



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

DEC 15 2015

Mr. David Fraley
John Twitty Energy Center
P.O. Box 551
Springfield, MO 65807

Re: John Twitty Energy Center, 077-0039
Permit Number: OP2015-055

Dear Mr. Fraley:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jw

Enclosures

c: PAMS File: 2013-06-003



PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2015-055
Expiration Date: DEC 15 2020
Installation ID: 077-0039
Project Number: 2013-06-003

Installation Name and Address

John Twitty Energy Center
5100 W. Farm Road 164
Springfield, MO 65807
Greene County

Parent Company's Name and Address

City Utilities of Springfield
301 E. Central St.
Springfield MO, 65801

Installation Description:

John Twitty Energy Center is a fossil-fuel steam electric generation facility consisting of two coal-fired boilers which produce steam that power electrical generating equipment. The boilers are fired with low sulfur western coal. Unit 1 is capable of burning natural gas and is equipped to burn fuel oil as a backup and startup fuel. Unit 2 is equipped to burn natural gas as a startup fuel and for flame stabilization. The facility is equipped with two (2) natural gas-fired combustion turbines with a nameplate capacity of 52 MW each. The turbines are used as peaking units during periods of high electrical demand or system emergencies and voltage regulation. There is a small natural gas/fuel oil building heat boiler, a diesel generator and emergency fire pump. Other activities include coal unloading, transfer, and storage and fly ash storage and disposal. This facility is major for all criteria pollutants. This installation is a named source therefore fugitive emissions are included in calculations of potential-to-emit.

Prepared by
Jill Wade
Operating Permit Unit

Director or Designee
Department of Natural Resources

DEC 15 2015

Effective Date

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	4
INSTALLATION DESCRIPTION	4
EMISSION UNITS WITH LIMITATIONS	5
EMISSION UNITS WITHOUT LIMITATIONS.....	6
II. PLANT WIDE EMISSION LIMITATIONS.....	7
PERMIT CONDITION PW001	7
10 CSR 10-6.065 Operating Permits, Voluntary Condition.....	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	8
PERMIT CONDITION 001	8
10 CSR 10-6.070 New Source Performance Regulations	8
40 CFR Part 60 Subpart D, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 17, 1971.....	8
Construction Permit 072914-002, Issued July 14, 2014.....	8
40 CFR Part 64, Compliance Assurance Monitoring (CAM)	8
PERMIT CONDITION 002	11
10 CSR 10-6.070 New Source Performance Regulations	11
40 CFR Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 18, 1978 (NSPS as published in Federal Register as of February 27, 2006)	11
PERMIT CONDITION 003	16
10 CSR 10-6.075 Maximum Achievable Control Technology Requirements	16
60 CFR Part 63 Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units.....	16
PERMIT CONDITION 004	21
10 CSR 10-6.270 Acid Rain source Permits Required	21
40 CFR Part 72 through Part 76.....	21
PERMIT CONDITION 005	22
10 CSR 10-6.362 Clean Air Interstate Rule Annual NO _x Trading Program	22
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO _x Trading Program.....	22
10 CSR 10-6.366 Clean Air Interstate Rule SO _x Trading Program	22
PERMIT CONDITION 006	23
10 CSR 10-6.060 Construction Permits Required.....	23
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B).....	23
PERMIT CONDITION 007	28
10 CSR 10-6.060 Construction Permits Required.....	28
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B).....	28
40 CFR Part 64, Compliance Assurance Monitoring.....	28
PERMIT CONDITION 008	32
10 CSR 10-6.060 Construction Permits Required.....	32
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B).....	32
PERMIT CONDITION 009	33
10 CSR 10-6.060 Construction Permits Required.....	33
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B).....	33
PERMIT CONDITION 010	33
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	33
PERMIT CONDITION 011	36
10 CSR 10-6.070 New Source Performance Standards	36
40 CFR Part 60 Subpart Y, Standards of Performance for Coal Preparation Plants and Processing Plants	36
PERMIT CONDITION 012	38

10 CSR 10-6.060 Construction Permits Required.....	38
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B).....	38
PERMIT CONDITION 013	41
10 CSR 10-6.060 Construction Permits Required.....	41
Construction Permit 122004-007B, Issued June 12, 2013	41
PERMIT CONDITION 014	43
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	43
40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.....	43
PERMIT CONDITION 015	45
10 CSR 10-6.060 Construction Permits Required.....	45
Construction Permit No. 0391-001, Issued March 4, 1991	45
PERMIT CONDITION 016	48
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	48
40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.....	48
PERMIT CONDITION 017	49
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	49
PERMIT CONDITION 018	50
40 CFR Part 70 and 97.....	50
Cross State Air Pollution Rule.....	50
IV. CORE PERMIT REQUIREMENTS	67
V. GENERAL PERMIT REQUIREMENTS.....	73
VI. ATTACHMENTS	79
ATTACHMENT A.....	80
ATTACHMENT B	80
ATTACHMENT C	84
ATTACHMENT D.....	94
ATTACHMENT E1	99
ATTACHMENT E2	100
ATTACHMENT F	101
ATTACHMENT G.....	102

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

John Twitty Energy Center is a fossil-fuel steam electric generation facility consisting of two coal-fired boilers which produce steam that power electrical generating equipment. The boilers are fired with low sulfur western coal and burns natural gas and fuel oil as a backup and startup fuel. Unit 2 is rated at 2,724 MMBtu/hr and can generate a total of 309 MWe. It is also fired with low sulfur western coal. Unit 1 is capable of burning natural gas and is equipped to burn fuel oil as a backup and startup fuel. Unit 2 is equipped to burn natural gas as a startup fuel and for flame stabilization. The facility is equipped with two (2) natural gas-fired combustion turbines with a nameplate capacity of 52 MW each. The turbines are used as peaking units during periods of high electrical demand or system emergencies and voltage regulation. There is a small natural gas/fuel oil building heat boiler, a diesel generator and emergency fire pump. Other activities include coal unloading, transfer, and storage and fly ash storage and disposal. Units are subject to 40 CFR Part 63 Subparts DDDDD, UUUUU and ZZZZ, 40 CFR Part 64 (CAM), and 40 CFR Part 60 Subparts D and Da, Acid Rain and CAIR. This installation is a named source therefore fugitive emissions are included in calculations of potential-to-emit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	380.68	296.42	385.60	349.92	304.12
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	195.25	146.79	172.50	110.24	95.19
Sulfur Oxides (SO _x)	2584.40	2,798.83	5,455.78	3,992.32	3,780.32
Nitrogen Oxides (NO _x)	884.60	782.75	1,367.10	983.34	774.20
Volatile Organic Compounds(VOC)	22.33	21.43	26.18	27.11	21.73
Carbon Monoxide (CO)	603.98	507.02	835.87	212.26	181.28
Lead (Pb)	0.02	0.01	0.02	0.03	0.02
Hazardous Air Pollutants (HAPs)	13.70	12.99	18.35	21.77	19.26
Ammonia (NH ₃)	9.08	7.83	9.43	22.45	4.38

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>	<u>Emission Point</u>
EU09	Unit 1 Boiler	
EU100	Unit 2 Boiler	
EU06	Coal Transfer Conveyors	
EU01	Coal Transfer Conveyors	
EU02	Coal Transfer Conveyor	
EU04	Coal Transfer Conveyor	
EU121	Coal Transfer Conveyor	
EU06	Coal Transfer Conveyor	
EU124	Coal Transfer Conveyor	
EU102	Coal Transfer Conveyor	
EU103	Coal Transfer Crusher to Tripper	
EU101	Coal Transfer Conveyor	
EU30	Ash Receiver	
EU32	Ash Storage Silo	
EU50	Ash Silo Side Discharge	
EU85	Fly Ash Batch Mixer Unloading Spout	
EU106	Fly Ash Transfer to Tanks	
EU107/108	Waste Power Tank Mechanical Exhausters #1 and #2	
EU109	Conditioned Waste Powder to Ash Truck Transfer	
EU110	Ash Truck Transfer	
EU112	Bottom Ash Transfer to Conveyors	
EU104	Coal Transfer Conveyors	
EU114	Ash Truck Transfer Point –truck loading	
EU116	Lime Transfer to Storage Silos	
EU117	Lime Transfer to Feed Bins	
EU118	Cooling Tower	
EU124	Coal Transfer to Underground Conveyor	
EU126	Powder Activated Carbon Silo Bin Vent Filter	
EU127	Powder Activated Carbon Haul Road	
EU16	Building Heat Boiler	
EU12/74	Paved and Unpaved Haul Roads	
EU41/42	Combustion Turbines 1A and 1B	
EU43/44	Combustion Turbines 2A and 2B	
EU20/22	Two Standby Emergency Diesel Generators	

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Bottom Ash and Fly Ash Storage/Disposal

Natural Gas Igniter Vents

200,000, 892,500, 2-2,000, and 130 Gallon fuel oil storage tanks

500 and 550 Gallon Above Ground Storage Tanks (No. 1 Diesel)

5,430 and 5,940 Gallon Sulfuric Acid Storage Tanks

3-2,200 Gallon Hydrochloric Acid Storage Tanks

500 Gallon Lube and Loop Seal Oil System

1,100 Gallon Above Ground Storage Tank (Waste Lube Oil)

12,044 Gallon Lube Oil Storage Tank

Mineral Spirits Storage Drums

Bleach Bromide Storage and Use

Diesel Fueling Station

200 Gallon Electrohydraulic Fluid Storage Tank

Lubricating Oil Storage

Hydrazine Storage Drums/Tank/Line Vent

2 – 2,000 Gallon Diesel Fuel Above Ground Tanks and fueling stations

2,000 gallon above ground unleaded gasoline storage tank and fueling station

Selective Catalytic Reduction (SCR) Urea Tank

Urea Decomposition Chamber Exhaust Unit 1 (E128) – 1.67 mmBtu/hr

Urea Decomposition Chamber Exhaust Unit 2 (E129) – 1.67 mmBtu/hr

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.065 Operating Permits, Voluntary Condition

Operational Limitation:

The permittee shall not burn fuel oils with at sulfur content greater than 0.1% by weight.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. Fuel samples taken by the permittee shall be conducted following delivery of the bulk shipment or lot. Specifically, the permittee may use one of the total sulfur sampling options and the associated sampling frequency described in Appendix D to Part 75. Attachment A or an equivalent record keeping form shall be used to record all fuel oil samples and analyses required by this voluntary condition.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or computer media.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

<p>PERMIT CONDITION 001 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart D, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 17, 1971 Construction Permit 072914-002, Issued July 14, 2014 40 CFR Part 64, Compliance Assurance Monitoring (CAM)</p>

Emission Unit	Description	Manufacturer/Model #
EU9	Unit 1 Boiler: 1,810 MMBtu/hr boiler which combusts coal, pipeline grade natural gas and #2 fuel oil; Controlled by pulse jet baghouse; Boiler installed in 1976	Riley Stoker Turbo

Emission Limitation:

The exhaust stream from the emission unit shall not:

- a) Contain particulate matter in excess of 0.1 lbs/MMBtu;
- b) Exhibit greater than twenty (20%) percent opacity, except for one six-minute period per hour of not more than twenty-seven (27%) percent opacity;
- c) Contain sulfur dioxide in excess of 0.80 lb/MMBtu derived from liquid fossil fuel;
- d) Contain sulfur dioxide in excess of 1.2 lbs/MMBtu derived from solid fossil fuel;
- e) Contain nitrogen oxides, expressed as nitrogen dioxide, in excess of 0.30 lb/MMBtu derived from liquid fossil fuel;
- f) Contain nitrogen oxides, expressed as nitrogen dioxide, in excess of 0.70 lb/MMBtu derived from solid fossil fuel.

Monitoring:

- 1) The permittee shall control emissions from Utility Boiler #1 using a baghouse. [Special Condition 1.A of Construction Permit No.072014-002]
- 2) Monitoring Requirements for the pulse jet baghouse:
 - a) The baghouse shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauge or meter shall be located such that Department of Natural Resources’ employees may easily observe it. [Special Condition 1.B of Construction Permit No. 072014-002]
 - b) Replacement filters for the baghouse shall be maintained onsite at all times in sufficient quantities to replace broken bags. The bags shall be made of fibers appropriate for operating conditions expected to occur. [Special Condition 1.C of Construction Permit No. 072014-002]
 - c) The permittee shall continuously monitor and record the operating pressure drop across the baghouse. The operating pressure drop shall be maintained within the design conditions

specified by the manufacturer's performance specifications. [Special Condition 1.D of Construction Permit No. 072014-002]

- d) The permittee shall maintain a copy of the baghouse manufacturer's performance specifications on site. [Special Condition 1.E of Construction Permit 072014-002]
 - e) The permittee shall maintain an operating and maintenance log for the baghouse which shall include the following: [Special Condition 1.F of Construction Permit 072014-002]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions and replacements, etc.
 - f) Periodic monitoring is not required during periods of time greater than one day in which the source does not operate. The baghouse will be required to operate and be maintained within the operating and maintenance plan after initial start-up of the emission unit.
- 3) Monitoring Requirements for Continuous Emission Monitoring system:
- a) The permittee shall install, calibrate, maintain, and operate a continuous emissions monitoring and automated data acquisition system for measuring and recording the parameters as specified in 40 CFR Part 75.
 - b) The permittee shall conduct daily calibration checks on this system with known concentrations of sulfur dioxide gas and oxides of nitrogen outline in Performance Specification 2 of Appendix B of 40 CFR Part 60. Span values for the continuous monitoring system must be taken from the 40 CFR Part 75 requirements.
 - c) The permittee shall conduct a Relative Accuracy Test Audit on the continuous emission monitoring system as outlined in 40 CFR Part 75.
- 4) Monitoring for Continuous Opacity Monitoring System (COMS):
- a) The permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring and automated data acquisition system for measuring and recording the opacity (in percent opacity) in order to provide a reasonable assurance of the performance of the electrostatic precipitator (ESP). Previously installed and certified monitoring systems that conform to provisions of the Performance Specification for COMS meet the monitoring requirements.
 - b) The installation shall conduct a daily calibration check for zero and span adjustments (span value must be 80, 90, or 100 percent) on the monitoring system as outlined by 40 CFR Part 60, Appendix B, Performance Specification 1.
 - c) The permittee shall conduct an annual certification test on the continuous opacity monitoring system.
 - d) *Proper Maintenance.* At all times, the permittee shall maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b)).
 - e) *Continued Operation.* Except for monitoring system malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that the boiler (EU09) is operating. Unit operations are defined when any fuel is burned in the boiler. Periods when the fans are operated for maintenance or cleaning during unit outages are not considered unit operations. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for data averages and calculations, or fulfilling a minimum data availability requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data.

Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.7(c))

Test methods and Procedures:

The permittee shall refer to §60.46 for test methods and procedures applicable under NSPS D.

Record Keeping:

- 1) The permittee shall keep a record of continuous monitoring system data, including any rolling average emissions data of sulfur dioxide and nitrogen oxides. Attachment B or an equivalent form shall be used to maintain records of continuous emissions monitoring.
- 2) The permittee shall maintain an accurate record of throughput, emission factors and actual emission of particulate matter, sulfur oxides, and nitrogen oxides emitted into the atmosphere from this emission unit.
- 3) The permittee shall record the daily monitoring system calibration check done on the continuous opacity monitoring system and the continuous emissions monitoring system.
- 4) The permittee shall maintain an accurate record of the sulfur content of fuel as fired as required under 10 CSR 10-6.040. This requirement is not necessary if a continuous emissions SO₂ monitoring system is used to demonstrate compliance with the applicable emission limitation.
- 5) A record of any stack testing conducted on the emission unit, any subsequent testing will be maintained, and all other records required by this rule shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 6) All records must be kept for five (5) years.

Reporting:

- 1) General Requirements:

The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance. Sulfur and Nitrogen Dioxide Reporting:

- a) The permittee shall report quarterly when the continuous emission monitoring system showed exceedances of the sulfur and nitrogen dioxide limitations (any three (3)-hour period during which average emissions exceed the applicable standard set forth in this rule). If any exceedances were recorded, the quarterly report should give the day and duration the emission unit was out of the limitations set forth in this rule. Additionally, the report shall give a detailed explanation of why the plant was in exceedance and corrective action taken by John Twitty Energy Center to bring the emission unit back into the limitations set forth in this rule. All quarterly reports (See Attachment G or equivalent form shall be used) shall be postmarked by the 30th day following the end of each calendar quarter.
- 2) Opacity Reporting:
 - a) The permittee shall report quarterly on the opacity emissions. The quarterly report (See Attachment G or equivalent form shall be used) should give the day, the duration that the emission unit was out of the opacity limitations set forth in this rule, and a data summary of the exceedance (the data summary shall consist of the magnitude in actual percent opacity of all six (6)-minute averages of opacity greater than twenty percent (20%), except that one six (6)-minute average per hour of up to twenty-seven percent (27%) opacity). Additionally, the report shall provide a detailed explanation of why the plant was in exceedance (nature and cause) and corrective action taken by John Twitty Energy Center to bring the emission unit back into the

limitations set forth in this rule. If no excess emissions occurred within the quarter and the continuous opacity monitoring system has not been inoperative, repaired, or adjusted, that information shall be included in the report. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

PERMIT CONDITION 002
 10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 18, 1978 (NSPS as published in Federal Register as of February 27, 2006)

Emission Unit	Description	Manufacturer/Model #
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NOx Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse with Activated Carbon Injection (ACI) system; Installed 2011 (commenced construction March 2007)	Foster-Wheeler

Emission Limitations:

- 1) The permittee shall not cause to be discharged into the atmosphere any gases which exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [§60.42Da(b)]
- 2) The permittee shall not cause to be discharged into the atmosphere any gases than contain PM in excess of 6.4 ng/J (0.015 lb/MMBtu) heat input derived from the combustion of solid, liquid, or gaseous fuel. [§60.42Da (2)]
- 3) The permittee shall not cause to be discharged into the atmosphere any gases that contain SO₂ in excess of 180 ng/J (1.4 lb/MWh) gross energy output on a 30-day rolling average basis. [§60.43Da(i)(1)(i)]
- 4) The permittee shall not cause to be discharged into the atmosphere any gases that contain NO_x (expressed at NO₂) in excess of 130 ng/J (1.0 lb/MWh) gross energy output as determined on a 30-boiler operating day rolling average basis. [§60.44Da(e)(1)]
- 5) The applicable PM emissions and opacity standard, SO₂ emissions limit and NO_x emission limit apply at all times except during periods of startup, shutdown or malfunction. [§60.48Da(a) or §60.48Da(c) as published in FR on February 27, 2006]

Monitoring:

- 1) The permittee shall install, calibrate, maintain and operate a COMS, and record the output of the system, for measuring the opacity of emissions discharged to the atmosphere. [§60.49Da(a)(1)]
- 2) The owner or operator must install, calibrate, maintain, and operate a CEMS, and record the output of the system, for measuring SO₂ emissions. For a facility that qualifies under the numerical limit provisions, SO₂ emissions are only monitored as discharged to the atmosphere. [§60.49Da(b)(2)]
- 3) If the permittee has installed and certified a SO₂ CEMS according to the requirements of §75.20(c)(1) and appendix A to part 75, and is continuing to meet the ongoing quality assurance requirements of §75.21 and appendix B to part 75, that CEMS may be used to meet the requirements of this section provided that a CO₂ or O₂ continuous monitoring system is installed, calibrated, maintained and operated at the same location. [§60.49Da(b)(4)(i)]

- 4) For sources subject to an SO₂ emission limit in lb/MMBtu under §60.43Da, SO₂ concentration and CO₂ (or O₂) data shall be collected simultaneously when relative accuracy testing is conducted. The RA standard in section 13.2 of Performance Specification 2 in Appendix B to this part shall be met when the RA is calculated on a lb/MMBtu basis. [§60.49Da(b)(4)(ii)]
- 5) The permittee shall install, calibrate, maintain, and operate a CEMS, and record the output of the system for measuring NO_x emissions discharged to the atmosphere. [§60.49Da(c)(1)]
- 6) If the permittee has installed a NO_x emission rate CEMS to meet the requirements of part 75 and is continuing to meet the ongoing requirements of part 75, that CEMS may be used to meet the requirements of this section, except that the owner or operator shall also meet the requirements of §60.51Da. [§60.49Da(c)(2)]
- 7) The permittee shall follow all applicable compliance determination procedures and methods required in §60.50Da.

Compliance with applicable SO₂ percentage reduction requirements is determined based on the average inlet and outlet SO₂ emission rates for the 30 successive boiler operating days.

Compliance Provisions:

- 1) The applicable PM emissions limit and opacity standard under §60.42Da, SO₂ emissions limit under §60.43Da, and NO_x emissions limit under §60.44Da apply at all times except during periods of startup, shutdown, or malfunction. [§60.48(a) or §60.48Da(c) as published in FR on February 27, 2006]
- 2) Compliance with the applicable SO₂ emissions limit requirements under §60.43Da and NO_x emissions limit under §60.44Da is based on the average emission rate for 30 successive boiler operating days. A separate performance test is completed at the end of each boiler operating day after the initial performance test, and a new 30-boiler operating day rolling average emission rate for both SO₂ and NO_x. [§60.48Da(b)]
- 3) Compliance with applicable SO₂ percentage reduction requirements is determined based on the average inlet and outlet SO₂ emission rates for the 30 successive boiler operating days. [§60.48Da(e)]
- 4) If the permittee has not obtained the minimum quantity of emission data as required under §60.49Da, compliance with the emission requirements under §60.43Da and §60.44Da for the day on which the 30-day period ends may be determined by the Director by following the applicable procedures in Section 7 of Method 19 of NSPS Appendix A. [§60.48Da(h)]
- 5) Compliance provisions for sources subject to §60.44Da(e)(1). The permittee shall calculate NO_x emissions as 1.194×10^{-7} lb/scf-ppm times the average hourly NO_x output concentration in ppm (measured according to the provisions of §60.49Da(c)), times the average hourly flow rate (measured in scfh, according to the provisions of §60.49Da(l) or §60.49Da(m)), divided by the average hourly gross energy output (measured according to the provisions of §60.49Da(k)) or the average hourly net energy output, as applicable. Alternatively, for oil-fired units, NO_x emissions may be calculated by multiplying the hourly NO_x emission rate in lb/MMBtu (measured by the CEMS required under §60.49Da(c) and (d)), by the hourly heat input rate (measured according to the provisions of §60.49Da(n)), and dividing the result by the average gross energy output (measured according to the provisions of §60.49Da(k)) or the average hourly net energy output, as applicable. [§60.48Da(i)]
- 6) Compliance provisions for sources subject to §60.43Da(i)(1)(i). The permittee shall calculate SO₂ emissions as 1.660×10^{-7} lb/scf-ppm times the average hourly SO₂ output concentration in ppm (measured according to the provisions of §60.49Da(b)), times the average hourly flow rate

(measured according to the provisions of §60.49Da(l) or §60.49Da(m)), divided by the average hourly gross energy output (measured according to the provisions of §60.49Da(k)) or the average hourly net energy output, as applicable.

- 7) The permittee must conduct a performance test to demonstrate initial compliance with the applicable PM emissions limit. Thereafter, the permittee must conduct each subsequent performance test within 12 calendar months following the date of the previous test. Each performance test must be conducted according to the requirements in §60.8 using test methods and procedures in §60.50Da. [§60.48Da(o)(1)]
- 8) The permittee must monitor the baghouse using a continuous opacity monitoring system according to the following requirements: [§60.48Da(o)(1)(i) and (ii)(A) through (E)]
 - a) Each COMS must meet Performance Specification 1 in 40 CFR Part 60, appendix B; and
 - b) The permittee must automatically (intrinsic to the opacity monitor) check the zero and upscale (span) calibration drifts at least once daily. For a particular COMS, the acceptable range of zero and upscale calibration materials is as defined in the applicable version of Performance Specification 1 in 40 CFR Part 60, appendix B.
 - c) The permittee must adjust the zero and span whenever the 24-hour zero drift or 24-hour span drift exceeds 4 percent opacity. The COMS must allow for the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified. The optical surfaces exposed to the effluent gases must be cleaned prior to performing the zero and span drift adjustments, except for systems using automatic zero adjustments, for which the optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.
 - d) The permittee must apply a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. All procedures applied must provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photodetector assembly.
 - e) Except during periods of system breakdowns, repairs, calibration checks, and zero and span adjustments, the COMS must be in continuous operation and must complete a minimum of one cycle of sampling and analyzing for each successive 10 second period and one cycle of data recording for each successive 6-minute period.
 - f) The permittee must reduce all data from COMS to 6-minute averages. Six-minute opacity averages must be calculated from 36 or more data points equally spaced over each 6-minute period. Data recorded during periods of system breakdowns, repairs, calibration checks, and zero and span adjustments must not be included in the data averages. An arithmetic or integrated average of all data may be used
- 9) During each performance test conducting, the permittee must establish an opacity baseline level. The value of the opacity baseline level is determined by averaging all of the 6-minute average opacity values (reported to the nearest 0.1 percent opacity) from the COMS measurements recorded during each of the test run intervals conducted for the performance test, and then adding 2.5 percent opacity to your calculated average opacity value for all of the test runs. If the opacity baseline level is less than 5.0 percent, then the opacity baseline is set at 5.0 percent. [§60.48Da(o)(2)(iii)]
- 10) The permittee must evaluate the preceding 24-hour average opacity level measure by the COMS each boiler operating day excluding periods of affected facility startup, shutdown, or malfunction. If the measured 24-hour average opacity emission level is greater than the baseline opacity level the permittee must initiate investigation of the relevant equipment and control systems within 24 hours of the first discover of the high opacity incident and take the appropriate corrective action as soon as

practicable to adjust control settings or repair equipment to reduce the measured 24-hour average opacity to a level below the baseline level. [§60.48Da(o)(2)(iv)]

- 11) The permittee must record the opacity measurements, calculations performed and any corrective actions taken. The record of corrective action taken must include the date and time during which the measured 24-hour average opacity was greater than baseline opacity level, and the date, time and description of the corrective action. [§60.48Da(o)(2)(v)]
- 12) If the measured 24-hour average opacity remains at a level greater than the opacity baseline level after seven (7) boiler operating days, then the permittee must conduct a new PM performance test and establish a new opacity baseline value. This new performance test must be conducted within 60 days of the date that the measured 24-hour average opacity was first determined to exceed the baseline opacity level unless a waiver is granted. §60.48Da(o)(2)(vi)]
- 13) As an alternative to using opacity, the owner or operator may elect to monitor the performance of the baghouse using a bag leak detection system. Each bag leak detection system must meet the following specifications: [§60.48Da(o)(4)(i)(A) through (H)]
 - a) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.
 - b) The bag leak detection system sensor must provide output of relative PM loadings. The owner or operator must continuously record the output from the bag leak detection system using electronic or other means.
 - c) The bag leak detection system must be equipped with an alarm system that will react when the system detects an increase in relative particulate loading over the alarm set point and the alarm must be located such that it can be noticed by the appropriate personnel.
 - d) In the initial adjustment of the bag leak detection system, the permittee must establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.
 - e) Following initial adjustment, the permittee must not adjust the averaging period, alarm set point, or alarm delay time without approval from the permitting authority.
 - f) Once per quarter, the permittee may adjust the sensitivity of the bag leak detection system to account for seasonal effects, including temperature and humidity.
 - g) The bag leak detection sensor must be installed downstream of the baghouse and upstream of any wet scrubber.
 - h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- 14) The permittee must develop and submit for approval a site-specific monitoring plan for each bag leak detection system. The permittee must operate the bag leak detection system according to this plan at all times. Each monitoring plan must describe the following items: [§60.48Da(o)(3)(ii)(A) through (F)]
 - a) Installation of the bag leak detection system;
 - b) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established;
 - c) Operation of the bag leak detection system, including quality assurance procedures;
 - d) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;
 - e) How the bag leak detection system output will be recorded and stored; and
 - f) Corrective action procedures.

- 15) For each bag leak detection system, the permittee must initiate procedures to determine the cause of every alarm within one (1) hour of the alarm. Except when shutting down the process producing the particulate emissions, the permittee must alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective actions are necessary. Corrective action may include, but are not limited to the following: [§60.48Da(o)(3)(iii)(A) through (F)]
- a) Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in particulate emissions;
 - b) Sealing off defective bags or filter media;
 - c) Replacing defective bags or filter media or otherwise repairing the control device;
 - d) Sealing off a defective fabric filter compartment; or
 - e) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system.
- 16) The permittee must maintain records of the following information: [§60.48Da(o)(3)(iv)(A) through (C)]
- a) Records of the bag leak detection system output;
 - b) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and
 - c) The date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, if procedures were initiated within 1 hour of the alarm, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and if the alarm was alleviated within three (3) hours of the alarm.
- 17) If after any period composed of 30 boiler operating days during which the alarm rate exceeds five (5) percent of the process operating time (excluding control device or process startup, shutdown and malfunction), then the permittee must conduct a new PM performance test. This new performance test must be conducted within sixty (60) calendar days of the date that the alarm rate was first determined to exceed 5 percent limit unless a waiver is granted. [§60.48Da(o)(3)(v)]

Reporting:

- 1) For SO_x, NO_x, and PM, the performance test data from the initial and subsequent performance test and from the performance evaluation of the continuous monitors must be reported to the Director. [§60.51Da(a)]
- 2) For SO_x and NO_x the following information is reported to the Administrator for each 24-hour period: §60.51Da(b)(1) through (9)
 - a) Calendar date;
 - b) The average SO₂ and NO_x emission rates for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the emission standards; and description of corrective actions taken;
 - c) Identification of the boiler operating days for which pollutant or diluent data have not been obtained by an approved method for at least 75 percent of the hours of operation of the facility; justification for not obtaining sufficient data; and description of corrective actions taken;
 - d) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
 - e) Identification of times when hourly averages have been obtained based on manual sampling methods;
 - f) Identification of the times when the pollutant concentration exceeded full span of the CEMS;
 - g) Description of any modifications to CEMS which could affect the ability of the CEMS to comply with Performance Specifications 2 or 3.

- 3) For any periods for which opacity, SO_x or NO_x emissions data are not available, the owner or operator of the affected facility shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability. [§60.51Da(f)]
- 4) The owner or operator shall submit a signed statement indicating whether: [§60.51Da(h)(1) through (4)]
 - a) The required CEMS calibration, span, and drift checks or other periodic audits have or have not been performed as specified;
 - b) The data used to show compliance was or was not obtained in accordance with approved methods and procedures of this part and is representative of plant performance;
 - c) The minimum data requirements have or have not been met; or, the minimum data requirements have not been met for errors that were unavoidable;
 - d) Compliance with the standards has or has not been achieved during the reporting period.
- 5) The owner or operator shall submit the written reports required under this section and subpart A to the Director semiannually for each six-month period. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. [§60.51Da(j)]
- 6) The owner or operator may submit electronic quarterly reports for SO₂ and/or NO_x and/or opacity in lieu of submitting the written reports. [§60.51Da(k)]

PERMIT CONDITION 003
10 CSR 10-6.075 Maximum Achievable Control Technology Requirements
60 CFR Part 63 Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units

Emission Unit	Description	Manufacturer/Model #
EU9	Unit 1 Boiler: 1,810 MMBtu/hr boiler; Combusts coal, natural gas and #2 fuel oil; Controlled by electrostatic precipitator, SO ₃ injection system, SCR, Inherently low NO _x burners ; boiler installed in 1976. A pulse-jet fabric filter (baghouse) and carbon injection for Hg control will be installed in 2015 (prior to the April 16, 2016 extended MATS compliance date).	Riley Stoker Turbo
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse w/Activated Carbon Injection (ACI) system; Installed 2011 (commenced construction March 2007).	Foster-Wheeler

Applicability:

Currently, Boilers 1 and 2 meet the definition of a coal-fired electric utility steam generating unit (EGU) within §63.10042. The boilers were originally constructed in 1976 and 2007, respectively, classifying them as existing coal-fired EGU and affected sources per §63.9982(a)(1). The boilers combust coal with a heat content in excess of 8,300 Btu/lb meeting the subcategory of non-low rank virgin coal in §63.9990(a)(1).

Compliance Dates:

The permittee shall comply with 40 CFR Part 63, Subpart UUUUU by not later than April 16, 2015. [§63.9984(b)].2. On November 21, 2012, City Utilities received approval from MDNR for a one-year extension of the compliance date for the federal Mercury and Air Toxics Standards (MATS) found in 40 CFR Part 63, Subpart UUUUU. The approved compliance date for this facility is April 16, 2016.

Emission Limitations and Work Practice Standards:

- 1) The permittee must meet the emission limitations in Table 2 of 40 CFR Part 63 Subpart UUUUU that applies to existing sources listed below: [§63.9991(a)(1)]
- 2) The permittee must meet the applicable work practice standards in Table 3 of 40 CFR Part 63 Subpart UUUUU that applies to existing sources listed below: [§63.9991(a)(1)]
- 3) The permittee may use the alternate SO₂ limit in Table 2 of 40 CFR Part 63, Subpart UUUUU only if the EGU: [§63.9991(c)]
 - a) Has a system using dry FGD technology and SO₂ CEMS installed on the unit: and [§63.9991(c)(1)]
 - b) At all times, the permittee operates the dry FGD technology installed on the unit consistent with §63.10000(b). [§63.9991(c)(2)]

Table 2 to Subpart UUUUU of Part 63—Emission Limits for Existing EGUs

If your EGU is in this subcategory . . .	For the following pollutants . . .	You must meet the following emission limits and work practice standards . . .	Using these requirements, as appropriate (e.g., specified sampling volume or test run duration) and limitations with the test methods in Table 5 . . .
1. Coal-fired unit not low rank virgin coal	a. Filterable particulate matter (PM)	.030 lb/MMBtu or 0.30 lb/MWh. ²	Collect a minimum of 1 dscm per run.
	OR	OR	
	Total non-Hg HAP metals	0.00005 lb/MMBtu or 0.50 lb/GWh.	Collect a minimum of 1 dscm per run.
	OR	OR	
	Individual HAP metals:		Collect a minimum of 3 dscm per run.
	Antimony (Sb)	0.801 lb/TBtu or 0.008 lb/GWh.	
	Arsenic (As)	1.1 lb/TBtu or 0.020 lb/GWh.	
	Beryllium (Be)	0.20 lb/TBtu or 0.0020 lb/GWh.	
	Cadmium (Cd)	0.30 lb/TBtu or 0.0030 lb/GWh.	
	Chromium (Cr)	2.8 lb/TBtu or 0.030 lb/GWh.	
	Cobalt (Co)	0.80 lb/TBtu or 0.0080 lb/GWh.	
	Lead (Pb)	1.2 lb/TBtu or 0.020 lb/GWh.	
	Manganese (Mn)	4.0 lb/TBtu or 0.050 lb/GWh.	

If your EGU is in this subcategory . . .	For the following pollutants . . .	You must meet the following emission limits and work practice standards . . .	Using these requirements, as appropriate (e.g., specified sampling volume or test run duration) and limitations with the test methods in Table 5 . . .
	Nickel (Ni)	3.5 lb/TBtu or 0.040 lb/GWh.	
	Selenium (Se)	5.0 lb/TBtu or 0.060 lb/GWh.	
	b. Hydrogen chloride (HCl)	0.0020 lb/MMBtu or 0.020 lb/MWh.	For Method 26A, collect a minimum of 0.75 dscm per run; for Method 26, collect a minimum of 120 liters per run.
			For ASTM D6348-03 ³ or Method 320, sample for a minimum of 1 hour.
	OR		
	Sulfur dioxide (SO ₂) ⁴	0.20 lb/MMBtu or 1.5 lb/MWh.	SO ₂ CEMS.
	c. Mercury (Hg)	1.2 lb/TBtu or 0.0130 lb/GWh	LEE Testing for 30 days with 10 days maximum per Method 30B run or Hg CEMS or sorbent trap monitoring system only.

Table 3 to Subpart UUUU of Part 63 – Work Practice Standards

If your EGU is . . .	You must meet the following . . .
1. An existing EGU	Conduct a tune-up of the EGU burner and combustion controls at least each 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in § 63.10021(e).
3. A coal-fired EGU during startup	You must operate all CMS during startup. Startup means either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). For startup of a unit, you must use clean fuels, either natural gas or distillate oil or a combination of clean fuels for ignition. Once you convert to firing coal, residual oil, or solid oil-derived fuel, you must engage all of the applicable control technologies except dry scrubber and SCR. You must start your dry scrubber and SCR systems, if present, appropriately to comply with relevant standards applicable during normal operation. You must comply with all applicable emissions limits at all times except for periods that meet the definitions of startup and shutdown in this subpart. You must keep records during periods of startup. You must provide reports concerning activities and periods of startup, as specified in § 63.10011(g) and § 63.10021(h) and (i).
4. A coal-fired EGU during shutdown	You must operate all CMS during shutdown. Shutdown means the cessation of operation of a boiler for any purpose. Shutdown begins either when none of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on-site use) or at the point of no fuel being fired in the boiler. Shutdown ends when there is both no electricity being generated and no fuel being fired in the boiler. During shutdown, you must operate all applicable control technologies while firing coal, residual oil, or solid oil-derived fuel. You must comply with all applicable emissions limits at all times except for periods that meet the definitions of startup and shutdown in this subpart. You must keep records during periods of startup. You must provide reports concerning activities and periods of startup, as specified in § 63.10011(g) and § 63.10021(h) and (i).

General Requirements:

- 1) The permittee must be in compliance with the emission limits and operating limits at all times except during periods of startup and shutdown; however, for coal-fired EGUs, the permittee is required to meet the work practice requirements in Table 3 during periods of startup or shutdown. [§63.10000(a)]
- 2) At all times the permittee must operate and maintain the affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.10000(b)]

Initial Compliance and Performance Testing Requirements:

- 1) The permittee shall comply with 40 CFR Part 63 Subpart UUUUU no later than April 16, 2016 (MDNR granted one (1) year extension on November 21, 2012).
- 2) The permittee shall demonstrate initial compliance with performance testing as specified in §§63.10005 and 63.10011 of Subpart UUUUU
- 3) The permittee shall demonstrate continuous compliance as specified in §63.10021 of Subpart UUUUU.
- 4) As part of the initial compliance demonstration, the permittee must conduct a performance tune-up of the EGUs according to §63.10021(e). [§63.10005(e)]
- 5) The permittee shall comply with all required subsequent performance tests and tune-ups as specified in §63.10006 of Subpart UUUUU.
- 6) The permittee shall follow the methods and other procedures for performance testing as described in §63.10007 of Subpart UUUUU.

Monitoring:

- 1) The permittee shall comply with all monitoring, installation, operation and maintenance requirements as specified in §63.10010 of Subpart UUUUU.
- 2) The permittee shall monitor and collect data to demonstrate compliance according to the methods required in §63.10020 of Subpart UUUUU.

Demonstrating Continuous Compliance:

- 1) The permittee shall demonstrate continuous compliance with each emissions limit, operating limit, and work practice standard in Tables 2 through 4 to 40 CFR Part 63, Subpart UUUUU that applies, according to the monitoring specified in Tables 6 and 7 to 40 CFR Part 63, Subpart UUUUU and §63.10021(b) through (g). [§63.10021(a)]
- 2) Except as otherwise provided in §§63.10020(c), if the permittee uses a CEMS to measure SO₂, PM, HCl, or Hg emissions, or uses a sorbent trap monitoring system to measure Hg emissions, the permittee shall demonstrate continuous compliance by using all quality-assured hourly data recorded by the CEMS (or sorbent trap monitoring system) and the other required monitoring systems (e.g., flow rate, CO₂, O₂, or moisture systems) to calculate the arithmetic average emissions rate in units of the standard on a continuous 30-boiler operating day (or, if alternate emissions averaging is used for Hg, 90-boiler operating day) rolling average basis, updated at the end of each new boiler operating day. Use Equation 8 to determine the 30-(or, if applicable, 90-) boiler operating day rolling average.

$$\text{Boiler Operating Day Average} = \frac{\sum_{i=1}^n \text{Her}_i}{n} \quad \text{Equation 8}$$

Where:

Her_i is the hourly emissions rate for hour i and n is the number of hourly emissions rate values collected over 30-(or, if applicable, 90-) boiler operating days. [§63.10021(b)]

- 3) If the permittee uses quarterly performance testing to demonstrate compliance with one or more applicable emissions limits in Table 2 to 40 CFR Part 63, Subpart UUUUU, the permittee [§63.10021(d)]
 - a) May skip performance testing in those quarters during which less than 168 boiler operating hours occur, except that a performance test shall be conducted at least once every calendar year. [§63.10021(d)(1)]
 - b) Shall conduct the performance test as defined in Table 5 to 40 CFR part 63, Subpart UUUUU and calculate the results of the testing in units of the applicable emissions standard; and [§63.10021(d)(2)]

Recordkeeping:

- 1) The permittee shall keep records as required by §63.10032 of Subpart UUUUU.
- 2) The records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). [§63.10033(a)]
- 3) As specified in § 63.10(b)(1), the permittee must keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.10033(b)]
- 4) The permittee must keep each record on site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). Records can be kept off-site for the remaining 3 years. [§63.10033(c)]
- 5) Records shall be retained in either hard copy or electronic form.

Notifications and Reporting:

- 1) The permittee shall submit applicable notifications as required by §63.10030 of Subpart UUUUU.
- 2) The permittee shall submit all reports in Table 8 of Subpart UUUUU that are applicable: [§63.10031]

Table 8 to Subpart UUUUU of Part 63—Reporting Requirements

You must submit a . . .	The report must contain . . .	You must submit the report . . .
Compliance report	a. Information required in § 63.10031(c)(1) through (4); and b. If there are no deviations from any emission limitation (emission limit and operating limit) that applies to you and there are no deviations from the requirements for work practice standards in Table 3 to this subpart that apply to you, a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system, and operating parameter monitoring systems, were out-of-control as specified in § 63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period; and	Semiannually according to the requirements in § 63.10031(b).
	c. If you have a deviation from any emission limitation (emission limit and operating limit) or work practice standard during the reporting period, the report must contain the information in § 63.10031(d). If there were periods during which the CMSs, including continuous emissions monitoring systems and continuous parameter monitoring systems, were out-of-control, as specified in § 63.8(c)(7), the report must contain the information in § 63.10031(e)	

<p>PERMIT CONDITION 004 10 CSR 10-6.270 Acid Rain source Permits Required 40 CFR Part 72 through Part 76</p>

Emission Unit	Description	Manufacturer/Model #
EU9	Unit 1 Boiler: 1,810 MMBtu/hr boiler; Combusts coal, natural gas and #2 fuel oil; Controlled by electrostatic precipitator, SO ₃ injection system, SCR, Inherently low NO _x burners and Activated Carbon Injection (to be installed) ; Installed in 1976	Riley Stoker Turbo
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse with Activated Carbon Injection (ACI) system; Installed 2011	Foster-Wheeler

Emission Limitation:

The permittee shall obtain an Acid Rain Source Permit for the Unit1 Boiler (EU9) and Unit 2 Boiler (EU100) pursuant to Title IV of the Clean Air Act.

The Acid Rain Permit (Missouri Department of Natural Resources project 2013-06-051, ORIS Code 6195) is being renewed for this facility in along with this operating permit. Sulfur dioxide (SO₂) limitations are referenced in this Title IV: Phase II Acid Rain Permit for the installation. (see Attachment C)

Monitoring/Recordkeeping:

The permittee shall retain the most current Acid Rain Permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:

Annual Compliance Certification.

The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 005 10 CSR 10-6.362 Clean Air Interstate Rule Annual NO _x Trading Program 10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO _x Trading Program 10 CSR 10-6.366 Clean Air Interstate Rule SO _x Trading Program
--

Emission Unit	Description	Manufacturer/Model #
EU9	Unit 1 Boiler: 1,810 MMBtu/hr boiler; Combusts coal, natural gas and #2 fuel oil; Controlled by electrostatic precipitator, SO ₃ injection system, SCR, Inherently low NO _x burners and Activated Carbon Injection (to be installed) ; Installed in 1976	Riley Stoker Turbo
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse with Activated Carbon Injectin (ACI) system; Installed 2011	Foster-Wheeler

The permittee shall obtain a CAIR Source Permit for the Unit 1 Boiler (EU9) and the Unit 2 Boiler (EU100). A CAIR Permit (Missouri Department of Natural Resources project 2013-06-050, ORIS Code 6195) is being issued to the permittee in conjunction with this Title V permit. (See Attachment D)

Monitoring/Recordkeeping:

The permittee shall retain the most current CAIR permit issued to this installation on-site and shall make such permit available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

Annual Compliance Certification.

The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 006
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006
 (007A) and June 12, 2013 (007B)

Emission Unit	Description	Manufacturer/Model #
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse with Activated Carbon Injection (ACI) system; Installed 2011	Foster-Wheeler

Operational Limitations:

- 1) In the event that natural gas will be combusted in the pulverized coal (PC) fired boiler Number 2 for purpose other than startup, flame stabilization, or emissions testing, the permittee shall: [Special Conditions 1.A.1 through 3]
 - a) Notify and coordinate with the Air Pollution Control Program prior to any planned emissions testing;
 - b) Submit an Ambient Air Quality Analysis to the Air Pollution Control Program for all scenarios in which natural gas will be combusted; and
 - c) Receive prior approval from the Air Pollution Control Program based on the Ambient Air Quality Analysis results before combusting natural gas for any purpose other than startup or flame stabilization.
- 2) If the permittee receives written approval from the Air Pollution Control Program to burn natural gas in the PC boiler Number 2, then: [Special Conditions 1.B.1 and 2]
 - a) The permittee shall not combust natural gas as the primary fuel in the pulverized coal boiler for more than 6,000 hours in any consecutive 12-month period;
 - b) The permittee shall not operate the boiler at loads greater than 60 percent when combusting natural gas as the primary fuel.
- 3) The sulfur content of the natural gas combusted in the PC boiler Number 2 shall not exceed 0.05 percent by weight. [Special Condition 1.C]
- 4) The permittee shall not operate the following emission points once the new PC boiler Number 2 becomes fully operational. A revised Ambient Air Quality Analysis must be submitted to the Air Pollution Control Program, which incorporates these emission points, before they may be operated: [Special Condition H]

Emission Point ID	Emission Point Description
E03*	Primary crusher
E10	Pugmill
E11	Truck loading
E28	Unpaved haul road
E33	Limestone truck unloading
E34	Limestone storage pile
E35	Limestone transfer conveyor
E36	Limestone Preparation

*E03 – Primary Crusher has been removed from service

Emission Limitations:

Except during periods of startup, shutdown, or malfunction, the permittee shall limit the following pollutant’s emissions from the PC boiler Number 2 when burning coal: [Special Condition 2A through 2M]

Pollutant	Emission Limitation
Nitrogen Oxides (NO _x)	0.08 lb/MMBtu on 30-day rolling average
Sulfur Oxides (SO ₂)	0.095 lb/MMBtu on a 30-day rolling average May not exceed an average of 490.4 lb/hr in any rolling 24-hour period, subject to the following a) Each rolling 24-hour period may have a maximum of one discrete 3-hour period in which average SO ₂ emissions exceed 490.5 lb/hr. b) For that 3-hour block of time, the SO ₂ emissions may not exceed 6,785 lbs
Carbon Monoxide (CO)	0.16 lb/MMBtu on a 30-day rolling average 436 lb/hr
Volatile Organic Compounds (VOC)	0.0036 lb/MMBtu
Particulate Matter (filterable and condensable) less than 10 microns in aerodynamic diameter (PM ₁₀)	0.018 lb/MMBtu
Sulfuric Acid Mist (H ₂ SO ₄)	1.84 x 10 ⁻⁴ lb/MMBtu May not exceed an average of 0.74 lb/hr in any rolling 24-hour period, subject to the following: a) Each rolling 24-hour period may have a maximum of one discrete 3-hour period in which average H ₂ SO ₄ emissions exceed 0.74 lb/hr. b) For that 3-hour period, the H ₂ SO ₄ emissions may not exceed 10.22 lbs
Mercury (Hg)	7.5 x 10 ⁻⁶ lb/MMBtu
Lead (Pb)	2.56 x 10 ⁻⁵ lb/MMBtu
Hydrogen Chloride (HCl)	0.00073 lb/MMBtu
Hydrogen Fluoride (HF)	0.00037 lb/MMBtu

Best Available Control Technology (BACT):

- 1) The permittee shall control NO_x emissions from PC boiler Number 2 by using selective catalytic reduction (SCR). [Special Condition 3.A.1]
- 2) The permittee shall control SO₂ emissions from PC boiler Number 2 by using dry flue gas desulfurization (dry FGD). [Special Condition 3.A.2]
- 3) The permittee shall control PM₁₀ emissions from PC boiler Number 2 by using a baghouse. [Special Condition 3.A.3]
- 4) The permittee shall control volatile organic compounds (VOC) emissions from PC Boiler Number 2 through the use of good combustion practices. [Special Condition 3.A.4]
- 5) The permittee shall control carbon monoxide (CO) emission from PC Boiler Number 2 through the use of good combustion practices. [Special Condition 3.A.5]

Monitoring:

- 1) The permittee shall install and operate CEMS for NO_x and SO₂ along with COMS in accordance with 40 CFR Part 60, Subpart Da and 40 CFR Part 75. [Special Condition 7.A.]

For CO emissions:

- 2) The permittee shall install, calibrate, maintain and operate a CEMS for measuring CO emissions discharged to the atmosphere and record the output of the system for purposes of showing compliance with the CO emission limits. [Special Condition 7.B.1]
- 3) The system shall be designed to meet the 40 CFR 60, Appendix B Performance Specification 4A (PS4A) and Performance Specification 6 (PS6) requirements. [Special Condition 7.B.2]
- 4) The specifications for 40 CFR 60, Appendix F (Quality Assurance/Quality Control) shall apply. Appendix F requirements shall be supplemented with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit. [Special Condition 7.B.3]
- 5) Compliance with all non-NSPS CO, NO_x and SO₂ emissions limits of this permit shall be demonstrated through the use of the required CEMS. The permittee shall use the procedures described in 40 CFR §75.32 to determine monitor availability. [Special Condition 7.C]
 - a) The CEMS shall be operated and data recorded during all periods of operation except for CEMS breakdown and repairs. Data will be recorded during calibration checks and zero and span adjustments. [Special Condition C.1]
 - b) The 1-hour average CO, NO_x and SO₂ emission rates measured by the CEMS shall be used to calculate compliance with the emission standards of this permit. At least 2 data points must be used to calculate each 1-hour average. [Special Condition C.2]
 - c) For each hour of missing SO₂ emissions data, The permittee shall substitute data by: [Special Conditions C.3 (a) through (c)]
 - i. If the monitor data availability is equal to or greater than 95%, the permittee shall calculate substitute data by means of the automated data acquisition and handling system for each hour of each missing data period according to the following procedures:
 - 1) For the missing data period less than or equal to 24 hours, substitute the average of the hourly concentrations recorded by a pollutant concentration monitor for the hour before and the hour after the missing data period.
 - 2) For a missing data period greater than 24 hours, substitute the greater of:
 - a. The 90th percentile hourly concentration recorded by a pollutant concentration monitor during the previous 720 quality-assured monitor operating hours; or
 - b. The average of the hourly concentrations recorded by a pollutant concentration monitor for the hour before and the hour after the missing data period.
 - ii. If the monitor data availability is at least 90% but less than 95%, the permittee shall calculate substitute data by means of the automated data acquisition and handling system for each hour of each missing data period according to the following procedures:
 - 1) For a missing data period of less than or equal to 8 hours, substitute the average of the hourly concentrations recorded by a pollutant concentration monitor for the hour before and the hour after then missing data period.
 - 2) For the missing data period of more than 8 hours, substitute the greater of:
 - a. The 95th percentile hourly pollutant concentration recorded by a pollutant concentration monitor during the previous 720 quality-assured monitor operating hours; or
 - b. The average of the hourly concentrations recorded by a pollutant concentration monitor for the hour before and the hour after the missing data period.

-
- iii. If the monitor data availability is less than 90%, the owner or operator shall obtain actual emission data by an alternate testing or monitoring method approved by the Department.
 - d) For each hour of missing NO_x (or CO) emissions data, the permittee shall substitute data by:
[Special Condition 3.D.(a) through (b)]
 - i. Whenever the monitor data availability is equal to or greater than 95%, the owner or operator shall calculate substitute data by means of the automated data acquisition and handling system for each hour of each missing data period according to the following procedures:
 - 1) For a missing data period less than or equal to 24 hours, substitute, as applicable, for each missing hour, the arithmetic average of the flow rates or NO_x emission rates or NO_x (or CO) concentrations recorded by a monitoring system during the previous 2,160 quality-assured monitor operating hours at the corresponding unit load range or operational bin as determined using the procedure in Appendix C to 40 CFR Part 75.
 - 2) For a missing data period greater than 24 hours, substitute as applicable, for each missing hour, the greater of:
 - a) The 90th percentile hourly flow rate or the 90th percentile NO_x (or CO) emission rate or the 90th percentile NO_x (or CO) concentration recorded by a monitoring system during the previous 2,160 quality-assured monitor operating hours at the corresponding unit load range or operational bin, as determined using the procedure in Appendix C to 40 CFR Part 75, or
 - b) The 90th percentile hourly flow rate or the 90th percentile NO_x or (CO) emission rate or the 90th percentile NO_x (or CO) concentration recorded by a monitoring system during the previous 2,160 quality-assured monitor operating hours at the corresponding unit load range or operational bin, as determined using the procedure in Appendix C to 40 CFR Part 75; or
 - c) The average of the recorded hourly flow rates, NO_x (or CO) emission rates or NO_x (or CO) concentrations recorded by a monitoring system for the hour before and the hour after the missing data period.
 - ii. Whenever the monitor data availability is at least 90.0 percent but less than 95.0 percent, the permittee shall calculate substitute data by means of the automated data acquisition and handling system for each hour of each missing data period according to the following procedures:
 - 1) For a missing data period of less than or equal to 8 hours, substitute, as applicable, the arithmetic average hourly flow rate of NO_x (or CO) emission rate or NO_x (or CO) concentration recorded by a monitoring system during the previous 2,160 quality-assured monitor operating hours at the corresponding unit load range or operational bin, as determined using the procedure in Appendix C to 40 CFR Part 75.
 - 2) For a missing data period greater than 8 hours, substitute, as applicable, for each missing hour, the greater of:
 - a) The 95th percentile hourly flow rate or the 95th percentile NO_x (or CO) emission rate or the 95th percentile NO_x (or CO) concentration recorded by a monitoring system during the previous 2,160 quality-assured monitor operating hours at the corresponding unit load range or operational bin, as determined using the procedure in Appendix C to 40 CFR Part 75; or
 - b) The average of the hourly flow rates, NO_x (or CO) emission rates or NO_x (or CO) concentrations recorded by a monitoring system for the hour before and the hour after the missing data period.

- c) If the monitor availability is less than 90%, the owner or operator shall obtain actual emission data by an alternative testing or monitoring method approved by the Department.

Record Keeping:

- 1) The permittee shall maintain an operational log, which shall detail each startup, shutdown and malfunction of the PC boiler Number 2. [Special Condition 8.A]
- 2) The permittee shall maintain inspection, maintenance, and repair log(s) for the PC boiler Number 2 system. [Special Condition 8.B]
- 3) The permittee shall maintain records demonstrating compliance with the NO_x, SO₂, CO and opacity limits using CEMS data. [Special Condition 8.C]
- 4) The permittee shall develop a correlation between the SO₂ emissions from the PC boiler Number 2 and the boiler's H₂SO₄ emissions. This correlation will be used to show compliance with the Sulfuric Acid Mist and H₂SO₄ emission limits. [Special Condition 8.D]
- 5) The permittee shall maintain records, based upon an approved parametric monitoring plan, demonstrating compliance with the HCl and HF emission limits. [Special Condition 8.E]
- 6) The permittee shall, upon approval from the Air Pollution Control Program to burn natural gas for purposes other than startup and flame stabilization, maintain a log detailing all occasions in which natural gas is used for purposes other than startup and flame stabilization of the PC boiler Number 2. The log will, at a minimum, record the dates natural gas is used as the primary fuel, the reason for the switch from coal to natural gas, the percent load the boiler was operated and the daily amount of natural gas combusted in the boiler. [Special Condition 8.F]
- 7) At least once every year, after commencement of operation, the permittee shall obtain from the fuel vendors or conduct their own fuel analysis to evaluate the typical sulfur content weight percent for natural gas. [Special Condition 8.G]
- 8) The permittee shall, upon approval from the Air Pollution Control Program to burn natural gas for purposes other than startup and flame stabilization, keep monthly, and the sum of the most recent 12-month records that are adequate to determine compliance with the natural gas fuel usage limits (not more than 6,000 hours in any consecutive 12-month period and not operate the boiler at loads greater than 60% when combustion NG as the primary fuel). [Special Condition 8.H]
- 9) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 8.K]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the day in which the records show that the source exceeded the NO_x, SO_x, CO, H₂SO₄, HCl or HF limits. [Special Condition 9.A]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 007
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006
 (007A) and June 12, 2013 (007B)
 40 CFR Part 64, Compliance Assurance Monitoring

Emission Unit	Description	Manufacturer/Model #
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse with Activated Carbon Injection (ACI) system; Installed 2011	Foster-Wheeler

Emission Limitations:

For Particulate Matter less than 10 Microns in diameter (PM₁₀):
 Except during periods of startup, shutdown, or malfunction, City Utilities shall limit emissions of PM₁₀ (filterable and condensable) from the PC boiler Number 2 when burning coal to 0.018 lb/MMBtu [Special Condition 2G]

Best Available Control Technology (BACT):

- 1) City Utilities shall control PM₁₀ emissions from PC boiler Number 2 by using a baghouse. [Special Condition 3.A.3]
- 2) The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.A]

Monitoring/Recordkeeping:

- 1) City Utilities shall monitor and record the operating pressure drop across the baghouses as specified in Table 2: City Utilities of Springfield Unit 2 Boiler– John Twitty Power Station – CAM Monitoring Approach.
- 2) Monitoring for Continuous Opacity Monitoring System (COMS):
 - a) The permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring and automated data acquisition system for measuring and recording the opacity (in percent opacity) in order to provide a reasonable assurance of the performance of the baghouse. Previously installed and certified monitoring systems that conform to provisions of the Performance Specification for COMS meet the monitoring requirements.
 - b) The installation shall conduct a daily calibration check for zero and span adjustments (span value must be 80, 90, or 100 percent) on the monitoring system as outlined by 40 CFR Part 60, Appendix B, Performance Specification 1.
 - c) The permittee shall conduct an annual certification test on the continuous opacity monitoring system.

- d) The performance requirements for the COMS shall be as specified in Table 2: City Utilities of Springfield Unit 2 Boiler– John Twitty Power Station – CAM Monitoring Approach.
- e) An excursion and its associated averaging time for each emission unit shall be as specified in Table 2: City Utilities of Springfield Unit 2 Boiler– John Twitty Power Station – CAM Monitoring Approach..
- f) City Utilities shall conduct monitoring continuously except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, in accordance with §64.7(c). Although compliance with the PM₁₀ emission limitation may be exempted in some circumstances during conditions such as startup, shutdown, and malfunction, City Utilities is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires City Utilities to minimize periods of startup, shutdown or malfunction, and take corrective action to restore normal operation and prevent recurrence of the problem that led to the excursion except where the excursion was related to an excused startup, shutdown, or malfunction.

Table 2:

City Utilities of Springfield - John Twitty Energy Center CAM Monitoring Approach for Baghouse on Unit 2 boiler		
Particulate Matter (PM₁₀) Compliance Indicator		
Indicator	Opacity from flue gas exhaust	Bag Leak/Pressure Drop
Measurement Approach	Continuous Opacity Monitoring System (COMS) located in flue gas exhaust system	Instrumentation is installed to collect monitor baghouse pressure drop (ΔP) across the collection control system on a continuous basis.
Indicator Range	The opacity indicator range is a collection of all 1-minute and 6-minute averages over a discrete 1-hour period. The 1-hour averages will be collected to calculate a 24-hour block average opacity for Unit 2. The 24-hour average baseline opacity level is greater than or equal to 5.0 percent.	The ΔP indicator range is a collection of all 1-minute averages over a discrete 1-hour period. The 1-hour averages will be collected to calculate a 3-hour block average ΔP for Unit 2. The 3-hour average recommended ΔP levels for John Twitty 2 are greater than or equal to 5 and less than equal to 10 inches of H ₂ O. Differential pressure readings greater than or equal to 15 inches of H ₂ O column are beyond manufacturer recommended safety levels and unit load shall be immediately dropped. Normal (baseline) setpoint for baghouse ΔP is 7 inches of WC.
	An excursion is defined as a measured stack opacity greater than 5.0 percent, excluding those events defined as startup, shutdown or malfunction	An excursion is defined as a 3-hour average ΔP less than 5 and greater than 10 inches of H ₂ O., excluding those events defined as startup, shutdown or malfunction
	Excursions trigger an inspection, corrective action, and a reporting requirement	
QIP Threshold	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If an emission unit reaches the QIP threshold, the permittee shall submit a QIP for that unit along with the Semiannual Monitoring Report for that reporting period.	

City Utilities of Springfield - John Twitty Energy Center CAM Monitoring Approach for Baghouse on Unit 2 boiler		
Particulate Matter (PM₁₀) Compliance Indicator		
Performance Criteria		
Data Representativeness	<p>Opacity is related to the size and concentration of particles in the flue gas. As particulate mass emissions increase, it can be reasonable expected that stack opacity will also increase.</p> <p>The boiler discharges to a dedicated stack with no bypass capabilities. The stack is equipped with a COMS that meets the installation and minimum acceptable accuracy requirements as specified in the applicable version of 40 CFR Part 60, Appendix B, Performance Specification 1 (PS-1). The COMS is located downstream of the baghouse and, therefore, reflects the performance of the control device.</p>	<p>The baghouse pressure drop system was installed at a representative location based on manufacturer recommendation and experience.</p> <p>Initial testing for PM emissions was performed using EPA Method 5/202 at three conditions. Average ΔP data were collected during the same time as the performance testing for comparison. Annual PM compliance testing (Method 5 only) is performed to confirm results are still valid.</p>
Verification of Operational Status	Results of PM versus opacity measurements were evaluated.	Results of initial performance PM compliance testing have been evaluated.
QA/QC Practices and Criteria	COMS installed via PS-1. Daily Zero and Span drift checks are performed. Annual filter audits are performed. Filters are calibrated and certified annually.	Annual checks of the instrumentation used to collect baghouse pressure drop, or as per manufacturer recommendation
Monitoring Frequency	Continuously. The opacity following the baghouse is monitored continuously used to calculate 1-minute averages. All 1-minute averages are used to calculate and store 6-minute and 1-hour opacity data, except for periods of quality assurance and other maintenance activities. 1-hour opacity averages will be used to calculate the 24-hour block average used as the CAM monitoring indicator.	<p>The baghouse ΔP is monitored continuously used to calculate 1-minute averages. All 1-minute averages are used to calculate and store 1-hour data, except for periods of quality assurance and other maintenance activities. 1-hour averages will be used to calculate the 3 hour block average used as the CAM monitoring indicator.</p> <p>51% data capture is required to calculate a valid 1-hour average, outside of startup and shutdown. Hours consisting of less than the required 51% data capture will be treated as missing data</p>
Averaging Period	The 10-second opacity data are used to calculate 1-minute averages. The 1-minute data are used to calculate the 6-minute and 1-hour average opacity, which is used to create a 24-hour block average of opacity.	The 1 minute data are used to calculate the 1-hour average ΔP, which is used to create a 3-hour block average.
Data Collection Procedure	The DAHS retains all 6-minute, hourly, and 24-hour average opacity data.	The DCS retains all hourly, and 3-hour, and daily average ΔP data. All records of data collected are retained for a maximum period of five (5) years.

City Utilities of Springfield - John Twitty Energy Center CAM Monitoring Approach for Baghouse on Unit 2 boiler		
Particulate Matter (PM₁₀) Compliance Indicator		
Corrective Action	Upon detecting an excursion, the permittee shall investigate the cause of the excursion and restore operation of the control device to its normal manner of operation as expeditiously as possible.	
Reporting	Summary information of the number, duration, and cause for any excursions and COMS downtime will be reported on a semiannual basis in the Semiannual Monitoring Report for the Part 70 Operating Permit.	Summary information of the number, duration, and cause for any excursions and monitoring downtime will be reported on a semiannual basis in the Semiannual Monitoring Report for the Part 70 Operating Permit.

Proper Maintenance. At all times, the permittee shall maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.(40 CFR 64.7(b)).

- g) *Continued Operation.* Except for monitoring system malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that the boiler (EU100) is operating. Unit operations are defined when any fuel is burned in the boiler. Periods when the fans are operated for maintenance or cleaning during unit outages are not considered unit operations. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for data averages and calculations, or fulfilling a minimum data availability requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.7(c))
- h) The permittees shall follow the following procedure in response to excursions or exceedances.
 - i. Upon detecting an excursion or exceedance, the permittee shall restore operation of the boiler (EU100) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (40 CFR 64.7(d)(1))
 - ii. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. (40 CFR Part 64.7(d)(2))

Record Keeping:

- 1) City Utilities shall maintain an operating and maintenance log for the baghouses which shall include the following: [Special Condition 4.C]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 2) City Utilities shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 8.K]
- 3) The permittee shall maintain an accurate record of throughput, emission factors and actual emission of particulate matter.
- 4) The permittee shall record the daily monitoring system calibration check done on the continuous opacity monitoring system and the continuous emissions monitoring system.
- 5) A record of any stack testing conducted on the emission unit, any subsequent testing will be maintained, and all other records required by this rule shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 6) All records must be kept for five (5) years.

Reporting:

- 1) General Requirements:
The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance.
- 2) Reports of any deviations from this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 008 10 CSR 10-6.060 Construction Permits Required Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006 (007A) and June 12, 2013 (007B)

Emission Unit	Description	Manufacturer/ Model #
EU06	Coal Transfer Conveyors: Belts 1-3, 1-4, 1-5A, 1-5B, 1-5C); MHDR = 450 tons/hr; Controlled by baghouse (84.48% efficiency)	N/A

Operational Limitation:

City Utilities shall operate only one (1) of the underground conveying systems (Emission Unit E06) at any given time in which coal is conveyed from the storage pile to the boiler. [Special Condition 1.D]

Reporting:

Reports of any deviations from this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 009
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006
(007A) and June 12, 2013 (007B)

Emission Unit	Description	Manufacturer/ Model #
EU01	Coal Rail Unloading; Unloading coal from unit trains (bottom dump) drop onto conveyor 1-1; MHDR = 3,300 tons/hr; Controlled with Fabric Filter with 99% control efficiency and water sprays with 32.86% control efficiency; Constructed in 1976	N/A

Operational Limitation:

City Utilities shall not unload from railcars (Emission Point E01) more than 26,000 tons of coal in any 24-hour period. [Special Condition 1.E]

Monitoring/Recordkeeping:

The permittee shall maintain records of the amount of coal (tons) unloaded from the railcars in each 24-hour period in order to demonstrate compliance with the operational limitation.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance.
- 2) Reports of any deviations from this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 010
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Unit	Description	Manufacturer/ Model #
EU30	Ash Receiver – Internal Handling of Ash from Boiler; MHDR = 10 tons/hr; Controlled by fabric filter with 89.48% efficiency	N/A
EU32	Ash Storage Silo – Silos to store fly ash from the combustion of coal; MHDR = 10 tons/hr; Controlled by fabric filter with 89.48% efficiency	N/A
EU50	Ash Silo Side Discharge- A fly ash load-out system to load fly ash into trucks for off-site disposal; MHDR = 30 tons/hr; Process Enclosed (50% control efficiency)	N/A
EU85	Fly Ash Batch Mixer Unloading Spout – Wet conditioning (agglomerator) of fly ash into dustless pellets; MHDR = 60 tons/hr; (66% control efficiency)	DustMaster Series II System Model 150

Emission Unit	Description	Manufacturer/ Model #
EU106	Fly Ash Transfer to Tanks (Bin Vent Filter): Internal handling transfer of ash to storage silos; MHDR = 11.5 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU107 and EU108	Waste Power Tank Mechanical Exhausters #1 and #2: Ash storage silo baghouse vents; MHDR = 5.7 tons hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU109	Conditioned Waste Powder to Ash Truck Transfer – Unit 2: Fly ash load out system to load fly ash into truck for disposal in on-site utility landfill; MHDR = 15 ton/hr (max); Controlled by wet turbine mixer (90%) efficiency); Constructed 2011	DustMaster SWSTA11CC125 TPHD11/372807
EU110	Ash Truck Transfer (Dry Ash Loading): Fly ash load-out system to load fly ash into truck for disposal/recycling/reuse; MHDR = 11.5 tons/hr; Controlled by fabric filter (99% efficiency); Constructed 2011	N/A
EU116	Lime Transfer to Storage Silos: MHDR = 25 tons/hr; Controlled by dust collector (98% efficiency); Constructed 2011	N/A
EU117	Lime Transfer to Feed Bins: MHDR = 2.1 tons/hr; Controlled by enclosed process/dust collector (98% efficiency); Constructed in 2011	N/A
EU126	Powder Activated Carbon Silo Bin Vent Filter: MHDR = 20 tons/hr; Controlled by dust collector (98% efficiency); Constructed 2011	N/A
EU16	Building Heat Boiler – 6.3 MMBtu/hr boiler; Combusting pipeline grade natural gas and fuel oil; Installed 1975	Kewanee

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971 or in the Springfield metropolitan area after September 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the

applicable opacity standard, the certified source representative or contracted service provider would then conduct a Method 9 observation.

- 2) The following Method 22 monitoring schedule must be maintained, when visible emissions perceived or believed to exceed the applicable opacity standard, otherwise see 4., below:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted following a Method 9 Visual Observation, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
- 4) The permittee is allowed to maintain its current monitoring schedule under its existing permit, unless visible emissions perceived or believed to exceed the applicable opacity standard.
- 5) A Method 9 Visual Observation can be used to satisfy the monitoring requirement, in lieu of a Method 22.

Record Keeping:

- 1) The permittee shall maintain records of all observation results (see Attachment E1 or E2), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment G)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment F)
- 4) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request and presentation of identification.
- 5) All records shall be maintained for five years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 011
10 CSR 10-6.070 New Source Performance Standards
40 CFR Part 60 Subpart Y, Standards of Performance for Coal Preparation Plants and Processing Plants

Emission Unit	Description	Manufacturer/ Model #
EU01	Coal Rail Unloading; Unloading coal from unit trains (bottom dump) drop onto conveyor 1-1; MHDR = 3,300 tons/hr; Controlled with Fabric Filter with 99% control efficiency and water sprays with 32.86% control efficiency; Constructed in 1976	N/A
EU02	Coal Transfer Conveyor (Belt1-1): to Main Stackers(Transfer House) to both piles; MHDR = 3,300 tons/hr; Controlled with Fabric Filter with 99% control efficiency and water sprays with 37.5% control efficiency; Constructed in 1976	N/A
EU04	Coal Transfer Conveyors: Conveyor No. 1-2 through telescopic chute on to active coal pile; MHDR = 3,300 tons/hr; Controlled by limited water sprays (20% efficiency) and telescopic chute (36% efficiency); Constructed 1976	N/A
EU121	Coal Transfer Conveyors (Conveyor No. 2-2 through telescopic chute) on to active coal pile: Coal Conveying to drop onto Unit 2 active coal storage pile; MHDR = 18,000 tons/hr; Controlled by active water spray (32.86% efficiency) and telescopic chute (36% efficiency); Constructed 2011	N/A
EU06	Coal Transfer Conveyors: Belts 1-3, 1-4, 1-5A, 1-5B, 1-5C); MHDR = 450 tons/hr; Controlled by baghouse (84.48% efficiency)	N/A
EU124	Coal Transfer Conveyors (Belt 2-3 to Underground Belt 2-4): Coal conveying drop point from storage pile to underground belt transfer; MHDR = 1000 tons/hr; Controlled by Baghouse (99% efficiency); Constructed 2011	N/A
EU102	Coal Transfer Conveyors (Belt 2-4 to Crusher): Coal conveying drop point from belt 2-4 into crusher (coal crusher house); MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU103	Coal Transfer Crusher to Conveyor (elt 2-5) – Coal Crusher: Coal transfer drop point crusher onto belt 2-5; MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU101	Coal Transfer Conveyors (Belt 2-5 to 2-6): Coal Transfer Drop Point from belt 2-5 to 2-6 (tripper deck); MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU104	Coal Transfer Conveyors (Belt 2-6 to Storage Silos Via Tripper: MHDR=1000 tons/hr; Controlled by fabric filter (99% efficiency); Constructed in 2011	N/A
EU124	Coal Transfer to Underground Conveyor	N/A

Emission Limitations:

The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater. [§60.254(a)]

Performance Testing Requirements:

- 1) An owner or operator of each affected facility must conduct all performance tests required by §60.8 to demonstrate compliance with the applicable emission standards using the methods identified in §60.257. [§60.255(a)]
- 2) The owner or operator must determine compliance with the applicable opacity standards using Method 9 of appendix A-4 of 40 CFR Part 60 and the procedures in §60.11 to determine opacity with the following exceptions: [§60.257(a)(1)(i) and (ii)]
 - a) The duration of the Method 9 of appendix A-4 of 40 CFR Part 60 performance test shall be 1 hour (ten 6-minute averages);
 - b) If, during the initial 30 minutes of the observation of a Method 9 performance test, all of the 6-minute average opacity readings are less than or equal to half the applicable opacity limit (10%), then the observation period may be reduced from 1 hour to 30 minutes.
- 3) To determine opacity for fugitive coal dust emissions sources the following additional requirements must be used: [§60.257(a)(2)(i) through (iii)]
 - a) The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140-degree sector of the back;
 - b) The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction; and
 - c) The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission.
- 4) A visible emission observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions are met:
 - a) No more than three emissions points may be read concurrently;
 - b) All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points; and
 - c) If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point.

Recordkeeping/Reporting:

- 1) For the purpose of reports required under section 60.7(c), any owner operator subject to the provision of Subpart Y also shall report semiannually all 6-minute average opacity values that exceed the applicable standard. [§60.258(b)(3)]
- 2) The permittee of an affected facility shall submit the results of initial performance tests to the Director, consistent with the provisions of section 60.8. [§60.258(b)(3)] The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance.
- 3) Reports of any deviations from this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 012

10 CSR 10-6.060 Construction Permits Required
Construction Permit 122004-007, Issued December 15, 2004, and as amended February 23, 2006
(007A) and June 12, 2013 (007B)

Emission Unit	Description	Manufacturer/Model #
EU01	Coal Rail Unloading; Unloading coal from unit trains (bottom dump) drop onto conveyor 1-1; MHDR = 3,300 tons/hr; Controlled with Fabric Filter with 99% control efficiency and water sprays with 32.86% control efficiency; Constructed in 1976	N/A
EU02	Coal Transfer Conveyor (Belt1-1): to Main Stackers (Transfer House) to both piles; MHDR = 3,300 tons/hr; Controlled with Fabric Filter with 99% control efficiency and water sprays with 37.5% control efficiency; Constructed in 1976	N/A
EU121	Coal Transfer Conveyors (Conveyor No. 2-2 through telescopic chute) on to active coal pile: Coal Conveying to drop onto Unit 2 active coal storage pile; MHDR = 18,000 tons/hr; Controlled by active water spray (32.86% efficiency) and telescopic chute (36% efficiency); Constructed 2011	N/A
EU06	Coal Transfer Conveyors: Belts 1-3, 1-4, 1-5A, 1-5B, 1-5C); MHDR = 450 tons/hr; Controlled by baghouse (84.48% efficiency)	N/A
EU124	Coal Transfer Conveyors (Belt 2-3 to Underground Belt 2-4): Coal conveying drop point from storage pile to underground belt transfer; MHDR = 1000 tons/hr; Controlled by Baghouse (99% efficiency); Constructed 2011	N/A
EU102	Coal Transfer Conveyors (Belt 2-4 to Crusher): Coal conveying drop point from belt 2-4 into crusher (coal crusher house); MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU103	Coal Transfer Crusher to Conveyor (Belt 2-5) – Coal Crusher: Coal transfer drop point crusher onto belt 2-5; MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU101	Coal Transfer Conveyors (Belt 2-5 to 2-6): Coal Transfer Drop Point from belt 2-5 to 2-6 (tripper deck); MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU104	Coal Transfer Conveyors (Belt 2-6 to storage silos via tripper): Coal transfer drop point from belt 2-6 to storage silos via tripper (10 th floor tripper deck); MHDR = 1000 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU106	Fly Ash Transfer to Tanks (Bin Vent Filter): Internal handling transfer of ash to storage silos; MHDR = 11.5 tons/hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A
EU107 and EU108	Waste Power Tank Mechanical Exhausters #1 and #2: Ash storage silo baghouse vents; MHDR = 5.7 tons hr; Controlled by baghouse (99% efficiency); Constructed 2011	N/A

Emission Unit	Description	Manufacturer/ Model #
EU110	Ash Truck Transfer (Dry Ash Loading): Fly ash load-out system to load fly ash into truck for disposal/recycling/reuse; MHDR = 11.5 tons/hr; Controlled by fabric filter (99% efficiency); Constructed 2011	N/A
EU116	Lime Transfer to Storage Silos: MHDR = 25 tons/hr; Controlled by dust collector (98% efficiency); Constructed 2011	N/A
EU117	Lime Transfer to Feed Bins: MHDR = 2.1 tons/hr; Controlled by baghouse (98% efficiency); Constructed in 2011	N/A
EU04	Coal Transfer Conveyors: Conveyor No. 1-2 through telescopic chute on to active coal pile; MHDR = 3,300 tons/hr; Controlled by limited water sprays (20% efficiency) and telescopic chute (36% efficiency); Constructed 1976	N/A
EU05	External Coal Storage Pile – Vehicle Activity Area	N/A
EU126	Powder Activated Carbon Silo Bin Vent Filter: MHDR = 20 tons/hr; Controlled by dust collector (98% efficiency); Constructed 2011	N/A
EU12	Landfill Haul Road – paved	N/A
EU74	Landfill Haul Road - unpaved	N/A
EU109	Conditioning of Ash for Landfill	N/A
EU112	Bottom Ash Transfer to Conveyors	N/A
EU114	Ash Truck Transfer Point – truck loading	N/A
EU127	Powder Activated Carbon Haul Road	N/A
EU118	Cooling Tower	N/A

Operational Limitations:

1) BACT for PM₁₀ Emission Sources- City Utilities shall demonstrate compliance with the BACT specified in Construction Permit 122004-007A and B as listed in the table below:

Emission Point ID	Emission Point Description	BACT	Method of Compliance
E01	Railcar unloading of coal	Enclosure to baghouse	See below for baghouse monitoring.
E02	Conveyor transfer to main stacker	Water spray	Utilize water spray as needed. (Additional baghouse installed at transfer house. See below for baghouse monitoring.)
E04	Stack drop point onto active coal pile	Water spray carryover and telescoping chute	Utilize telescoping chute to deliver coal to active pile. Utilize water sprays to control dust as needed.
E05	External Coal Storage Pile – Vehicle Activity Area	Watering or Chemical Surfactant	Maintain logs of watering or surfactant use
E06	Active coal transfer to Underground Conveyor	baghouse	See below for baghouse monitoring.

Emission Point ID	Emission Point Description	BACT	Method of Compliance
E12	Haul road to landfill–unpaved	Watering or Chemical Surfactant	Maintain logs of watering or surfactant use
E12	Haul road to landfill–paved	Pavement	Pave roads and monitor periodically for integrity. Maintain documentation that road is paved.
E74	Landfill haul road – unpaved	Maintain logs of watering or surfactant use	Maintain logs of watering or surfactant use
E101	Conveyor transfer to tripper deck	Enclosure to baghouse	See below for baghouse monitoring.
E102	Conveyor transfer to mills (Note 1)	Enclosure to baghouse	See below for baghouse monitoring.
E103	Coal mills operations (Note 1)	Enclosure to baghouse	See below for baghouse monitoring.
E104	Conveyor transfer to storage silos	Enclosure to baghouse	See below for baghouse monitoring.
E106	Baghouse hopper to collecting conveyors transfer point	Enclosure to baghouse	See below for baghouse monitoring.
E107	Waste powder silo Number 1	Enclosure to baghouse	See below for baghouse monitoring.
E108	Waste powder silo Number 2	Enclosure to baghouse	See below for baghouse monitoring.
E109	Conditioning of ash for landfill	Wet collector	(Dust Master System Installed) Utilize range of water to product ratio: Add water to product 8-13% as needed to control dust
E110	Waste powder to ash truck transfer point	Enclosure to baghouse	See below for baghouse monitoring.
E112	Bottom ash transfer to conveyors	Wet material	Material is wet based on inherent technology
E114	Ash truck transfer point – truck loading	Wet material	Material is wet based on inherent technology
E116	Lime transfer to storage silos	Enclosure to baghouse	See below for baghouse monitoring.
E117	Lime transfer to feed bins	Enclosure to baghouse	See below for baghouse monitoring.
E118	Cooling tower	High efficiency drift eliminators – 0.001% drift	Use high efficiency drift eliminators
E121	Drop point onto active coal pile	Water spray and telescoping chute	Utilize telescoping chute to deliver coal to active pile. Utilize water sprays to control dust as needed.

Emission Point ID	Emission Point Description	BACT	Method of Compliance
E126	Powder activated carbon silo bin vent filter	Enclosure to baghouse	See below for baghouse monitoring.
E127	Powder activated carbon haul road	Pavement	Pave roads and monitor periodically for integrity. Maintain documentation that road is paved.

- 2) All baghouses shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.A]

Monitoring/Recordkeeping:

- 1) The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 4.B]
- 2) The permittee shall maintain an operating and maintenance log for the baghouses which shall include the following: [Special Condition 4.C]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probably cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) The permittee shall maintain records of water spray (or chemical surfactant) used to maintain dust control on fugitive sources.
- 4) The permittee shall maintain all records required by this permit for not less than five (50 years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 8.K]

Reporting:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 013
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122004-007B, Issued June 12, 2013

Emission Unit	Description	Manufacturer/ Model #
EU12	Paved and Unpaved Haul Roads	N/A

Operational Limitations:

- 1) The permittee shall limit the truck traffic carrying fly ash to the landfill on haul road (Emission Point E12) to no more than 48 trips per 24-hour period. [Special Condition 1.G]

- 2) **Paved Roads:** [Special Condition 5.A]
 - a) Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these roads.
 - b) The permittee shall periodically water, wash and/or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these roads.
- 3) **Unpaved Roads:** [Special Condition 5.B]
 - a) The permittee shall control emissions from all unpaved haul roads by either documented watering or the application of chemical dust suppressant.
 - i. Chemical Dust Suppressant - The suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) shall be applied in accordance with the manufacturer's suggested application rate and reapplied as necessary to achieve control of fugitive emissions from these areas.
 - ii. Documented Watering – Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads/vehicle activity area as necessary to achieve control of fugitive emissions from these areas.

Monitoring/Recordkeeping:

- 1) The permittee shall keep records of the time, date, and the amount of material applied for each application of chemical dust suppressant agent on these areas. [Special Condition 5.B.1.b]
- 2) The permittee shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the areas are in use (e.g., meteorological situations, precipitation events, freezing, etc.) [Special Condition 5.B.2]
- 3) The permittee shall keep records of each trip taken on the haul road to verify compliance with Operational Limitation 1.
- 4) Meteorological precipitation of any kind (e.g., quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the areas are in use, may be substituted for documented water application until such time as conditions warrant applying documented watering. [Special Condition 5.B.2.b]
- 5) Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. City Utilities shall record a brief description of such events in the log. [Special Condition 5.B.2.c]
- 6) All records shall be kept on site for not less than five (5) years, and made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 014
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for
 Industrial, Commercial, and Institutional Boilers and Process Heaters

Emission Unit	Description	Manufacturer/Model #
EU16	Building Heat Boiler – 6.3 MMBtu/hr boiler; Combusting pipeline grade natural gas and fuel oil; Installed 1975	Kewanee

Applicability:

Currently, the building heat boiler (EU16) are designated as units designed to burn gas 1 fuels for compliance purposes under 40 CFR Part 63, Subpart DDDDD. Only the work practice standards in Table 3 apply for these emission units.

Note: Boilers and process heaters in subcategory designed to burn gas 1 fuels are not subject to the emission limits in Tables 2 or 11 through 13, or the operating limits in Table 4 to 40 CFR Part 63 Subpart DDDDD. [§63.7500(e)]

Compliance Dates:

- 1) The permittee shall comply with 40 CFR Part 63, Subpart DDDDD by not later than January 31, 2016. [§63.7495(b)]
- 2) The permittee shall meet the notification requirements in §63.7545 according to the schedule in §63.7545 and 40 CFR Part 63, Subpart A. Some of the notifications must be submitted before the permittee is required to comply with the requirements in 40 CFR Part 63, Subpart DDDDD. [§63.7495(d)]

Emission Limitations:

- 1) The permittee must meet the following work practice standards in Table 3 of Subpart DDDDD: [§63.7500(a)(1)]

Table 3 of Subpart DDDDD – Work Practice Standards

If your unit is . . .	You must meet the following . . .
2. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of less than 10 million Btu per hour in the unit designed to burn heavy liquid or unit designed to burn solid fuel subcategories; or a new or existing boiler or process heater with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour, in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid	Conduct a tune-up of the boiler or process heater biennially as specified in § 63.7540.

If your unit is . . .	You must meet the following . . .
4. An existing boiler or process heater located at a major source facility, not including limited use units	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items a. to e. appropriate for the on-site technical hours listed in § 63.7575:</p> <p>a. A visual inspection of the boiler or process heater system.</p> <p>b. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.</p> <p>c. An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.</p> <p>d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.</p> <p>e. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.</p> <p>f. A list of cost-effective energy conservation measures that are within the facility's control.</p> <p>g. A list of the energy savings potential of the energy conservation measures identified.</p> <p>h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.</p>

- 2) At all times, the permittee must operate and maintain the boiler in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.7500(a)(3)]

Initial Compliance Demonstration:

- 1) The permittee must submit a signed statement in the Notification of Compliance Status report that indicates that a tune-up of the unit was conducted. [§63.7535(d)]
- 2) The permittee must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 2 of Subpart DDDDD and is an accurate depiction of the facility at the time of the assessment. [§63.7535(e)]

Recordkeeping:

- 1) The permittee must keep a copy of each notification and report that is submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status report that is submitted. [§63.7555(a)(1)]

- 2) The permittee must maintain records of the calendar date, time, occurrence and duration of each startup and shutdown. [§63.7555(i)]
- 3) The permittee must maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown. [§63.7555(j)]
- 4) Records must be in a form suitable and readily available for expeditious review according to §63.109b(1). [§63.7560(a)]
- 5) The permittee must keep each record for 5 years. [§63.7560(b)]
- 6) Records must be kept on site, or must be accessible from on site, for at least two years. [§63.7560(c)]

Reporting:

- 1) The permittee must submit reports as required in §63.7550 of 40 CFR Part 63 Subpart DDDDD.
- 2) The permittee shall report to the Air Pollution Control Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the limits established by this regulation, or any malfunction that causes a limit exceedance.
- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 015
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 0391-001, Issued March 4, 1991

Emission Unit	Description	Manufacturer/Model #
EU41/42	Combustion Turbines 1A and 1B (Set 1); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)
EU43/44	Combustion Turbines 2A and 2B (Set 2); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)

Emission Limitation:

- 1) Best Available Control Technology for the emissions of nitrogen oxides from the operation of each of these turbine sets is set at 42 parts per million by volume, one-hour rolling average, corrected to 15% oxygen, when burning natural gas. [Special Condition No. 1]
- 2) Best Available Control Technology for the emissions of nitrogen oxides from the operation of each of these turbine sets is set at 65 parts per million by volume, one-hour rolling average, corrected to 15% oxygen, when burning No. 2 fuel oil. [Special Condition No. 2]
- 3) Recognizing that fuel-bound nitrogen can be a problem when combusting No. 2 fuel oil, an allowance for fuel-bound nitrogen is allowed. The allowance is taken from the following table, and added to the 65 ppmv limit: [Special Condition No. 2]

Fuel-bound nitrogen (percent by weight)	Allowable (ppmv)
$N \leq 0.015$	
$0.015 < N \leq 0.05$	400 (N)

- 4) The aggregated emissions from the operation of both turbine sets shall not exceed the de minimis emissions limits for any pollutant except nitrogen oxides, carbon monoxide and volatile organic compounds. [Special Condition No. 3]
- 5) These turbine sets shall not be operated in excess of 3,000 hours per year per turbine set. This operating restriction is established on a rolling monthly basis, with the end of each month establishing a new yearly period. [Special Condition No. 4]
- 6) These two turbines combined shall not combust in excess of 1.35 million gallons of No. 2 fuel oil, with a sulfur content of 0.4 percent. However, the voluntary PW permit condition (PW001) limits the sulfur content to 0.1%, by weight. This is equivalent to 320 hours per year. This will insure that the de minimis limit of 40 tons per year sulfur dioxide will not be exceeded due to sulfur dioxide emissions from fuel-bound sulfur. This operating restriction is established on a rolling monthly basis, with the end of each month establishing a new yearly period. These operating hours may be split between the two turbine sets in any manner the permittee chooses. Should the permittee choose to use distillate oil with a sulfur content different from 0.4 percent, the maximum combustion limit of 1.35 million gallons of No. 2 fuel oil must be adjusted to compensate for the difference in fuel sulfur content. The permittee shall be required to keep records in sufficient detail that compliance with the requirement that the annual emission rate of sulfur dioxide not exceed 40 tons maybe easily and unambiguously verified. [Special Condition No. 5]
- 7) If any one or more of the baseload coal-fired units at either James River Power Station or Southwest Power Station is out of service due to malfunction, or if the electrical power is required in order to preserve the integrity of the power grid, the permittee may operate these two turbine sets in excess of 3,000 hours per year per turbine set, though the combined operating rate may not exceed 9,000 hours. Further such operation shall be done only while combusting pipeline grade natural gas. The permittee shall take all reasonable steps necessary to restore to operation the affected baseload units in as timely a manner as possible. BACT must be reevaluated if this agency subsequently decides that either of these turbine sets have been used in excess of 3,000 hours per year without a generation emergency having actually existed, or that such excess usage of these turbine sets is no longer temporary. [Special Condition No. 6]
- 8) No fuels other than pipeline grade natural gas or No. 2 fuel oil shall be combusted in these turbine sets at any time. [Special Condition No. 7]
- 9) The permittee is exempt from Conditions 1 and 2 when ice fog is deemed a traffic hazard by the permittee. "Ice Fog" is defined as an atmospheric suspension of highly reflective ice crystals. [Special Condition No. 13]

Monitoring:

- 1) The permittee shall maintain records of operating time for the turbines in order to verify compliance with Emission Limitation 5. The permittee shall record the number of hours the turbines are operated each month and maintain a rolling 12-month total.
- 2) The permittee shall operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine sets. This system shall be accurate to within ± 5 percent, and shall be approved by the director. [Special Condition No. 8]
- 3) The permittee shall monitor the sulfur content and the nitrogen content of the fuel being fired in the turbine sets. The frequency of determination of these values shall be as follows:
 - a) If the turbine sets are supplied their fuel from a bulk storage tank, the values shall be determined on each operation that fuel is transferred to the storage tank from any other source.
 - b) If the turbine sets are supplied fuel without intermediate bulk storage, the values shall be determined and recorded daily. Owners, operators, or fuel vendors may develop custom

schedules for determination of the values based on the design and operation of the affected installation and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by both the Director of the Department of Natural Resources, and by the Administrator of the U.S. Environmental Protection Agency, before they can be used to comply with this condition. [Special Condition 9]

- 4) Since these units are newly affected CAIR units, provisions of Appendix D to Part 75 apply, and may be used, in lieu of, specific permit provisions.
 - a) For fuel oil, use one of the total sulfur sampling options and the associated sampling frequency described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of appendix D to part 75 (*i.e.*, flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with fuel oil already in the intended storage tank).
 - b) For gaseous fuels, use one of the following sources of information to make the required demonstration:
 - i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
 - ii) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of chapter 40 is required.
 - c) Nitrogen content sampling is required, if the permittee claims an emission allowance for fuel bound nitrogen (*i.e.*, if an F-value greater than zero is being or will be used by the permittee to calculate STD).

Record Keeping:

Records shall be kept on-site which detail the number of hours each turbine set is operated, and the amount of natural gas and fuel oil consumed in these turbine sets, and ratio of water to fuel being fired on a per-month basis. These records shall be kept for a period of at least five (5) years, and shall be made available to Department of Natural Resources personnel during any site inspection. [Special Conditions 4, 5, and 8]

Reporting:

- 1) Quarterly reports shall be submitted to the department by the 30th of the following month detailing any exceedances of applicable emission limits. [Special Condition No. 10]
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 016
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for
 Stationary Reciprocating Internal Combustion Engines

Emission Unit	Description	Manufacturer/Model #
EU20/22	One Stand-by Emergency Diesel Generator and Emergency Fire Pump; 1.382 mmBtu/hr; Installed in 1975	Cummins

Note: These units are located at a major source of HAP, and were constructed before June 12, 2006, therefore they are classified as an existing source for the purpose of 40 CFR Part 63, Subpart ZZZZ. These engine types are exempt from MACT Subpart ZZZZ if they meet the usage limitations of 40 CFR 63.6640(f). No other requirements

40 CFR 63 Subpart ZZZZ applicable requirements listed by citation:			
Engine Category	Emergency CI	Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(e), (f), (h), Table 6-9
Date Constructed	Before 6/12/2006	Initial Compliance	No Requirements
Compliance Date	May 3, 2013	Continuous Compliance	63.6605 63.6640 (f)(1)-(3)
Emission Limitations	No requirements	Notification Requirements	No Requirements
Operating Limitations	No Requirements	Recordkeeping Requirements	63.6655(e)(2),(f)(1)
Fuel Requirements	No Requirements	Reporting Requirements	No requirements
Performance Tests	No Requirements	General Provisions (40 CFR part 63)	Yes, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

Operational Limitations/Monitoring:

- 1) The permittee shall operate and maintain start up engines according to the manufacturer’s emission-related written instructions. [§63.6625(e)]
- 2) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) The permittee shall minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. [§63.6625(h)]

Continuous Compliance:

- 1) The permittee shall demonstrate compliance according to the methods specified in Table 6 to this subpart: [§63.6640(a)]

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year, and existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

- 2) The permittee shall be in compliance with the operating limitations and other requirements in this subpart that apply at all times. [§63.6605(a)]
- 3) At all times the permittee shall operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.6605(b)]

Recordkeeping/Reporting:

- 1) The permittee shall submit reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
- 2) Reports of any deviations from the requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 017
 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Unit	Description	Manufacturer/Model #
EU16	Building Heat Boiler – 6.3 MMBtu/hr boiler; Combusting pipeline grade natural gas and fuel oil; Installed 1975	Kewanee
EU41/42	Combustion Turbines 1A and 1B (Set 1); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)

Emission Unit	Description	Manufacturer/Model #
EU43/44	Combustion Turbines 2A and 2B (Set 2); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)
EU20/22	Two Stand-by Emergency Diesel Generators; 1.382 mmBtu/hr; Installed in 1975	Cummings

Emission Limitation:

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

When burning number 2 fuel oil (diesel fuel) these units are limited to burning fuel with a sulfur content less than 0.1% as required in Plant Wide Permit Condition PW001.

Monitoring/Recordkeeping:

The monitoring and Recordkeeping required by Plant Wide Permit Condition PW001 is sufficient to determine compliance with this rule.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<p>PERMIT CONDITION 018 40 CFR Part 70 and 97 Cross State Air Pollution Rule</p>

Emission Unit	Description	Manufacturer/Model #
EU9	Unit 1 Boiler: 1,810 MMBtu/hr boiler; Combusts coal, natural gas and #2 fuel oil; Controlled by electrostatic precipitator, SO ₃ injection system, SCR, Inherently low NO _x burners ; boiler installed in 1976. A pulse-jet fabric filter (baghouse) and carbon injection for particulate matter and Hg control will be installed in 2015 (prior to the April 16, 2016 extended MATS compliance date).	Riley Stoker Turbo

Emission Unit	Description	Manufacturer/Model #
EU100	Unit 2 Boiler: 2,724 MMBtu/hr; Combusts Coal and natural gas; Control Devices: Low NO _x Burners/Over-Fired Air, SCR, Dry Lime Injection Fluidized Bed Scrubber, and Baghouse w/Activated Carbon Injection (ACI) system; Installed 2011 (commenced construction March 2007).	Foster-Wheeler
EU41/42	Combustion Turbines 1A and 1B (Set 1); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)
EU43/44	Combustion Turbines 2A and 2B (Set 2); 56 MW Turbines Combusting Natural gas and No. 2 Fuel Oil; Manufactured in 1972 but installed 1982	United Technologies TP4 Twin Pac/ FT4C-1(DF)

The TR subject unit(s), and the unit-specific monitoring provisions, at this source are identified in the following table(s). These unit(s) are subject to the requirements for the TR NO_x Annual Trading Program, TR NO_x Ozone Season Trading Program, and TR SO₂ Group 1 Trading Program.

Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
SO ₂	EU9, EU100	EU41/42 &43/44	-----	-----	-----
NO _x	EU9, EU100	-----	EU41/42 &43/44	-----	-----
Heat Input	EU9, EU100	EU41/42 &43/44	-----	-----	-----

- 1) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
- 2) The permittee must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.

- 3) The permittee that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
- 4) The permittee that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
- 5) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

TR NO_x Annual Trading Program requirements (40 CFR 97.406)

- 1) Designated representative requirements.
The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.
- 2) Emissions monitoring, reporting, and recordkeeping requirements.
 - a) The permittee, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
 - b) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.
- 3) NO_x emissions requirements.
 - a) TR NO_x Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall

- hold, in the source's compliance account, TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Annual units at the source.
- (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Annual units at a TR NO_x Annual source are in excess of the TR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
- (A). The permittee of the source and each TR NO_x Annual unit at the source shall hold the TR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
- (B). The permittee of the source and each TR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- b) TR NO_x Annual assurance provisions.
- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Annual units at TR NO_x Annual sources in the state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the state for such control period exceed the state assurance level.
- (ii). The permittee shall hold the TR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Annual units at TR NO_x Annual sources in the state during a control period exceeds the common designated representative's assurance level.

- (v). To the extent the permittee fails to hold TR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
 - c) Compliance periods.
 - (i). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - d) Vintage of allowances held for compliance.
 - (i). A TR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
 - e) Allowance Management System requirements. Each TR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.
 - f) Limited authorization. A TR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - g) Property right. A TR NO_x Annual allowance does not constitute a property right.
- 4) Title V permit revision requirements.
- a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
 - b) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring

Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

- 5) Additional recordkeeping and reporting requirements.
 - a) Unless otherwise provided, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Annual Trading Program.
 - b) The designated representative of a TR NO_x Annual source and each TR NO_x Annual unit at the source shall make all submissions required under the TR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.
- 6) Liability.
 - a) Any provision of the TR NO_x Annual Trading Program that applies to a TR NO_x Annual source or the designated representative of a TR NO_x Annual source shall also apply to the owners and operators of such source and of the TR NO_x Annual units at the source.
 - b) Any provision of the TR NO_x Annual Trading Program that applies to a TR NO_x Annual unit or the designated representative of a TR NO_x Annual unit shall also apply to the owners and operators of such unit.
- 7) Effect on other authorities.

No provision of the TR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Annual source or TR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

TR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)

Designated representative requirements.

The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

1) Emissions monitoring, reporting, and recordkeeping requirements.

- a) The permittee, and the designated representative, of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation,

certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

- b) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

2) **NO_x emissions requirements.**

- a) TR NO_x Ozone Season emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Ozone Season units at the source.
- (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Ozone Season units at a TR NO_x Ozone Season source are in excess of the TR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:
- (A). The permittee of the source and each TR NO_x Ozone Season unit at the source shall hold the TR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
- (B). The permittee of the source and each TR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBBB and the Clean Air Act.

- b) TR NO_x Ozone Season assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state exceed the state assurance level, then The permittee of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—
- (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance

- level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state for such control period exceed the state assurance level.
- (ii). The permittee shall hold the TR NO_x Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart BBBBBB or of the Clean Air Act if total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the permittee fails to hold TR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
- (A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
- (B). Each TR NO_x Ozone Season allowance that the permittee fails to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBBB and the Clean Air Act.
- c) Compliance periods.
- (i). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- (ii). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- d) Vintage of allowances held for compliance.
- (i). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
- (ii). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year

- must be a TR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- e) Allowance Management System requirements. Each TR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBB.
 - f) Limited authorization. A TR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Ozone Season Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - g) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.
- 3) **Title V permit revision requirements.**
- a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.
 - b) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- 4) **Additional recordkeeping and reporting requirements.**
- a) Unless otherwise provided, the permittee of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.
 - b) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season

Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

5) Liability.

- a) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.
- b) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

6) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the permittee, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

1) Designated representative requirements.

The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

2) Emissions monitoring, reporting, and recordkeeping requirements.

- a) The permittee, and the designated representative, of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- b) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

3) SO₂ emissions requirements.

- a) TR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the

- tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.
- (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The permittee of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The permittee of the source and each TR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- b) TR SO₂ Group 1 assurance provisions.
- (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state exceed the state assurance level, then the permittee of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the permittee of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state for such control period exceed the state assurance level.
 - (ii). The permittee shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the during a control period exceeds the common designated representative's assurance level.

- (v). To the extent the permittee fails to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR SO₂ Group 1 allowance that the permittee fails to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
 - c) Compliance periods.
 - (i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - d) Vintage of allowances held for compliance.
 - (i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
 - e) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
 - f) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - g) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.
- 4) **Title V permit revision requirements.**
- a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
 - b) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E), Therefore, the Description of TR

Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

5) Additional recordkeeping and reporting requirements.

- a) Unless otherwise provided, the permittee of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 1 Trading Program.
- b) The designated representative of a TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall make all submissions required under the TR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

6) Liability.

- a) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 source or the designated representative of a TR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 1 units at the source.
- b) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 unit or the designated representative of a TR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

7) Effect on other authorities.

No provision of the TR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 1 source or TR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

TR SO₂ Group 2 Trading Program requirements (40 CFR 97.706)

1) Designated representative requirements.

The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.713 through 97.718.

2) Emissions monitoring, reporting, and recordkeeping requirements.

- a) The permittee, and the designated representative, of each TR SO₂ Group 2 source and each TR SO₂ Group 2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.730 (general requirements, including installation, certification, and

data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.731 (initial monitoring system certification and recertification procedures), 97.732 (monitoring system out-of-control periods), 97.733 (notifications concerning monitoring), 97.734 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.735 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

- b) The emissions data determined in accordance with 40 CFR 97.730 through 97.735 shall be used to calculate allocations of TR SO₂ Group 2 allowances under 40 CFR 97.711(a)(2) and (b) and 97.712 and to determine compliance with the TR SO₂ Group 2 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.730 through 97.735 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

3) **SO₂ emissions requirements.**

- a) TR SO₂ Group 2 emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the permittee of each TR SO₂ Group 2 source and each TR SO₂ Group 2 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 2 allowances available for deduction for such control period under 40 CFR 97.724(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 2 units at the source.
- (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 2 units at a TR SO₂ Group 2 source are in excess of the TR SO₂ Group 2 emissions limitation set forth in paragraph (c)(1)(i) above, then:
- (A). The permittee of the source and each TR SO₂ Group 2 unit at the source shall hold the TR SO₂ Group 2 allowances required for deduction under 40 CFR 97.724(d); and
- (B). The permittee of the source and each TR SO₂ Group 2 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart DDDDD and the Clean Air Act.

- b) TR SO₂ Group 2 assurance provisions.

- (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 2 units at TR SO₂ Group 2 sources in the exceed the state assurance level, then the permittee of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO₂ Group 2 allowances available for deduction for such control period under 40 CFR 97.725(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.725(b), of multiplying—
- (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such control period, by

- which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total SO₂ emissions from all TR SO₂ Group 2 units at TR SO₂ Group 2 sources in the state for such control period exceed the state assurance level.
- (ii). The permittee shall hold the TR SO₂ Group 2 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total SO₂ emissions from all TR SO₂ Group 2 units at TR SO₂ Group 2 sources in the state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 2 trading budget under 40 CFR 97.710(a) and the state's variability limit under 40 CFR 97.710(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart DDDDD or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 2 units at TR SO₂ Group 2 sources in the state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 2 units at TR SO₂ Group 2 sources in the state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the permittee fails to hold TR SO₂ Group 2 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
- (A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
- (B). Each TR SO₂ Group 2 allowance that the permittee fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart DDDDD and the Clean Air Act.
- c) Compliance periods.
- (i). A TR SO₂ Group 2 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.730(b) and for each control period thereafter.
- (ii). A TR SO₂ Group 2 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.730(b) and for each control period thereafter.
- d) Vintage of allowances held for compliance.
- (i). A TR SO₂ Group 2 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 2 allowance that was allocated for such control period or a control period in a prior year.
- (ii). A TR SO₂ Group 2 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 2 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- e) Allowance Management System requirements. Each TR SO₂ Group 2 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart DDDDD.

- f) Limited authorization. A TR SO₂ Group 2 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the TR SO₂ Group 2 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart DDDDD, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- g) Property right. A TR SO₂ Group 2 allowance does not constitute a property right.
- 4) **Title V permit revision requirements.**
- a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 2 allowances in accordance with 40 CFR part 97, subpart DDDDD.
 - b) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.730 through 97.735, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.706(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- 5) **Additional recordkeeping and reporting requirements.**
- a) Unless otherwise provided, the owners and operators of each TR SO₂ Group 2 source and each TR SO₂ Group 2 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.716 for the designated representative for the source and each TR SO₂ Group 2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.716 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart DDDDD.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 2 Trading Program.
 - b) The designated representative of a TR SO₂ Group 2 source and each TR SO₂ Group 2 unit at the source shall make all submissions required under the TR SO₂ Group 2 Trading Program, except as provided in 40 CFR 97.718. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in parts 70 and 71.

6) **Liability.**

- a) Any provision of the TR SO₂ Group 2 Trading Program that applies to a TR SO₂ Group 2 source or the designated representative of a TR SO₂ Group 2 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 2 units at the source.
- b) Any provision of the TR SO₂ Group 2 Trading Program that applies to a TR SO₂ Group 2 unit or the designated representative of a TR SO₂ Group 2 unit shall also apply to the owners and operators of such unit.

7) **Effect on other authorities.**

No provision of the TR SO₂ Group 2 Trading Program or exemption under 40 CFR 97.705 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 2 source or TR SO₂ Group 2 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten (10) days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten (10) days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.
- 6) Use Attachment L or equivalent approved by the Director to record and submit written notification of Startup, Shutdown, and Malfunction events which result in excess emissions that exceed one hour. A facsimile of the notification is sufficient.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.
- 4) The fee payments shall be due June 1 each year for emissions produced during the previous calendar year.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-4.090 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning (10 CSR 10-4.090 (1), (2), and (3)).
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning (40 CSR 10-4.090(4)(B)).
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;

- b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt John Twitty Energy Center from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-4.070 Restriction on Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. **This requirement is not federally enforceable.**

Springfield City Code Article X Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten (10) days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten (10) days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten (10) days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten (10) days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.E Title IV Allowances

This permit prohibits emissions which exceed any allowances the installation holds under Title IV of the Clean Air Act.

No permit revisions shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program if the increases do not require a permit revision under any other applicable requirement.

Limits cannot be placed on the number of allowances that may be held by an installation. The installation may not use these allowances, however, as a defense for noncompliance with any other applicable requirement.

Any allowances held by a Title IV installation shall be accounted for according to procedures established in rules promulgated under Title IV of the Clean Air Act.

An acid rain permit renewal is being issued to this facility along with this operating permit. It is included in the operating permit as Attachment C.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)1.J Emissions Trading

10 CSR 10-6.350 Emission Limitations and Emissions Trading of Oxides of Nitrogen, applies to EU0040 – Boiler #1. This emission unit is also a Clean Air Interstate Rule (CAIR) source.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

- d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven (7) days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by David Fraley, Ph.D., Director – Environmental Affairs, however, a letter received April 6, 2015 changed the responsible official from Dave Fraley to Mr. Daniel S. Hedrick, Director Environmental Affairs. Mr. Hedrick is authorized to sign and submit documentation on behalf of the facility. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit.
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
--

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

ATTACHMENT A
Fuel Oil Analysis Summary Report
Southwest Power Station

This record keeping sheet or an equivalent form may be used for the record keeping requirements of Permit Condition PW001

Nitrogen Content		
Sulfur %, wt		
Specific Gravity		
Btu		
Gallons Delivered		
Date Sample Upon Delivery		
Sample ID		WTD. AVG.

ATTACHMENT B

Continuous Emissions Monitoring Quarterly Report

Date: _____
Source Name: _____
County Plant Number: _____
Reporting Quarter: _____
Due Date of Report: _____
Reporting Under: _____

Emission Point: _____
Pollutant Monitored (limit): _____

Total Source Operation Per Emission Point (minutes/hours): _____

Reasons for Excess Emissions	Code	Duration (minutes/hours)
Startup/Shutdown		
Control Equipment Problems		
Process Problems		
Other Known Excess Emissions		
Unknown Excess Emissions		
Fuel Problems		
Cleaning; Soot-Blowing		
Percent Operating Time Above Standard		%

Code	Comments

Reason for Monitor Downtime	Code	Duration (minutes/hours)
CEM Equipment Malfunction		
Non-CEM Equipment Malf.		
Calibration		
Other Known CEM Downtime		
Unknown CEM Downtime		
Percent Operating Downtime		%

Code	Comments

Continuous Emissions Monitoring Quarterly Report Monitor Downtime Form

Date: _____

Source Name: _____

Reporting Quarter: _____

Emission Point: _____

Pollutant Monitored (limit): _____

Downtime Start		Total Minutes	Downtime End		Reason Code
Date	Time		Date	Time	
Sum Downtime					

Reported By _____

Position Title _____

Continuous Emissions Monitoring Quarterly Report Excess Emissions Form

Date: _____

Source Name: _____

Reporting Quarter: _____

Emission Point: _____

Pollutant Monitored (limit): _____

Date	Time Start	Time End	Minutes	Magnitude	Reason Code
Sum Excess Emissions					
Sum Excess Emissions					
Startup/Shutdown					

Reported By _____

Position Title _____

ATTACHMENT C

Title IV: Acid Rain Permit

In accordance with Titles IV and V of the Clean Air Act and Missouri State Rule 10 CSR 10-6.270, *Acid Rain Source Permits Required*, the State of Missouri issues this Acid Rain Permit.

Installation Name: City Utilities of Springfield – John Twitty Energy Center
ORIS Code: 6195
Unit ID: Unit 1 and Unit 2 Boilers

The permit application submitted for this source, as corrected by the State of Missouri Department of Natural Resources (MDNR), Air Pollution Control Program (APCP), Operating Permit Section, is attached. The owners and operators of this source must comply with the standard requirements and special provisions set forth in this application.

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by the United States Environmental Protection Agency. Pursuant to 40 CFR 72.84, *Automatic permit amendment*, this does not necessitate a revision to any unit SO₂ allowance allocations identified in this permit.

Pursuant to 40 CFR Part 76, the Missouri Department of Natural Resources Air Pollution Control Program approves the Phase II NO_x Compliance Plan submitted for this unit. In addition to complying with these NO_x limits, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the requirement to reapply for a NO_x compliance plan and requirements covering excess emissions.

This Acid Rain permit is being issued in conjunction with this operating permit and is effective for the same period of time as the operating permit. The permittee shall submit an application to renew this Acid Rain permit in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

John Twitty
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

John Twitty
Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
- (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
- (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

John Twitty
Facility (Source) Name (from STEP 1)

Acid Rain - Pag

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

John Twitty
Facility (Source) Name (from STEP 1)

Acid Rain - Page 5

Effect on Other Authorities, Cont'd.

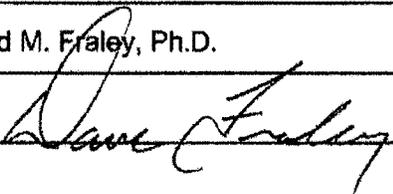
STEP 3, Cont'd.

- to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
 - (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
 - (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
 - (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the
certification
statement,
sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	David M. Fraley, Ph.D.	
Signature		Date 05.29.13

John Twitty

Plant Name (from Step 1)

NO_x Compliance - Page 2
Page 2 of 2

STEP 2, cont'd.

	ID#	ID#	ID#	ID#	ID#	ID#
	Type	Type	Type	Type	Type	Type
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)	<input type="checkbox"/>					
(n) AEL (Include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)	<input type="checkbox"/>					
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	<input type="checkbox"/>					
(p) Repowering extension plan approved or under review	<input type="checkbox"/>					

STEP 3

Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.6 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(e)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name David M. Fraley, Ph.D.	
Signature	Date 05.24.13

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012



Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11 Page 1

This submission is: New Revised Page 1 of 2

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
James River	MO	3	0.50	0.60	4,200,000
James River	MO	4	0.50	0.60	4,782,000
James River	MO	5	0.50	0.50	8,031,000
John Twitty	MO	1	0.50	0.40	9,050,000

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

0.50

$$\frac{\sum_{i=1}^n (R_{U_i} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

0.50

$$\frac{\sum_{i=1}^n (R_{R_i} \times HI_i)}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_U = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_R = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

James River - John Twitty
Plant Name (from Step 1)

NO_x Averaging - Page 2

STEP 3

Mark one of the two options and enter dates.

This plan is effective for calendar year 2014 through calendar year 2016

unless notification to terminate the plan is given.

Treat this plan as identical plans, each effective for one calendar year for the following calendar years: _____, _____, _____, _____ and _____ unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
- (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
- (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
- (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <u>David M. Fraley, Ph.D.</u>	
Signature <u>David Fraley</u>	Date <u>05.24.13</u>

ATTACHMENT D

TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT

In accordance with Title V of the Clean Air Act and Missouri State Rules 10 CSR 10-6.362, *Clean Air Interstate Rule Annual NOx Trading Program*, 10 CSR 10-6.364 *Clean Air Interstate Rule Seasonal NOx Trading Program*, and 10 CSR 10-6.366, *Clean Air Interstate Rule Sox Trading Program*, the State of Missouri issues this CAIR Permit.

Installation Name: City Utilities of Springfield – John Twitty Energy Center, **ORIS Code: 6195**
Unit IDs: Unit 1 and Unit 2 Boilers

The permit application submitted for this source, as corrected by the State of Missouri Department of Natural Resources' Air Pollution Control Program, Operating Permit Section, is attached. The owners and operators of this source must comply with the standard requirements and special provisions set forth in this application.

This CAIR Permit applies only to the Unit 1 and Unit 2 Boilers at the John Twitty Energy Center, plant 077-0039.

This CAIR permit is being issued in conjunction with this operating permit and is effective for the same period of time as the operating permit. The permittee shall submit an application to renew this CAIR permit in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

CAIR Permit Application

(for sources covered under a CAIR SIP)

Page 1

For more information, refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, and 96.322

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS or facility code

Plant Name	John Twitty	State	MO	ORIS/Facility Code	6195
------------	-------------	-------	----	--------------------	------

STEP 2
Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO _x Annual	SO ₂	NO _x Ozone Season
1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CT1A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CT1B	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CT2A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CT2B	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

STEP 3
Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date

Standard Requirements

- (a) Permit Requirements.
 - (1) The CAIR designated representative of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall:
 - (i) Submit to the permitting authority a complete CAIR permit application under §96.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §96.121, §96.221, and §96.321 (as applicable); and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
 - (2) The owners and operators of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for the source and operate the source and the unit in compliance with such CAIR permit.
 - (3) Except as provided in subpart II, III, and IIII (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and such CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable).

John Twitty
Plant Name (from Step 1)

CAIR Permit Application
Page 2

**STEP 3,
continued**

(b) Monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(2) The emissions measurements recorded and reported in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 shall be used to determine compliance by each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) with the CAIR NO_x emissions limitation, CAIR SO₂ emissions limitation, and CAIR NO_x Ozone Season emissions limitation (as applicable) under paragraph (c) of §96.106, §96.206, and §96.306 (as applicable).

(c) Nitrogen oxides emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under §96.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

(2) A CAIR NO_x unit shall be subject to the requirements under paragraph (c)(1) of §96.106 for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.106, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.

(4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with subparts FF, GG, and II of 40 CFR part 96.

(5) A CAIR NO_x allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.105 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_x allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR NO_x unit.

Sulfur dioxide emission requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO₂ allowances available for compliance deductions for the control period under §96.254(a) and (b) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with subpart HHH of 40 CFR part 96.

(2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (c)(1) of §96.206 for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §96.270(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.206, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.

(4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 96.

(5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR SO₂ allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFF, GGG, or III of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR SO₂ unit.

Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under §96.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of §96.306 for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.306, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with subparts FFFF, GGGG, and IIII of 40 CFR part 96.

(5) A CAIR NO_x allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.305 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_x allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

John Twitty
Plant Name (from Step 1)

CAIR Permit Application
Page 3

**STEP 3,
continued**

(d) Excess emissions requirements.

If a CAIR NO_x source emits nitrogen oxides during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under §96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR SO₂ source emits sulfur dioxide during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under §96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR NO_x Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under §96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under §96.113, §96.213, and §96.313 (as applicable) for the CAIR designated representative for the source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §96.113, §96.213, and §96.313 (as applicable) changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96, provided that to the extent that subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(2) The CAIR designated representative of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) including those under subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(f) Liability.

(1) Each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) shall meet the requirements of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(2) Any provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) that applies to a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO_x units, CAIR SO₂ units, and CAIR NO_x Ozone Season units (as applicable) at the source.

(3) Any provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) that applies to a CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) shall also apply to the owners and operators of such unit.

John Twitty
Plant Name (from Step 1)

CAIR Permit Application
Page 4

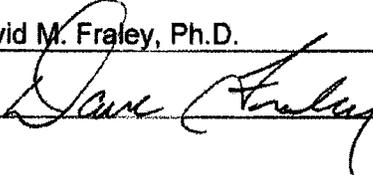
STEP 3,
continued

(g) Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) or CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State Implementation plan, a federally enforceable permit, or the Clean Air Act.

Certification

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name David M. Fraley, Ph.D.	
Signature 	Date 05.24.13

ATTACHMENT E2
Method 22 (Outdoor) Observation Log

This record keeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 22 (Outdoor) Observation Log		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute: second)	Accumulative Emission Time (minute: second)
Begin Observation		
End Observation		

ATTACHMENT F
Method 9 Opacity Emissions Observations

This record keeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer _____

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 31, 2013;
- 2) 2013 Emissions Inventory Questionnaire, received May 1m, 2014;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit No. 0391-001, Issued March 4, 1991;
- 5) Construction Permit No. 122004-007B, Issued June 12, 2013;
- 6) WebFIRE;
- 7) Acid Rain Permit Application;
- 8) CAIR Permit Application; and
- 9) Compliance Assurance Monitoring (CAM) Plan.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

40 CFR Part 97 Cross-State Air Pollution Rule

This rule is applicable to Emission Units EU9, EU100 and EU41-EU44 and is included in the operating permit as Permit Condition 018.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

City of Springfield Code – Regulations from the City of Springfield Code were not included in this operating permit because they are not federally or state enforceable.

10 CSR 10-6.405, *Restriction of Emission of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply to the coal fired boilers because they are subject to PM limitations of 10 CSR 10-6.070, *New Source Performance Regulations*. It does not apply to the Building Heat Boiler, EU16, because it burns natural gas and No. 2 Fuel Oil with a sulfur content less than 1.2% and is thus exempt according to 10 CSR 10-6.405(1)(C).

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

This regulation does not apply to the particulate matter emission sources at this facility. See Other Regulatory Determinations section for a detailed explanation.

Construction Permitting History

Construction Permit 0482-002, Issued April 9, 1982

This construction permit authorized the installation and operation of two 44 MW Twin Pac combustion turbines. The construction permit did not include any special conditions.

Construction Permit 0391-001, Issued January 18, 1991

This construction permit authorized the increase in the operating hours of the turbines. The permit allows the turbine to operate up to 3,000 hours per year with an emergency clause allowing operation for up to an additional 3,000 hours per year combined in the event of the unanticipated loss of baseload generation capacity or threat to grid integrity. The special conditions were applied to EU41/42 CT1A and 1B and EU43/EU44 CT 2A and 2B and included in the operating permit under permit condition 013. The recordkeeping requirements were changed from two years to five years in this permit.

Construction Permit 0695-023, Issued May 22, 1995

This construction permit authorized the modification of a side discharge chute on a fly ash silo to minimize dusting when loading dry ash into enclosed cement tankers and to install natural gas burners in the existing boiler to permit the permittee to supplement or replace the burning of coal with natural gas. This permit contained no special conditions.

Project 1999-04-004, Completed April 22, 1999

This project was a request for applicability determination for combustion fogging. It was determined that no construction permit was necessary for this equipment.

Project 2001-05-042, Completed July 2, 2001

This project was a request for applicability determination for the installation of a flue gas conditioning system to enhance electrostatic precipitator performance. It was determined that no construction permit was necessary for this equipment.

Construction Permit 122004-007, Issued December 15, 2004

This construction permit authorized the construction of a new 2,724 MMBtu/hr pulverized coal fired boiler and associated material handling equipment. The special conditions of this construction permit can be found throughout this operating permit. This construction permit has been amended twice.

Several of the emission points permitted were either not constructed or used or were redesignated. The following table lists these changes and will explain why not all emission units listed in the construction permit are included in the operating permit:

Emission Point No.	Emission Point Description	Status
E105	Permitted Point – Recycle of Ash to FDG Silos	Not applicable/used
E113	Permitted Point – Conveyor Transfer to Silo	Not applicable/used

Emission Point No.	Emission Point Description	Status
E120	Permitted Point- Railcar Dump of Raw Coal	Not applicable/used – Designated as E119 in permit (duplicate) Railcar unloading for Units 1 and 2 E01
E121	Permitted Point – Conveyor Transfer to Drive Tower	Not applicable/used
E122	Stack Drop Point (Belt 2-2) onto active coal pile	Redesignated as E121
E123	Permitted Point – Conveyor Transfer to Truck Reclaim	Not applicable/used
E124	Permitted Point – Conveyor Transfer to Truck Loadout	Not applicable/used
E125	Coal Transfer (Belt 2-3) To Underground Conveyor (Belt 2-4)	Redesignated as E124
E126	Brine Tank	Not an emission Point
E127	Powdered Activated Carbon Silo Bin Vent Filter	Redesignated as E126
E128	Powdered Activated Carbon Haul Road	Redesignated as E127

The following special conditions from CP 122004-007 were not included in Permit Condition 006 because they have already been fulfilled:

- The permittee shall conduct post construction ambient monitoring for SO₂ for a period no less than one (1) year after the PC boiler Number 2 is fully operational. Monitoring may be discontinued upon written request and approval from the Air Pollution Control Program’s Director. [Special Condition 10.A]
- The monitoring shall be conducted under an approved quality Assurance Project Plan at sites approved by the Air Pollution Control Program [Special Condition 10.B]
- The Quality Assurance Project Plan shall be submitted to the Air Pollution Control Program within a year from the date of issuance of this permit. [Condition 10.C]

Project No. 2005-07-013, Completed October 6, 2005

This project was a request for applicability determination for the installation of a fly ash batch mixer unloading system (wet agglomerator). It was determined that no construction permit was necessary for this equipment.

Project No. 2005-08-054, Completed September 13, 2005

This project was a request for applicability determination for the installation of a 2,000 gallon diesel fuel oil storage tank. The fuel is used for fueling heavy equipment and mobile sources. The tank will store No. 1 or No. 2 fuel oil grades and maximum yearly throughput of fuel oil in the tank is not expected to exceed 80,000 gallons, therefore it was determined that no construction permit was required for this tank.

Construction Permit No. 122004-007A, Issued February 23, 2006

This construction permit amendment was issued to make changes to the original construction permit No. 122004-007 in accordance with the Missouri Air Conservation Commission’s December 8, 2005

decision in regards to Linda Chipperfield and the Sierra Club's appeal of the permit. Special Conditions 2.I., 2.G, and 6 were corrected.

Project No. 2006-10-066, Completed November 16, 2006

This project was a request for applicability determination for the installation of selective catalytic reduction (SCR) equipment. It was determined that no construction permit was required.

Project 2007-03-056, Completed May 5, 2009

This project was a request for applicability determination for the installation of flue gas desulfurization equipment. It was determined that no construction permit was required.

Project 2008-04-077, Completed July 2, 2008

This project was a request for applicability determination for upgrades to the existing turbine. The project included the replacement of the existing unit (Westinghouse BB145P) with an enhance model (Siemens-Westinghouse BB145PA) which would result in an increase in turbine output without increasing the output of the boiler or the annual emissions from the boiler. It was determined that no construction permit was required for this modification.

Project No. 2009-08-038, Completed October 14, 2009

This project was a request for applicability determination for using three diesel engines to perform drilling operations for a Carbon Sequestration Pilot Project. The diesel engines were to be used for drilling for exploratory and injection wells purposes. The project was completed in the fall of 2010 and it was determined that a construction permit was not required.

Project No. 2010-03-066, Completed April 8, 2010

This project was a request for applicability determination for a mobile diesel-fired boiler. The boiler was to be used between April and May 2010. It was determined that this equipment would not require a construction permit.

Project No. 2011-12-040, Completed June 12, 2013

This project was a request for applicability determination for a demonstration project. It was determined that the project did not require a construction permit.

Construction Permit No. 122004-007B, Issued June 12, 2013

This project is an amendment to construction permit No. 122004-007. The amendment adjusts carbon monoxide (CO) and sulfuric acid mist (SAM) emission limit averaging periods for the Unit 2 Boiler. The special conditions of this amendment supersede Special Conditions 2.D through 2.H and 2.J through 2.M.

Project No. 2012-10-024

This project was a request to for an applicability determination for a portable generator. It was determined that the equipment did not require a construction permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart D, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 17, 1971*

This subpart applies to Emission Unit EU9 – Unit 1 Boiler.

40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after August 18, 1978*

This subpart applies to Emission Unit EU100 – Unit 2 Boiler.

40 CFR Part 60 Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984*

The fuel oil storage tanks at this facility are not subject to Subpart Ka because they do not meet the definition of “petroleum liquid” storage.

40 CFR Part 60 Subpart Y, *Standards of Performance for Coal Preparation Plants*

This subpart is applicable to any of the following facilities in coal preparation plants which process more than 200 tons per day and were constructed or modified after October 24, 1974: Thermal dryers, pneumatic coal-cleaning equipment, coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems. This subpart applies to the coal processing, conveying, storage, transfer and loading systems at this facility due to upgrades to the equipment as a result of the issuance of Construction Permit 122004-007 and the construction of the Unit 2 boiler. Although the upgrades were not fully constructed until 2011, the facility initiated the contract for construction much earlier, which was dated December 5, 2007. This subjects the facility to the provisions in §60.251, §60.254(a), §60.258(b), which include an opacity limit of 20%, initial testing and semi-annual reporting.

40 CFR Part 60 Subpart GG, *Standards of Performance for Stationary Gas Turbines*

This Subpart applies to all stationary gas turbines with a heat input peak load equal to or greater than 10 MMBtu/hr that commenced construction, modification, or reconstruction after October 3, 1977. The combustion turbines (EU42/42 and EU43/44) were originally built in 1972 and predate Subpart GG. Construction permit 0391-001, which was issued March 4, 1991 increased the operating hours of the turbines, however this does not constitute a modification according to the definition of modification under §60.14 which states that an increase in hours of operation by themselves shall not be considered a modification (even though the increase in hours may result in an increase in emissions). Therefore this subpart was not applied to EU41/42 Combustion Turbine 1A and 1B or EU43/44 Combustion Turbine 2A and 2B.

40 CFR Part 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This Subpart does not apply to Emission Units E20/22 Emergency Diesel Generators because they were constructed before July 11, 2005.

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

This Subpart does not apply to Emission Units EU20/22 Emergency Diesel Generators because they are not spark ignition internal combustion engines.

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63, Subpart YYYY, *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*

This Subpart applies to stationary combustion turbines located at a major source of HAP emissions. However, the combustion turbines located at this facility (EU42/42 and EU43/44) would be considered “existing” units (commenced construction or reconstruction on or before January 14, 2003). There are no listed requirements or work practice standards to meet for existing combustion turbines, therefore this Subpart was not included in the operating permit.

40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters*

This rule applies to EU16 Building Heat Boiler. The work practice standards apply to this boiler.

40 CFR Part 63, Subpart UUUUU, *National Emission Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units*

This rule applies to EU9 – Unit 1 Boiler and EU100 – Unit 2 Boiler.

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

This Subpart applies to Emission Units EU20/22 Emergency Diesel Generators.

40 CFR part 63 Subpart CCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

This subpart applies to each gasoline dispensing facility (GDF) located at an area source of hazardous air pollutants. It applies to each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. This subpart does not apply to the 2,000 gallon above ground gasoline storage tanks and fueling station because this installation is a major source of hazardous air pollutants.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and

- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

Unit 1 Boiler (EU9) meets the applicability criteria for 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*, because the Unit 1 Boiler has the uncontrolled potential to emit particulate matter above the major source threshold levels (as defined by Part 70) and utilizes control devices (as defined by 40 CFR §64.1) to comply with the PM limitation from 40 CFR Part 60 Subpart D which is 0.1 lb/MMBtu heat input. Construction Permit 072014-002, Issued July 14, 2014 authorized the replacement of the ESP with a pulse jet baghouse. At this time the permittee has commenced construction of the new baghouse, however testing to satisfy the requirements of CAM have not been completed. Once the permittee submits an updated CAM plan for this unit the plan will be incorporated into Permit Condition 001.

Unit 2 Boiler (EU100) also meets the applicability criteria for 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*, because the Unit 2 Boiler has the uncontrolled potential to emit PM₁₀ above the major source threshold levels (as defined by Part 70) and utilizes control devices (as defined by 40 CFR §64.1) to comply with the PM₁₀ filterable limitation from Construction Permit No. 122004-007E. The CAM plan is included as part of the monitoring of Permit Condition 006. This unit is also subject to a particulate matter emission limit in 40 CFR Part 60 Subpart Da of 0.015 lb/MMBtu heat input. According to Part 64.2(b)(1), “The requirements of this part shall not apply to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.” Although Subpart Da is a pre-1990 subpart, the Unit 2 Boiler was constructed between February 28, 2005 and May 4, 2011 so it is subject to a PM limit that was proposed after 1990 in an amended version of Subpart Da and therefore CAM does not apply to the PM emission limit from Subpart Da.

Greenhouse Gas Emissions

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	3,304.14
HAP	143.35
NO _x	4,874.96
PM ₁₀	1,609.31
PM ₂₅	804.19
SO _x	16,274.22
VOC	232.77

Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. Construction Permit limits are taken into account. All emergency equipment was evaluated at 500 hours of operation per year. Because this is a named source both fugitive and point source emissions are included when possible. Potential emissions of VOC from tanks are not included in the total for VOC.

Other Regulatory Determinations

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

According to 10 CSR 10-6.400(a)(B)15, any particulate matter emission unit that is subject to a federally enforceable requirement to install, operate and maintain a particulate matter control device system that controls at least 90% of particulate matter emissions is exempt from this regulation. Several emission units are required by Construction Permit No. 122004-007B, Special Condition 3.B to utilize a baghouse to control PM emissions. Special Condition 4 of the permit requires operation and maintenance according to the manufacturer's specifications and requires daily monitoring of the pressure drop across the baghouses to ensure proper operation. For this reason the following emission units are not subject to 10 CSR 10-6.400:

- EU01 – Coal Rail Unloading
- EU106 – Fly Ash Transfer to Tanks
- EU107/108 – Waste Power Tank Mechanical Exhausters #1 and #2
- EU109 – Conditioned Waste Powder to Ash Truck Transfer – Unit 2
- EU110 – Ash Truck Transfer (Dry Ash Loading)
- EU116 – Lime Transfer to Storage Silos
- EU117 – Lime Transfer to Feed Bins
- EU124 – Coal Transfer to Underground Conveyor
- EU126 – Powder Activated Carbon Silo Bin Vent Filter

10 CSR 10-6.400(1)(B)13 exempts the “grinding, crushing and conveying operations at a power plant.” For this reason the following conveyors are not subject to this rule:

- EU04 – Coal Transfer Conveyors
- EU06 – Coal Transfer Conveyors
- EU102 – Coal Transfer Conveyors
- EU103 – Coal Transfer Conveyor to Crusher
- EU101 – Coal Transfer Conveyors
- EU102 – Coal Transfer Conveyors
- EU104 – Coal Transfer Conveyors

10 CSR 10-6.400(1)(B)12 exempts “emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter.” For this reason, Emission Units EU30 – Ash Receiver and EU32 Ash Storage Silo are exempt from the rule. Below are the potential to emit calculations for these units:

Emission Point #	Associated Equipment	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)
E30	Ash Receiver	10.0	0.04	FIRE	0.4
E32	Ash Storage Silo	10.0	0.04	FIRE	0.4

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

Plant-wide permit condition PW001 limits all emission units that burn fuel oil to using only fuel oil with a sulfur content less than 0.1%. With a sulfur content this low, the limits established in 10 CSR 10-6.260 will never be exceeded, therefore there is no additional recordkeeping required for Permit Condition 015.

This rule does not apply to Emission Units EU9 – Unit 1 Boiler and EU100 – Unit 2 boiler because they are subject to sulfur standards in 40 CFR Part 63 Subpart D and 40 CFR Part 63 Subpart Da, respectively.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Part 70 Operating Permit for City Utilities of Springfield – John Twitty Energy Center (077-0039) was placed on public notice as of February 23, 2015 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. On February 19, 2015 the Air Pollution Control Program received comments via e-mail from Bob Cheever, EPA Region 7. On March 2, 2015, comments were received via email from Dan Hedrick, Director Environmental Affairs for City Utilities of Springfield. The comments are addressed below in the order in which they appear within the e-mail.

Comments submitted by Bob Cheever, USEPA:

Comment #1: Compliance provision 3, in Permit Condition 002 (page 12), shows a regulatory reference only. Also, compliance provision 5 (also on page 12) lists the Administrator as the individual to make a determination for the permittee. EPA suggests the Director may be a more appropriate individual, in lieu of the Administrator. EPA also suggests adding the requirement that was meant to be in provision 3.

Response to Comment: The compliance provision has been added to the permit condition and the word "Administrator" has been changed to "Director."

Comment #2: Monitoring requirements 6, 7, and 8 under Permit Condition 006, requires the permittee to conduct post construction ambient monitoring. The construction permit associated with Permit Condition 006 was issued in 2004 and therefore, it would appear that this one-time ambient air monitoring is a completed activity and no longer an applicable requirement to be listed in an operating permit. EPA suggests a discussion of the ambient air monitoring be included in the Statement of Basis.

Response to Comment: These requirements have been removed from Permit Condition 006 and discussed in the Statement of Basis under Construction Permit History.

Comment #3: Record keeping requirement 9 under Permit Condition 006 (page 27) shows a "50 year" records retention, which seems to be excessively long.

Response to Comment: This mistake in the operating permit has been corrected.

Comment #4: Monitoring requirement #1 in Permit Condition 010 reads as if the requirement is applicable to one (1) emission unit. However, Permit Condition 010 lists twelve (12) emission units and therefore, EPA suggests MDNR may want to modify the wording in monitoring requirement 1.

Response to Comment: The wording of this permit condition has been corrected.

Comment #5: Permit Condition 011 emission limitation references a performance test requirement as if the test requirement is in the future. EPA suspects the performance test has already been conducted and MDNR may want to modify the operating permit wording.

Response to Comment: Wording has been changed on the emission limitation for Permit Condition 011 to remove reference to the performance testing as suggested.

Comment #6: Operational limitation #1 in Permit Condition 013 requires that “the permittee limit truck traffic carrying fly ash to the landfill on haul road (emission point EP-12) to no more than 48 trips per 24-hour period.” However, there is no monitoring and record keeping requirement to verify compliance and EPA suggest MDNR add a monitoring and record keeping requirement for operational limitation compliance verification.

Response to Comment: A condition has been added under monitoring/recordkeeping requiring the permittee to maintain records of each trip taken on the haul road in order to demonstrate compliance with the 48 trip/24-hour period limit.

Comment #7: Monitoring requirement #1 in Permit Condition 015 says “compliance with the restriction on annual operating hours shall be verified monthly.” EPA suggests MDNR include who is to verify compliance and how compliance is verified.

Response to Comment: To clarify, this condition has been changed to state that following:
“The permittee shall maintain records of operating time for the turbines in order to verify compliance with Emission Limitation 5. The permittee shall record the number of hours the turbines are operated each month and maintain a rolling 12-month total.”

Comment #8: Permit Condition 016 incorporates the applicable requirements from 40 CFR Part 63, Subpart ZZZZ; *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (RICE MACT). City Utilities—John Twitty appears to be an area source of hazardous air pollutants and therefore EPA continues to manage the source compliance and should be the primary recipient of the compliance reporting associated with RICE MACT. EPA suggest MDNR show EPA Region 7 Air Compliance Coordinator as the recipient of the compliance information associated with the RICE MACT.

Response to Comment: EPA has been added as a contact for reporting under MACT ZZZZ for Permit Condition 016.

Comments submitted by Daniel Hedrick, City Utilities of Springfield:

Comment #9: Condition 002, Compliance Provisions 4 – Compliance provisions listed suggest a PM monitoring system is used to collect hourly emission rates and calculate an arithmetic average. As provided under §60.48Da(0)(2), performance of the fabric filter operation for determining compliance with the PM limit is monitored by the COMS. Opacity is monitored on a continuous basis to represent PM emissions between the initial and subsequent performance testing. Remove non-applicable language from the operating permit Compliance Provisions.

Response to Comment: The non-applicable language has been removed from Permit Condition 002.

Comment #10: As of January 1, 2015, the Cross-State Air Pollution Rule (CSAPR) replaced CAIR for affected units. Remove references to CAIR and use as placeholder for CSAPR regulatory requirements.

Response to Comment: EPA Region 7 has instructed us to leave the CAIR permits in operating permits at this time.

Comment #11: Permit Condition 007, Table 2 CAM Monitoring Approach, indicator range, second Bag Leak/Pressure Drop column, page 29 – The excursion definition should be restated to reflect correct indicators for potential excursions or problems associated with the fabric filter.

Response to Comment: The definition of excursion has been corrected as suggested.

Comment #12: Change address on cover page to 5100 W. Farm Road 164.

Response to Comment: The address has been corrected.

Comment #13: Include the following language in the description of the two natural gas-fired combustion turbines: “The turbines are used as peaking units during periods of high electrical demand, system emergencies, and voltage regulation.”

Response to Comment: This change was made.

Comment #14: Remove references to CAIR on page 4.

Response to Comment: See response to Comment #10.

Comment #15: Remove references to Springfield City Code Articles listed under Core Permit Requirements.

Response to Comment: The Springfield City Code Articles have been removed as requested.