## Aemilia Hamel

**From:** Air.Pollution Control
**Sent:** Thursday, 2 June, 2022 07:36
**To:** APC Permitting
**Subject:** FW: Revised Construction Air Permit Application, Source No. 06-0282-25
**Attachments:** Wacker_Source_06-0282-25_June02_Permit_App_Revision.pdf

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**From:** Copeland, Jeremy <Jeremy.Copeland@wacker.com>
**Sent:** Thursday, June 2, 2022 6:34 AM
**To:** Air.Pollution Control <Air.Pollution.Control@tn.gov>
**Cc:** Derek Briggs <Derek.Briggs@tn.gov>
**Subject:** [EXTERNAL] Revised Construction Air Permit Application, Source No. 06-0282-25



Derek,

Per our discussions, please see the attached revised construction air permit application. Please contact me directly with any questions.

Thank You,

**JEREMY COPELAND, CHMM**
Environmental Manager
Wacker Polysilicon North America LLC
PO Box 446
553 Wacker Blvd NW, Building D112
Charleston, TN 37310-0446, USA
Tel. +1 423 780 7953
Fax +1 517 264 4021
jeremy.copeland@wacker.com

WACKER

Jeremy Copeland, CHMM
Environmental Manager

**Wacker Polysilicon North America LLC**
P.O. Box 446
Charleston, TN 37310-0446
Tel. 423-780-7953
Jeremy.Copeland@wacker.com

June 02, 2022
Division of Air Pollution Control
Tennessee Department of Environment and Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Delivered via email

*RE: Wacker Polysilicon North America LLC*
*Emission Source Reference No. 06-0282-25, Additional Information Request*

Dear Mr. Briggs,

Per the request in the May 27th letter issued to Wacker from the Division of Air Pollution Control, Wacker is providing updated application forms APC 100, 101 & 102 to reflect the best estimates of air flow rates from the dust collection systems. The only process data that changed on APC form 101 was in section 7. We found that the emissions quantities in section 10 of the forms were correct because the correctly estimated flow rates were used for the emission calculations, but incorrect flow rates had been populated in section 7 of the forms. APC 102 form is also being updated with the silicon grinding equipment manufacturer state design capacity of 16,535 lbs/hr. Wacker's overall polysilicon production capacity is limited by the downstream reactors that receive the silicon, at a maximum quantity of 9,001 lbs/hr. This production capacity is limited in condition S5-1 of conditional major operating permit number 474253. With this value being recognized as the overall plant production capacity, this same quantity has been used in the APC 102 form as the actual input rate of silicon. An updated agreement letter for the PM limit for this source is not necessary because the current one dated March 25, 2022 is still valid due to the emissions values on the revised APC 101 forms having not changed.

Wacker is requesting an opportunity to review the final draft of the permit prior to issuance as our understanding is some of the permit conditions may be changing since the original draft was published.

If you have any questions or comments regarding this topic, please do not hesitate to contact me directly at 423.780.7953.

Cordially,

Jeremy Copeland, CHMM
Environmental Manager
Wacker Polysilicon North America LLC

# Attachment 1

## Permit Forms

APC 100
(2) APC 101
APC 102

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov



# NON-TITLE V PERMIT APPLICATION
# FACILITY IDENTIFICATION

Type or print and submit. Attach appropriate source description forms.

## SITE INFORMATION

**1. Organization's legal name and SOS control number** [as registered with the TN Secretary of State (SOS)]
Wacker Polysilicon North America LLC, SOS No. 588246

**2. Site name** (if different from legal name)
Wacker, Charleston

**3. Is a construction permit application fee being submitted?** Yes [✔] No [ ]
(see instructions for appropriate fee to submit)

| **4. Site address** (St./Rd./Hwy.) | | County name |
|---|---|---|
| 553 Wacker Blvd. NW | | Bradley |
| City: Charleston | Zip code: 37310 | **5.** NAICS or SIC code: 3339 |

| **6. Site location** (in lat. /long.) | Latitude | Longitude |
|---|---|---|
| | 35.298673138 | -84.800751707 |

## CONTACT INFORMATION (RESPONSIBLE PERSON)

| **7. Responsible person/Authorized contact** | | | Phone number with area code |
|---|---|---|---|
| Ken Collins | | | (423) 780-8800 |
| **Mailing address** (St./Rd./Hwy.) | | | Fax number with area code |
| PO Box 446 | | | |
| City: Charleston | State: TN | Zip code: 37310 | Email address: Ken.Collins@wacker.com |

## CONTACT INFORMATION (TECHNICAL)

| **8. Principal technical contact** | | | Phone number with area code |
|---|---|---|---|
| Jeremy Copeland | | | (423) 780-7953 |
| **Mailing address** (St./Rd./Hwy.) | | | Fax number with area code |
| PO Box 446 | | | |
| City: Charleston | State: TN | Zip code: 37310 | Email address: Jeremy.Copeland@wacker.com |

## CONTACT INFORMATION (BILLING)

| **9. Billing contact** | | | Phone number with area code |
|---|---|---|---|
| Jeremy Copeland | | | (423) 780-7953 |
| **Mailing address** (St./Rd./Hwy.) | | | Fax number with area code |
| PO Box 446 | | | |
| City: Charleston | State: TN | Zip code: 37310 | Email address: Jeremy.Copeland@wacker.com |

## AIR CONTAMINANT SOURCE(S) INFORMATION

**10. Description of air contaminant source(s) and Unique Source ID(s).** List, identify, and briefly describe process emission sources, fuel burning installations, and incinerators that are contained in this application and include a Unique Source ID for each source. The Unique Source ID is a name/number/letter, which uniquely identifies the air contaminant source(s), like Boiler #1, Paint Line #1, Engine #1, etc. (see instructions for more details)

This application is for our existing silicon grinding operation. Previously this operation was designated an insignificant activity on February 14, 2017, at Wacker's request. Wacker has experiencing operating difficulties with this operation and desires to vent the emissions from the crushing operation to the outdoors. This portion of the operation previously was ducted back into the unit.

The site emissions identification numbers for the emissions are C218E35 for the silicon unloading and initial conveying and C218E36 for the crushing, screening and conveying operations. This is considered all one operation. Two separate APC 101 forms are included to represent each portion of the operation that have separate particulate control systems and venting.

**11. Is the air contaminant source(s) in a nonattainment area? If "Yes", then minor source BACT must be addressed.** Yes ☐ No ☑

| | | | | |
|---|---|---|---|---|
| **12. Normal operation:** | Hours/Day<br>12 | Days/Week<br>7 | Weeks/Year<br>52 | Days/Year<br>365 |
| **13. Percent annual throughput** | Dec. – Feb.<br>25 | March – May<br>25 | June – August<br>25 | Sept. – Nov.<br>25 |

**TYPE OF PERMIT REQUESTED (check appropriate box)**

| | | | |
|---|---|---|---|
| **14.** Operating permit ☐ | Date construction started | Date completed | Date of ownership change (if applicable) |
| | Last permit number(s) | Emission Source Reference Number(s) | |
| Construction permit ☑ | Last permit number(s)<br>None | Emission Source Reference Number(s) | |

If you chose Construction permit above, then choose either New Construction, Modification, or Location Transfer

| | | |
|---|---|---|
| New Construction ☐ | Starting date | Completion date |
| Modification ☑ | Date modification started or will start<br>07/15/2022 | Date completed or will complete<br>10/30/2022 |
| Location Transfer ☐ | Transfer date | Address of last location |

**15. Describe changes that have been made to this equipment or operation(s) since the last construction or operating permit application:**

Not Applicable

**16. Comments**

None

**SIGNATURE**

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

| **17. Signature** (application must be signed before it will be processed) | **Date** |
|---|---|
| | 6/2/22 |

| **Signer's name** (type or print) | **Title** | **Phone number with area code** |
|---|---|---|
| Ken Collins | Senior Director, Site Leader | (423) 780-8800 |

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov



# NON-TITLE V PERMIT APPLICATION
# EMISSION POINT DESCRIPTION

Type or print and submit for each stack or air contaminant source. Submit with the APC 100.

## GENERAL IDENTIFICATION AND DESCRIPTION

**1. Organization's legal name and SOS control number** [as registered with the TN Secretary of State (SOS)]
Wacker Polysilicon North America LLC

**2. Unique Source ID** (name/number/letter which uniquely identifies this air contaminant source, like Boiler #1)
C218

**3. Unique Emission Point ID** (name/number/letter which uniquely identifies this emission point, like Stack #1)
C218E35

**4. Brief description of air contaminant source** (Attach a diagram if appropriate):
Silicon unloading and conveying

| **5. Emission point location** | Latitude | Longitude | **6. Distance to nearest property line (Ft.)** |
|---|---|---|---|
| | 35.29917634824 | -84.79702033113 | 1,208 |

## STACK AND EMISSION DATA

| **7. Stack or emission point data:** → | Height above grade (Ft.) | Diameter (Ft.) | Temperature (°F) | % of time over 125°F | Direction of exit (Up, down or horizontal) |
|---|---|---|---|---|---|
| | 22' 4" | 1' 1.75" x 1' 8.5" | 70 | 0 | Horizontal |

| Data at exit conditions: → | Flow (actual $Ft.^3$/Min.) | Velocity (Ft. /Sec.) | Moisture ($Grains/Ft.^3$) | Moisture (Percent) |
|---|---|---|---|---|
| | 3,500 | 74 | 0 | 0 |

| Data at standard conditions: → | Flow (Dry std. $Ft.^3$/Min.) | Velocity (Ft. /Sec.) | Moisture ($Grains/Ft.^3$) | Moisture (Percent) |
|---|---|---|---|---|
| | 3,500 | 74 | 0 | 0 |

**8. Monitoring device and recording instrument (check all that apply):**

| Opacity monitor | $SO_2$ monitor | $NO_X$ monitor | Strip chart | Electronic data logger | Other (specify in comments) | No monitor (none) |
|---|---|---|---|---|---|---|
| ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☑ |

**9. Control device.** Description of proposed monitoring, recordkeeping, and reporting to assure compliance with emission limits. Include operating parameters of control device (flow rate, temperature, pressure drop, etc.).

Particulate filtration utilizing bag filters while measuring pressure drop across filters. Additionally a particulate monitor in the duct exiting the dust collector that can detect a change in dust concentration caused by a broken bag or failing filtration.

**10. Air contaminants.** Emission estimates for each air contaminant emitted from this point should be based on stack sampling results or engineering calculations. Calculations should be attached on a separate sheet. (see instructions for more details)

| Air contaminants | Average Emissions (Lbs./Hr.) | Maximum Emissions (Lbs./Hr.) | Concen-tration | Average Emissions (Ton/Yr.) | Potential Emissions (Ton/Yr.) | Emissions Estimation Method Code * | Control Devices * | Control Effi-ciency % |
|---|---|---|---|---|---|---|---|---|
| Particulate matter (PM) | 0.12 | 0.15 | ** 0.004 | 0.43 | 0.64 | 6 | 017 | 99 |
| Sulfur dioxide ($SO_2$) | | | *** | | | | | |
| Carbon monoxide (CO) | | | PPM | | | | | |
| Volatile organic compounds (VOC) | | | PPM | | | | | |
| Nitrogen oxides ($NO_X$) | | | PPM | | | | | |
| Hydrogen fluoride (HF) | | | | | | | | |
| Hydrogen chloride (HCl) | | | | | | | | |
| Lead (Pb) | | | | | | | | |
| Greenhouse gases ($CO_2$ equivalents) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |

**11. Comments**
Emissions estimations are made based on air pollution control device manufactuer provided information.

**SIGNATURE**

If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required.

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

| **12. Signature** | | **Date** 6/2/22 |
|---|---|---|
| **Signer's name** (type or print)<br>Ken Collins | **Title**<br>Senior Director, Site Leader | **Phone number with area code**<br>(423) 780-8800 |

* Refer to the tables in the instructions for estimation method and control device codes.

** Exit gas particulate matter concentration units: Process – Grains/Dry Standard $Ft^3$ ($70^0$F), Wood fired boilers - Grains/Dry Standard $Ft^3$ ($70^0$F), all other boilers – Lbs. /Million BTU heat input.

*** Exit gas sulfur dioxide concentrations units: Process – PPM by volume, dry bases, and boilers – Lbs. /Million BTU heat input

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
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# NON-TITLE V PERMIT APPLICATION
# EMISSION POINT DESCRIPTION

Type or print and submit for each stack or air contaminant source. Submit with the APC 100.

## GENERAL IDENTIFICATION AND DESCRIPTION

**1. Organization's legal name and SOS control number** [as registered with the TN Secretary of State (SOS)]
Wacker Polysilicon North America LLC

**2. Unique Source ID** (name/number/letter which uniquely identifies this air contaminant source, like Boiler #1)
C218

**3. Unique Emission Point ID** (name/number/letter which uniquely identifies this emission point, like Stack #1)
C218E36

**4. Brief description of air contaminant source** (Attach a diagram if appropriate):
Silicon crushing, screening and conveying

| **5. Emission point location** | Latitude | Longitude | **6. Distance to nearest property line (Ft.)** |
|---|---|---|---|
| | 35.29913751886 | -84.79683957991 | 1,158 |

## STACK AND EMISSION DATA

| **7. Stack or emission point data:** → | Height above grade (Ft.) | Diameter (Ft.) | Temperature (°F) | % of time over 125°F | Direction of exit (Up, down or horizontal) |
|---|---|---|---|---|---|
| | 22' 4" | 1' 1.75" x 1' 8.5" | 70 | 0 | Horizontal |

| Data at exit conditions: → | Flow (actual $Ft.^3$/Min.) | Velocity (Ft. /Sec.) | Moisture ($Grains/Ft.^3$) | Moisture (Percent) |
|---|---|---|---|---|
| | 7,600 | 161.3 | 0 | 0 |

| Data at standard conditions: → | Flow (Dry std. $Ft.^3$/Min.) | Velocity (Ft. /Sec.) | Moisture ($Grains/Ft.^3$) | Moisture (Percent) |
|---|---|---|---|---|
| | 6,514 | 138.2 | 0 | 0 |

**8. Monitoring device and recording instrument (check all that apply):**

| Opacity monitor | $SO_2$ monitor | $NO_X$ monitor | Strip chart | Electronic data logger | Other (specify in comments) | No monitor (none) |
|---|---|---|---|---|---|---|
| ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☑ |

**9. Control device.** Description of proposed monitoring, recordkeeping, and reporting to assure compliance with emission limits. Include operating parameters of control device (flow rate, temperature, pressure drop, etc.).

Particulate filtration utilizing bag filters while measuring pressure drop across filters. Additionally a particulate monitor in the duct exiting the dust collector that can detect a change in dust concentration caused by a broken bag or failing filtration.

**10. Air contaminants.** Emission estimates for each air contaminant emitted from this point should be based on stack sampling results or engineering calculations. Calculations should be attached on a separate sheet. (see instructions for more details)

| Air contaminants | Average Emissions (Lbs./Hr.) | Maximum Emissions (Lbs./Hr.) | Concen-tration | Average Emissions (Ton/Yr.) | Potential Emissions (Ton/Yr.) | Emissions Estimation Method Code * | Control Devices * | Control Effi-ciency % |
|---|---|---|---|---|---|---|---|---|
| Particulate matter (PM) | 0.26 | 0.32 | ** 0.004 | 0.93 | 1.40 | 6 | 017 | 99 |
| Sulfur dioxide ($SO_2$) | | | *** | | | | | |
| Carbon monoxide (CO) | | | PPM | | | | | |
| Volatile organic compounds (VOC) | | | PPM | | | | | |
| Nitrogen oxides ($NO_X$) | | | PPM | | | | | |
| Hydrogen fluoride (HF) | | | | | | | | |
| Hydrogen chloride (HCl) | | | | | | | | |
| Lead (Pb) | | | | | | | | |
| Greenhouse gases ($CO_2$ equivalents) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Hazardous air pollutant (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |
| Other (specify) | | | | | | | | |

**11. Comments**
Emissions estimations are made based on air pollution control device manufactuer provided information

**SIGNATURE**

If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required.

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

| **12. Signature** | | **Date** 6/2/22 |
|---|---|---|
| **Signer's name** (type or print)<br>Ken Collins | **Title**<br>Senior Director, Site Leader | **Phone number with area code**<br>(423) 780-8800 |

* Refer to the tables in the instructions for estimation method and control device codes.

** Exit gas particulate matter concentration units: Process – Grains/Dry Standard $Ft^3$ ($70^0$F), Wood fired boilers - Grains/Dry Standard $Ft^3$ ($70^0$F), all other boilers – Lbs. /Million BTU heat input.

*** Exit gas sulfur dioxide concentrations units: Process – PPM by volume, dry bases, and boilers – Lbs. /Million BTU heat input

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
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APC 102

# NON-TITLE V PERMIT APPLICATION
# PROCESS OR FUEL BURNING SOURCE DESCRIPTION

Type or print. Submit with the APC 100.

## GENERAL IDENTIFICATION AND DESCRIPTION

| 1. **Organization's legal name and SOS control number** [as registered with the TN Secretary of State (SOS)] | 2. **Emission Source Reference Number** |
|---|---|
| Wacker Polysilicon North America LLC, SOS No. 588246 | |

**3. Is this air contaminant source subject to an NSPS or NESHAP rule?** Yes ☐ No ☑
If Yes, list rule citation, including Part, Subpart, and applicable Sections:

| 4. **Unique Source ID** (see instructions) | 5. **Unique Emission Point ID** (see instructions) |
|---|---|
| C218 | C218E35 & 36 |

**6. Description of air contaminant source**
Silicon crushing operation for raw material silicon feed.

**7. Type of air contaminant source** (Check only one option to the right)

| | |
|---|---|
| Process Emission Source: For each process emission source, submit a separate application. (Check at right and complete lines 8, 9, and 14) | ☑ |
| Process Emission Source with in process fuel: Products of combustion contact materials heated. For each process emission source, submit a separate application. (Check at right and complete lines 8 through 14) | ☐ |
| Non-Process fuel burning source: Products of combustion do not contact materials heated. Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 10 through 14) | ☐ |

## PROCESS EMISSION SOURCE DESCRIPTION AND DATA

| 8. **Type of operation:** Continuous ☑ Batch ☐ | Normal batch time | Normal batches/day |
|---|---|---|

| 9. **Process material inputs and In-process solid fuels** | Diagram reference | Input rates (pounds/hour) Design | Actual |
|---|---|---|---|
| A. 39,424 tons/year | | 16,535 | 9,001 |
| B. | | | |
| C. | | | |
| D. | | | |
| E. | | | |
| F. | | | |
| G. | | | |
| Totals | | | |

* A simple process flow diagram must be attached.

## DESCRIPTION OF BOILER, BURNER, ENGINE, OR OTHER FUEL BURNING SOURCE

**10. Boiler or burner data:** (Complete lines 10 through 14 using a separate form for each boiler, burner, etc.)

| Serial Number | Type of firing*** |
|---|---|
| | |

| Rated horsepower | Rated input capacity ($10^6$ BTU/Hr.) | Other rating (specify capacity and units) |
|---|---|---|
| | | |

| Date constructed | Date manufactured | Date of last modification (explain in comments below) |
|---|---|---|
| | | |

** Source with a common stack will have the same stack number.

*** Cyclone, spreader (with or without reinjection), pulverized (wet or dry bottom, with or without reinjection), other stoker (specify type, hand fired, automatic, or other type (describe below in comments).

## FUEL USED IN BOILER, BURNER, ENGINE, OR OTHER FUEL BURNING SOURCE

**11. Fuel data:** (Complete for a process emission source with in process fuel or a non-process fuel burning source)

| Primary fuel type (specify) | | | | Standby fuel type(s) (specify) | | | | |
|---|---|---|---|---|---|---|---|---|
| Fuels used | Annual usage | Hourly usage | | % Sulfur | % Ash | BTU value of fuel | | (For APC use only) SCC code |
| | | Design | Average | | | | | |
| Natural gas: | $10^6$ Cu. Ft. | Cu. Ft. | Cu. Ft. | ////////// ////////// | ///// ///// | 1,000 | | |
| #2 Fuel oil: | $10^3$ Gal. | Gal. | Gal. | | ///// ///// | | | |
| #5 Fuel oil: | $10^3$ Gal. | Gal. | Gal. | | ///// ///// | | | |
| #6 Fuel oil: | $10^3$ Gal. | Gal. | Gal. | | ///// ///// | | | |
| Coal: | Tons | Lbs. | Lbs. | | | | | |
| Wood: | Tons | Lbs. | Lbs. | ////////// ////////// | ///// ///// | | | |
| Liquid propane: | $10^3$ Gal. | Gal. | Gal. | //////// //////// | ///// ///// | 85,000 | | |
| Other (specify type & units): | | | | | | | | |

**12. If Wood is used as a fuel, specify types and estimate percent by weight of bark**

**13. If Wood is used with other fuels, specify percent by weight of wood charged to the burner.**

**14. Comments**

This form is for the whole silicon unloading and crushing process. It includes two emission points. This process was formerly granted an insignificant activity request due to emissions calculations used reflective of no emission controls and exhaust being ducted back into the system to recapture particulate. Due to operating difficulties with this model, now the unit will be ducted outside the building and emissions quantities are based on the existing particulate controls in place.

**SIGNATURE**

If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required.

Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

| **15. Signature** K Collins | | **Date** 6/2/22 |
|---|---|---|
| **Signer's name** (type or print)<br>Ken Collins | **Title**<br>Senior Director, Site Leader | **Phone number with area code**<br>(423) 780-8800 |