24/2019	10/14/2019	CAANSPSOOO PA, CAANSPSPDB
0210023	Jayhawk Fine Chemicals Corp	8545 SE JAYHAWK DRIVE, GALENA, KS, 66739		2869	Other Construction Permit	CSO03312	7/2/2019	10/15/2019	
1030144	Saint Luke's Cushing Hospital	711 Marshall St, Leavenworth, KS, 66048	Boiler	8062	Construction Approval	CSA04463	9/23/2019	10/17/2019	CAAMACTJJJJ
0910150	St. Lukes South-St. Lukes Hospital - Shawnee Mission	12300 METCALF AVE., OVERLAND PARK, KS, 66211	Boilers	8062	Construction Approval	CSA04464	9/16/2019	10/17/2019	CAAMACTJJJJ

0450006	API AMERICAS	3841 GREENWAY CIRCLE, LAWRENCE, KS, 66046	New equipment	3497	Construction Permit	CSP02844	9/10/2019	10/17/2019	CAAMACTJJJJ
0810056	Merit Energy - Jones Station	S3-T28S-R3W, JONES STA., KS, 00000		1311	Construction Permit	CSP02804	4/2/2019	10/17/2019	CAAMACTZZZZ
1850050	Verizon Wireless - KS13 Stafford Repeater	S14-T24S-R12W, Stafford, KS, 67578	EMG	4899	Construction Approval	CSA04472	10/3/2019	10/18/2019	CAANSPSIII
0910324	Verizon, Lessee - Shawnee Mission Pkwy	5351 Martway St, Mission, KS, 66205	EMG	4899	Construction Approval	CSA04448	9/3/2019	10/18/2019	CAAMACTZZZZ, CAANSPSIII
1110054	Verizon Wireless - KS15 Neosho Rapids	S29-T19S-R13E, Neosho Rapids, KS, 66864	EMG	4899	Construction Approval	CSA04470	9/30/2019	10/18/2019	CAANSPSIII
1670038	Verizon Wireless - KS07 Gorham Repeater	S31-T13S-R15W, Gorham, KS, 67640	EMG	4899	Construction Approval	CSA04471	9/30/2019	10/18/2019	CAANSPSIII
1730019	TEXTRON AVIATION - WEST CAMPUS	One Cessna Boulevard, Wichita, KS, 67215	EMG	3721	Construction Approval	CSA04473	9/30/2019	10/18/2019	CAAMACTZZZZ, CAANSPSIII
0910318	Novation iQ	9806 Lackman Rd, Lenexa, KS, 66219		3086	Construction Approval	CSA04300	5/20/2019	10/18/2019	
0910318	Novation iQ	9806 Lackman Rd, Lenexa, KS, 66219	Printing equipment	3086	Construction Approval	CSA04409	9/3/2019	10/18/2019	
1330030	Chanute Mun. Power Plant #2	1415 N GARFIELD AVE, CHANUTE, KS, 66720	Turbine Maintenance	4911	Other Construction Permit	CSO03336	10/10/2019	10/22/2019	CAANSPSGG
1510053	NEXT GINERATION - PRATT	80105 W US HWY 54, PRATT, KS, 67124		0724	Construction Permit	CSP02816	5/22/2019	10/23/2019	
1670029	Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665		2869	Construction Approval	CSA04323	6/12/2019	10/25/2019	CAANSPSVVV,C AANSPSKPB
0910317	Cintas Corporation	9333 E 35th St N, Wichita, KS, 67226	Laundering facility	7218	Construction Approval	CSA04285	4/23/2019	10/28/2019	
1730366	Cintas Corporation	2050 East Kansas City Road, Olathe, KS, 66061		7218	Construction Permit	CSP02818	5/24/2019	10/28/2019	
1750114	Arkalon Ethanol	8664 COUNTY ROAD P, LIBERAL, KS, 67901	Modification of Conditions	2869	Construction Approval	CSA04474	9/13/2019	10/28/2019	CAANSPSDD
1750114	Arkalon Ethanol	8664 COUNTY ROAD P, LIBERAL, KS, 67901		2869	Construction Permit	CSP02815	5/14/2019	10/28/2019	CAAMACTZZZZ, CAANSPSIII,CA ANSPSPDB,CAANSPSKPB
1470030	PRAIRIE VALLEY FEEDERS	1350 W Granite Rd, Long Island, KS, 67664	Boiler	0211	Construction Approval	CSA04481	10/17/2019	10/28/2019	CAANSPSPDC
1230026	Great Plains Mfg. - Tipton	607 N. MAIN STREET, TIPTON, KS, 67485	Replace paint booth	3523	Construction Approval	CSA04395	8/16/2019	10/29/2019	
0910318	Novation iQ	9806 Lackman Rd, Lenexa, KS, 66219	Approval Modification	3086	Construction Approval	CSA04300	10/22/2019	10/29/2019	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Debottlenecking Project	2911	PSD Construction Permit	CSD00080	12/13/2018	10/30/2019	CAAMACTDDD, CAAMACTZZZZ, CAAMACTUUU, CAANSPSJJJ,CAANSPSGGPA,C AANSPSKPB,CAANSPSJPA,CAANSPSJ,CAANSPSPDB

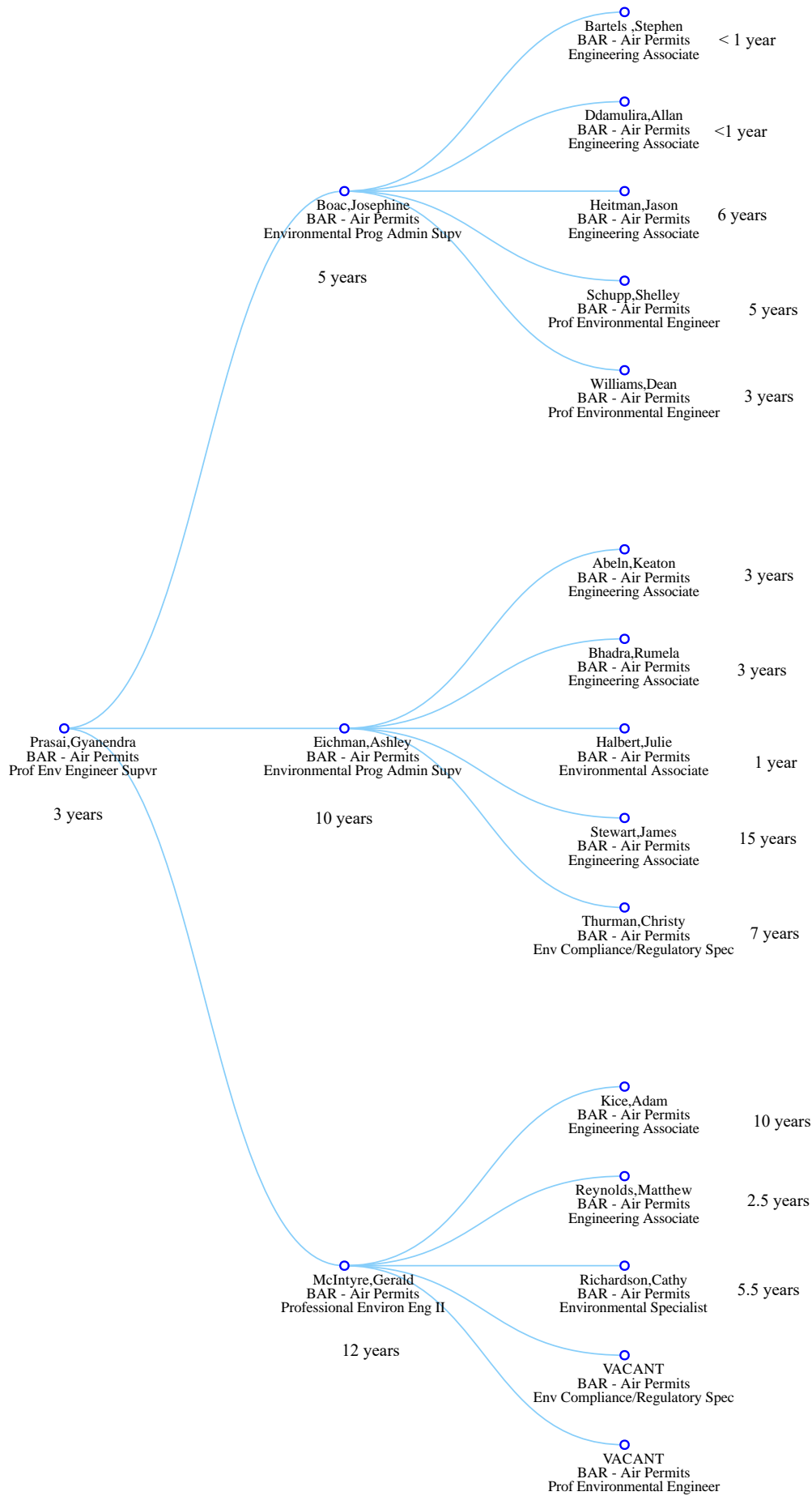
1730375	City of Wichita - Wastewater Plant 3	4182 N. 135th St. E., Wichita, KS, 67277	Cowskin Creek Water Quality Reclamation Facility	9511	Construction Approval	CSA04486	10/1/2019	10/31/2019	CAAMACTZZZZ
1730376	City of Wichita - Wastewater Plant 1	15800 E Harry, Wichita, KS, 67230	Four Mile Creek Water Reclamation Facility	9511	Construction Approval	CSA04492	10/1/2019	10/31/2019	CAAMACTZZZZ
1730322	City of Wichita - Wastewater Plant 2	2305 E. 57TH ST. S., WICHITA, KS, 67216	Lower Arkansas Water Quality Reclamation Facility	4952	Construction Approval	CSA04485	9/19/2019	10/31/2019	CAANSPSIII
0010019	IOLA MUN. POWER PLANT #2	1300 S. WASHINGTON ST., IOLA, KS, 66749	Two engines	4911	Construction Permit	CSP02838	8/14/2019	10/31/2019	CAAMACTZZZZ
1250003	CRRM Refinery	400 NORTH LINDEN, COFFEYVILLE, KS, 67337		2911	PSD Construction Permit	CSD00079	12/12/2018	10/31/2019	CAAMACTUUU, CAAMACTCC, CAANSPSGGPA, CAANSPSJPA
0990065	Dayton Superior - Parsons	1900 WILSON AVE, PARSONS, KS, 67357		3315, 3449	Construction Approval	CSA04478	6/12/2019	11/5/2019	CAAMACTDDD DD
1910111	Cellular Network Partners - Caldwell DT	23 E 7th Ave, Caldwell, KS, 67022	Emergency Generator	4899	Construction Approval	CSA04491	10/22/2019	11/6/2019	CAAMACTZZZZ, CAANSPSJJJ
0770277	Cellular Network Partners - Bluff City	771 SE 80th Ave, Bluff City, KS, 67018	Emergency Generator	4899	Construction Approval	CSA04489	10/22/2019	11/6/2019	CAAMACTZZZZ, CAANSPSIII
0770279	Cellular Network Partners - Freeport	990 E Hwy 44, Freeport, KS, 67049	Emergency Generator	4899	Construction Approval	CSA04497	10/22/2019	11/6/2019	CAAMACTZZZZ, CAANSPSIII
0350071	Cellular Network Partners - Burden	21180 152nd St, Burden, KS, 67019	Emergency Generator	4899	Construction Approval	CSA04490	10/22/2019	11/6/2019	CAAMACTZZZZ, CAANSPSIII
1770007	Goodyear Tire & Rubber	2000 NW US Hwy 24, Topeka, KS, 66601	Temporary Natural Gas Boiler	3011	Construction Approval	CSA04488	10/22/2019	11/6/2019	
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	Silica Catalyst Dense Phase Transfer System	2819	Other Construction Permit	CSO03339	10/16/2019	11/6/2019	
0070134	Cellular Network Partners - Deerhead	1147 SW Sun City Rd., Sun City, KS, 67143	Emergency Generator	4899	Construction Approval	CSA04500	10/22/2019	11/7/2019	CAAMACTZZZZ, CAANSPSJJJ
0070131	Cellular Network Partners - Hardtner	4151 SW US 281 Hwy, Hardtner, KS, 67057	Emergency Generator	4899	Construction Approval	CSA04512	10/22/2019	11/7/2019	CAAMACTZZZZ, CAANSPSJJJ
0070133	Cellular Network Partners - Kiowa	414 14th St., Kiowa, KS, 67070	Emergency Generator	4899	Construction Approval	CSA04499	10/22/2019	11/7/2019	CAAMACTZZZZ, CAANSPSJJJ
2050037	COBALT BOATS - NEODESHA	1701 North 9th Street, NEODESHA, KS, 66757	Putty Application Process	3732	Construction Approval	CSA04477	10/3/2019	11/7/2019	CAAMACTVVVV

1250079	CRNF - Coffeyville	701 EAST MARTIN STREET, COFFEYVILLE, KS, 67337	Boiler	2873	Construction Approval	CSA04475	10/3/2019	11/7/2019	CAAMACTDDD DD, CAANSPSPDB
0910158	Intervet - DBA MERCK ANIMAL HEALTH	35500 W 91ST ST, DE SOTO, KS, 66018	Permit basis update and notification clarification	8731	Other Construction Permit	CSO03307	5/17/2019	11/8/2019	
0350072	Cellular Network Partners - Cambridge	30380 US 160 Hwy, Cambridge, KS, 67023	Emergency Generator	4899	Construction Approval	CSA04493	10/22/2019	11/8/2019	CAAMACTZZZZ, CAANSPSJUU
0070132	Cellular Network Partners - Hazelton	12064 SW Gerlane, Hazelton, KS, 67061	Emergency Generator	4899	Construction Approval	CSA04498	10/22/2019	11/8/2019	CAAMACTZZZZ, CAANSPSJUU
1550194	GEO Chemicals LLC	2506 E 14TH AVE, HUTCHINSON, KS, 67501	New batch manufacturing plant	2899	Construction Approval	CSA04465	9/26/2019	11/8/2019	
2090338	ExxonMobil Mobil Serv Lubricant Analysis Laboratory	935 1/2 Sunshine Rd, Kansas City, KS, 66115	Emergency Generator	8734	Construction Approval	CSA04513	11/6/2019	11/12/2019	
1730322	City of Wichita - Wastewater Plant 2	2305 E. 57TH ST. S., WICHITA, KS, 67216	Lower Arkansas Water Quality Reclamation Facility	4952	Construction Approval	CSA04484	9/19/2019	11/12/2019	CAANSPSPDC
0070130	Cellular Network Partners - Forest City	11009 NW River Rd, Lake City, KS, 67071	Emergency Generator	4899	Construction Approval	CSA04496	10/22/2019	11/12/2019	CAAMACTZZZZ, CAANSPSJUU
0770278	Cellular Network Partners - Danville	897 90th St, Danville, KS, 67036	Emergency Generator	4899	Construction Approval	CSA04495	10/22/2019	11/12/2019	CAAMACTZZZZ, CAANSPSIII
1910112	Cellular Network Partners - Corbin	1155 W 90th St, Caldwell, KS, 67022	Emergency Generator	4899	Construction Approval	CSA04494	10/22/2019	11/12/2019	CAAMACTZZZZ, CAANSPSIII
0770280	Cellular Network Partners - Manchester	3 SW 70 Rd, Manchester, KS, 67003	Emergency Generator	4899	Construction Approval	CSA04502	10/22/2019	11/12/2019	CAAMACTZZZZ, CAANSPSJUU
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206		3721	Other Construction Permit	CSO03323	7/29/2019	11/12/2019	
1910114	Cellular Network Partners - South Haven	397 E 170th St, South Haven, KS, 67140	Emergency Generator	4899	Construction Approval	CSA04506	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJUU
0070135	Cellular Network Partners - Medicine Lodge DT	215 1/2 S Iliff, Medicine Lodge, KS, 67104	Emergency Generator	4899	Construction Approval	CSA04504	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJUU
1910113	Cellular Network Partners - Mayfield	1402 S B St, Wellington, KS, 67152	Emergency Generator	4899	Construction Approval	CSA04503	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSIII
0350073	Cellular Network Partners - Winfield North	9445 52nd Rd, Rock, KS, 73750	Emergency Generator	4899	Construction Approval	CSA04510	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJUU
1510069	Cellular Network Partners - Sawyer	90141 SE 30th Ave, Sawyer, KS, 67134	Emergency Generator	4899	Construction Approval	CSA04505	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJUU
0950072	Cellular Network Partners - South Kingman	8757 S Hwy 14, Kingman, KS, 67068	Emergency Generator	4899	Construction Approval	CSA04507	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJUU

0950073	Cellular Network Partners - Spivey	16584-A S Hwy 14, Harper, KS, 67058	Emergency Generator	4899	Construction Approval	CSA04508	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJJJ
0070136	Cellular Network Partners - Sun City	6416 NW Sun City Rd, Sun City, KS, 67143	Emergency Generator	4899	Construction Approval	CSA04509	10/22/2019	11/13/2019	CAAMACTZZZZ, CAANSPSJJJ
1070041	AT&T Mobility - CCT Linn Valley	7530 West 399th Street, La Cygne, KS, 66040	Emergency Generator	4899	Construction Approval	CSA04501	11/1/2019	11/14/2019	CAAMACTZZZZ, CAANSPSJJJ
0670007	BIRLA CARBON USA	3500 SOUTH RD S, ULYSSES, KS, 67880		2895	Construction Approval	CSA04302	5/22/2019	11/15/2019	
0070137	Cellular Network Partners - Aetna	21151 SW Cottage Creek, Lake City, KS, 67071	Emergency Generator	4899	Construction Approval	CSA04516	11/8/2019	11/18/2019	CAAMACTZZZZ, CAANSPSJJJ
1730377	Verizon - BU#881180 WICC Pawnee-Broadway 277686	2442 St Francis St, Wichita, KS, 67211	Emergency Generator	4899	Construction Approval	CSA04511	11/1/2019	11/18/2019	CAAMACTZZZZ, CAANSPSIII
1150030	Hillsboro Industries	220 INDUSTRIAL ROAD, HILLSBORO, KS, 67063	Laser Cutter	3713	Other Construction Permit	CSO03340	10/18/2019	11/18/2019	
7770967	Brandenburg Industrial Service Company	NO STREET ADDRESS, PORTABLE, KS, 00000	Portable Rock Crusher	1422, 1423, 1429	Construction Permit	CSP02847	11/13/2019	11/18/2019	CAANSPSOOO
2090039	PQ Corp.	1700 KANSAS AVE, KANSAS CITY, KS, 66105	Emergency engines in the Zeolyst Process Unit	2819	Construction Approval	CSA04476	10/8/2019	11/19/2019	
0530022	Great Plains Mfg. - Ellsworth	910 E. 8TH STREET, ELLSWORTH, KS, 67439	Construction modification	3523	Construction Approval	CSA04412	8/6/2019	11/21/2019	
1670021	Great Plains Mfg. (Land Pride) - Lucas	240 S. GREELEY, LUCAS, KS, 67648	Construction modification	3523	Construction Approval	CSA04415	8/6/2019	11/21/2019	
1690020	Great Plains Mfg. (Land Pride) - Kipp	244 N HUGH ST, KIPP, KS, 67401	Construction approval	3523	Construction Approval	CSA04411	8/6/2019	11/21/2019	
1690044	Great Plains Mfg. - Salina (1733 Dewey/601 Idlewilde Ct)	1733 DEWEY ST/601 IDLEWILDE CT, SALINA, KS, 674010000	Construction modification	3523	Construction Approval	CSA04414	8/6/2019	11/21/2019	
1230026	Great Plains Mfg. - Tipton	607 N. MAIN STREET, TIPTON, KS, 67485	Construction modification	3523	Construction Approval	CSA04413	8/6/2019	11/21/2019	
0810041	DCP OPERATING - TREES STRADDLE STATION	S34-T30S-R34W, TREES STRADLE, KS, 00000		1311	Construction Approval	CSA04347	7/19/2019	11/22/2019	CAAMACTZZZZ
0990041	Grandview Products	1601 SUPERIOR DRIVE, PARSONS, KS, 67357		2434	Construction Permit	CSP02817	5/23/2019	11/25/2019	CAAMACTJJ
1610001	Fort Riley	407 PERSHING CT., FORT RILEY, KS, 66442	8 engines/turbines	9711	Construction Approval	CSA04446	9/5/2019	11/26/2019	CAAMACTZZZZ, CAANSPSJJJ
0790086	ALLTEL COMMUNICATIONS - KS14 WALTON	310 N WALTON AVENUE, WALTON, KS, 67151	Emergency Generator	4899	Construction Approval	CSA04479	10/17/2019	11/27/2019	CAANSPSIII
1730005	McConnell Air Force Base	57830 Pittsburg Street Suite 120, WICHITA, KS, 67221	Combination permit which includes a generator	9711	Construction Permit	CSP02846	10/25/2019	12/3/2019	CAAMACTZZZZ, CAANSPSJJJ, CAANSPSIII

1890016	MERIT ENERGY - PANOMA COMPRESSOR STATION	S4-T325-R38W, PANOMA BOOSTER STA., KS, 000000000	Replace Engine	4922	Other Construction Permit	CSO03344	11/18/2019	12/3/2019	
1890144	MERIT ENERGY - WEST DUNNE STATION	S1-T345-R38W, WEST DUNNE STATION, KS, 000000000	Replace Engine	4922	Other Construction Permit	CSO03345	11/18/2019	12/3/2019	
1430001	Northern Natural Gas - Tescott Station	S34-T115-R5W, Lyons, KS, 67484	Adding equipment: natural gas-fired turbine, fuel heater and EMG	4922	Construction Approval	CSA04400	8/21/2019	12/3/2019	CAANSPSKKKK, CAANSPSJJJ
0670094	Merit Energy - Hoffman Station	S14-T275-R36W, HOFFMAN STA., KS, 00000	Replace Engine	4922	Other Construction Permit	CSO03338	10/15/2019	12/3/2019	
1130036	Johns Manville - McPherson	1465 17TH AVENUE, MCPHERSON, KS, 67460	PSD - Submitted 10/2018 & Revised 8/2019	3296	PSD Construction Permit	CSD00081	10/24/2018	12/3/2019	CAAMACTZZZZ, CAANSPSIII, CAANSPSPPP
0790021	Agco Corp.	420 WEST LINCOLN BLVD., HESSTON, KS, 670620000	New Oven	3523	Construction Approval	CSA04515	11/7/2019	12/5/2019	
0090080	Bartlett Grain - Great Bend	15 NE 60 AVENUE, GREAT BEND, KS, 67530	New Storage Capacity	5153	Construction Approval	CSA04482	10/17/2019	12/6/2019	CAANSPSDD
0670048	Merit Energy - Ulysses Main Station	S29-T285-R35W, ULYSSES, KS, 67880	Oil & Gas Facility Permit	4922	Construction Permit	CSP02849	11/25/2019	12/6/2019	
1690037	Crestwood Inc.	601 E. WATER WELL RD., SALINA, KS, 67401	Adding equipment	2434	Other Construction Permit	CSO03334	10/3/2019	12/10/2019	
1030012	Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361	Boilers	9711	Other Construction Permit	CSO03348	11/25/2019	12/12/2019	
1730053	ELEMENT LLC - COLWICH	1 Element Drive, COLWICH, KS, 67030		2869	Construction Approval	CSA04524	12/11/2019	12/12/2019	
1550144	Superior Pipeline - Reno Co. Gas Proc. Plant	SE 1/4 S33-T25S-R10W, TURON, KS, 00000	New Engine	1321	Construction Approval	CSA04517	11/21/2019	12/12/2019	CAAMACTZZZZ
0570030	CARGILL MEAT SOLUTIONS - DODGE CITY	3201 East Highway 154, Dodge City, KS, 67801		2011	Construction Approval	CSA04526	12/9/2019	12/13/2019	
0670187	Scout Energy - SLC A-57 Station	S26-T295-R35W, SLC A-57, KS, 00000		1311	Construction Approval	CSA04527	12/13/2019	12/16/2019	CAANSPSJJJ
0450075	Baldwin City Water Pumping Station	912 E 1600 Rd, Lawrence, KS, 66044	Emergency Generator	4941	Construction Approval	CSA04519	12/3/2019	12/17/2019	CAANSPSIII
0450056	Baldwin City Mun. Power Plant #2	1100 ORANGE ST, BALDWIN CITY, KS, 66006	Emergency Generator	4911	Construction Approval	CSA04520	12/3/2019	12/17/2019	CAANSPSIII
1730022	TEXTRON AVIATION - EAST CAMPUS	9709 E CENTRAL AVE, WICHITA, KS, 67206	Replace boilers	3721	Construction Approval	CSA04402	8/26/2019	12/18/2019	
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Approval	2911	Construction Approval	CSA04523	12/4/2019	12/18/2019	CAAMACTCC
0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Approval	2911	Construction Approval	CSA00096	12/4/2019	12/18/2019	
1170021	GP INDUSTRIAL PLASTERS	2127 US Highway 77, Blue Rapids, KS, 66411	Replacement feeder/scraper	3275	Other Construction Permit	CSO03347	11/22/2019	12/19/2019	

0150004	HollyFrontier El Dorado Refinery	1401 Douglas Road, El Dorado, KS, 67042	Approval	2911	Construction Approval	CSA04522	12/4/2019	12/20/2019	CAAMACTDDD DD
1910106	Mid Kansas Co-op - Milan	1063 W 10th Ave, Milan, KS, 67105	Permit Modification	4221	Construction Permit	CSP02702	12/2/2019	12/23/2019	CAANSPSDD
0010009	Monarch Cement	PO BOX 1000, HUMBOLDT, KS, 66748	New burner pipes	3241	Construction Approval	CSA04469	10/3/2019	12/30/2019	CAAMACTLLL, CAANSPSY, CAANSPSF
0910127	Advent Health Shawnee Mission	9100 WEST 74TH STREET, SHAWNEE MISSION, KS, 66204	Two natural gas fired boilers	8062	Construction Approval	CSA04480	7/31/2019	12/31/2019	CAAMACT6J, CAANSPSDPC



Construction and Operating Permit Training Checklist

Welcome to KDHE BOA! The following is a rubric to guide you through the initial training process. Questions that arise as you review the following documents and trainings should be addressed to your supervisor.

Training	Completed								
New Employee Orientation									
Human Resources New Employee Orientation									
Phone Training: http://kdhenet/documents/phone-instructions.pdf									
Computer use: <ul style="list-style-type: none"> • E-mail Mike Martin the following information to get I- Steps User ID: First Name, MI, Last Name of new employee • KDHE Help Desk 6-5655 or kdhe.helpdesk@ks.gov • Internet and E-mail Usage Policy http://kdhenet/policies/Information Tehnology Acceptable Use Policy.pdf 									
Travel Policy: http://www.da.ks.gov/ar/employee/travel/ http://kdhenet/policies/travel_policy.pdf Vehicle usage policy: http://kdhenet/fiscal/download/Agency Policy on Vehicle Usage and Mileage Reimbursement.pdf									
Fire/ Tornado/ Emergency Situations see web site at: http://kdhenet/evacuation/ BOA plan: http://kdhenet/evacuation/download/BOA Evacuation Plan.pdf									
Required Technical (one-on-one with supervisor or online)									
Air Pollution Training Institute (APTI) offers a variety of courses in various air related areas. Use this link https://www.apti-learn.net/LMS/register/EPALearning.aspx?t=0 to review the following courses (<i>note you do not have to register to review these courses</i>): <table style="width: 100%; border: none;"> <thead> <tr> <th style="text-align: left;"><u>Functional Area</u></th> <th style="text-align: left;"><u>Course Name</u></th> </tr> </thead> <tbody> <tr> <td>Introduction to Air Pollution</td> <td>APTI SI: 105 Introduction to Air pollution Control</td> </tr> <tr> <td>Permitting</td> <td>APTI SI: 460 Introduction to Permitting</td> </tr> <tr> <td>Inspection and Enforcement</td> <td>APTI SI: 446 Air Pollution Source Inspection</td> </tr> </tbody> </table>	<u>Functional Area</u>	<u>Course Name</u>	Introduction to Air Pollution	APTI SI: 105 Introduction to Air pollution Control	Permitting	APTI SI: 460 Introduction to Permitting	Inspection and Enforcement	APTI SI: 446 Air Pollution Source Inspection	
<u>Functional Area</u>	<u>Course Name</u>								
Introduction to Air Pollution	APTI SI: 105 Introduction to Air pollution Control								
Permitting	APTI SI: 460 Introduction to Permitting								
Inspection and Enforcement	APTI SI: 446 Air Pollution Source Inspection								
Read all Kansas regulations, focus on K.A.R. 28-19-200, K.A.R. 28-19-300 and K.A.R. 28-19-500 series, also 28-19-20, 28-19-30 through 32, and 28-19-650 http://www.kdheks.gov/bar/regs/KS AQ REGS.pdf									
Program Overview- http://www.kdheks.gov/air-permit/forms/Overview.pdf									

Construction and Operating Permit Training Checklist

Training	Completed
Construction Permit/Approval- http://www.kdheks.gov/air-permit/forms/Informational_Sheet.pdf	
Commencing Construction- http://www.kdheks.gov/air-permit/forms/Pre_Construction.pdf	
Confidential Information- http://www.kdheks.gov/air-permit/forms/Confidential.pdf	
Permit Applications- http://www.kdheks.gov/air-permit/download.html	
Review permit applications and instructions for Construction, Class I, and Class II permits and approvals http://www.kdheks.gov/air-permit/download.html	
Read the <i>Air Quality Permit Training Manual</i>	



FOR INTERNAL KDHE USE ONLY

Kansas Department of Health and Environment
Bureau of Air and Radiation
1000 SW Jackson, Suite 310, Topeka, Kansas 66612-1366

Public Notice Practices Guidance Training Document: TD 2004-109

Public Notice Summary

1. K.S.A. 65-3008a mandates public notice for permits and gives the Secretary of KDHE discretion to determine the level of public review for approvals. The statute does not define the terms “permits” or “approvals.”
2. BAR regulations, however, define “permits” and “approvals.”
 - A. For source construction purposes, “permits” are issued under K.A.R. 28-19-300(a) and “approvals” are issued under K.A.R. 28-19-300(b); PSD permits are issued under K.A.R. 28-19-350.¹
 - B. For source operating purposes, Class I sources are permitted under K.A.R. 28-19-500 *et seq.*; Class II sources are permitted under K.A.R. 28-19-540 *et seq.* and 28-19-560 *et seq.*; Class III sources are permitted under K.A.R. 28-19-575 *et seq.* Although these regulations generally use the term “permit” to refer to the regulatory action, K.A.R. 28-19-500(e) defines only the Class I permit as a “permit.” K.A.R. 28-19-500(e) defines Class II and Class III operating permits as “approvals” for the purposes of the Kansas Air Quality Act.
3. Although K.A.R. 28-19-204(a) appears to require public notice for all construction permits and Class I and Class II operating permits, the rule must be interpreted within the context of the statutory and regulatory scheme as a whole. The dual notice scheme established in the statute when coupled with the regulations that define certain types of construction permits and Class II operating permits as approvals suggests that K.A.R. 28-19-204 does not require these permit categories to undergo public notice, although the public participation procedures may be used when notice is determined to be appropriate.

¹ General permits are issued under K.A.R. 28-19-400 *et seq.* and may be adopted as either construction or operating permits subject to the “procedures and requirements applicable to the issuance of the corresponding class of construction or operating permit.” K.A.R. 28-19-400(a)(3).

4. K.A.R. 28-19-301(b) states "A construction permit shall not be issued to a source whose potential-to-emit (PTE) exceeds that specified at K.A.R. 28-19-500(a) or K.A.R. 28-19-500(b) without first satisfying the public participation requirements of K.A.R. 28-19-204(a).
5. Because K.A.R. 28-19-500(b) does not actually set a lower threshold which may be exceeded or not, this provision has no applicability other than to the sources specified in 500(a); therefore this provision does not require public notice of Class II approvals. To read it otherwise would require notice for each minor facility having greater than zero emissions, which could not have been contemplated.
6. " '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. Secondary emissions shall not be considered in determining the potential-to-emit of a stationary source."²
7. The PTE determination may take into account the control measures set forth in K.A.R. 28-19-500(b). If, in a construction permit, a source seeks to limit PTE to keep it below the Class I (major source) threshold of K.A.R. 28-19-500(a), then the source does not exceed the PTE specified at K.A.R. 28-19-500(a), thereby rendering the public participation requirements of K.A.R. 28-19-301(b) inapplicable to the non-major sources contemplated by K.A.R. 28-19-500(b).
8. K.A.R. 28-19-501(e) requires that for operational restrictions to limit PTE for sources that opt to obtain a Class II permit, other than a Class II operating permit-by-rule, the permit must be publicly noticed to make the restrictions federally enforceable. (Because Class II operating permits-by-rule has already been subject to public notice, they were excluded.)
9. The definition of "federally enforceable" reads: " 'Federally enforceable' means: (1) all limitations and conditions that are enforceable by the administrator of the U.S. environmental protection agency; (2) requirements of regulations included in the federally approved state implementation plan; and (3) any permit requirements established pursuant to these requirements."³
10. Federal enforceability therefore attaches to operational restrictions through several means other

² K.A.R. 28-19-200(yy).

³ K.A.R. 28-19-200(ee).

than public notice, including the Federal standards (NSPS, MACT, etc.) which are independently enforceable by the EPA and which may be used to limit PTE; state regulations applied to the sources that are in the SIP, and through the SIP-approved permit process itself, any limitations placed therein.

11. Accordingly, the regulation's caveat that only public notice suffices to create federally enforceable restrictions in a permit or approval is moot given the realities that other mechanisms established by EPA may cause federal enforceability to attach to these conditions. Also, the limitation contravenes the legislative intent in K.S.A. 65-3008a(c), in that the statute clearly indicates a legislative intent that sources that are not major or otherwise controversial should not be unduly burdened with public notice requirements. To read this requirement consistently with the legislative intent, the Bureau must conclude that the term "only" applies to require public notice only where no other mechanism makes the conditions within the permit or approval federally enforceable. Conversely, where the conditions are otherwise federally enforceable, the public notice adds nothing to further the express interest of the EPA and the public in facilitating their abilities to enforce the provisions of the permit or approval, and therefore may be considered moot and contrary to legislative intent in light of the relative environmental significance of the source.
12. With respect to 28-19-501(e)'s requirements, the Bureau is not required to provide public notice for a Class II operating permit which incorporates Federal standards or limitations (including those through the delegated standards in our regulations), or which contain limitations of the Kansas Air Quality Regulations (because these are SIP-approved regulations). In the event staff have doubts about the federal enforceability of any provisions, after consultation with and approval from supervisors, public notice may be provided to ensure the permit conditions meet the requirements. (See criteria list, below.)
13. In addition to the general notice requirements in K.A.R. 28-19-204⁴, K.A.R. 28-19-515 establishes public notice requirements for Class I permit actions. Because the regulation sits within the midst of other Class I permit rules, this regulation has no application to any other category of permit action.
14. To further clarify this interpretation of the public notice requirements and to take environmental significance into consideration, the relevant regulations will be amended to create significant Class II permits (85% of major source) that will require public notice and class II approvals (for sources having little or no environmental impact), which will not require public notice. This view of the public notice requirements is seen to be consistent with EPA's logic in the proposed rulemaking of August 31, 1995, which, in sum, ties public notice requirements to the significance of the source's emissions.

Criteria for Determining Whether Public Notice is Required

⁴K.A.R. 28-19-204 applies to construction permits and modifications as well as operating permits and is broader in scope than K.A.R. 28-19-515.

Construction permits where the permit PTE exceeds the thresholds in 28-19-500(a) will be put on public notice.

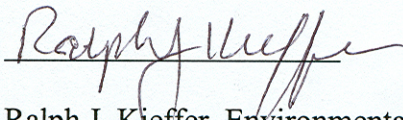
Class I and PSD permits will also be put on public notice.

The following would indicate the potential need to provide public notice:

- ★ The proposed permit action has generated news coverage, or unsolicited comments from the public (including local or other government entities, public interest groups, businesses, or individuals).
- ★ The proposed facility or source has been the subject of news reports.
- ★ The proposed facility or source is located near a school, nursing home, or other site of a sensitive population.
- ★ The proposed facility or source is located in an area for which environmental justice issues are or may be raised.
- ★ The proposed facility or source will have actual emissions close to the major source threshold. For this group of sources, the regulations will be amended, as noted above, to create a category of Class II permits that will be publicly noticed because the actual emissions are or will be within 85% of the threshold.
- ★ The facility owner or operator has expressed a lack of comfort about going forward with the financial investment without public notice.

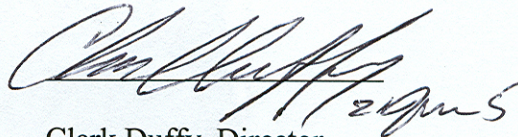
These and other factors may be evaluated, and upon consultation with supervisory staff, may provide the basis for providing public notice for the subject facility.

Prepared by:



Ralph J. Kieffer, Environmental Scientist IV
Bureau of Air and Radiation

Approved by:



Clark Duffy, Director
Bureau of Air and Radiation



Unified Government Public Health Department

619 Ann Avenue, Kansas City, KS 66101-3038

Phone (913) 573-8855

wycokck.org/health

October 29, 2019

Ms. Linda Vandevord
Public Service Administrator
Bureau of Air
Kansas Department of Health & Environment
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Re: Unified Gov't of WyCo/KCK Work Plan and Affidavit

Dear Ms. Vandevord:

Attached are the Unified Government Division of Air Quality's work plan and affidavit for the 4th quarter of FY19 (July 1, 2019 – September 30, 2019). If you have any questions, please call Rollin Sachs at your convenience.

Sincerely,

Jaclyn Brown
Environmental Scientist

c: Rollin Sachs, Division of Air Quality
John Werner, Business Manager, UG Public Health Dept.

/APPENDIX A
LOCAL AGENCY WORK PLAN
for
Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Division of Air Quality (DAQ)
FY 2019
Contract Period October 1, 2018 – September 30, 2019

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agree to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	Phone #	Primary DAQ Contact	Phone #
General				
General Administrative Duties	Rick Brunetti	785-296-1551	Rollin Sachs	913-573-6700
Permitting				
Liaison for Permitting	Gyanendra Prasai	785-296-6427	Rollin Sachs	913-573-6700
Compliance and Enforcement				
Administrative Issues; QA/QC	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Compliance and Enforcement	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Performance Testing and RATA	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Planning				
Planning Activities	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
Emission Reduction Strategies/ Public Education				
Emission Reduction Strategies	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Monitoring				
Administrative Issues	Kathleen Waters	785-296-1692	Rollin Sachs	913-573-6700
Network design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin	785-296-1571	Rollin Sachs	913-573-6700
Data Issues	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700

II. Air Permitting

Issued Type	1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
PSD	None	None	None	None
Class I Permit	None	None	None	None
Construction Permit	None	None	None	None
Class I Renewals; Class II; Major Modifications	O-14225: 12/07/2018 - 2090075	O-12324: 01/14/2019 - 2090060	None	None
All Other Permits, Registrants & Approvals	C-14440: 10/02/2018 – 2090309 C-14404: 10/08/2018 – 2090060 CSA04059 v1.0: 10/10/2018 – 2090023 CSA04088 v1.0: 10/24/2018 – 2090060 CSA04125 v1.0: 12/04/2018 – 2090326 CSA04126 v1.0: 12/04/2018 – 2090325 CSA04163 v1.0: 12/13/2018 – 2090329 CSA04165 v1.0: 12/13/2018 – 2090330 CSA04166 v1.0: 12/13/2018 – 2090331 CSA04146 v1.0: 12/17/2018 – 2090327 CSA04145 v1.0: 12/17/2018 – 2090328 CSA04117 v1.0: 12/18/2018 – 2090305 CSA04118 v1.0: 12/18/2018 – 2090305 CSA04119 v1.0: 12/18/2018 – 2090305 CSO03262 v1.0: 12/28/2018 – 2090111	CSA04172 v1.0: 01/28/2019 – 2090046 CSA04223 v1.0: 03/11/2019 – 2090332 CSA04202 v1.0: 03/21/2019 – 2090039 CSA04210 v1.0: 03/27/2019 – 2090001	CSA04228 v1.0: 04/04/2019 – 2090065 CSA04257 v1.0: 04/05/2019 – 2090333 CSO03299 v1.0: 04/24/2019 – 2090039	CSO03318 v1.0: 07/22/2019 – 2090062 CSA01811 v1.0: 07/31/2019 – 2090060 CSA04345 v1.0: 08/12/2019 – 2090002 CSA04387 v1.0: 09/12/2019 – 2090336 CSO03325 v1.0: 09/12/2019 – 2090039 CSA04455 v1.0: 09/30/2019 – 2090337

III. Compliance and Enforcement

Inspections – Major Sources

1st Quarter (10/1 – 12/31/18)	2090046 – General Motors LLC – 12/10/2018 2090001 – CertainTeed Corporation – 12/19/2018
2nd Quarter (1/01 – 3/31/19)	2090009 – Amsted Rail Company – 03/21/2019 2090008 – BPU Nearman – 03/25/2019 2090194 – Stericycle – 03/27/2019
3rd Quarter (4/01 – 6/30/19)	2090063 – Sinclair Transportation Company – 06/04/2019 2090039 – PQ Corporation – 06/11/2019 2090048 – BPU Quindaro – 06/25/2019 2090049 – BPU Kaw – 06/25/2019
4th Quarter (7/01 – 9/30/19)	2090010 – Owens Corning – 08/28/2019 2090075 – Phillips 66 Carrier LLC – KC Product Terminal – 09/17/2019 2090060 – Magellan Pipeline Company – 09/26/2019

Inspections – Synthetic Minors

1st Quarter (10/1 – 12/31/18)	2090023 – Bartlett Grain Company – 10/29/2018 2090040 – Bartlett Grain Co., LP – 10/29/2018 2090300 – ACH Foam Technologies, LLC – 11/14/2018 2090055 – GFG Agriproducts, LLC – 11/14/2018 2090014 – Talon Concrete & Aggregates – 11/15/2018 2090309 – ZW Tech, LLC – 11/15/2018 2090038 – Quikrete-Kansas City – 11/28/2018 2090017 – Grain Craft – 12/04/2018 2090047 – Pentair – 12/05/2018 2090044 – Cargill – 12/12/2018
2nd Quarter (1/01 – 3/31/19)	2090012 – VVF – 03/07/2019 2090232 – Nexeo Solutions, LLC – 03/08/2019 2090065 – Fuchs Lubricants Co. – 03/08/2019 2090229 – Garsite – 03/20/2019 2090026 – Kaw Valley Sand and Gravel – 03/21/2019 2090011 – Procter & Gamble – 03/21/2019 2090202 – Barton Solvents, Inc. – 03/26/2019 2090077 – Keebler Company – 03/27/2019 2090277 – KU Hospital Authority – 03/28/2019
3rd Quarter (4/01 – 6/30/19)	7770795 – Century Concrete Co., Inc. – 05/16/2019 2090284 – L.G. Everist – 05/16/2019 2090094 – Kaw Valley Sand and Gravel – 05/30/2019 2090317 – WaterOne – 05/30/2019 2090236 – Peerless Conveyor – 06/03/2019 2090069 – ReConserve – 06/04/2019 2090041 – Cargill AgHorizons KATY Elevator – 06/05/2019 2090062 – Harcros Chemicals, Inc. – 06/12/2019 2090089 – Ash Grove Cement Co. – 06/18/2019 2090002 – Buzzzi Unicem USA – 06/26/2019
4th Quarter (7/01 – 9/30/19)	2090067 – Geiger Ready Mix Concrete – 08/12/2019 2090169 – KU Medical Center – 08/22/2019 2090251 – Mid-West Terminal Warehouse – 08/22/2019 2090035 – Asphalt Sales Co., Inc. – 08/27/2019 2090066 – Exide Technologies – 08/27/2019 2090231 – APAC-Kansas Inc. – 08/28/2019 2090018 – J.M. Fahey Asphalt – 09/09/2019 2090206 – Plastic Packaging Technologies LLC – 09/09/2019 2090029 – Darling International, Inc. – 09/18/2019 2090212 – ACH Foam Technologies, LLC – 09/19/2019 2090322 – Road Builders Machinery – 09/23/2019 2090305 – BNSF Railway Company – 09/23/2019 2090280 – Bennet-Rogers Pipe Coating – 09/26/2019 2090064 – Magellan Reclamation Center – 09/27/2019

Inspections – NESHAP/MACT/B

1st Quarter (10/1 – 12/31/18)	7770893 – Talon Concrete & Aggregates – 11/15/2018
2nd Quarter (1/01 – 3/31/19)	None
3rd Quarter (4/01 – 6/30/19)	7770898 – Kansas Heavy Construction – 05/30/2019 2090314 – Skymark – 06/11/2019 7770909 – Recyclable Materials Relocation – 06/25/2019 2090211 – Spangler Graphics – 06/27/2019
4th Quarter (7/01 – 9/30/19)	2090213 – Ashland Specialty Chemical Company – 09/17/2019 2090248 – Greif Brothers Corp – 09/27/2019

Complaint Investigations

1st Quarter (10/1 – 12/31/18)	10/22/2018 – Dust being emitted from construction activities on bridge from westbound I-70 10/23/2018 – Alleged illegal burning of garbage in a neighborhood - 5520 Knox Ave 11/02/2018 – Dust found on cars near dumpster at Certainteed (2090001) 11/29/2018 – Dumping of several containers at 11 th and Lathrop- Certainteed (2090001) 12/03/2018 – Open burning of plastic in neighborhood – 2712 N. 18 th Street 12/21/2018 – Concern over improper asbestos abatement activities at 1140 Richmond Ave.
2nd Quarter (1/01 – 3/31/19)	03/01/2019 – Odor complaint believed to originate at Darling International Inc. (2090029) 03/21/2019 – Heavy opacity observed from stack at Advantage Metals (2090162)

3rd Quarter (4/01 – 6/30/19)	04/02/2019 – Alleged smoke cloud with foul stench in neighborhood – 11155 Hubbard Road 04/09/2019 – Dust from crushing operation at Kansas Heavy Construction (7770898) 04/25/2019 – Burning rubber smell in neighborhood – South of 65 th Street and Rowland Ave 05/19/2019 – Complaint of neighbor burning trash in a barrel – 3005 S. 10 th Street 05/20/2019 – Foul odors believed to be coming from Darling International Inc. (2090029) 06/07/2019 – Alleged hazardous fumes originating from Asphalt Sales Co. (2090035) 06/18/2019 – Burning wood and other materials in unattended fire pit – 2226 Richmond Ave 06/24/2019 – Propane smell near Cross Country Freight – 351 S. 62 nd Street
4th Quarter (7/01 – 9/30/19)	07/09/2019 – Dust complaint regarding construction at a former elementary school – 2600 N. 44 th Street 07/22/2019 – Potential fumes from autobody shop on residential property – 3810 Georgia Avenue 08/21/2019 – Dust complaint regarding Granite Designs – 5031 Welborn Lane 08/30/2019 – Visible emissions observed at Proctor and Gamble (2090011) 09/16/2019 – Dust from grain processes at Gage’s Fertilizer and Grain (2090055)

IV. Planning

DAQ will attend and participate in committees and other group meetings to develop, discuss, review and revise priorities, plans and strategies (both regulatory and voluntary) for improving air quality. These include MARC Air Quality and Public Education Forums, Clean Cities, DAQ Sustainability Committee and others as appropriate.

1st Quarter (10/1 – 12/31/18)	October 2 nd -3 rd , Rollin attended CenSARA Fall meeting in Oklahoma City, OK October 4 th , Rollin participated in KDHE BOA Enforcement call October 9 th , Mark and Jaelyn participated in KDHE BOA Permitting call October 9 th , Rollin and Jaelyn attended MARC Air Quality Forum October 10 th -11 th , Rollin, Mark, and Jaelyn attended EPA Region 7 Air Agencies meeting in Lenexa October 14 th -16 th , Rollin attended NACAA Fall Membership meeting in Cleveland, OH October 16 th , Mark attended Smoke School Lecture October 17 th , Mark, Erik, and Jaelyn attended Smoke School October 24 th -25 th , Rollin and Jaelyn attended the Fall BEFS meeting in Topeka, KS October 26 th , Rollin participated in KDHE BOA monitoring call October 31 st , Jaelyn observed WaterOne engine testing November 1 st , Rollin participated in KDHE BOA monitoring call November 8 th , Jaelyn attended MARC Public Education meeting November 13 th , Rollin and Jaelyn attended MARC Air Quality Forum November 20 th , Mark and Jaelyn participated in KDHE BOA Permitting call December 6 th , Rollin participated in KDHE BOA Enforcement call December 11 th , Rollin and Jaelyn attended MARC Air Quality Forum December 12 th , Rollin participated in CenSARA Board call December 20 th , Mark and Jaelyn participated in KDHE BOA Permitting call
2nd Quarter (1/01 – 3/31/19)	January 10 th , Jaelyn attended MARC Public Education meeting January 18 th , Rollin attended Tree Board Meeting January 22 nd , Rollin and Jaelyn participated in KDHE BOA Permitting call February 11 th -12 th , Jaelyn and Mark attended CenSARA PSD/NSR (Advanced) in Topeka, KS February 13 th , Rollin participated in CenSARA Board of Directors Call February 15 th , Jaelyn and Mark participated in KDHE BOA Permitting call February 20 th -21 st , Jaelyn attended NACT #299 Air Pollution Control Devices in Topeka, KS February 21 st , Erik participated in NACAA Monitoring Committee call February 27 th , Rollin participated in NACAA Criteria Pollutant call March 7 th , Rollin participated in KDHE BOA Enforcement call March 12 th , Rollin attended MARC Air Quality Forum March 12 th -14 th , Jaelyn, Erik, and Mark attended NACT #355 Advanced Inspector Training in Topeka, KS March 19 th , Jaelyn and Mark participated in KDHE BOA Permitting call
3rd Quarter (4/01 – 6/30/19)	April 4 th , Rollin participated in KDHE BOA Enforcement call April 4 th , All DAQ staff participated in National Public Health Week Open House; distributed DAQ Public Education materials April 9 th , Rollin and Jaelyn attended MARC Air Quality Forum April 10 th , Rollin participated in CenSARA Board of Directors call April 10 th , Jaelyn and Mark participated in NACAA Permitting call April 16 th , Rollin, Jaelyn, and Mark participated in EPS 4 State call April 17 th , Mark, Erik, and Jaelyn attended Smoke School April 26 th , Rollin and Jaelyn participated in Arbor Day Event April 29 th , Jaelyn observed stack testing at Owens Corning April 29 th , Jaelyn and Mark attended NACAA Spring Membership meeting in Kansas City April 29 th -30 th , Rollin and Erik attended NACAA Spring Membership meeting in Kansas City April 30 th -May 2 nd , Jaelyn attended CenSARA Principles of Air Pollution in Topeka, KS May 1 st , Rollin participated in KDHE BOA Monitoring call May 8 th , Jaelyn and Mark participated in NACAA Permitting call May 9 th , Jaelyn and Gayle attended MARC Public Education meeting May 14 th , Rollin, Jaelyn, and Gayle attended MARC Air Quality Forum May 21 st , Jaelyn, Mark, and Gayle participated in KDHE BOA Permitting call May 22 nd -23 rd , Rollin, Jaelyn, and Gayle attended the Spring BEFS meeting in Hays, KS June 18 th -20 th , Jaelyn, Mark, and Gayle attended CenSARA Principles of Environmental Compliance and Enforcement in Topeka, KS

4th Quarter (7/01 – 9/30/19)	<p>July 9th, Rollin and Jaclyn attended MARC Air Quality Forum</p> <p>July 17th, Rollin, Jaclyn, and Mark participated in NACAA Permitting call</p> <p>July 18th, Jaclyn and Mark participated in KDHE BOA Permitting call</p> <p>July 24th, Jaclyn attended MARC Public Education meeting</p> <p>August 1st, Rollin participated in KDHE BOA Enforcement call</p> <p>August 13th, Rollin, Erik, and Jaclyn attended CAAAG meeting in Manhattan, KS</p> <p>August 13th, Gayle attended MARC Air Quality Forum</p> <p>September 4th, Jaclyn, Mark, Gayle, and Erik participated in SBEAP Surface Coating Webinar</p> <p>September 5th, Mark participated in NACAA Enforcement call</p> <p>September 10th, Jaclyn and Gayle attended E15 presentation at MARC</p> <p>September 11th, Jaclyn and Mark participated in NACAA Permitting call</p> <p>September 19th, Jaclyn and Mark participated in KDHE BOA Permitting call</p> <p>September 25th, Rollin participated in NACAA Criteria Pollutants call</p> <p>September 30th, Mark presented at AWMA Young Professionals Conference in Overland Park, KS</p>
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V. Emission Reduction Strategies

DAQ will continue to implement strategies that reduce emissions.

- Promotion of Idling Rule for Wyandotte and Johnson Counties in Wyandotte County.
 - Continue to distribute educational materials at appropriate venues
 - Coordinate with KDHE to place signage in appropriate spots.
- Promotion of good commuter habits to drivers of vehicles that do not fall under the Idling Rule. (Gasoline powered vehicles and diesel fueled vehicles weighing less than 14,000 pounds, activities may include:
 - Provide routine newsletter and e-mail updates containing pertinent information on good commuter behavior to employees during ozone season.
 - Operate a bicycle check out program for UG employees for appropriate local work related travel.
 - Participate in gas cap testing or Car Clinic events for general public efforts
 - Maintain educational materials on the website.
- Promotion of Yard Care for Clean Air at appropriate venues in Wyandotte County.
 - Continue to maintain yard care educational materials on the website
 - Participate at yard care events as appropriate

DAQ and BOA acknowledge that the above list of emissions sources and associated strategies may be modified in support of state and local air quality initiatives and after consultation with BOA.

1st Quarter (10/1 – 12/31/18)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>
2nd Quarter (1/01 – 3/31/19)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>

3rd Quarter (4/01 – 6/30/19)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>
4th Quarter (7/01 – 9/30/19)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>

VI. Ambient Air Monitoring

DAQ will establish, operate and maintain the following monitors:

Monitoring	Number
NO _x	1
NO _y	1
CO, O ₃ , SO ₂	3
PM ₁₀	2
Johnson County	
O ₃	1
Lead	1

NAMS/ SLAMS & SPM operation

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

General O & M and QA/AC

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Particulate Matter/PM₁₀

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Continuous Gaseous Monitors

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Review and Submission of Data

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Johnson County Monitor

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

VII. Indirect Costs

DAQ and BOA agree to indirect costs associated with this contract of 19.7% of the total account reimbursed by BOA.

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
See Affidavit	See Affidavit	See Affidavit	See Affidavit

**ATTACHMENT A
LOCAL AGENCY WORK PLAN**

**For
Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Department of Air Quality (DAQ)
FFY2020 EPA 103 Funds
Contract Period April 1, 2019 – March 31, 2020**

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agrees to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	Phone #	Primary DAQ Contact	Phone #
Contract Administrator	Linda Vandevord	785-296-6423	Rollin Sachs	913-573-6700
Workplan and Budget	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Network Design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin Yao Tang	785-296-1571 785-291-3555	Rollin Sachs	913-573-6700

II. Ambient Air Monitoring

A. Requirements

1. The DAQ will operate the State/Local Air Monitoring Stations (SLAMS), and Special Purpose Monitoring (SPM) and make timely submittal of all samples and data in accordance with procedures presented in the following documents:
 - 40 CFR Part 58;
 - State of Kansas Implementation Plan for Attainment and Maintenance of NAAQS, Sec. E – Monitoring Plan;
 - Kansas Ambient Air Monitoring Quality Assurance Program/Project Plans (QAPPs) and associated standard operating procedures (SOPs); and
 - Instrument Operator’s Manuals.
2. DAQ agrees to provide monitoring field support to BOA in responding to natural disasters or other emergent situations.

B. General Documentation

1. Operation: DAQ will make regularly scheduled site visits, and additional site visits as necessary for maintenance, repairs, and QA/QC activities. ¹ Document all site visits and activities, and maintain required records and logs.
2. Maintenance: DAQ will perform minor repairs or secure repair service from manufacturer as needed. Coordinate more difficult problems with BOA field staff. Notify BOA by the next working day that an ambient air monitor is down due to equipment failure and provide estimated down time for repairs. Document all maintenance and repair activities, and maintain required records and logs.

C. PM_{2.5} FRMs

1. For sequential PM_{2.5} equipment DAQ will retrieve/change, prepare, and ship PM_{2.5} filter elements (including field blanks) to contract laboratory on schedule. Collect field blank after every tenth routine sample. Download/record, review, and transmit required data from samplers per schedule

¹ At the conclusion of each month QA/QC documents are provided to the BOA Data Manager (Yao Tang).

in item E of this section. Perform monthly maintenance and verifications (date, time temperature, pressure, leak check, flow rate). Perform annual calibrations.

2. For continuous PM_{2.5} equipment DAQ will perform routine calibration, maintenance and verification activities per the most current version of Ambient Air Monitoring Standard Operating Procedure.

D. PM_{2.5} Speciation

1. DAQ will retrieve/change, prepare, and ship filter cassettes to laboratory on schedule. Submit field blanks and trip blanks to laboratory. Download/record, review, and transmit required data from speciation sampler.
2. DAQ will perform monthly verifications (date and time, temperature, pressure, leak check, flow check) and annual calibrations.

E. Review and Submission of Data

1. DAQ will transmit PM_{2.5} filter and interval data to BOA on a regular basis.

F. Johnson County Monitors

1. DAQ will operate and maintain the existing Johnson County monitors (PM_{2.5}) in the manner described above.

G. Reporting and Funding

1. DAQ will provide quarterly updates on the progress of the Ambient Air Monitoring activities.²
2. Locations

Monitoring	Location	Number
<i>Wyandotte County</i>		
PM2.5 Continuous	NCore	1
PM2.5 Sequential, 1 and 3-day schedule	NCore	1
PM2.5 Speciation (3 filters per run between 2 instruments)	NCore	1
<i>Johnson County</i>		
PM2.5 Sequential	Justice Center	1
PM2.5 Continuous	Heritage Park	1
TOTAL		5

H. Quarterly Reporting Requirements

1st Quarter (4/01/18 – 6/30/19)	2nd Quarter (7/01/19 – 9/30/19)	3rd Quarter (10/01/19 – 12/31/19)	4th Quarter (1/01/20 – 3/31/20)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

III. Indirect Costs

- A. DAQ and BOA agree to indirect costs associated with this contract of 17.6 percent of the total account reimbursed by BOA.

B. Quarterly Reporting Requirements

1st Quarter (4/01/19– 6/30/19)	2nd Quarter (7/01/19 – 9/30/19)	3rd Quarter (10/01/19 – 12/31/19)	4th Quarter (1/01/20 – 3/31/20)
See Affidavit	See Affidavit		

² The quarterly updates should continue to appear with quarterly affidavit submissions.

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT
AFFIDAVIT OF EXPENDITURES**

GRANTEE NAME:

Unified Government of Wyandotte County - Kansas City, Kansas Health Department
Phone: 913-573-6700

REPORTING PERIOD

July 1, 2019 to September 30, 2019

GRANT EXPENDITURES		Air Quality Fee Fund 2020	Federal Grant 105	Federal Grant 103	Local Match	Total Amount
\$466,188.00	Permitting Compliance & Enforcement RATA Inspections Planning Emission Reduction Strategies Public Education & Outreach Blue Skyways Ambient Air Monitoring Local Priorities Program Maintenance	\$ 101,929.45	\$ 35,540.80	\$ 7,878.22	\$ 25,948.14	\$171,296.61
\$99,764.00	Indirects	\$ 8,091.13	\$ 6,397.35	\$ 1,386.57	\$ 19,127.67	\$35,002.72
	Affidavit Total	\$110,020.58	\$41,938.15	\$9,264.79	\$45,075.81	\$206,299.33

By electronic submission, the local agency administrator below certified that this report is in agreement with the agency official accounting records and that individual employee time reports are maintained documenting time charged to this program

ADMINISTRATOR NAME:

Terry Brecheisen

DATE:

10/28/2019



Public Health Department

Terry Brecheisen, Director

619 Ann Avenue
Kansas City, KS 66101-3038

Phone (913) 573-8855
Fax (913) 321-7932

July 26, 2019

Ms. Linda Vandevord
Public Service Administrator
Bureau of Air
Kansas Department of Health & Environment
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Re: Unified Gov't of WyCo/KCK Work Plan and Affidavit

Dear Ms. Vandevord:

Attached are the Unified Government Division of Air Quality's work plan and affidavit for the 3rd quarter of FY19 (April 1, 2019 – June 30, 2019). If you have any questions, please call Rollin Sachs at your convenience.

Sincerely,

Jaclyn Brown
Environmental Scientist

c: Rollin Sachs, Division of Air Quality
John Werner, Business Manager, UG Public Health Dept.



Promoting good health and a safe environment for a better community.

/APPENDIX A
LOCAL AGENCY WORK PLAN
for
Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Division of Air Quality (DAQ)
FY 2019
Contract Period October 1, 2018 – September 30, 2019

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agree to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	Phone #	Primary DAQ Contact	Phone #
General				
General Administrative Duties	Rick Brunetti	785-296-1551	Rollin Sachs	913-573-6700
Permitting				
Liaison for Permitting	Gyanendra Prasai	785-296-6427	Rollin Sachs	913-573-6700
Compliance and Enforcement				
Administrative Issues; QA/QC	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Compliance and Enforcement	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Performance Testing and RATA	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Planning				
Planning Activities	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
Emission Reduction Strategies/ Public Education				
Emission Reduction Strategies	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Monitoring				
Administrative Issues	Kathleen Waters	785-296-1692	Rollin Sachs	913-573-6700
Network design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin	785-296-1571	Rollin Sachs	913-573-6700
Data Issues	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700

II. Air Permitting

Issued Type	1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
PSD	None	None	None	
Class I Permit	None	None	None	
Construction Permit	None	None	None	
Class I Renewals; Class II; Major Modifications	O-14225: 12/07/2018 - 2090075	O-12324: 01/14/2019 - 2090060	None	
All Other Permits, Registrants & Approvals	C-14440: 10/02/2018 – 2090309 C-14404: 10/08/2018 – 2090060 CSA04059 v1.0: 10/10/2018 – 2090023 CSA04088 v1.0: 10/24/2018 – 2090060 CSA04125 v1.0: 12/04/2018 – 2090326 CSA04126 v1.0: 12/04/2018 – 2090325 CSA04163 v1.0: 12/13/2018 – 2090329 CSA04165 v1.0: 12/13/2018 – 2090330 CSA04166 v1.0: 12/13/2018 – 2090331 CSA04146 v1.0: 12/17/2018 – 2090327 CSA04145 v1.0: 12/17/2018 – 2090328 CSA04117 v1.0: 12/18/2018 – 2090305 CSA04118 v1.0: 12/18/2018 – 2090305 CSA04119 v1.0: 12/18/2018 – 2090305 CSO03262 v1.0: 12/28/2018 – 2090111	CSA04172 v1.0: 01/28/2019 – 2090046 CSA04223 v1.0: 03/11/2019 – 2090332 CSA04202 v1.0: 03/21/2019 – 2090039 CSA04210 v1.0: 03/27/2019 – 2090001	CSA04228 v1.0: 04/04/2019 – 2090065 CSA04257 v1.0: 04/05/2019 – 2090333 CSO03299 v1.0: 04/24/2019 – 2090039	

III. Compliance and Enforcement

Inspections – Major Sources

1 st Quarter (10/1 – 12/31/18)	2090046 – General Motors LLC – 12/10/2018 2090001 – CertainTeed Corporation – 12/19/2018
2 nd Quarter (1/01 – 3/31/19)	2090009 – Amsted Rail Company – 03/21/2019 2090008 – BPU Nearman – 03/25/2019 2090194 – Stericycle – 03/27/2019
3 rd Quarter (4/01 – 6/30/19)	2090063 – Sinclair Transportation Company – 06/04/2019 2090039 – PQ Corporation – 06/11/2019 2090048 – BPU Quindaro – 06/25/2019 2090049 – BPU Kaw – 06/25/2019
4 th Quarter (7/01 – 9/30/19)	

Inspections – Synthetic Minors

1st Quarter (10/1 – 12/31/18)	2090023 – Bartlett Grain Company – 10/29/2018 2090040 – Bartlett Grain Co., LP – 10/29/2018 2090300 – ACH FOAM Technologies, LLC – 11/14/2018 2090055 – GFG Agriproducts, LLC – 11/14/2018 2090014 – Talon Concrete & Aggregates – 11/15/2018 2090309 – ZW Tech, LLC – 11/15/2018 2090038 – Quikrete-Kansas City – 11/28/2018 2090017 – Grain Craft – 12/04/2018 2090047 – Pentair – 12/05/2018 2090044 – Cargill – 12/12/2018
2nd Quarter (1/01 – 3/31/19)	2090012 – VVF – 03/07/2019 2090232 – Nexeo Solutions, LLC – 03/08/2019 2090065 – Fuchs Lubricants Co. – 03/08/2019 2090229 – Garsite – 03/20/2019 2090026 – Kaw Valley Sand and Gravel – 03/21/2019 2090011 – Procter & Gamble – 03/21/2019 2090202 – Barton Solvents, Inc. – 03/26/2019 2090077 – Keebler Company – 03/27/2019 2090277 – KU Hospital Authority – 03/28/2019
3rd Quarter (4/01 – 6/30/19)	7770795 – Century Concrete Co., Inc. – 05/16/2019 2090284 – L.G. Everist – 05/16/2019 2090094 – Kaw Valley Sand and Gravel – 05/30/2019 2090317 – WaterOne – 05/30/2019 2090236 – Peerless Conveyor – 06/03/2019 2090069 – ReConserve – 06/04/2019 2090041 – Cargill AgHorizons KATY Elevator – 06/05/2019 2090062 – Harcros Chemicals, Inc. – 06/12/2019 2090089 – Ash Grove Cement Co. – 06/18/2019 2090002 – Buzzi Unicem USA – 06/26/2019
4th Quarter (7/01 – 9/30/19)	

Inspections – NESHAP/MACT/B

1st Quarter (10/1 – 12/31/18)	7770893 – Talon Concrete & Aggregates – 11/15/2018
2nd Quarter (1/01 – 3/31/19)	None
3rd Quarter (4/01 – 6/30/19)	7770898 – Kansas Heavy Construction – 05/30/2019 2090314 – Skymark – 06/11/2019 7770909 – Recyclable Materials Relocation – 06/25/2019 2090211 – Spangler Graphics – 06/27/2019
4th Quarter (7/01 – 9/30/19)	

Complaint Investigations

1st Quarter (10/1 – 12/31/18)	10/22/2018 – Dust being emitted from construction activities on bridge from westbound I-70 10/23/2018 – Alleged illegal burning of garbage in a neighborhood - 5520 Knox Ave 11/02/2018 – Dust found on cars near dumpster at Certainteed (2090001) 11/29/2018 – Dumping of several containers at 11 th and Lathrop- Certainteed (2090001) 12/03/2018 – Open burning of plastic in neighborhood – 2712 N. 18 th Street 12/21/2018 – Concern over improper asbestos abatement activities at 1140 Richmond Ave.
2nd Quarter (1/01 – 3/31/19)	03/01/2019 – 2090029 Odor complaint believed to originate at Darling International Inc. 03/21/2019 – 2090162 Heavy opacity observed from stack at Advantage Metals
3rd Quarter (4/01 – 6/30/19)	04/02/2019 – Alleged smoke cloud with foul stench in neighborhood – 11155 Hubbard Road 04/09/2019 – 7770898 Dust from crushing operation at Kansas Heavy Construction 04/25/2019 – Burning rubber smell in neighborhood – South of 65 th Street and Rowland Ave 05/19/2019 – Complaint of neighbor burning trash in a barrel – 3005 S. 10 th Street 05/20/2019 – 2090029 Foul odors believed to be coming from Darling International Inc. 06/07/2019 – 2090035 Alleged hazardous fumes originating from Asphalt Sales Co. 06/18/2019 – Burning wood and other materials in unattended fire pit – 2226 Richmond Ave 06/24/2019 – Propane smell near Cross Country Freight – 351 S. 62 nd Street
4th Quarter (7/01 – 9/30/19)	

IV. Planning

DAQ will attend and participate in committees and other group meetings to develop, discuss, review and revise priorities, plans and strategies (both regulatory and voluntary) for improving air quality. These include MARC Air Quality and Public Education Forums, Clean Cities, DAQ Sustainability Committee and others as appropriate.

<p>1st Quarter (10/1 – 12/31/18)</p>	<p>October 2nd-3rd, Rollin attended CenSARA Fall meeting in Oklahoma City, OK October 4th, Rollin participated in KDHE BOA Enforcement call October 9th, Mark and Jaclyn participated in KDHE BOA Permitting call October 9th, Rollin and Jaclyn attended MARC Air Quality Forum October 10th-11th, Rollin, Mark, and Jaclyn attended EPA Region 7 Air Agencies meeting in Lenexa October 14th-16th, Rollin attended NACAA Fall Membership meeting in Cleveland, OH October 16th, Mark attended Smoke School Lecture October 17th, Mark, Erik, and Jaclyn attended Smoke School October 24th-25th, Rollin and Jaclyn attended the Fall BEFS meeting in Topeka, KS October 26th, Rollin participated in KDHE BOA monitoring call October 31st, Jaclyn observed WaterOne engine testing November 1st, Rollin participated in KDHE BOA monitoring call November 8th, Jaclyn attended MARC Public Education meeting November 13th, Rollin and Jaclyn attended MARC Air Quality Forum November 20th, Mark and Jaclyn participated in KDHE BOA Permitting call December 6th, Rollin participated in KDHE BOA Enforcement call December 11th, Rollin and Jaclyn attended MARC Air Quality Forum December 12th, Rollin participated in CenSARA Board call December 20th, Mark and Jaclyn participated in KDHE BOA Permitting call</p>
<p>2nd Quarter (1/01 – 3/31/19)</p>	<p>January 10th, Jaclyn attended MARC Public Education meeting January 18th, Rollin attended Tree Board Meeting January 22nd, Rollin and Jaclyn participated in KDHE BOA Permitting call February 11th-12th, Jaclyn and Mark attended CenSARA PSD/NSR (Advanced) in Topeka, KS February 13th, Rollin participated in CenSARA Board of Directors Call February 15th, Jaclyn and Mark participated in KDHE BOA Permitting call February 20th-21st, Jaclyn attended NACT #299 Air Pollution Control Devices in Topeka, KS February 21st, Erik participated in NACAA Monitoring Committee call February 27th, Rollin participated in NACAA Criteria Pollutant Call March 7th, Rollin participated in KDHE BOA Enforcement Call March 12th, Rollin attended MARC Air Quality Forum March 12th-14th, Jaclyn, Erik, and Mark attended NACT #355 Advanced Inspector Training in Topeka, KS March 19th, Jaclyn and Mark participated in KDHE BOA Permitting call</p>
<p>3rd Quarter (4/01 – 6/30/19)</p>	<p>April 4th, Rollin participated in KDHE BOA Enforcement Call April 4th, All DAQ staff participated in National Public Health Week Open House; distributed DAQ Public Education materials April 9th, Rollin and Jaclyn attended MARC Air Quality Forum April 10th, Rollin participated in CenSARA Board of Directors Call April 10th, Jaclyn and Mark participated in NACAA Permitting call April 16th, Rollin, Jaclyn, and Mark participated in EPS 4 State Call April 17th, Mark, Erik, and Jaclyn attended Smoke School April 26th, Rollin and Jaclyn participated in Arbor Day Event April 29th, Jaclyn observed stack testing at Owens Corning April 29th, Jaclyn and Mark attended NACAA Spring Membership meeting in Kansas City April 29th-30th, Rollin and Erik attended NACAA Spring Membership meeting in Kansas City April 30th-May 2nd, Jaclyn attended CenSARA Principles of Air Pollution in Topeka, KS May 1st, Rollin participated in KDHE BOA Monitoring Call May 8th, Jaclyn and Mark participated in NACAA Permitting call May 9th, Jaclyn and Gayle attended MARC Public Education meeting May 14th, Rollin, Jaclyn, and Gayle attended MARC Air Quality Forum May 21st, Jaclyn, Mark, and Gayle participated in KDHE Permitting call May 22nd-23rd, Rollin, Jaclyn, and Gayle attended the Spring BEFS meeting in Hays, KS June 18th-20th, Jaclyn, Mark, and Gayle attended CenSARA Principles of Environmental Compliance and Enforcement in Topeka, KS</p>
<p>4th Quarter (7/01 – 9/30/19)</p>	

V. Emission Reduction Strategies

DAQ will continue to implement strategies that reduce emissions.

- Promotion of Idling Rule for Wyandotte and Johnson Counties in Wyandotte County.

- Continue to distribute educational materials at appropriate venues
- Coordinate with KDHE to place signage in appropriate spots.
- Promotion of good commuter habits to drivers of vehicles that do not fall under the Idling Rule. (Gasoline powered vehicles and diesel fueled vehicles weighing less than 14,000 pounds, activities may include:
 - Provide routine newsletter and e-mail updates containing pertinent information on good commuter behavior to employees during ozone season.
 - Operate a bicycle check out program for UG employees for appropriate local work related travel.
 - Participate in gas cap testing or Car Clinic events for general public efforts
 - Maintain educational materials on the website.
- Promotion of Yard Care for Clean Air at appropriate venues in Wyandotte County.
 - Continue to maintain yard care educational materials on the website
 - Participate at yard care events as appropriate

DAQ and BOA acknowledge that the above list of emissions sources and associated strategies may be modified in support of state and local air quality initiatives and after consultation with BOA.

1st Quarter (10/1 – 12/31/18)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>
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4th Quarter (7/01 – 9/30/19)	

VI. Ambient Air Monitoring

DAQ will establish, operate and maintain the following monitors:

Monitoring	Number
NO _x	1
NO _y	1
CO, O ₃ , SO ₂	3
PM ₁₀	2
Johnson County	
O ₃	1
Lead	1

NAMS/ SLAMS & SPM operation

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

General O & M and QA/AC

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Particulate Matter/PM₁₀

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Continuous Gaseous Monitors

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Review and Submission of Data

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Johnson County Monitor

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

VII. Indirect Costs

DAQ and BOA agree to indirect costs associated with this contract of 19.7% of the total account reimbursed by BOA.

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
See Affidavit	See Affidavit	See Affidavit	

**ATTACHMENT A
LOCAL AGENCY WORK PLAN**

For

**Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Department of Air Quality (DAQ)
FFY2020 EPA 103 Funds
Contract Period April 1, 2019 – March 31, 2020**

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agrees to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	State Phone #	Primary DAQ Contact	DAQ Phone #
Contract Administrator	Linda Vandevord	785-296-6423	Rollin Sachs	913-573-6700
Workplan and Budget	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Network Design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Erik Wolf	913-573-6700
Sample or data submission	Mike Martin Yao Tang	785-296-1571 785-291-3555	Erik Wolf	913-573-6700

II. Ambient Air Monitoring

A. Requirements

1. The DAQ will operate the State/Local Air Monitoring Stations (SLAMS), and Special Purpose Monitoring (SPM) and make timely submittal of all samples and data in accordance with procedures presented in the following documents:
 - 40 CFR Part 58;
 - State of Kansas Implementation Plan for Attainment and Maintenance of NAAQS, Sec. E – Monitoring Plan;
 - Kansas Ambient Air Monitoring Quality Assurance Program/Project Plans (QAPPs) and associated standard operating procedures (SOPs); and
 - Instrument Operator’s Manuals.
2. DAQ agrees to provide monitoring field support to BOA in responding to natural disasters or other emergent situations.

B. General Documentation

1. Operation: DAQ will make regularly scheduled site visits, and additional site visits as necessary for maintenance, repairs, and QA/QC activities. ¹ Document all site visits and activities, and maintain required records and logs.
2. Maintenance: DAQ will perform minor repairs or secure repair service from manufacturer as needed. Coordinate more difficult problems with BOA field staff. Notify BOA by the next working day that an ambient air monitor is down due to equipment failure and provide estimated down time for repairs. Document all maintenance and repair activities, and maintain required records and logs.

C. PM_{2.5} FRMs

1. For sequential PM_{2.5} equipment DAQ will retrieve/change, prepare, and ship PM_{2.5} filter elements (including field blanks) to contract laboratory on schedule. Collect field blank after every tenth routine sample. Download/record, review, and transmit required data from samplers per schedule

¹ At the conclusion of each month QA/QC documents are provided to the BOA Data Manager (Yao Tang).

in item E of this section. Perform monthly maintenance and verifications (date, time temperature, pressure, leak check, flow rate). Perform annual calibrations.

2. For continuous PM_{2.5} equipment DAQ will perform routine calibration, maintenance and verification activities per the most current version of Ambient Air Monitoring Standard Operating Procedure.

D. PM_{2.5} Speciation

1. DAQ will retrieve/change, prepare, and ship filter cassettes to laboratory on schedule. Submit field blanks and trip blanks to laboratory. Download/record, review, and transmit required data from speciation sampler.
2. DAQ will perform monthly verifications (date and time, temperature, pressure, leak check, flow check) and annual calibrations.

E. Review and Submission of Data

1. DAQ will transmit PM_{2.5} filter and interval data to BOA on a regular basis.

F. Johnson County Monitors

1. DAQ will operate and maintain the existing Johnson County monitors (PM_{2.5}) in the manner described above.

G. Reporting and Funding

1. DAQ will provide quarterly updates on the progress of the Ambient Air Monitoring activities.²
2. Locations

Monitoring	Location	Number
<i>Wyandotte County</i>		
PM2.5 Continuous	NCore	1
PM2.5 Sequential, 1 and 3-day schedule	NCore	1
PM2.5 Speciation (3 filters per run between 2 instruments)	NCore	1
<i>Johnson County</i>		
PM2.5 Sequential	Justice Center	1
PM2.5 Continuous	Heritage Park	1
TOTAL		5

H. Quarterly Reporting Requirements

1st Quarter (4/01/18 – 6/30/19)	2nd Quarter (7/01/19 – 9/30/19)	3rd Quarter (10/1/19 – 12/31/19)	4th Quarter (1/1/20 – 3/31/20)
<input checked="" type="checkbox"/>			

III. Indirect Costs

- A. DAQ and BOA agree to indirect costs associated with this contract of 17.6 percent of the total account reimbursed by BOA.

B. Quarterly Reporting Requirements

1st Quarter (4/01/19– 6/30/19)	2nd Quarter (7/01/19 – 9/30/19)	3rd Quarter (10/1/19 – 12/31/19)	4th Quarter (1/1/20 – 3/31/20)
See Affidavit			

² The quarterly updates should continue to appear with quarterly affidavit submissions.

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT
AFFIDAVIT OF EXPENDITURES**

GRANTEE NAME:

Unified Government of Wyandotte County - Kansas City, Kansas Health Department
Phone: 913-573-6700

REPORTING PERIOD

April 1, 2019 to June 30, 2019

GRANT EXPENDITURES		Air Quality Fee Fund 2020	Federal Grant 105	Federal Grant 103	Local Match	Total Amount
\$493,100.00	Permitting Compliance & Enforcement RATA Inspections Planning Emission Reduction Strategies Public Education & Outreach Blue Skyways Ambient Air Monitoring Local Priorities Program Maintenance	\$ 27,726.28	\$ 49,510.24	\$ 7,849.39	\$ 20,348.59	\$105,434.50
\$99,764.00	Indirects	\$ 4,720.43	\$ 8,911.84	\$ 1,381.49	\$ 16,989.43	\$32,003.19
	Affidavit Total	\$32,446.71	\$58,422.08	\$9,230.88	\$37,338.02	\$137,437.69

By electronic submission, the local agency administrator below certified that this report is in agreement with the agency official accounting records and that individual employee time reports are maintained documenting time charged to this program

ADMINISTRATOR NAME:

Terry Brecheisen

DATE:

7/15/2019



Public Health Department
Terry Brecheisen, Director

619 Ann Avenue
Kansas City, KS 66101-3038

Phone (913) 573-8855
Fax (913) 321-7932

April 25, 2019

Ms. Linda Vandevord
Public Service Administrator
Bureau of Air
Kansas Department of Health & Environment
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Re: Unified Gov't of WyCo/KCK Work Plan and Affidavit

Dear Ms. Vandevord:

Attached are the Unified Government Division of Air Quality's work plan and affidavit for the 2nd quarter of FY19 (January 1, 2019 – March 31, 2019). If you have any questions, please call Rollin Sachs at your convenience.

Sincerely,

Jaclyn Brown
Environmental Scientist

c: Rollin Sachs, Division of Air Quality
John Werner, Business Manager, UG Public Health Dept.



/APPENDIX A
LOCAL AGENCY WORK PLAN
for
Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Division of Air Quality (DAQ)
FY 2019
Contract Period October 1, 2018 – September 30, 2019

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agree to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	Phone #	Primary DAQ Contact	Phone #
General				
General Administrative Duties	Rick Brunetti	785-296-1551	Rollin Sachs	913-573-6700
Permitting				
Liaison for Permitting	Gyanendra Prasai	785-296-6427	Rollin Sachs	913-573-6700
Compliance and Enforcement				
Administrative Issues; QA/QC	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Compliance and Enforcement	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Performance Testing and RATA	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Planning				
Planning Activities	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
Emission Reduction Strategies/ Public Education				
Emission Reduction Strategies	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Monitoring				
Administrative Issues	Kathleen Waters	785-296-1692	Rollin Sachs	913-573-6700
Network design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin	785-296-1571	Rollin Sachs	913-573-6700
Data Issues	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700

II. Air Permitting

Issued Type	1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
PSD	None	None		
Class I Permit	None	None		
Construction Permit	None	None		
Class I Renewals; Class II; Major Modifications	O-14225: 12/07/2018 - 2090075	O-12324: 01/14/2019 - 2090060		
All Other Permits, Registrants & Approvals	C-14440: 10/02/2018 – 2090309 C-14404: 10/08/2018 – 2090060 CSA04059 v1.0: 10/10/2018 – 2090023 CSA04088 v1.0: 10/24/2018 – 2090060 CSA04125 v1.0: 12/04/2018 – 2090326 CSA04126 v1.0: 12/04/2018 – 2090325 CSA04163 v1.0: 12/13/2018 – 2090329 CSA04165 v1.0: 12/13/2018 – 2090330 CSA04166 v1.0: 12/13/2018 – 2090331 CSA04146 v1.0: 12/17/2018 – 2090327 CSA04145 v1.0: 12/17/2018 – 2090328 CSA04117 v1.0: 12/18/2018 – 2090305 CSA04118 v1.0: 12/18/2018 – 2090305 CSA04119 v1.0: 12/18/2018 – 2090305 CSO03262 v1.0: 12/28/2018 – 2090111	CSA04172 v1.0: 01/28/2019 – 2090046 CSA04223 v1.0: 03/11/2019 – 2090332 CSA04202 v1.0: 03/21/2019 – 2090039 CSA04210 v1.0: 03/27/2019 – 2090001		

III. Compliance and Enforcement

Inspections – Major Sources

1 st Quarter (10/1 – 12/31/18)	2090046 – General Motors LLC – 12/10/2018 2090001 – CertainTeed Corporation – 12/19/2018
2 nd Quarter (1/01 – 3/31/19)	2090009 – Amsted Rail Company – 03/21/2019 2090008 – BPU Nearman Creek Power Station – 03/25/2019 2090194 – Stericycle – 03/27/2019
3 rd Quarter (4/01 – 6/30/19)	
4 th Quarter (7/01 – 9/30/19)	

Inspections – Synthetic Minors

1 st Quarter (10/1 – 12/31/18)	2090023 – Bartlett Grain Company – 10/29/2018 2090040 – Bartlett Grain Co., LP – 10/29/2018 2090300 – ACH FOAM Technologies, LLC – 11/14/2018 2090055 – GFG Agriproducts, LLC – 11/14/2018 2090014 – Talon Concrete & Aggregates – 11/15/2018 2090309 – ZW Tech, LLC – 11/15/2018 2090038 – Quikrete-Kansas City – 11/28/2018 2090017 – Grain Craft – 12/04/2018 2090047 – Pentair – 12/05/2018 2090044 – Cargill – 12/12/2018
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2nd Quarter (1/01 – 3/31/19)	2090012 – VVF – 03/07/2019 2090232 – Nexeo Solutions, LLC – 03/08/2019 2090065 – Fuchs Lubricants Co. – 03/08/2019 2090229 – Garsite – 03/20/2019 2090026 – Kaw Valley Sand and Gravel – 03/21/2019 2090011 – Procter & Gamble – 03/21/2019 2090202 – Barton Solvents, Inc. – 03/26/2019 2090077 – Keebler Company – 03/27/2019 2090277 – KU Hospital Authority – 03/28/2019
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

Inspections – NESHAP/MACT/B

1st Quarter (10/1 – 12/31/18)	7770893 – Talon Concrete & Aggregates – 11/15/2018
2nd Quarter (1/01 – 3/31/19)	
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

Complaint Investigations

1st Quarter (10/1 – 12/31/18)	10/22/2018 – Dust being emitted from construction activities on bridge from westbound I-70 10/23/2018 – Alleged illegal burning of garbage in a neighborhood - 5520 Knox Ave 11/02/2018 – Dust found on cars near dumpster at Certainteed (2090001) 11/29/2018 – Dumping of several containers at 11 th and Lathrop- Certainteed (2090001) 12/03/2018 – Open burning of plastic in neighborhood – 2712 N. 18 th Street 12/21/2018 – Concern over improper asbestos abatement activities at 1140 Richmond Ave.
2nd Quarter (1/01 – 3/31/19)	03/01/2019 – 2090029 Odor complaint believed to originate at Darling Ingredients Inc. 03/21/2019 – 2090162 Heavy opacity observed from stack at Advantage Metals
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

IV. Planning

DAQ will attend and participate in committees and other group meetings to develop, discuss, review and revise priorities, plans and strategies (both regulatory and voluntary) for improving air quality. These include MARC Air Quality and Public Education Forums, Clean Cities, DAQ Sustainability Committee and others as appropriate.

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2nd Quarter	January 10 th , Jaclyn attended MARC Public Education meeting

(1/01 – 3/31/19)	<p>January 18th, Rollin attended Tree Board Meeting</p> <p>January 22nd, Rollin and Jaclyn participated in KDHE BOA Permitting call</p> <p>February 11th-12th, Jaclyn and Mark attended CenSARA PSD/NSR (Advanced) in Topeka, KS</p> <p>February 13th, Rollin participated in CenSARA Board of Directors Call</p> <p>February 15th, Jaclyn and Mark participated in KDHE BOA Permitting call</p> <p>February 20th-21st, Jaclyn attended NACT #299 Air Pollution Control Devices in Topeka, KS</p> <p>February 21st, Erik participated in NACAA Monitoring Committee call</p> <p>February 27th, Rollin participated in NACAA Criteria Pollutant Call</p> <p>March 7th, Rollin participated in KDHE BOA Enforcement Call</p> <p>March 12th, Rollin attended MARC Air Quality Forum</p> <p>March 12th-14th, Jaclyn, Erik, and Mark attended NACT #355 Advanced Inspector Training in Topeka, KS</p> <p>March 19th, Jaclyn and Mark participated in KDHE BOA Permitting call</p>
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DAQ and BOA acknowledge that the above list of emissions sources and associated strategies may be modified in support of state and local air quality initiatives and after consultation with BOA.

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NO _y	1
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NAMS/ SLAMS & SPM operation

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

General O & M and QA/AC

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Particulate Matter/PM₁₀

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Continuous Gaseous Monitors

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Review and Submission of Data

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Johnson County Monitor

1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
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VII. Indirect Costs

DAQ and BOA agree to indirect costs associated with this contract of 19.7% of the total account reimbursed by BOA.

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
See Affidavit	See Affidavit		

**APPENDIX A
LOCAL AGENCY WORK PLAN**

For

Unified Government of Wyandotte County, Kansas City, Kansas Health Department

Division of Air Quality (DAQ)

FFY 2018 EPA 103 Funds

Contract Period April 1, 2018 – March 31, 2019

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agrees to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary Contact	State	Phone #	Primary DAQ Contact	Phone #
Contract Administrator	Linda Vandevord		785-296-6423	Rollin Sachs	913-573-6700
Workplan and Budget	Kathleen Waters		785-296-1575	Rollin Sachs	913-573-6700
Network Design/configuration	Doug Watson		785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin		785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin Yao Tang		785-296-1571 785-291-3555	Rollin Sachs	913-573-6700

II. Ambient Air Monitoring

DAQ will establish, operate and maintain the following monitors:

Monitoring	Location	Number
<i>Wyandotte County</i>		
PM2.5 Continuous	NCore	1
PM2.5 Filter-based	NCore	1
PM2.5 Speciation (3 filters per run between 2 instruments)	NCore	1
<i>Johnson County</i>		
PM2.5 Filter-based	Justice Center	1
PM2.5 Continuous	Heritage Park	1
TOTAL		5

NAMS/ SLAMS & SPM operation

1st Quarter (4/01/18 – 6/30/18)	2nd Quarter (7/01/18 – 9/30/18)	3rd Quarter (10/1/18 – 12/31/18)	4th Quarter (1/01/19 – 3/31/19)
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General O & M and QA/AC

1st Quarter (4/01/18 – 6/30/18)	2nd Quarter (7/01/18 – 9/30/18)	3rd Quarter (10/1/18 – 12/31/18)	4th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Continuous PM_{2.5}

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

PM_{2.5} Speciation

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Johnson County Monitors

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
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Review and Submission of Data

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

III. Indirect Costs

DAQ and BOA agree to an indirect costs associated with this contract of 18.00% of the total account reimbursed by BOA.

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
See Affidavit	See Affidavit	See Affidavit	See Affidavit

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT
AFFIDAVIT OF EXPENDITURES**

GRANTEE NAME:

Unified Government of Wyandotte County - Kansas City, Kansas Health Department
Phone: 913-573-6700

REPORTING PERIOD

January 1, 2019 to March 31, 2019

GRANT EXPENDITURES		Air Quality Fee Fund 2020	Federal Grant 105	Federal Grant 103	Local Match	Total Amount
\$493,100.00	Permitting Compliance & Enforcement RATA Inspections Planning Emission Reduction Strategies Public Education & Outreach Blue Skyways Ambient Air Monitoring Local Priorities Program Maintenance	\$ 29,034.13	\$ 56,394.28	\$ 12,747.80	\$ 21,195.82	\$119,372.03
\$99,764.00	Indirects	\$ 5,226.18	\$ 10,150.97	\$ 3,249.72	\$ 17,260.56	\$35,887.43
	Affidavit Total	\$34,260.31	\$66,545.25	\$15,997.52	\$38,456.38	\$155,259.46

By electronic submission, the local agency administrator below certified that this report is in agreement with the agency official accounting records and that individual employee time reports are maintained documenting time charged to this program

ADMINISTRATOR NAME:

Louise Lawson

DATE:

4/15/2019



Public Health Department
Terry Brecheisen, Director

619 Ann Avenue
Kansas City, KS 66101-3038

Phone (913) 573-8855
Fax (913) 321-7932

January 25, 2019

Ms. Linda Vandevord
Public Service Administrator
Bureau of Air
Kansas Department of Health & Environment
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Re: Unified Gov't of WyCo/KCK Work Plan and Affidavit

Dear Ms. Vandevord:

Attached are the Unified Government Division of Air Quality's work plan and affidavit for the 1st quarter of FY19 (October 1, 2018 – December 31, 2018). If you have any questions, please call Rollin Sachs at your convenience.

Sincerely,

Jaclyn Brown
Environmental Scientist

c: Rollin Sachs, Division of Air Quality
John Werner, Business Manager, UG Public Health Dept.



Promoting good health and a safe environment for a better community.

**/APPENDIX A
LOCAL AGENCY WORK PLAN
for
Unified Government of Wyandotte County, Kansas City, Kansas Health Department
Division of Air Quality (DAQ)
FY 2019
Contract Period October 1, 2018 – September 30, 2019**

The Bureau of Air (BOA), on behalf of the Kansas Department of Health and Environment (KDHE), and the Unified Government of Wyandotte County, Kansas City, Kansas Health Department, Division of Air Quality (DAQ) hereby agree to comply with the cooperative intent of the Clean Air Act within Wyandotte County as follows:

I. Contacts

Issue/Activity	Primary State Contact	Phone #	Primary DAQ Contact	Phone #
General				
General Administrative Duties	Rick Brunetti	785-296-1551	Rollin Sachs	913-573-6700
Permitting				
Liaison for Permitting	Gyanendra Prasai	785-296-6427	Rollin Sachs	913-573-6700
Compliance and Enforcement				
Administrative Issues; QA/QC	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Compliance and Enforcement	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Performance Testing and RATA	Connie Ellis	785-296-1556	Rollin Sachs	913-573-6700
Planning				
Planning Activities	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
Emission Reduction Strategies/ Public Education				
Emission Reduction Strategies	Kathleen Waters	785-296-1575	Rollin Sachs	913-573-6700
Monitoring				
Administrative Issues	Kathleen Waters	785-296-1692	Rollin Sachs	913-573-6700
Network design/configuration	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700
General Operation and Maintenance	Gary Ficklin	785-296-1554	Rollin Sachs	913-573-6700
Sample or data submission	Mike Martin	785-296-1571	Rollin Sachs	913-573-6700
Data Issues	Doug Watson	785-296-0910	Rollin Sachs	913-573-6700

II. Air Permitting

Issued Type	1 st Quarter (10/1 – 12/31/18)	2 nd Quarter (1/01 – 3/31/19)	3 rd Quarter (4/01 – 6/30/19)	4 th Quarter (7/01 – 9/30/19)
PSD	None			
Class I Permit	None			
Construction Permit	None			
Class I Renewals; Class II; Major Modifications	O-14225: 12/07/2018 - 2090075			
All Other Permits, Registrants & Approvals	C-14440: 10/02/2018 – 2090309 C-14404: 10/08/2018 – 2090060 CSA04059 v1.0: 10/10/2018 – 2090023 CSA04088 v1.0: 10/24/2018 – 2090060 CSA04125 v1.0: 12/04/2018 – 2090326 CSA04126 v1.0: 12/04/2018 – 2090325 CSA04163 v1.0: 12/13/2018 – 2090329 CSA04165 v1.0: 12/13/2018 – 2090330 CSA04166 v1.0: 12/13/2018 – 2090331 CSA04146 v1.0: 12/17/2018 – 2090327 CSA04145 v1.0: 12/17/2018 – 2090328 CSA04117 v1.0: 12/18/2018 – 2090305 CSA04118 v1.0: 12/18/2018 – 2090305 CSA04119 v1.0: 12/18/2018 – 2090305 CSO03262 v1.0: 12/28/2018 – 2090111			

III. Compliance and Enforcement

Inspections – Major Sources

1 st Quarter (10/1 – 12/31/18)	2090046 – General Motors LLC – 12/10/2018 2090001 – CertainTeed Corporation – 12/19/2018
2 nd Quarter (1/01 – 3/31/19)	
3 rd Quarter (4/01 – 6/30/19)	
4 th Quarter (7/01 – 9/30/19)	

Inspections – Synthetic Minors

1st Quarter (10/1 – 12/31/18)	2090023 – Bartlett Grain Company – 10/29/2018 2090040 – Bartlett Grain Co., LP – 10/29/2018 2090300 – ACH FOAM Technologies, LLC – 11/14/2018 2090055 – GFG Agriproducts, LLC – 11/14/2018 2090014 – Talon Concrete & Aggregates – 11/15/2018 2090309 – ZW Tech, LLC – 11/15/2018 2090038 – Quikrete-Kansas City – 11/28/2018 2090017 – Grain Craft – 12/04/2018 2090047 – Pentair – 12/05/2018 2090044 – Cargill – 12/12/2018
2nd Quarter (1/01 – 3/31/19)	
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

Inspections – NESHAP/MACT/B

1st Quarter (10/1 – 12/31/18)	7770893 – Talon Concrete & Aggregates – 11/15/2018
2nd Quarter (1/01 – 3/31/19)	
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

Complaint Investigations

1st Quarter (10/1 – 12/31/18)	10/22/2018 – Dust being emitted from construction activities on bridge from westbound I-70 10/23/2018 – Alleged illegal burning of garbage in a neighborhood - 5520 Knox Ave 11/02/2018 – Dust found on cars near dumpster at Certainteed (2090001) 11/29/2018 – Dumping of several containers at 11 th and Lathrop- Certainteed (2090001) 12/03/2018 – Open burning of plastic in neighborhood – 2712 N. 18 th Street 12/21/2018 – Concern over improper asbestos abatement activities at 1140 Richmond Ave.
2nd Quarter (1/01 – 3/31/19)	
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

IV. Planning

DAQ will attend and participate in committees and other group meetings to develop, discuss, review and revise priorities, plans and strategies (both regulatory and voluntary) for improving air quality. These include MARC Air Quality and Public Education Forums, Clean Cities, DAQ Sustainability Committee and others as appropriate.

1st Quarter (10/1 – 12/31/18)	<p>October 2nd-3rd, Rollin attended CenSARA Fall meeting in Oklahoma City, Oklahoma</p> <p>October 4th, Rollin participated in KDHE BOA Enforcement call</p> <p>October 9th, Mark and Jaclyn participated in KDHE BOA Permitting call</p> <p>October 9th, Rollin and Jaclyn attended MARC Air Quality Forum</p> <p>October 10th-11th, Rollin, Mark, and Jaclyn attended EPA Region 7 Air Agencies meeting in Lenexa</p> <p>October 14th-16th, Rollin attended NACAA Fall Membership meeting in Cleveland, Ohio</p> <p>October 16th, Mark attended Smoke School Lecture</p> <p>October 17th, Mark, Erik, and Jaclyn attended Smoke School</p> <p>October 24th-25th, Rollin and Jaclyn attended the BEFS meeting in Topeka</p> <p>October 26th, Rollin participated in KDHE BOA monitoring call</p> <p>October 31st, Jaclyn observed WaterOne engine testing</p> <p>November 1st, Rollin participated in KDHE BOA monitoring call</p> <p>November 8th, Jaclyn attended MARC Public Education meeting</p> <p>November 13th, Rollin and Jaclyn attended MARC Air Quality Forum</p> <p>November 20th, Mark and Jaclyn participated in KDHE BOA Permitting call</p> <p>December 6th, Rollin participated in KDHE BOA Enforcement call</p> <p>December 11th, Rollin and Jaclyn attended MARC Air Quality Forum</p> <p>December 12th, Rollin participated in CenSARA Board call</p> <p>December 20th, Mark and Jaclyn participated in KDHE BOA Permitting call</p>
2nd Quarter (1/01 – 3/31/19)	
3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

V. Emission Reduction Strategies

DAQ will continue to implement strategies that reduce emissions.

- Promotion of Idling Rule for Wyandotte and Johnson Counties in Wyandotte County.
 - Continue to distribute educational materials at appropriate venues
 - Coordinate with KDHE to place signage in appropriate spots.
- Promotion of good commuter habits to drivers of vehicles that do not fall under the Idling Rule. (Gasoline powered vehicles and diesel fueled vehicles weighing less than 14,000 pounds, activities may include:
 - Provide routine newsletter and e-mail updates containing pertinent information on good commuter behavior to employees during ozone season.
 - Operate a bicycle check out program for UG employees for appropriate local work related travel.
 - Participate in gas cap testing or Car Clinic events for general public efforts
 - Maintain educational materials on the website.
- Promotion of Yard Care for Clean Air at appropriate venues in Wyandotte County.
 - Continue to maintain yard care educational materials on the website
 - Participate at yard care events as appropriate

DAQ and BOA acknowledge that the above list of emissions sources and associated strategies may be modified in support of state and local air quality initiatives and after consultation with BOA.

1st Quarter (10/1 – 12/31/18)	<p>The DAQ continues to operate the Clean Commute (bicycle check out) program designed to encourage UG employees to reduce air pollution by using alternative modes of transportation.</p> <p>The DAQ continues to corresponded with Unified Government departments, as well as private business with regards to planting native plants for the purpose of reducing lawn and garden equipment emissions.</p> <p>The Unified Government continues to be a RideShare Connection employer. RideShare Connection is a web-based service that connects UG employees who are interested in carpooling.</p>
2nd Quarter (1/01 – 3/31/19)	

3rd Quarter (4/01 – 6/30/19)	
4th Quarter (7/01 – 9/30/19)	

VI. Ambient Air Monitoring

DAQ will establish, operate and maintain the following monitors:

Monitoring	Number
NO _x	1
NO _y	1
CO, O ₃ , SO ₂	3
PM ₁₀	2
Johnson County	
O ₃	1
Lead	1

NAMS/ SLAMS & SPM operation

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>			

General O & M and QA/AC

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>			

Particulate Matter/PM₁₀

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>			

Continuous Gaseous Monitors

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
<input checked="" type="checkbox"/>			

Review and Submission of Data

1st Quarter (10/1 – 12/31/18)	2nd Quarter (1/01 – 3/31/19)	3rd Quarter (4/01 – 6/30/19)	4th Quarter (7/01 – 9/30/19)
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Johnson County Monitor

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For

Unified Government of Wyandotte County, Kansas City, Kansas Health Department

Division of Air Quality (DAQ)

FFY 2018 EPA 103 Funds

Contract Period April 1, 2018 – March 31, 2019

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General O & M and QA/AC

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<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Continuous PM_{2.5}

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

PM_{2.5} Speciation

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Johnson County Monitors

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Review and Submission of Data

1 st Quarter (4/01/18 – 6/30/18)	2 nd Quarter (7/01/18 – 9/30/18)	3 rd Quarter (10/1/18 – 12/31/18)	4 th Quarter (1/01/19 – 3/31/19)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

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DAQ and BOA agree to an indirect costs associated with this contract of 18.00% of the total account reimbursed by BOA.

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See Affidavit	See Affidavit	See Affidavit	

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT
AFFIDAVIT OF EXPENDITURES**

GRANTEE NAME: Unified Government of Wyandotte County - Kansas City, Kansas Health Department
Phone: 913-573-6700

REPORTING PERIOD October 1, 2018 to December 31, 2018

GRANT EXPENDITURES		Air Quality Fee Fund 2020	Federal Grant 105	Federal Grant 103	Local Match	Total Amount
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\$99,764.00	Indirects	\$ 4,685.53	\$ 6,757.10	\$ 757.59	\$ 8,571.47	\$20,771.69
	Affidavit Total	\$31,274.03	\$44,296.52	\$4,603.24	\$8,571.47	\$88,745.26

By electronic submission, the local agency administrator below certified that this report is in agreement with the agency official accounting records and that individual employee time reports are maintained documenting time charged to this program

ADMINISTRATOR NAME: Terry Brocheison **DATE:** 1/22/2019

ATTACHMENT C: Completed Title V Questionnaire

Returned by KDHE prior to Audit.

[see the attached copy]

Title V Program
Self-Evaluation Questionnaire

Last Updated: December 7, 2006

Instructions for completing the Title V Permit Program Self-Evaluation Questionnaire

- When answering Yes or No questions, please add explanation as appropriate to clarify your response.
- Please skip any sections of the self-evaluation questionnaire that do not apply within your permitting jurisdiction rather than answering hypothetically.
- If you have a written policy or guidance document that substantially answers any question in this self-evaluation questionnaire, please so indicate and either attach a hardcopy to your response or point to a specific URL on your public web server where the document may be found.
- This self-evaluation questionnaire was developed by EPA Headquarters and Regions to assist in the agency's Title V oversight program. As part of its peer review process, EPA sought review and comment from STAPPA-ALAPCO. While this questionnaire has undergone a make-over from the original, the scope and detail of the questions asked remains the same for all agencies.

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- A. Title V Permit Preparation and Content
- B. General Permits (GP)
- C. Monitoring
- D. Public Participation and Affected State Review
- E. Permit Issuance / Revision / Renewal
- F. Compliance
- G. Resources & Internal Management Support
- H. Title V Benefits

A. Title V Permit Preparation and Content

1. What % of your initial applications contained sufficient information so the permit could be drafted without seeking additional information? What efforts were taken to improve quality of applications if this % was low?

Response: There is almost always some additional information needed after we received the initial applications. We could draft a permit for about 15% to 20% of the applications with the amount of information submitted with the applications. But some additional information is almost always required before final permit issuance. For instance, periodic monitoring requirements and regulations often change and because of the lengthy time period between receipt of application to permit issuance, application updates were essential. Some applications needed little update; others required extensive revision.

- Y N** 2. For those title V sources with an application on file, do you require the sources to update their applications in a timely fashion if a significant amount of time has passed between application submittal and the time you draft the permit?

Response: We do not have a requirement for the applicants to do this. However, if a significant amount of time had passed since an application was submitted, the permit reviewer will always ask for updated information in order to maintain the application current.

- Y N** a. Do you require a new compliance certification?

Response: A compliance certification is always required as part of the application and as deemed necessary we may require a new compliance certification if a significant of time has passed since application submittal and the draft permit.

- Y N** 3. Do you verify that the source is in compliance before a permit is issued and if so, how?

Response: Class I sources are required to submit an Annual Compliance Certification. Additionally, the permit writer performs a file review that includes inspection reports. If not provided in the application or the file, the permit writer will solicit additional information to determine regulatory compliance. In addition, the compliance and enforcement staff send a bi-weekly report on facilities that are not in compliance with all requirements.

Y x N

- a. In cases where the facility is out of compliance, are specific milestones and dates for returning to compliance included in the permit, or do you delay issuance until compliance is attained?

Response: Permit Section staff work with the BOA Compliance section to include dates and milestones, when needed. Class I permits are not specifically held up due to non-compliance issues. However, due to the work involved in developing milestones with the assistance of the BOA Compliance section and coordinating the milestones with the source can cause permits to be delayed sometime.

Y N

4. What have you done over the years to improve your permit writing and processing time?

Response: KDHE BOA staff participate in permit writing training from CenSARA and use standardized formats and conditions. We recently implemented on-line permitting system (KEIMS), which will improve tracking status of permits throughout the permitting process, from application submission through permit finalization. Additionally, BOA uses standardized forms, such as equipment forms, as part of the application submission process.

Y x N

5. Do you have a process for quality assuring your permits before issuance? Please explain.

Response: All permits are reviewed for both accuracy and completeness by a supervisor and the Permit Section Chief before issuance. The Bureau Director also reviews Title V permits before issuance. In most cases, the draft permit is provided to the source to review for accuracy and completeness.

6. Do you utilize any streamlining strategies in preparing the permit such as:

Y x N

- a. Incorporating test methods, major and minor New Source Review permits, MACT's, other Federal requirements into the Title V permit by referencing the permit number, FR citation, or rule? Explain.

Response: We streamline applicable requirements while also ensuring clarity of the requirements. Federal requirements are cited by section or paragraph to the level that the requirements are clear. Less complex federal requirements may be restated.

Y x N □

- b. Streamlining multiple applicable requirements on the same emission unit(s) (i.e., grouping similar units, listing the requirements of the most stringent applicable requirements)? Describe.

Response: We do this when possible and reasonable. Units with the same requirements are grouped together in the permit. Format flexibility is provided for complex sources, but generally, the requirement is stated with a list of the units subject to that requirement, in that the requirement is generally longer than the unit list. Units can also be compiled into groups, or individual activities can be compiled into units to the extent that the requirements are similar.

- c. Describe any other streamlining efforts.

Response: We implement EPA guidance for streamlining, such as for insignificant activities and facility wide requirements.

7. What do you believe are the strengths and weaknesses of the format of the permits (i.e. length, readability, facilitates compliance certifications, etc.)? Why?

Response: Facility requirements are made clear and concise for the public, the source, and inspectors through individual listings of facility air quality activities and facility wide requirements. A focus is put on the more significant units, requirements and monitoring.

8. How do you fulfill the requirement for a statement of basis? Please provide examples.

Response: The statement of basis attempts to identify the potential applicable requirements and provide summary statements as to why units may not be subject. Renewal SOB's address renewal issues and facility changes.

9. Does the statement of basis¹ explain:

¹ The Statement of Basis sets forth the legal and factual basis for the permit as required by 70.7(a)(5). The permitting authority might use another name for this document such as Technical Support Document, Determination of Compliance, Fact Sheet.

Y x N a. the rationale for monitoring (whether based on the underlying standard or monitoring added in the permit)?

Y x N b. applicability and exemptions, if any?

Y x N c. streamlining (if applicable)?

Y x N 10. Do you provide training and/or guidance to your permit writers on the content of the statement of basis?

11. Do any of the following affect your ability to issue timely initial title V permits:

Y **N** a. SIP backlog (i.e., EPA approval still awaited for proposed SIP revisions)

Y **N** b. Pending revisions to underlying NSR permits

Y x N c. Compliance/enforcement issues

Y **N** d. EPA rule promulgation awaited (MACT, NSPS, etc.)

Y x N e. Issues with EPA on interpretation of underlying applicable requirements

Response: Not usually, only on occasion.

Y x N f. Permit renewals and permit modification (i.e., competing priorities)

Y x N g. Awaiting EPA guidance

Response: Yes, sometimes.

i. If yes, what type of guidance?

Response: An example - MACT requirements in Title V permits.

Y N

ii. If yes, have you communicated this to EPA?

Response:

Not formally. We sometimes have discussions concerning these types of issues on our monthly call with EPA staff.

A. If yes, how did you request the guidance?

If yes, please specify what type of EPA guidance, and how you requested the guidance

Note: If yes to any of the above, please explain.

12. Any additional comments on permit preparation or content?

Response: None

B. General Permits (GP)

- Y N** 1. Do you issue general permits?
- a. If no, go to next section
 - b. If yes, list the source categories and/or emission units covered by general permits.
- Y N** 2. In your agency, can a title V source be subject to multiple general permits and/or a general permit and a standard "site-specific" Title V permit?
- a. What percentage of your title V sources have one or more general permits? _____%
- Y N** 3. Do the general permits receive public notice in accordance with 70.7(h)?
- a. How does the public or regulated community know what general permits have been written? (E.g., are the general permits posted on a website, available upon request, published somewhere?)
4. Is the 5 years permit expiration date based:
- Y N** a. on the date the general permit is issued?
- Y N** b. on the date you issue the authorization for the source to operate under the general permit?
5. Any additional comments on general permits?

C. Monitoring

1. How do you ensure that your operating permits contain adequate monitoring (i.e., the monitoring required in §§ 70.6(a)(3) and 70.6(c)(1)) if monitoring is not specified in the underlying standard or CAM?

Response: The permit writing staff use engineering and professional judgment on the type and the frequency of monitoring that would satisfy our agency's concern that a facility is complying with all applicable requirements.

- Y N** a. Have you developed criteria or guidance regarding how monitoring is selected for permits? If yes, please provide the guidance.

- Y N** 2. Do you provide training to your permit writers on monitoring? (e.g., periodic and/or sufficiency monitoring; CAM; monitoring QA/QC procedures including for CEMS; test methods; establishing parameter ranges)

Response: Permit writers regularly attend area and regional seminars. Additionally, the BOA tries to organize permit writers such that new people work with the more experienced people. The permit writers are guided by monitoring required by previous permits tempered by the compliance history of the facility and actual emissions vs limits by unit.

- Y N** 3. How often do you "add" monitoring not required by underlying requirements? Have you seen any effects of the monitoring in your permits such as better source compliance?

Response: State of Kansas policy referenced in statute, K.S.A. 65-3005(b) requires that the BOA be no more stringent than federal standards. Therefore, our testing requirements are generally based on State and Federal regulatory requirements. However, in order to ensure compliance, we sometimes include additional testing requirements due to unusual compliance issues that arise or based previous testing that indicated emissions were close to limits.

- Y N** 4. Are you incorporating CAM monitoring into your permits?

D. Public Participation and Affected State Review

Public Notification Process

Y x N 1. Do you publish notices on proposed title V permits in a newspaper of general circulation?

Y x N 2. Do you use a state publication designed to give general public notice?

Response: The Kansas Register, which is the official State of Kansas newspaper.

3. On average, how much does it cost to publish a public notice in the newspaper (or state publication)?

Response: It varies widely, depending on the newspaper (per publication)

Y **N x** 4. Have you published a notice for one permit in more than one paper?

a. If so, how many times have you used multiple notices for a permit?

b. How do you determine which publications to use?

c. What cost-effective approaches have you utilized for public publication?

Y x N 5. Have you developed a mailing list of people you think might be interested in title V permits you propose? [e.g., public officials, concerned environmentalists, citizens]

Response: The historic list of interested parties included required notification recipients including, District offices, Local Agencies and EPA R7 staff. Additionally, KDHE BOA has developed a listserv subscription option for all interested parties to be notified of all permit actions in Kansas. Currently, there are 73 individuals receiving automatic email updates for permit actions, including those individuals maintained on the historic list.

The listserv registration link is located at <https://www.kdheks.gov/bar/publicnotice.html>

a. How does a person get on the list?

Response: A person can subscribe to get on the list using the link found under the Air Permit tab on the BOA public notice website.

b. How does the list get updated?

Response: The list gets updated automatically. A person can unsubscribe if they do not want to continue to receive emails notifying them of new permits on public notice.

c. How long is the list maintained for a particular source?

Response: The list is not source specific but allows interested parties to be notified of any permit being public noticed. Any person who has subscribed to the listserv will receive email notices until they unsubscribe from the list.

d. What do you send to those on the mailing list?

Response: The person in the listserv will receive emails automatically notifying when new permits are on public notice and will have access to the documents available on the website for public notice.

Y x N 6. Aside from publications described above, do you use other means of public notification?

Response: We post public notices on the BOA website.

If yes, what are they (e.g., post notices on your webpage, e-mail)?

Response: The website is: <https://www.kdheks.gov/bar/publicnotice.html>

Y **N** x 7. Do you reach out to specific communities (e.g., environmental justice communities) beyond the standard public notification processes?

Y x N 8. Do your public notices clearly state when the public comment period begins and ends?

9. What is your opinion on the most effective avenues for public notice?

Response: Website and social media would be the most effective avenues for public notice.

- Y x N** a. Are the approaches you use for public notice effective?
- Y** **N x** 10. Do you provide notices in languages besides English? Please list.

Public Comments

- Y x N** 11. Have you ever been asked by the public to extend a public comment period?

Response: On one occasion, over 5 years ago. The request was due to a modeling error.

- Y x N** a. If yes, did you normally grant them?
- b. If not, what would be the reason(s)?

- Y** **N x** 12. Has the public ever suggested improvements to the contents of your public notice, improvements to your public participation process, or other ways to notify them of draft permits? Describe.

Response: Not in recent years. In the past there were a few requests that individual or agency specific notification to be provided.

- Y x N** 13. Do you provide the public a copy of the statement of basis if they request it? If no, explain.

14. What percentage of your permits have received public comments?

Response: Very few, 2% or less of the permits have received public comments in last two years.

- Y** **N x** 15. Over the years, has there been an increase in the number of public comments you receive on title V permits? Is there any pattern to types of sources getting comments?

- Y** **N x** 16. Have you noticed any trends in the type of comments you have received? Please explain.

- a. What percentage of your permits change due to public comments?

Response: Less than 1% of permits change due to public comments.

- Y N 17. Have specific communities (e.g., environmental justice communities) been active in commenting on permits?
- Y N 18. Do your rules require that any change to the draft permit be re-proposed for public comment?
- a. If not, what type of changes would require you to re-propose (and re-notice) a permit for comment?

Response: Significant changes only would require to re-propose (and re-notice) a permit for comments.

EPA 45-day Review

- Y N 19. Do you have an arrangement with the EPA region for its 45-day review to start at the same time the 30-day public review starts? What could cause the EPA 45-day review period to restart (i.e., if public comments received, etc)?

Response: A significant change in the permit could cause the review period to restart.

- a. How does the public know if EPA's review is concurrent?

Response: It is stated in the public notice.

- Y N 20. Is this concurrent review process memorialized in your rules, a MOA or some other arrangement?

Response: MOA

28-19-515. Class I operating permits; public participation, affected state participation, and USEPA participation. (a) Except for administrative permit amendments or modifications qualifying for minor permit modification procedures, all permit proceedings, including initial permit issuance, significant modifications, and renewals, shall provide adequate procedures for public notice including offering an opportunity for public comment and an opportunity for a public hearing on the proposed permit. In addition to procedures specified at K.A.R. 28-19-204, the procedures shall include the following requirements. (1) Notice shall be given to persons on a mailing list developed by the department, including those who request in writing to be on the list and by other means if necessary to assure adequate notice to the affected public. (2) The notice shall identify

the emissions change involved in any permit modification. (3) The notice shall state that prior to the issuance of the permit, permit modification, or permit renewal, the USEPA has the right to object to issuance of the permit. The notice shall further state that if the USEPA fails to object to issuance of the permit within 45 days of receipt of the permit which the department proposes to issue, a person may petition the administrator of the USEPA to review the permit by filing a petition with the administrator of the USEPA within 60 days of the expiration of the USEPA's 45 day review period

Permittee Comments

- Y x N** 21. Do you work with the permittees prior to public notice?
- Y x N** 22. Do permittees provide comments/corrections on the permit during the public comment period? Any trends in the type of comments? How do these types of comments or other permittee requests, such as changes to underlying NSR permits, affect your ability to issue a timely permit?

Response: We try to solicit permittee input prior to the public notice in order to propose an accurate permit. There are no known trends.

Public Hearings

23. What triggers a public hearing on a title V permit?

Response: A request from the public for a hearing.

- Y x N** a. Do you ever plan the public hearing yourself, in anticipation of public interest?

Response: A tentative public hearing is sometimes scheduled in order to save time if one is requested. If the public does not request a hearing, the tentative hearing is cancelled.

Availability of Public Information

- Y x N** 24. Do you charge the public for copies of permit-related documents?

Response: Documents are available electronically, but if a hard copy was requested, we would charge for copies.

If yes, what is the cost per page?

Response: 25 cents per page.

Y N a. Are there exceptions to this cost (e.g., the draft permit requested during the public comment period, or for non-profit organizations)?

Y N b. Do your title V permit fees cover this cost? If not, why not?

Response: Since the documents are available electronically, we very rarely, if ever, get a request to make hard copies.

25. What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, 6-month monitoring reports, compliance certifications, statement of basis) especially during the public comment period?

Response: Access is provided free of charge, is available during normal working hours at Topeka. Permit related information is available upon request at local outlets during comment periods. Copies are provided at standard departmental cost. KDHE complies with open record requirements. Draft permit and supporting information are also available on the BOA's website.

Y N a. Are any of the documents available locally (e.g., public libraries, field offices) during the public comment period? Explain.

Response: The documents are available at field offices.

26. How long does it take to respond to requests for information for permits in the public comment period?

Response: Within one or two days. Requests are infrequent. Most request would be fulfilled with electronic documents.

Y N 27. Have you ever extended your public comment period as a result of information requests?

a. Where is this information stored?

Response: Topeka office.

Y N b. Do information requests, either during or outside of the public comment period, affect your ability to issue timely permits?

Y N c. Have you ever extended the public comment period because of a request for a public hearing?

Y N 28. Do you have a website for the public to get permit-related documents?

Response: <https://www.kdheks.gov/bar/publicnotice.html>

a. What is available online?

Response: Public notice, draft permit and related documents.

b. How often is the website updated? Is there information on how the public can be involved?

Response: Website is updated regularly, as changes occur and/or new permits added.

Y N 29. Have other ideas for improved public notification, process, and/or access to information been considered? If yes, please describe.

Response: While KDHE BOA has not yet adopted the public notice provisions promulgated in October 2016 to allow for electronic noticing (e-notice) of permit actions under the NSR and Title V programs, BOA has developed the website to try and implement the e-notice requirements, allowing the public to readily access the public notice and draft permit through the website. KDHE BOA also continues to develop web-based access to permit related documents for public review.

Y N 30. Do you have a process for notifying the public as to when the 60-day citizen petition period starts? If yes, please describe.

Response: Information is included in public notice.

Y N 31. Do you have any resources available to the public on public participation (booklets, pamphlets, webpages)?

Response: The public notice includes contact information on obtaining additional information.

Y x N 32. Do you provide training to citizens on public participation or on title V?

Response: At conferences, such as KDHE's annual Environmental Conference and through periodic BOA outreach.

Y x N 33. Do you have staff dedicated to public participation, relations, or liaison?

Response: All BOA permit section staff are available to answer questions. Additionally, the small business assistance program provides additional services.

a. Where are they in the organization?

Response: Staff within the BOA office in Topeka.

b. What is their primary function?

Response: Permit writers

Affected State Review and Review by Indian Tribes

34. How do you notify affected States of draft permits?

a. How do you determine what States qualify as "affected States" for your draft permits?

Response: BOA maintains a map that shows which states (including tribes) are affected. We then email letters to those affected states (including tribes). Affected states (including tribes) are also notified through the KDHE-BOA-Permits listserv email list.

35. How do you notify tribes of draft permits?

Response: Tribes in the affected area are treated as affected states and are notified directly through a letter and through the KDHE-BOA-Permits listserv email list. Tribes also have same opportunities as public.

36. What percentage of your permits get comments from affected States? from Tribes?

Response: 0%

37. Is there any pattern to the type of draft permit that gets affected State / Tribal comment? Are there common themes in comments from affected States or Tribes?

Response: N/A

38. Suggestions to improve your notification process?

Response: None at this time.

Any additional comments and public notification?

E. Permit Issuance / Revision / Renewal

Initial Permit Issuance

- Y N 1. If not all initial permits have been issued, do you have a plan to ensure your permits are issued in a reasonable timeframe? If not, what can EPA do to help?

Response: N/A

Permit Revisions

2. Did you follow your regulations on how to process permit modifications based on a list or description of what changes can qualify for:
- Y x N a. Administrative amendment? (See § 70.7(d)(vi))
- Y x N b. §502(b)(10) changes? (See §70.4(b)(12))
- Y x N c. Significant and/or minor permit modification? (See §70.7(e))
- Y x N d. Group processing of minor modifications?
- Y x N 3. If the EPA Regional office has formally asked you to re-open a permit, were you able to provide EPA with a proposed determination within 90 days? (40 CFR 70.7(g)(2))

If not, why not?

4. For those permits that have been issued, and where the permitted facility has undergone a change, how many changes to the title V permit have you processed?
- a. What percentage of changes at the facilities are processed as:
- Response: i. Significant
About 10%
- Response: ii. Minor
About 60%
- Response: iii. Administrative
About 30%

b. Of all changes that you have, how many (or what percentages) were:

i. Off-permit

Response: We do not track these changes because sources are not required to apply for a permit revision.

ii. 502(b)(10)

Response: We do not track these changes because sources are not required to apply for a permit revision.

5. How many days, on average, does it take to process (from application receipt to final permit amendment):

Response: It varies depending on the completeness of the application and complexity of the permit. Our goal is to issue the permits with 18 months of receipt. Recently, most permits are issued faster, some within 3 months.

a. a significant permit revision?

Response: 6 months.

b. a minor revision?

Response: 90 days

c. an administrative revision?

Response: 60 days

Y x N 6. Have you taken longer than the part 70 timeframes of 18 months for significant revision, 90 days for minor permit revisions and 60 days for administrative? Explain.

Response: Sometimes in the past due to permit backlog. But, not in the last few years.

7. What have you done to streamline the issuance of revisions?

Response: Eliminated permit backlog, which allows for more timely issuance of revisions.

8. What process do you use to track permit revision applications moving through your system?

Response: [Kansas Environmental Information Management System \(KEIMS\)](#).

- Y × N** 9. Have you developed guidance to assist permit writers and sources in evaluating whether a proposed revision qualifies as an administrative amendment, off-permit change, significant or minor revision, or requires that the permit be reopened? If so, provide a copy.

Response: We have a guidance document on this, and a copy can be found in the following link.

https://www.kdheks.gov/air-permit/forms/BAR_2005-02_Class_I_Revisions.pdf

- Y × N** 10. Do you require that source applications for minor and significant permit modifications include the source's proposed changes to the permit?

- Y × N** a. For minor modifications, do you require sources to explain their change and how it affects their applicable requirements?

- Y × N** 11. Do you require applications for minor permit modifications to contain a certification by a responsible official, consistent with 70.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used?

12. When public noticing proposed permit revisions, how do you identify which portions of the permit are being revised? (e.g., narrative description of change, highlighting, different fonts).

Response: [The public notice for proposed permit revisions describe the changes and identify which part of the permit is open for comments. The statement of basis of the permit will also include the proposed revisions and explains the rationale of those revisions.](#)

13. When public noticing proposed permit revisions, how do you clarify that only the proposed permit revisions are open to comment?

Response: [The public notice clarifies this.](#)

Permit Renewal Or Reopening

Y × N 14. Have you begun to issue permit renewals?

15. What are your plans for timely issuance of the renewals?

Response: Track review time through our KEIMS system to ensure permits are being issued on time. Keep backlog as low as possible.

Y × N 16. Do you have a different application form for a permit renewal compared to that for an original application? (e.g., are your application renewal forms different from the forms for initial permits)

a. If yes, what are the differences? Are 1st time requirements (like CAM, off permit changes, etc.) in a renewal application being included in the renewal?

Response: We request identification of facility and regulatory changes as well as any new requirements such as CAM.

Y × N 17. Has issuance of renewal permits been “easier” than the original permits? Explain.

Response: We review the initial determination of applicable requirements; incorporate the newest formatting, such as reduction of specific identification of insignificant activities, appropriate location of facility-wide requirements within the permit; incorporate facility and regulatory requirements and review compliance activities that might cause changes in periodic monitoring requirements.

Y **N** 18. How are you implementing the permit renewal process (ie., guidance, checklist to provide to permit applicants)?

Response: Permit renewal application includes detailed guidance for applicant, such as including a marked-up revised application.

19. What % of renewal applications have you found to be timely and complete?

Response: About 96% are found to be timely and complete. Reminders are provided to permittees. Renewal applications are more complete because of permittee experience.

20. How many complete applications for renewals do you presently have in-house ready to process?

Response: 55

Y × N 21. Have you been able to or plan to process these renewals within the part 70 timeframe of 18 months? If not, what can EPA do to help?

Y × N 22. Have you ever determined that an issued permit must be revised or revoked to assure compliance with the applicable requirements?

Response: We have revised some permits and revoked others at the request of the source.

F. Compliance

1. Deviation reporting:

- a. Which deviations do you require be reported prior to the semi-annual monitoring report? Describe.

Response: Unless a different time period is specified in the Title V permit, deviations which result in emissions exceeding those allowed in the permit shall be submitted as specified below. Deviations which do not result in emissions exceeding those allowed in the permit shall be reported in writing within 10 business days following discovery of the deviation.

Y x N

- b. Do you require that some deviations be reported by telephone?

Response: Permit requirement "Deviations, which result in emissions exceeding those allowed in the permit, shall be reported the next business day following the discovery of the release."

Y x N

- c. If yes, do you require a follow-up written report? If yes, within what timeframe?

Response: Permit requirement: "...with follow-up written notice within five business days following discovery of the release."

Y x N

- d. Do you require that all deviation reports be certified by a responsible official? (If no, describe which deviation reports are not certified).

Y N x

- i. Do you require all certifications at the time of submittal?

Y x N

- ii. If not, do you allow the responsible official to "back certify" deviation reports? If you allow the responsible official to "back certify" deviation reports, what timeframe do you allow for the follow-up certifications (e.g., within 30 days; at the time of the semi-annual deviation reporting)?

Response: At the time of the semi-annual deviation report.

2. How does your program define deviation?

Response: The Kansas Air Regulations do not provide a general definition of “deviation.” The Air Compliance and Enforcement section recognizes “deviation” to be a situation where an emission unit, or its associated control equipment, does not meet permit conditions.

- Y x N** a. Do you require only violations of permit terms to be reported as deviations?
- Y x N** b. Which of the following do you require to be reported as a deviation (Check all that apply):
- Y x N** i. excess emissions excused due to emergencies (pursuant to 70.6(g))
- Y** **N** ii. excess emissions excused due to SIP provisions (cite the specific state rule)
- Y x N** iii. excess emissions allowed under NSPS or MACT SSM provisions?
- Y x N** iv. excursions from specified parameter ranges where such excursions are not a monitoring violation (as defined in CAM)
- Y x N** v. excursions from specified parameter ranges where such excursions are credible evidence of an emission violation
- Y x N** vi. failure to collect data/conduct monitoring where such failure is “excused”:
- Y** **N** A. during scheduled routine maintenance or calibration checks
- Y x N** B. where less than 100% data collection is allowed by the permit
- Y x N** C. due to an emergency
- Y** **N** vii. Other? Describe.

3. Do your deviation reports include:
- Y x N a. the probable cause of the deviation?
- Y x N b. any corrective actions taken?
- Y x N c. the magnitude and duration of the deviation?
- Y x N 4. Do you define “prompt” reporting of deviations as more frequent than semi-annual?
- Y x N 5. Do you require a written report for deviations?
- Y x N 6. Do you require that a responsible official certify all deviation reports?

Response: Yes, we require a responsible official certify all deviation reports.

7. What is your procedure for reviewing and following up on:
- a. deviation reports?

Response: All deviation reports are reviewed by the Compliance Officer. Deviations that result in excess emissions, but were not reported as required by KAR 28-19-11, will be subject to informal or formal enforcement. Excess emission events and incomplete reports all require our follow-up with the facility, via email. All deviation and excess emission events are now tracked in the KEIMS database.

- b. semi-annual monitoring reports?

Response: Reviewed by compliance section and assigned permit writer. Compliance section reviews: all semi-annual monitoring reports are reviewed by an Environmental Specialist. All instances of noncompliance are reviewed and the level of enforcement necessary is discussed with the Compliance Officer. The report is considered complete regardless of violations and is logged in the KEIMS database.

- c. annual compliance certifications?

Response: Reviewed by compliance section and assigned permit writer. Compliance section reviews: all annual compliance certifications are reviewed in the same manner as semi-

annual monitoring reports, but they are cross-checked to confirm that the Annual Certification reflects any and all deviations listed in the semi-annual reports.

8. What percentage of the following reports do you review?

a. deviation reports

Response: 100%

b. semi-annual monitoring reports

Response: 100%

c. annual compliance certification

Response: 100%

9. Compliance certifications

Y x N

a. Have you developed a compliance certification form? If no, go to question 7.

Y x N

- i. Is the certification form consistent with your rules?
- ii. Is compliance based on whether compliance is continuous or intermittent or whether the compliance monitoring method is continuous or intermittent?

Response: Compliance is continuous or intermittent

Y x N

iii. Do you require sources to use the form? What percentage do?

Response: 100%

Y x N

iv. Does the form account for the use of credible evidence?

Response: Facilities have the ability to submit logs/records to explain deviations, but it is not required.

Y x N

v. Does the form require the source to specify the monitoring method used to determine compliance where there are options for monitoring, including

which method was used where more than one method exists?

10. Excess emissions provisions:

Y x N

a. Does your program include an emergency defense provision as provided in 70.6(g)? If yes, does it:

Y x N

i. Provide relief from penalties?

Response:

KDHE can use enforcement discretion for emergency and SSM events as long as the reporting is completed as required and the event meets the definition of an emergency.

Y x N

ii. Provide injunctive relief?

Y N x

iii. Excuse noncompliance?

Response:

KDHE can use enforcement discretion but the noncompliance event would need to be documented as such, noting the reasons for enforcement discretion.

Y x N

b. Does your program include a SIP excess emissions provision? If no, go to 6.c. If yes does it:

Y x N

i. Provide relief from penalties?

Response:

KDHE can use enforcement discretion if the facility submits excess emission reports due to SSM or scheduled maintenance within 10 days and includes the information required in the regulation.

Y x N

ii. Provide injunctive relief?

Y N x

iii. Excuse noncompliance?

c. Do you require the source to obtain a written concurrence from the PA before the source can qualify for:

Y N x

i. the emergency defense provision?

Y N x

ii. the SIP excess emissions provision?

Y N

iii. NSPS/NESHAP SSM excess emissions provisions?

11. Is your compliance certification rule based on:

Y N

a. the '97 revisions to part 70 - i.e., is the compliance certification rule based on whether the compliance monitoring method is continuous or intermittent; or:

Y N

b. the '92 part 70 rule - i.e., is the compliance certification rule based on whether compliance was continuous or intermittent?

12. Any additional comments on compliance?

G. Resources & Internal Management Support

Y x N 1. Are there any competing resource priorities for your “title V” staff in issuing Title V permits?

a. If so, what are they?

Response: Apparently, all the agencies writing initial Title V permits suffered from hiring and retaining experienced permit writers in the permitting program. This agency is no different. In addition, all permit writers draft and issue both construction and operating permits. So anytime there is a surge in construction, our priority is to issue construction permits to sources and not delay projects and economic growth in Kansas.

2. Are there any initiatives instituted by your management that recognize/reward your permit staff for getting past barriers in implementing the title V program that you would care to share?

Response: Exemplary staff are recognized at staff meeting and often encouraged to attend conferences and continuing education.

3. How is management kept up to date on permit issuance?

Response: Through the on-line permit system, KEIMS, and the permit approval concurrence process.

Y x N 4. Do you meet on a regular basis to address issues and problems related to permit writing?

Response: Permit writers regularly meet with permit section supervisors to provide updates of permit status.

Y x N 5. Do you charge Title V fees based on emission volume?

a. If not, what is the basis for your fees?

b. What is your Title V fee?

Response: Yes, the Title V fee schedule is largely funded by annual emission fees collected pursuant to K.A.R. 28-19-517. The current fee structure consists of Title V sources paying the greater of a base

fee of \$1,000 or \$53 per ton of actual “feeable” emissions reported. Feeable emissions are the total number of tons, rounded to the nearest ton, of each of the following pollutants combined: Sulfur dioxide, nitrogen oxides, particulate matter sized 10 microns and less, volatile organic compounds, and hazardous air pollutants.

Additionally, permit fees are assessed for both operating applications (initial, renewal and significant modifications) and construction applications, including additional fees for BACT analysis and modeling activities for PSD projects.

Pursuant to K.A.R. 28-19-516 for operating permit applications: initial and renewal application fee(s) are \$3,000; significant permit modification application is \$1,500; a general permit petition is \$2,250; and a general permit application is \$750.00.

Pursuant to K.A.R. 28-19-304 for construction applications: approval application fees are \$750; permit applications fees are based on source category and range from \$1,000 to \$4,000; PSD and NA NSR permit application fee is \$10,000 for any new permit and for any modification including BACT analysis, emission unit and process modification, review of emissions or netting calculations or addition of new unit subject to BACT; all other applications for modifications to existing PSD/NA NSR permits are \$3,000. Additional fees which can be assessed for any PSD/NA NSR application are \$8,000 for each refined modeling analysis, \$5,000 for each revision to the application and \$4,00 for each revision to modeling.

6. How do you track title V expenses?

Response: All Title V expenses for Title V program costs are tracked by the agency fiscal services staff by differentiating Title V funds from all other funding and utilizing standard and prescribed accounting practices. All Title V revenue is to be used solely for the purpose of implementation the Title V Operating Permit Program and cannot be used for any other purpose. All bureau staff contribute to all aspects of administering the overall Air Quality Program in Kansas and split their time between Title V activities and all other funded program activities. The bureau developed a time management tool to estimate staff time specific for Title V. This data was used to develop the current employee funding splits for salary/benefits based on actual work done per program over a two-year period.

KEIMS will be utilized to track activities across all aspects of the Overall Air Quality Program in Kansas and used to review and update funding splits for salary/benefits for future years.

7. How do you track title V fee revenue?

Response: Fee revenue is tracked utilizing KEIMS, and can be separated by annual emission fees, permit fees, etc. Revenue is also tracked by agency fiscal staff utilizing standard and prescribed accounting practices.

8. How many Title V permit writers does the agency have on staff (number of FTE's)?

Response: 15, including 3 supervisors + 2 vacancies.

Y N 9. Do the permit writers work full time on Title V?

a. If not, describe their main activities and percentage of time on title V permits.

Response: Varies by permit writer and assigned permits, operating vs construction, vs PSD, etc.

b. How do you track the time allocated to Title V activities versus other non-title V activities?

Response: On-line permit tracking system (KEIMS).

Y N 10. Are you currently fully staffed?

11. What is the ratio of permits to permit writers?

Response: (270 Title V sources + 745 synthetic minor sources) / 15 permit writers. Based on number of permits issued in year 2019, (4 Title V permits + 3 Synthetic Minor permits) per permit writer.

12. Describe staff turnover.

Response: Regular turnover. Lose approximately 2 permit writer per year. It often takes an extended time to fill the positions with a qualified person.

a. How does this impact permit issuance?

Response: There is a negative impact on permit issuance.

b. How does the permitting authority minimize turnover?

Response: We regularly encourage professional growth opportunities for all permit writing staff.

Y × N 13. Do you have a career ladder for permit writers?

a. If so, please describe.

Response: Staff can apply for positions as they become vacant. Engineering staff are encouraged to obtain a PE license, which will result in a higher pay.

Y **N** × 14. Do you have the flexibility to offer competitive salaries?

Y **N** × 15. Can you hire experienced people with commensurate salaries?

16. Describe the type of training given to your new and existing permit writers.

Response: A permit training manual is established and maintained current. We also try to maintain a mentoring relationship such that new permit writers work with experience permit writers. We send new permit writers to training classes as much as possible during the first years of employment.

17. Does your training cover:

Y × N a. how to develop periodic and/or sufficiency monitoring in permits?

Y × N b. how to ensure that permit terms and conditions are enforceable as a practical matter?

Y × N c. how to write a Statement of Basis?

Y × N 18. Is there anything that EPA can do to assist/improve your training? Please describe.

Response: Continue to provide training opportunities, like the annual 4 States meeting at EPA's regional office.

19. How has the PA organized itself to address Title V permit issuance?

Response: All permit writing staff currently work on both Title V and construction permits. Title V permits are assigned based on overall work load, work load of individual permit writers, and area of knowledge and expertise of permit writers.

20. Overall, what is the biggest internal roadblock to permit issuance from the prospective of Resources and Internal Management Support?

Response: Ability to hire and retain experienced permit writers.

Environmental Justice Resources

Y N 21. Do you have Environmental Justice (EJ) legislation, policy or general guidance which helps to direct permitting efforts?

If so, may EPA obtain copies of appropriate documentation?

Y N 22. Do you have an in-house EJ office or coordinator, charged with oversight of EJ related activities?

Y N 23. Have you provided EJ training / guidance to your permit writers?

Y N 24. Do the permit writers have access to demographic information necessary for EJ assessments? (e.g., soci-economic status, minority populations, etc.)

Y N 25. When reviewing an initial or renewal application, is any screening for potential EJ issues performed? If so, please describe the process and/or attach guidance.

Response: Through permit file review, communication with permit supervisors, and communication with other Bureau of Air staff, including the compliance section, the permit writer will become aware of the land uses in areas affected by a proposed project. For likely problem activities, he or she can access the web, visit the project site, or request the local air quality representative to survey the area affected.

H. Title V Benefits

1. Compared to the period before you began implementing the Title V program, does the Title V staff generally have a better understanding of:

- Y × N** a. NSPS requirements?
- Y × N** b. The stationary source requirements in the SIP?
- Y × N** c. The minor NSR program?
- Y × N** d. The major NSR/PSD program?
- Y × N** e. How to design monitoring terms to assure compliance?
- Y × N** f. How to write enforceable permit terms?

2. Compared to the period before you began implementing the Title V program, do you have better/more complete information about:

- Y** **N** a. Your source universe including additional sources previously unknown to you?
- Y × N** b. Your source operations (e.g., better technical understanding of source operations; more complete information about emission units and/or control devices; etc.)?
- Y × N** c. Your stationary source emissions inventory?
- Y × N** d. Applicability and more enforceable (clearer) permits?

3. In issuing the Title V permits:

- Y × N** a. Have you noted inconsistencies in how sources had previously been regulated (e.g., different emission limits or frequency of testing for similar units)? If yes, describe.

Response: Occasional inconsistencies are found during permit review and then addressed.

Y x N

- b. Have you taken (or are you taking) steps to assure better regulatory consistency within source categories and/or between sources? If yes, describe.

Response: Consistency is emphasized for all permit writers. During permit review concurrence process, permit consistency is verified.

4. Based on your experience, estimate the frequency with which potential compliance problems were identified through the permit issuance process:

Never Occasionally Frequently Often

- a. prior to submitting an application

Response: Occasionally

- b. prior to issuing a draft permit

Response: Frequently

- c. after issuing a final permit

Response: Occasionally

5. Based on your experience with sources addressing compliance problems identified through the Title V permitting process, estimate the general rate of compliance with the following requirements prior to implementing Title V:

Never Occasionally Frequently Often

- a. NSPS requirements (including failure to identify an NSPS as applicable)

Response: Often

- b. SIP requirements

Response: Often

- c. Minor NSR requirements (including the requirement to obtain a permit)

Response: Often

- d. Major NSR/PSD requirements (including the requirement to obtain a permit)

Response: Often

6. What changes in compliance behavior on the part of sources have you seen in response to Title V? (Check all that apply.)

Y x N

a. increased use of self-audits?

Y x N

b. increased use of environmental management systems?

Y x N

c. increased staff devoted to environmental management?

Y x N

d. increased resources devoted to environmental control systems (e.g., maintenance of control equipment; installation of improved control devices; etc.)?

Y x N

e. increased resources devoted to compliance monitoring?

Y x N

f. better awareness of compliance obligations?

Y N x

h. other? Describe.

Y x N

7. Have you noted a reduction in emissions due to the Title V program?

Response: Yes, we have approximately 745 Title V sources taking federally enforceable state operating permit limits to avoid Title V and the associated emission fee requirements in the state. This is largely due to the state historically not charging sources who emit under 100 tons actual emission any annual emission fee, so the financial benefit is the incentive. Also, for Title V sources complying with Title V requirements the incentive to reduce emissions is also due to the fee schedule.

We have seen reductions due to better awareness and compliance with regulatory requirements. Also, control equipment has sometimes been installed to avoid becoming a title V source.

Y x N

a. Did that lead to a change in the total fees collected either due to sources getting out of title V or improving their compliance?

Response: Yes, Kansas has experienced significant reduction in emissions since the implementation of the Title V program, which has directly impacted the adequacy of fees collected.

Y × N b. Did that lead to a change in the fee rate (dollars/ton rate)?

Response: The dollars per ton rate has been adjusted routinely to account for a reduction in emissions, most recently in January 2018.

8. Has title V resulted in improved implementation of your air program in any of the following areas due to Title V:

Y **N** a. netting actions

Y **N** b. emission inventories

Response: Sources have improved accuracy of emission reports in order to reduce title V fees.

Y **N** c. past records management (e.g., lost permits)

Y × N d. enforceability of PTE limits (e.g., consistent with guidance on enforceability of PTE limits such as the June 13, 1989 guidance)

Y × N e. identifying source categories or types of emission units with pervasive or persistent compliance problems; etc.

Y **N** f. clarity and enforceability of NSR permit terms

Y **N** g. better documentation of the basis for applicable requirements (e.g., emission limit in NSR permit taken to avoid PSD; throughput limit taken to stay under MACT threshold)

Y **N** h. emissions trading programs

Y **N** i. emission caps

Response: The PTE caps established in synthetic minor permits are generally done for the sole purpose of avoiding the Title V program.

Y **N** j. other (describe)

Y **N** 9. If yes to any of the above, would you care to share how this improvement came about? (E.g., increased training; outreach; targeted enforcement)?

Y N 10. Has Title V changed the way you conduct business?

Response: Not recently because we have been issuing Title V permits for many years.

Y N a. Are there aspects of the Title V program that you have extended to other program areas (e.g., require certification of accuracy and completeness for pre-construction permit applications and reports; increased records retention; inspection entry requirement language in NSR permits). If yes, describe.

Y N b. Have you made changes in how NSR permits are written and documented as a result of lessons learned in Title V (e.g., permit terms more clearly written; use of a statement of basis to document decision making)? If yes, describe.

Y N c. Do you work more closely with the sources? If yes, describe.

Response: We work closely with sources throughout the entire application review and permit preparation process.

Y N d. Do you devote more resources to public involvement? If yes, describe.

Y N e. Do you use information from Title V to target inspections and/or enforcement?

Y N f. Other ways? If yes, describe.

Y N 11. Has the Title V fee money been helpful in running the program? Have you been able to provide:

Response: Yes, Title V fees collected are necessary to administer and implement the program in Kansas. Unfortunately, in recent years the severe reduction in actual emissions reported has threatened the adequacy of the fee schedule to fully support the program. Most recently, the Kansas Legislature passed an appropriations bill (SB66) limiting KDHE's ability and authority to raise fees adequate to administer the program.

Y N a. better training?

Y N b. more resources for your staff such as CFRs and computers?

- Y N c. better funding for travel to sources?
- Y N d. stable funding despite fluctuations in funding for other state programs?
- Y N e. incentives to hire and retain good staff?
- Y N f. are there other benefits of the fee program? Describe.

Y N 12. Have you received positive feedback from citizens?

Response: There has not been any feedback in recent years.

Y N 13. Has industry expressed a benefit of Title V? If so, describe.

Response: We have not received any feedback from industry in recent years.

Y N 14. Do you perceive other benefits as a result of the Title V program? If so, describe.

Response: None other than the benefits already indicated.

Y N 15. Other comments on benefits of title V?

Response: The Title V program is beneficial in that the process identifies non-compliance issues, such as with NSPS related record keeping problems. Additionally, it has caused improved awareness on the part of facilities with the Bureau of Air. Applicable requirements have been better identified and inconsistencies in past documents have been resolved. Increased monitoring has resulted in better compliance and reduced emissions. Some synthetic minor permits have caused installation of controls to reduce actual emissions. Also, the working relationships between facility and Bureau of Air staff has improved through frequent contacts that take place during the application review and permit issuance process.

Good Practices not addressed elsewhere in this questionnaire

Are any of the practices employed that improve the quality of the permits, or other aspects of title V program that are not addressed elsewhere in this questionnaire?

Response: No

EPA assistance not addressed elsewhere in this questionnaire

Is there anything else EPA can do to help your title V program?

Response: Additional training assistance for staff would be helpful.

ATTACHMENT D: Fee Attachment

Attachment C
from the March 27, 2018 guidance

[see the attached copy]

ATTACHMENT C
Example Annual Financial Data Form for 40 CFR Part 70

Permitting Authority: Kansas Department of Health and Environment, Bureau of Air

Annual Period: 07/01/2018 to 06/30/2019

(MM/DD/YYYY)

Enter State Fiscal Year to populate value for C

2019

Annual Program Revenue		
A	Total Program Revenue (Fees Paid by Part 70 Sources)	\$ 4,240,754.35
Annual Presumptive Minimum Cost Calculation		
B	Total Emissions of "Regulated Pollutants (for presumptive fee calculation)"	73,863
C	Presumptive Minimum Fee Rate During Period (\$/ton)	\$ 51.06
D	Total Greenhouse Gas (GHG) Cost Adjustments (as applicable)	\$ 22,350.00
E = (B*C)+D	Presumptive Minimum Cost for the Program	\$ 3,793,794.78
A < E or A ≥ E	Compare Total Program Revenue to Presumptive Minimum Cost Enter: "Less Than" or "Greater Than" or "Equal To"	A ≥ E
Annual Program Costs		
F	Direct Labor Costs ¹	\$ 2,145,670.30
G	Other Direct Costs ²	\$ 841,018.66
H = F + G	Total Direct Costs	\$ 2,986,688.96
I	Known Indirect Costs ³	\$ 707,080.73
J = K*L	Calculated Indirect Costs ⁴	\$ -
K	Indirect Rate	
L	Total Cost Base for the Part 70 Program	
M = I or J	Total Indirect Costs	\$ 707,080.73
N = H + M	Total Program Costs	\$ 3,693,769.69
O = A - N	Annual Operating Result <i>(Report deficits in parentheses)</i>	\$ 546,984.66

¹ This is the sum of all direct labor costs, including regular payroll, overtime payroll, leave, fringe, and any other administrative surcharges.

² This is the sum of all other direct costs, including travel, materials, equipment, contractor, and any other costs directly allocable to the part 70 program.

³ Indirect Costs may either be known or calculated. If known, enter on this row; if calculated, skip to the next three rows.

⁴ If indirect Costs are calculated, enter the result here, and enter the rate and base below. Accounting or budgeting personnel may be able to provide additional information on or assistance with calculating Indirect Costs.

Program Balance of Accounts (Report deficits in parentheses)		
P	Beginning of Year Balance ⁵	\$ 1,299,717.96
Q = O	Annual Operating Result	\$ 546,984.66
R	Fee Revenue Transferred In (describe in comments)	\$ 70,355.97
S	Non-Exchange Revenue Transferred In (describe in comments) - Informational Only	\$ 445,150.00
T	Fee Revenues Transferred Out (describe in comments)	\$ (1,259,419.93)
U = O + Q + R - T	End of Year Balance	\$ (95,094.64)

COMMENTS:

Use this section to describe any changes in accounting methods or program elements that affect the fee program, categories of revenue or expenses that do not fit into any of the listed categories or apply across multiple categories transfers in or out, or any unusual activities or circumstances relevant to fees administration. Attach additional pages if needed.

Total Operational Costs do not include program costs for "adequate personnel and resources" as budgeted for vacant positions with associated ~ 25% indirects (~\$ 587,500), resulting in an **Annual Operating Result** surplus of \$ 586,984.66. If these expenditures were accounted for, the **Annual Operating Result** would reflect a deficit of \$ (40,515.34) and a calculated **End of Year Balance** deficit of \$ (1,270,094.64).

Fee Revenue Transferred In are permit application fees collected from Non-Part 70 sources that are deposited into the Air Quality Fee fund (Permit Fees) for SFY 2019 and cover expenditures. Fiscal reporting does not differentiate between Part 70 and other permit fees, these estimates are based on KEIMS reporting to calculate portion of Non-Part 70 Permit Fees [Expenditures from AQFF (Permit Fees) - Part 70 permit application fees from KEIMS].

Non-Exchange Revenue Transferred In represents all fines deposited from both Part 70 and Non-Part 70 Sources into the Air Quality Fee fund for SFY 2019 and does not represent previous year carry over balance of historic fines deposited into the account and used to fund the overall Air Quality Program.

Fee Revenues Transferred Out represents 30% of annual emission fees collected from Part 70 sources for SFY 2019 which were deposited into the NON Title V Fees fund and used to fund the Non-Part 70 Program. Currently the Non-Part 70 Program fee schedule is composed only of operating permit application fees and construction permit application fees collected from Non-Part 70 sources. This funding mechanism is not adequate to cover the operational costs of the Non-Part 70 Program and is supplemented with emission fees collected from Part 70 sources.

The Bureau of Air intends on establishing annual emission fee requirements for sources operating under our SIP Approved Federally Enforceable State Operating Permit (FESOP) program to provide adequate funding for the Non-Part 70 Program, which should free up Part 70 fees to adequately cover the operational costs of the Part 70 Operating Permit Program.

"Non-Part 70" program includes all construction and operating permit program elements for sources covered under our SIP approved Federally Enforceable State Operating Program (FESOP) and all true minor and/or area source permitting program that are not required to obtain a Part 70 Operating Permit. Program elements also include compliance/inspection, and planning, monitoring and inventory activities for these classes of sources. These activities are also funded with the 105 Grant.

⁵This is the prior year's End of Year Balance."

ATTACHMENT E: Entrance Meeting Attendees

Amy Algoe-Eakin
Allyson Prue [KDHE]
Ashley Eichman [KDHE]
Ward Burns
Robert Cheever
Connie Ellis [KDHE]
Douglas Watson [KDHE]
Kathy Finazzo
Gerald McIntyre [KDHE]
Gyanendra X Prasai [KDHE]
Jacki Diederich [KDHE]
Keith Johnson
Josephine Boac [KDHE]
Melissa McDonald [KDHE]
David Peter
Rick Brunetti [KDHE]
Patricia A. Scott
Dana Skelley

ATTACHMENT F: Exit Meeting Attendees

Amy Algoe-Eakin
Allyson Prue [KDHE]
Ashley Eichman [KDHE]
Lance Avey
Ward Burns
Cheever, Robert
Connie Ellis [KDHE]
Kathy Finazzo
Gerald McIntyre [KDHE]
Gyanendra X Prasai [KDHE]
Jacki Diederich [KDHE]
Keith Johnson
Josephine Boac [KDHE]
Melissa McDonald [KDHE]
David Peter
Rick Brunetti [KDHE]
Patricia A. Scott
Dana Skelley
Robert Webber

ATTACHMENT G: KDHE's Response Letter Regarding the Draft Report

[see the attached copy]

Program Review

of

KDHE's Air Permitting Programs

Conducted: August 2020

U.S. EPA, Region 7

Air Permitting and Standards Branch
Air and Radiation Division

Kansas Bureau of Air Program Review Report Contents

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KS/KDHE AIR BUREAU
AIR PERMITTING PROGRAMS
PROGRAM REVIEW REPORT

A. INTRODUCTION

The comprehensive review of Kansas Department of Health and Environment's (KDHE's) air permitting programs was part of the Environmental Protection Agency (EPA) Region 7's efforts to fulfill the EPA's oversight responsibility to ensure adequate implementation of the Clean Air Act. The overall scope of this review included assessment of the state agency's performance regarding: 1) Prevention of Significant Deterioration (PSD)/New Source Review (NSR) construction permitting, 2) Title V operating permitting, 3) synthetic minor permitting [construction and/or operating], 4) New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) determinations, 5) the establishment of enforceable permit conditions and 6) the use of Title V operating permit fees.

The review was initiated by a letter to the department dated March 4, 2020, with a request for separate lists of construction and Class II operating permits issued over the previous two years and a request that questionnaires be completed and returned to the regional office prior to the on-site review of files. We also requested that the KDHE fill out Attachment C from the March 27, 2018 guidance "Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70." In March, both the KDHE and the EPA employees started working from home to mitigate the spread of COVID-19. The EPA and the KDHE discussed postponing the program review. The decision was made to proceed with the program review from remote work locations. Therefore, this review was accomplished using video meetings and reviewing electronic versions of files.

The program review entrance meeting was held virtually on July 28, 2020. Attachment E list the attendees of the meeting. An exit meeting was held virtually on August 12, 2020. At this meeting, we discussed our initial findings and discussed the next steps for the review. Attachment F list the attendees of that meeting.

The following Region 7 staff participated in the review of files: Ward Burns, Bob Cheever, Keith Johnson, David Peter, Pat Scott, and Bob Webber. A total of 92 source files were reviewed regarding the above-mentioned actions (see **Appendix A**).

The review team appreciated the assistance of the KDHE staff in providing records and financial information, and answering questions related to the program review.

B. SUMMARY of FINDINGS and CONCLUSIONS

On balance, the department runs adequate construction and operating permit programs. In general, we found that all the projects we reviewed completed the proper level of permitting with the only major issues being 1) spending Title V fees on non-Title V activities and 2) the lack of verifying that construction projects would not interfere with the attainment or maintenance of any ambient air quality standard. The following observations are in no particular order and most are discussed in more detail later in the report.

Observations

The KDHE does appear to be collecting adequate funds to operate the Title V program. However, Title V funds are being used to fund other non-Title V air program activities.

No air dispersion modeling or other means is used to assure that new sources or modifications will not interfere with the attainment or maintenance of any ambient air quality standard except for when PSD applies. The KDHE staff have the technical ability to follow the requirements of 40 CFR Part 51 Appendix W.

The KDHE's electronic records systems, especially the new [Kansas Environmental Information Management System \(KEIMS\)](#) system, seem to work well and are extremely useful with employees teleworking. EPA was given access to KEIMS to retrieve records for the file reviews. The system seems easy to use and we had no issues accessing the records stored in the system. However, we did need to take some care to avoid accidentally downloading confidential business information.

We did not observe any incorrect NSPS/NESHAP applicability/non-applicability determinations. However, the files do not contain much documentation which support NSPS/NESHAP decisions. The application forms seemed well designed to collect information needed to determine NSPS/NESHAP applicability. In some cases, the description in the permit or the chronology log provided explanations for determinations.

K.A.R. 28-19-204(a) requires construction permits and Class I and Class II operating permits to have the opportunity for the public to participate in the permit development or modification process prior to issuance. The regulation appears to require public notice for all these permits. However, construction and Class II permits are being issued without public notice. The KDHE is following an internal guidance on which permits should be placed on public notice.

Kansas does not publish their final Class I permits online. This is not a requirement, but they are the only state in the Region that does not post their final permits.

Kansas has one local agency that issues permits on behalf of the state and that agency. The KDHE stated that the KDHE reviews all documents and draft permits before issuance (except for expedited permits and approvals). The files did not contain any record of these reviews.

Most permit limits appeared to be practically enforceable. However, we did note a few cases of 12-month rolling source-wide tons per year blanket emission limits.

Minor construction permits and Class II operating permits did not have a statement of basis or fact sheets. In some cases, a chronology log or the permit description did a good job documenting permit decisions. Also, Title V permits renewal's statement of basis only address renewal issues and facility changes.

The KDHE has a very low Title V backlog and issued construction permit timely. No variances are issued.

The KDHE uses standardized spreadsheets they created to calculate emissions from grain elevators. This eased the review of grain elevator emission calculations.

The KDHE was behind on entering Best Available Control Technology (BACT) decisions into the RBLC database. They have been working to catch up on this backlog and expect to be caught up by the end of September 2020.

The KDHE does a great job with early engagement with the EPA on Prevention of Significant Deterioration (PSD) permits including providing EPA with the modeling protocols and inviting the EPA to preapplication meetings.

Commented [JB1]: We are caught up on RBLC on September 9, 2020.

C. CATEGORIZED COMMENTS

1. General

a. Staffing

The KDHE air permitting program has a total of 21 staff positions with 19 of the positions currently filled. This includes a Section Chief, three Unit Supervisors, two clerical staff and 13 permit writers and database staff. The average length of NSR permitting experience is over 5 years.

In 2017, the State of Kansas implemented a market adjustment on the salary of engineers for both Engineers-In-Training and Professional Engineers. This adjustment has helped with the retention of staff.

The KDHE expressed an interest in the EPA providing additional training opportunities.

b. Other General Observations

Kansas's normal practice for permits receiving public comment is to schedule a hearing and publish the hearing information in the public notice. If no hearing is requested, the KDHE will cancel the hearing. This reduces the time needed to issue a permit if a hearing is requested since they do not need additional time to publish the notice for the hearing. This practice assists in Kansas issuing timely permits and we recommend they continue this practice.

We did not notice any documentation on Environmental Justice (EJ) in the files we reviewed. From the Questionnaires, we understand that Kansas does not have any EJ legislation, policy, or general guidance related to permitting. We understand that the KDHE is not required by the Clean Air Act or their State Implementation Plan to address EJ in permitting actions. However, people can file complaints for violating Title VI of the Civil Rights Act of 1964 against the KDHE. This has happened in another state in Region 7 related to a minor construction permit with a city filing the complaint. Therefore, we encourage the KDHE to consider EJ issues and engage with communities.

It appears that Kansas does a good job finding sources that should have air permits. Also, we noted that permits, approvals, and inspections all remind sources that pre-construction permits are required. Kansas has done an excellent job in finding air curtain incinerators subject to Title V permit requirements.

K.A.R. 28-19-204(a) requires construction permits and Class I and Class II operating permits to have the opportunity for the public to participate in the permit development or modification process prior to issuance. The regulation appears to require public notice for all these permits. However, minor construction permits and Class II operating permits are being issued without public notice. The KDHE is following an internal guidance on which permits should be placed on public notice. The Class II program is a SIP approved operating permit program that the EPA approved following the guidance from the June 28, 1989 Federal Register. At 54 FR 27282, the EPA listed several criteria that a program would have to meet to create federally enforceable limits. The fifth is that permits be issued subject to public participation. For construction permits, 40 CFR §51.161 requires permits to have public notice and comment. Therefore, we believe these permits should all be public noticed. However, the Region understands that public noticing permits increase cost in Kansas since Kansas's regulations require newspaper publication. We also understand that not having public notice speeds permit issuance which can be important for construction permits. This is especially true in areas where newspapers only publish weekly. Many other states also do not require minor construction permits to have an opportunity for public notice which would put Kansas facilities at a disadvantage if Kansas public noticed all the construction permits. The EPA will likely need to address

this issue nationwide to create a level playing field. However, we would recommend Kansas changing their regulations to allow for electronic public notices. We also note that when Kansas does public notice a permit, in addition to the newspaper notice required by their regulations, Kansas publishes the notice on their website. We believe that is a good practice and encourage Kansas to continue it.

We also examined if limits established in permits are enforceable as a practical matter. Most of the permits in the files we reviewed that had limits were based on tracking parameters that could be tracked to verify compliance such as process throughput. However, we did find a few examples where estimates were based on the use of a control device with no parametric monitoring to assure the device was operating properly or blanket emission limits. For example, the permit for Element LLC in Colwich, [KS Kansas](#) has a 12-month rolling emissions cap from the boiler and fermentation for [hazardous air pollutants \(HAPS\)](#). The permit does not specify how the emissions are to be calculated for compliance verification. The permit does require a stack test but does not specify the test method, run duration, or number of runs. In any event, short term tests would not allow verification of compliance with a 12-month rolling limit. Another example was Scout Energy Management's Lateral H-East Station. The permit limited PTE based on engine RPM but we did not see any correlation between engine RPM and emissions in the file.

2. Construction Permitting

a. Assuring Healthy Air Quality

We reviewed the construction permitting records for evidence that the KDHE was considering the impact to air quality when issuing permits.

40 CFR §51.160(a) says:

Each plan must set forth legally enforceable procedures that enable the State or local agency to determine whether the construction or modification of a facility, building, structure or installation, or combination of these will result in—

- (1) A violation of applicable portions of the control strategy; or
- (2) Interference with attainment or maintenance of a national standard in the State in which the proposed source (or modification) is located or in a neighboring State.

Kansas's regulations at K.A.R. 28-19-301(d) says:

No construction permit or approval shall be issued if the department determines that the air contaminant emissions from the source will interfere with the attainment or maintenance of any ambient air quality standard that has been

established under the provisions of the federal clean air act, as amended, or under the provisions of state law.

However, there was nothing in the permit records of the files we reviewed that would demonstrate that Kansas gives any consideration to ambient air quality when issuing construction permits. Kansas stated that no air modeling is required except for permits that trigger PSD. It is certainly likely that some new facilities or modifications to existing facilities have the potential to create unhealthy air quality exceeding the national ambient air quality standards. Assuring that unhealthy air quality is not created is the main purpose for minor construction permits. We recommend that the KDHE consider if construction permits would interfere with the attainment or maintenance of any ambient air quality standard. We suggest that Kansas document in each construction permit record its rationale for why the permit is not expected to interfere with the air quality standards.

b. Other Construction Permitting Observations

The Unified Government of Wyandotte County and Kansas City, ~~KS-Kansas~~ issues permit on behalf of the KDHE. In the NSR Questionnaire, the KDHE stated that they review the draft permits before issuance except for expedited permits or approvals as part of their oversight of the local agency. We were not able to find any record in the file of this review ~~occurring~~ occurring. We recommend that these reviews be documented.

The KDHE was behind on entering BACT decisions into the RACT/BACT/LAER Clearinghouse (RBLC). They have been working to catch up on this backlog and expect to be caught up by the end of September 2020. The EPA is required to have the clearinghouse by Section 108(h) of the Clean Air Act. It is widely relied on for researching other BACT determinations made in the nation when preparing and reviewing PSD permits. The EPA has started considering modernizing the clearinghouse but in recent years the current system has had no funding to fix errors and staffing has been reduced. The lack of staff is delaying entries in the system by permitting authorities like the KDHE from being reviewed and promoted from draft to final.

Commented [JB[2]: We are caught up on September 9, 2020.

The KDHE staff have the technical ability to follow the requirements 40 CFR Part 51 Appendix W.

3. NSPS / NESHAP

We did not observe any incorrect NSPS/NESHAP applicability/non-applicability determinations in the files we reviewed. NSPS and NESHAP standards have been correctly incorporated in the Title V operating permits we have reviewed. The application forms seemed well designed to collect information needed to determine NSPS/NESHAP

applicability.

We found that the files do not contain much documentation supporting NSPS/NESHAP decisions. In some cases, the description in the permit or the chronology log provided explanations for determinations. However, in many cases we did not see any record in the file explaining the rationale of the determination.

Kansas last adopted 40 CFR Part 60, 61 and 63 by reference as of July 1, 2010. We recommend that the KDHE update their adoptions of these standards in a timelier manner. Their current adoptions are a decade old. We know that the KDHE is working on updating these adoptions. The adoption of Part 60 has recently been public noticed by the KDHE and would update their adoption to July 1, 2017. The public hearing is scheduled for November 2020. The KDHE expressed some interest in updating our delegation agreement to clarify which authorities have been delegated to Kansas.

4. Operating Permits

a. Title V Fees

Section 502(b)(3)(A) of the Clean Air Act (Act) requires Title V operating permit programs to fund all “reasonable direct and indirect costs” of the permit programs through fees collected from Title V sources and requires the fees to be sufficient to cover all reasonable Title V permit program costs. 40 CFR §70.9(a) requires state Title V programs to collect fees sufficient to cover the permit program costs and “ensure that any fee required by this section will be used solely for permit program costs.”

In response to an EPA Office of Inspector General 2014 report, regarding the importance of enhanced EPA oversight of state, local, and tribal fee practices under Title V of the Act, the EPA issued a March 27, 2018 guidance titled “Program and Fee Evaluation Strategy Guidance for 40 CFR Part 70.” This guidance recommends the EPA seek internal assistance for fee evaluations from staff with governmental accounting, financial, or economics expertise, who work outside the Part 70 program. For this review, Kathy Finazzo from the EPA Region 7’s Resources and Financial Management Branch in the Mission Support Division provided assistance.

The Title V program is largely funded by annual emission fees. Currently, Title V sources pay the greater of a base fee of \$1,000 or \$53 per ton of actual “feeable” emissions. Feeable emissions are the total number of tons, rounded to the nearest ton, of each of the following pollutants combined: sulfur dioxide, nitrogen oxides, particulate matter sized 10 microns and less, volatile organic compounds, and hazardous air pollutants. Additionally, Title V fees are assessed for initial, renewal, and significant

modification applications. Initial and renewal application fees are \$3,000 and significant modification application fees are \$1,500. The EPA approved these Title V fees in a February 27, 2019 Federal Register notice, with a March 29, 2019 effective date. Fee revenue is tracked using KEIMS.

The Kansas fiscal year runs from July 1 to June 30. The EPA's presumptive Title V fee for the majority of Kansas's 2019 fiscal year was \$51.06 per ton. It was effective from September 1, 2018 to August 31, 2019. 40 CFR §70.9(b)(2)(v) requires a greenhouse gas cost adjustment. The KDHE calculated this cost adjustment to be \$22,350. During the Kansas 2019 fiscal year, total emissions for the presumptive fee calculation were 73,863 tons. Therefore, the presumptive minimum fee collection amount is calculated to be \$3,793,794.78 (73,863 tons*\$51.06/ton+\$22,350). Kansas actually collected \$4,240,754.35. Therefore, Kansas collected an amount greater than or equal to the presumptive fee required by the EPA and is presumed to have adequate fees to fund the Title V program.

However, Kansas does not currently have adequate resources to fund its non-Title V portion of the air program. In the 2019 fiscal year, Kansas used \$1,259,419.93 of Title V fees collected to help cover the cost of the non-Title V program. Deducting the \$1,259,419.93, which Kansas characterized as Fee Revenues Transferred Out, from the Title V program revenue of \$4,240,754.35, results in a remaining balance of \$2,981,334.42, to fund the Title V program, and this amount is less than the EPA's presumptive fee amount.

Additionally, under the current scenario, the amount of Title V funds spent is not sustainable. In the 2019 fiscal year, Kansas spent \$3,693,769.69 to fund the Title V program. These expenses should have resulted in a \$546,984.66 surplus in the Title V fund at the end of the year, yet instead, \$1,259,419.93 was also spent on non-Title V activities creating a \$712,435.27 deficit. This is not sustainable, and we recommend that the KDHE find other sources of revenue to fund their non-Title V activities.

The KDHE recognizes the issues caused by not collecting adequate non-Title V fees. In addition to application fees, the KDHE plans to establish annual emission fee requirements for sources operating under the approved Federally Enforceable State Operating Permit (FESOP) program and all true minor and/or area source permitting programs that are not required to obtain a Title V operating permit.

The EPA also understands that for several years Kansas has allocated 30 percent of the Title V emission fees to fund the non-Title V program. This practice is inconsistent with the requirement in 40 CFR §70.9(a) to "ensure that any fee required by this section will be used solely for permit program costs." However, nothing prevents Kansas from collecting non-Title V fees from Title V sources. We recommend that in the future when Title V program revisions are submitted to the EPA for approval, if KDHE plans to

collect non-Title V fees from Title V sources to help fund non-Title V fundable activities, then KDHE make that clear in the Title V program revisions when submitting them to the EPA for approval.

As is expected, the largest expense of KDHE's permit program is personnel cost. The allocation of personnel costs and related benefits to individual sources of revenue (Title V or non-Title V) is through each employee's task profiles. Task profiles are established within a time management system, which coordinates with the official state accounting system. Managers establish employee profiles based on work expected to be completed and these can be adjusted as managers deem appropriate. Therefore, the task profiles and the resulting allocation of expenses is based on management's knowledge and expertise. We inquired as to whether the accuracy of the profiles could be supported and if they had been updated recently. Our understanding is that no recent study has been completed to verify the accuracy of the allocation methodology of personnel costs, and that the task profiles appear to be unsupported by any data. We suggest that the KDHE consider conducting a study to collect data to support the task profiles and then adjust profiles based on the study results. Alternatively, we understand that KEIMS may have the ability to track permit actions and allocate labor to the various Title V and non-Title V tasks, though that capability has not been implemented. Should the KDHE implement that module within KEIMS, then funding splits for salary and benefits could be based on actual work performed and would be adequately supported. Allocation of personnel costs to multiple funding sources should be adjusted to actual effort on a yearly basis.

Finally, it appears that the state's official accounting system does not track programmatic financial data to the level needed to track the revenue and spending of Title V versus non-Title V programs. Spreadsheets and other systems are used. The allocation method of non-personnel expenses to either the Title V or non-Title V programs is unclear. Further, there does not appear to be documented policies and procedures for cash management and receipt of "revenue." We recommend that KDHE document the procedures used for financial recording and tracking for succession planning.

b. Other Title V Observations

The EPA tracks Title V timely permit issuance with semiannual reports called the Title V Operating Permits System (TOPS). The TOPS report from the KDHE for the period of January 1, 2020 through June 30, 2020 demonstrated that the KDHE is issuing Title V permits in a timely manner even with the challenges of COVID-19. Kansas reports two initial Part 70 applications older than 18 months. They only have one renewal application for an expired permit that is older than 18 months or 0.4% of their Title V permit universe. In 2017, this backlog was as high as 20 or 7.0% of their Title V permit universe. This shows a significant improvement in reducing their backlog and issuing Title V permits timely. Out of the six Title V permitting agencies in Region 7, Kansas has the lowest percent backlog of renewal applications.

When Kansas issues renewal Title V permits the statement of basis for the permits only cover issues related to the renewal and any facility changes. This would prevent a member of the public from benefiting from the statement of basis when trying to understand the permit without getting access to all the past statement of basis. We recommend that the initial permit's statement of basis be carried forward and added to or items removed if they are no longer applicable to the permit so that the single document provides the basis for the entire permit. We believe this would also be useful to staff at the KDHE as they renew permits. It would provide a single document they could review to get an understanding of the existing permits terms and conditions.

Kansas sends reminders to facilities when it is time to renew their operating permit. Providing this reminder is not a requirement of the Title V program. We believe Kansas should continue this practice since it likely reduces the number of late renewal applications, is a nice compliance assistance service to the facilities, and puts Kansas in a better enforcement position if facilities fail to submit their renewal application timely.

Kansas is the only permitting authority in Region 7 that does not make their final Title V permits available on the Internet. Kansas does post their draft permits and applications on the Internet during the public notice period. There is no requirement to publish the final Title V permits on the Internet, but we would recommend it. Kansas could also consider using the EPA's Electronic Permit System and we could post the final permits online if Kansas wished.

ATTACHMENT A: List of Files Reviewed

Facility Name	Location
Southern Kansas Cotton Growers Co-op - B	19493 51ST RD., S2-T33S-R3E, KS, 67156
IACX Energy - PEAK Facility (helium recov) (incl 3 dehys)	S29-T24S-R16W, BELPRE, KS
Fort Hays State University	600 PARK ST., HAYS, KS, 67601
SCOUT ENERGY MGMT. - LATERAL H-EAST STATION	S35-T26S-R34W
Lyon-Coffey Electric Cooperative, Inc. - Thunderbird Substation	2100 Rd F5, Emporia, KS, 66801
Mid-Continent Fract. & Stor. - Conway East Fac. (flare)	1299 8th Avenue, McPherson, KS, 67460
Producer Ag - Canton Terminal	1407 25TH AVENUE, CANTON, KS, 67428
Pfizer Inc.	1776 N CENTENNIAL DR, MCPHERSON, KS, 67460
CHS McPherson - Conway Underground Storage Facility	775 LANDMARK LANE, McPherson 67460
MID-CONTINENT FRACT. & STOR. - SHOCKER METER STATION	839 KIOWA RD, MCPHERSON, KS, 67460
Hillsboro Industries	220 INDUSTRIAL ROAD, HILLSBORO, KS, 67063
FARMERS COOPERATIVE - FRANKFORT (TUMBLEWEED RD)	TUMBLEWEED RD S8-T4S-R9E, FRANKFORT, KS, 66427
Great Plains Mfg. - Tipton	607 N. MAIN STREET, TIPTON, KS, 67485
John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337
DCP Operating - Roxanne Station (dehy)	S25-T31S-R41W, ROXANNE STA., KS
Scoular Co. - Downs	709 Commercial St, Downs, KS, 67764
Prairie Horizon Agri-Energy	1664 E. 100 ROAD, PHILLIPSBURG, KS, 67661
Pratt Energy	S17-T29S-R24W, STATION 103, KS, 67865
Scoular Co. - Pratt	10333 NE 30TH STREET, PRATT, KS, 67124
Lowen Corp.	1111 N AIRPORT RD, HUTCHINSON, KS, 67501
Tenawa Haven Processing - Haven Gas Plant	13114 S KENT RD, HAVEN, KS, 67543
Superior Pipeline - Reno Co. Gas Proc. Plant	SE 1/4 S33-T25S-R10W, TURON, KS

Facility Name	Location
GEO Chemicals LLC	2506 E 14TH AVE, HUTCHINSON, KS, 67501
Nesika Energy (ethanol plant)	1020 70TH RD S13-T3S-R5W, SCANDIA, KS, 66966
MID-CONTINENT FRACT. & STOR. - MITCHELL FAC. (DEGAS FLR)	S27-T19S-R7W, MITCHELL STA., KS, 00000
CRCT - Plainville Station (crude stor)	3 MI. NORTH OF PLAINVILLE, PLAINVILLE, KS, 00000
IACX Energy - Otis Station (dehys)	S27-T17S-R16W, OTIS, KS
Great Plains Mfg. (Land Pride) - Lucas	240 S. GREELEY, LUCAS, KS, 67648
Salina Reg. Health Center (incinerator)	400 S. SANTA FE, SALINA, KS, 67402
McConnell Air Force Base	57830 Pittsburg Street Suite 120, WICHITA, KS, 67221
IOLA MUN. POWER PLANT #2	1300 South Washington, Iola, KS 66749
East Kansas Agri-Energy	1304 S. Main Street, Garnett, KS 66032
Southern Star Central - Atchison Station	Section 12, T6S, R20E, Atchinson County, KS
TARGA PIPELINE MID-CONTINENT WESTOK - HAZELTON STA (DEHY)	Section 35, T3S, R11W, Hazelton, Barber County, KS
BOB BERGKAMP CONST. - SUN CITY QUARRY	2998 NW Sun City Road, Sun City, Barber County, KS
Kansas Brick & Tile	767 N. HWY 281, HOISINGTON, KS, 67544
NuStar Pipeline - El Dorado Products Pipeline Station	1624 SUNSET ROAD, EL DORADO, KS, 67042
DJ ENGINEERING	219 W 6TH AVE, AUGUSTA, KS, 67010
UTEC CORP. - HALLOWELL	2022 NW 110TH, HALLOWELL, KS, 66725
Great Plains Mfg -- Land Pride Abilene West	2150 NW 8th Street, Abilene, KS, 67410
CritiTech Drug Development Services LLC	1849 E 1450 ROAD, LAWRENCE, KS, 66044
IACX Energy - PEAK Facility (helium recov) (incl 3 dehys)	S29-T24S-R16W, BELPRE, KS
EnerSys	1 ENERSYS RD - S19-T13S-R18W, HAYS, KS, 67601
Bonanza Bioenergy	2810 EAST US HIGHWAY 50, GARDEN CITY, KS, 67846
F & F Iron & Metal Co.	3710 Jones Avenue, Garden City, KS, 67846
CAMSO MANUFACTURING USA LTD	2925 INDUSTRIAL STREET, JUNCTION CITY, KS, 66441
Western Plains Energy	S2-T11S-R31W, CAMPUS, KS, 67752

Facility Name	Location
DODGE CITY CO-OP EXCHANGE DBA PRIDE AG RESOURCES - ENSIGN	710 WEST TRAIL, DODGE CITY, KS, 67801
Southern Kansas Cotton Growers Co-op - A	32 SW 20 RD - S35-T33S-R7W, ANTHONY, KS, 67003
FREESTATE ELECTRIC COOPERATIVE - Oskaloosa Substation	13952 54TH ST, OSKALOOSA, KS, 66066
HONEYWELL INTERNATIONAL - OLATHE	23500 WEST 105TH STREET, OLATHE, KS, 66061
B/E AEROSPACE INTERIORS	10800 PFLUMM ROAD, LENEXA, KS, 66215
JOHNSON CO. WASTEWATER - TOMAHAWK CREEK PLANT	10701 LEE BLVD, LEAWOOD, KS, 66211
TOROTEL PRODUCTS	550 NORTH ROGERS ROAD, OLATHE, KS, 66062
SEATS INC	20241 WEST 207TH STREET, SPRING HILL, KS, 66083
NEVILLE WELDING	5581 SW 50TH ST, KINGMAN, KS, 67068
Fort Leavenworth	810 MCCLELLAN AVE, LEAVENWORTH, KS, 660271361
Hostess Brands - Emporia	1525 INDUSTRIAL RD, Emporia, KS 66801
SIMMONS PET FOOD	311 AVE. D, BISON, KS, 67520
John Deere Coffeyville Works	2624 N HWY 169 (AIRPORT), COFFEYVILLE, KS, 67337
Tamko Building Products LLC - Phillipsburg	1598 HIGHWAY 183, PHILLIPSBURG, KS, 67661
Wagner Unit Waterflood Facility	S29-T18S-R16W, S29-T18S-R16W, KS, 67575
Marble Arch LLC (wheat processing)	1030 E 15TH ST, RUSSELL, KS, 67665
Marble Arch LLC (ethanol plant)	1224 E. 15TH STREET, RUSSELL, KS, 67665
Great Plains Mfg. (Land Pride) - Kipp	244 N HUGH ST, KIPP, KS, 67401
ELEMENT LLC - COLWICH	1 Element Drive, COLWICH, KS, 67030
Form Systems	330 CAIN, HAYSVILLE, KS, 67060
Textron Aviation/Interiors Manufacturing Facility	1643 S. MAIZE ROAD, WICHITA, KS, 67209
Capps Mfg.	2120 SOUTH CUSTER, WICHITA, KS, 67213
FACC SOLUTIONS	800 E 37TH ST N, WICHITA, KS, 67219
Cintas Corporation	2050 East Kansas City Road, Olathe, KS, 66061

Facility Name	Location
Arkalon Ethanol	8664 COUNTY ROAD P, LIBERAL, KS, 67901
Cargill Ag Horizons - Topeka (W Gordon)	1845 NW GORDON, TOPEKA, KS, 66608
PTMW Inc. - Topeka	5040 NW HWY 24, TOPEKA, KS, 66618
HEAVENLY PET MEMORIAL (ANIMAL INCINERATOR)	1137 SW GAGE BLVD, TOPEKA, KS, 66604
Arlwin Mfg.	720 E. HWY 36, Smith Center, KS 66967
MERIT ENERGY - MOSCOW BOOSTER COMPRESSOR SITE	S4-T31S-R37W, MOSCOW STATION, KS
NORTHWEST COTTON GROWERS CO-OP - MOSCOW	SW1/4 S4-T32S-R36W, MOSCOW, KS, 67952
Triumph Accessory Service	411 N West Rd, WELLINGTON, KS, 67152
Mid Kansas Co-op - Milan	1063 W 10th Ave, Milan, KS, 67105
Colby Mun. Power Plant	120 N STERLING, COLBY, KS, 67701
Buzzi Unicem USA - Bonner Springs	12200 KAW DRIVE, BONNER SPRINGS, KS, 66012
Procter & Gamble	1900 KANSAS AVE, KANSAS CITY, KS, 66105
Bartlett Grain - Kansas City (Kindleberger Rd)	940 KINDLEBERGER RD, KANSAS CITY, KS, 66115
Harcros Chemicals - Kansas City	5200 Speaker Rd, Kansas City, KS, 66106
Fuchs Lubricants - Kansas City	2140 S 88TH ST, KANSAS CITY, KS, 66111
Reconserve Inc.	41 NORTH JAMES ST., KANSAS CITY, KS, 66118
Kelloggs Snacks aka Keebler Co.	801 SUNSHINE ROAD, KANSAS CITY, KS, 66110
Atlas Molded Products - Kansas City (Kaw Dr) <i>formerly ACJ Foam Technologies, LLC</i>	4001 KAW DR, KANSAS CITY, KS, 66102
MID-STATES MATERIALS (MASTER EQUIP LIST 2)	NO STREET ADDRESS, PORTABLE, KS
CORNEJO & SONS (PORTABLE)	NO STREET ADDRESS, PORTABLE, KS
Black Jack Energy Services	NO STREET ADDRESS, PORTABLE, KS

ATTACHMENT B: Completed NSR Questionnaire

Returned by KDHE prior to Audit.

[see the attached copy]

Draft

ATTACHMENT C: Completed Title V Questionnaire

Returned by KDHE prior to Audit.

[see the attached copy]

Draft

ATTACHMENT D: Fee Attachment

Attachment C
from the March 27, 2018 guidance

[see the attached copy]

Draft

ATTACHMENT C
Example Annual Financial Data Form for 40 CFR Part 70

Permitting Authority: Kansas Department of Health and Environment, Bureau of Air

Annual Period: 07/01/2018 to 06/30/2019

(MM/DD/YYYY)

Enter State Fiscal Year to populate value for C 2019

Annual Program Revenue		
A	Total Program Revenue (Fees Paid by Part 70 Sources)	\$ 4,240,754.35
Annual Presumptive Minimum Cost Calculation		
B	Total Emissions of "Regulated Pollutants (for presumptive fee calculation)"	73,863
C	Presumptive Minimum Fee Rate During Period (\$/ton)	\$ 51.06
D	Total Greenhouse Gas (GHG) Cost Adjustments (as applicable)	\$ 22,350.00
E = (B*C)+D	Presumptive Minimum Cost for the Program	\$ 3,793,794.78
A < E or A ≥ E	Compare Total Program Revenue to Presumptive Minimum Cost Enter: "Less Than" or "Greater Than" or "Equal To"	A ≥ E
Annual Program Costs		
F	Direct Labor Costs ¹	\$ 2,145,670.30
G	Other Direct Costs ²	\$ 841,018.66
H = F + G	Total Direct Costs	\$ 2,986,688.96
I	Known Indirect Costs ³	\$ 707,080.73
J = K*L	Calculated Indirect Costs ⁴	\$ -
K	Indirect Rate	
L	Total Cost Base for the Part 70 Program	
M = I or J	Total Indirect Costs	\$ 707,080.73
N = H + M	Total Program Costs	\$ 3,693,769.69
O = A - N	Annual Operating Result <i>(Report deficits in parentheses)</i>	\$ 546,984.66

¹ This is the sum of all direct labor costs, including regular payroll, overtime payroll, leave, fringe, and any other administrative surcharges.

² This is the sum of all other direct costs, including travel, materials, equipment, contractor, and any other costs directly allocable to the part 70 program.

³ Indirect Costs may either be known or calculated. If known, enter on this row; if calculated, skip to the next three rows.

⁴ If indirect Costs are calculated, enter the result here, and enter the rate and base below. Accounting or budgeting personnel may be able to provide additional information on or assistance with calculating Indirect Costs.

Program Balance of Accounts (Report deficits in parentheses)		
P	Beginning of Year Balance ⁵	\$ 1,299,717.96
Q = O	Annual Operating Result	\$ 546,984.66
R	Fee Revenue Transferred In (describe in comments)	\$ 70,355.97
S	Non-Exchange Revenue Transferred In (describe in comments) - Informational Only	\$ 445,150.00
T	Fee Revenues Transferred Out (describe in comments)	\$ (1,259,419.93)
U = O + Q + R - T	End of Year Balance	\$ (95,094.64)

COMMENTS:

Use this section to describe any changes in accounting methods or program elements that affect the fee program, categories of revenue or expenses that do not fit into any of the listed categories or apply across multiple categories transfers in or out, or any unusual activities or circumstances relevant to fees administration. Attach additional pages if needed.

Total Operational Costs do not include program costs for "adequate personnel and resources" as budgeted for vacant positions with associated ~ 25% indirects (~\$ 587,500), resulting in an **Annual Operating Result** surplus of \$ 586,984.66. If these expenditures were accounted for, the **Annual Operating Result** would reflect a deficit of \$ (40,515.34) and a calculated **End of Year Balance** deficit of \$ (1,270,094.64).

Fee Revenue Transferred In are permit application fees collected from Non-Part 70 sources that are deposited into the Air Quality Fee fund (Permit Fees) for SFY 2019 and cover expenditures. Fiscal reporting does not differentiate between Part 70 and other permit fees, these estimates are based on KEIMS reporting to calculate portion of Non-Part 70 Permit Fees [Expenditures from AQFF (Permit Fees) - Part 70 permit application fees from KEIMS].

Non-Exchange Revenue Transferred In represents all fines deposited from both Part 70 and Non-Part 70 Sources into the Air Quality Fee fund for SFY 2019 and does not represent previous year carry over balance of historic fines deposited into the account and used to fund the overall Air Quality Program.

Fee Revenues Transferred Out represents 30% of annual emission fees collected from Part 70 sources for SFY 2019 which were deposited into the NON Title V Fees fund and used to fund the Non-Part 70 Program. Currently the Non-Part 70 Program fee schedule is composed only of operating permit application fees and construction permit application fees collected from Non-Part 70 sources. This funding mechanism is not adequate to cover the operational costs of the Non-Part 70 Program and is supplemented with emission fees collected from Part 70 sources.

The Bureau of Air intends on establishing annual emission fee requirements for sources operating under our SIP Approved Federally Enforceable State Operating Permit (FESOP) program to provide adequate funding for the Non-Part 70 Program, which should free up Part 70 fees to adequately cover the operational costs of the Part 70 Operating Permit Program.

"Non-Part 70" program includes all construction and operating permit program elements for sources covered under our SIP approved Federally Enforceable State Operating Program (FESOP) and all true minor and/or area source permitting program that are not required to obtain a Part 70 Operating Permit. Program elements also include compliance/inspection, and planning, monitoring and inventory activities for these classes of sources. These activities are also funded with the 105 Grant.

⁵This is the prior year's End of Year Balance."

ATTACHMENT E: Entrance Meeting Attendees

Amy Algoe-Eakin
Allyson Prue [KDHE]
Ashley Eichman [KDHE]
Ward Burns
Robert Cheever
Connie Ellis [KDHE]
Douglas Watson [KDHE]
Kathy Finazzo
Gerald McIntyre [KDHE]
Gyanendra X Prasai [KDHE]
Jacki Diederich [KDHE]
Keith Johnson
Josephine Boac [KDHE]
Melissa McDonald [KDHE]
David Peter
Rick Brunetti [KDHE]
Patricia A. Scott
Dana Skelley

Draft

ATTACHMENT F: Exit Meeting Attendees

Amy Algoe-Eakin
Allyson Prue [KDHE]
Ashley Eichman [KDHE]
Lance Avey
Ward Burns
Cheever, Robert
Connie Ellis [KDHE]
Kathy Finazzo
Gerald McIntyre [KDHE]
Gyanendra X Prasai [KDHE]
Jacki Diederich [KDHE]
Keith Johnson
Josephine Boac [KDHE]
Melissa McDonald [KDHE]
David Peter
Rick Brunetti [KDHE]
Patricia A. Scott
Dana Skelley
Robert Webber

ATTACHMENT G: KDHE's Response Letter Regarding the Draft Report

[see the attached copy]

Draft