



**Missouri Department of Natural Resources**  
Air Pollution Control Program

## **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:** OP2010-130  
**Expiration Date:** DEC 26 2015  
**Installation ID:** 019-0002  
**Project Number:** 2004-03-084

**Installation Name and Address**

Columbia Municipal Power Plant  
P.O. Box 6015  
Columbia, MO 65205-6015  
Boone County

**Parent Company's Name and Address**

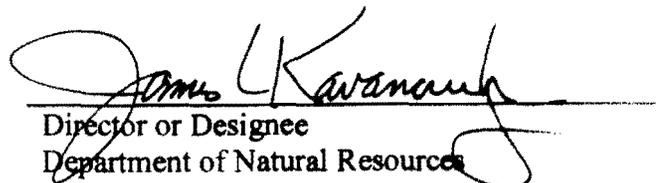
Columbia Municipal Power Plant  
P.O. Box 6015  
Columbia, MO 65205-6015

**Installation Description:**

The permittee operates a coal-fired power plant and several diesel generators, which are used for emergency backup and peak shaving. This installation can burn coal, distillate fuel oil, natural gas and acceptable biomass fuels; specifically wood chips and switchgrass pellets.

DEC 27 2010

\_\_\_\_\_  
Effective Date

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>4</b>
INSTALLATION DESCRIPTION .....	4
EMISSION UNITS WITH LIMITATIONS .....	4
EMISSION UNITS WITHOUT LIMITATIONS .....	5
DOCUMENTS INCORPORATED BY REFERENCE .....	5
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>6</b>
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>7</b>
GROUP 1 BOILERS .....	7
Group 1 Permit Condition 1 .....	7
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter .....	7
From Fuel Burning Equipment Used for Indirect Heating .....	7
40 CFR Part 64 Compliance Assurance Monitoring .....	7
Group 1 Permit Condition 2.....	8
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds .....	8
Group 1 Permit Condition 3.....	9
10 CSR 10-6.270 Acid Rain Source Permits Required .....	9
40 CFR Part 72 through Part 76.....	9
Group 1 Permit Condition 4.....	10
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 10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program 10 CSR 10-6.368 Control of Mercury Emissions From Electric Generating Units.....	10
EP-03 BOILER .....	10
EP-03 Permit Condition 1 .....	10
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter .....	10
From Fuel Burning Equipment Used for Indirect Heating .....	10
EP-03 Permit Condition 2 .....	10
10 CSR 10-6.270 Acid Rain Source Permits Required .....	10
40 CFR Part 72 through Part 76.....	10
EP-03 Permit Condition 3 .....	11
10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program.....	11
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program .....	11
10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program.....	11
GROUP EP-08A - NORTH COAL TRANSFER SYSTEM .....	11
EP-08A Permit Condition Group 1 .....	11
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	11
GROUP EP-08B – SOUTH COAL TRANSFER SYSTEM .....	11
EP-08B Permit Condition Group 1 .....	11
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	11
SHELTER INSURANCE GROUP.....	12
Shelter Insurance Group Permit Condition 1 .....	12
10 CSR 10-6.060 <i>Construction Permits Required</i> , Permit Number: 092000-018, Special Condition 1.A. ....	12
Shelter Insurance Group Permit Condition 2 .....	12
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds .....	12
Shelter Insurance Group Permit Condition 3 .....	13
40 CFR Part 63, MACT Subpart ZZZZ 63.6590(b)(3) .....	13
EP-15 DIESEL GENERATOR AT DANA CORPORATION .....	13
EP-15 Permit Condition 1 .....	13
10 CSR 10-6.060 <i>Construction Permits Required</i> , Permit Number: 082003-003, Special Condition 1.A. ....	13
EP-15 Permit Condition 2.....	14

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10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds .....	14
EP-15 Permit Condition 3 .....	15
40 CFR Part 63, MACT Subpart ZZZZ 63.6590(b)(1)(ii) & 63.6645(f) .....	15
WATER TREATMENT PLANT GROUP .....	15
Water Treatment Plant Group Permit Condition 1 .....	15
10 CSR 10-6.060 <i>Construction Permits Required</i> , Permit Number: 042004-013, Special Condition 2.A. ....	15
Water Treatment Plant Group Permit Condition 2 .....	15
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds .....	15
Water Treatment Plant Group Permit Condition 3 .....	16
40 CFR Part 63, MACT Subpart ZZZZ 63.6590(b)(3) .....	16
MISSOURI BOOK SERVICES (MBS) AND STATE FARM INSURANCE GROUP .....	17
MBS and State Farm Insurance Group Permit Condition 1 .....	17
10 CSR 10-6.060 <i>Construction Permits Required</i> , Permit Number: 122007-006, Special Condition 1.A. ....	17
MBS and State Farm Insurance Group Permit Condition 2 .....	17
10 CSR 10-6.060 <i>Construction Permits Required</i> , Permit Number: 122007-006, Special Condition 2.A. ....	17
MBS and State Farm Insurance Group Permit Condition 3 .....	17
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds .....	17
MBS and State Farm Insurance Group Permit Condition 4 .....	18
40 CFR Part 60, NSPS Subpart III .....	18
MBS and State Farm Insurance Group Permit Condition 5 .....	19
40 CFR Part 63, MACT Subpart ZZZZ 63.6590(b)(1)(ii) & 63.6645(f) .....	19
EP-29 EMERGENCY GENERATOR .....	20
EP-29 Permit Condition 1 .....	20
40 CFR Part 60, NSPS Subpart JJJ .....	20
STACKS GROUP .....	21
Stacks Group Permit Condition 1 .....	21
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants .....	21
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>22</b>
<b>V. GENERAL PERMIT REQUIREMENTS .....</b>	<b>31</b>
<b>VI. ATTACHMENTS .....</b>	<b>37</b>
ATTACHMENT A .....	38
Fugitive Emission Observations .....	38
ATTACHMENT B .....	39
Opacity Emission Observations .....	39
ATTACHMENT C .....	40
Method 9 Opacity Emissions Observations .....	40
ATTACHMENT D .....	41
Inspection/Maintenance/Repair/Malfunction Log .....	41
ATTACHMENT E .....	42
NO <sub>x</sub> Compliance Tracking Record From 092000-018 .....	42
ATTACHMENT F .....	43
NO <sub>x</sub> Compliance Worksheet From 082003-003 .....	43
ATTACHMENT G .....	44
NO <sub>x</sub> Compliance Worksheet (EP-17 and EP-19) From 042004-013 .....	44
ATTACHMENT H .....	45
NO <sub>x</sub> Compliance Worksheet for EP-21, EP-23, EP-25 and EP-27 From 122007-006 .....	45

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

The permittee operates a coal-fired power plant and several diesel generators, which are used for emergency backup and peak shaving. This installation can burn coal, distillate fuel oil, natural gas and acceptable biomass fuels; specifically wood chips and switchgrass pellets.

The permittee has two coal-fired boilers (Boilers #6 and #7) and one natural gas fired boiler (Boiler #8). Boiler #6 was constructed in 1957, Boiler #7 was constructed in 1965, and Boiler #8 was constructed in 1970. Combustion Turbine #6, constructed in 1963, is a natural gas combustion turbine with a rated output of 12.5 MW and is also used as a peaking unit. Boiler #6 serves Generator #5 with a rated output of 16.5 MW. Boiler #7 serves Generator #7 with a rated output of 22.0 MW. Boiler #8 serves Generator #8 with a rated output of 35.0 MW.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2009	24 <sup>1</sup>	1	909	305	1	118	0	28
2008	29 <sup>2</sup>	27	1,079	376	2	137	0	35
2007	2	0	1,113	345	1	136	0	37
2006	3	0	1,204	285	2	125	0	34
2005	3	1	993	285	2	112	0	30

### EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Emission Point Description	Equipment Number
EP-01	Boiler Unit #6	382
EP-02	Boiler Unit #7	16935
EP-03	Boiler Unit #8	22765
EP-08A	Coal Transfer System – includes north transfer systems	
EP-08B	Coal Transfer System – includes north and south transfer systems	
EP-11	Shelter Insurance diesel Generator #1	3512B/CCMC00125
EP-12	Shelter Insurance diesel Generator #2	3512B/CCMC00128
EP-15	DANA Corporation diesel generators	2000DQKC/F010257477
EP-17	Water Treatment Plant (WTP) diesel Generator #1	20000QKC/I010287041
EP-19	Water Treatment Plant (WTP) diesel Generator #2	2000DQKC/I010287042
EP-21	MBS 1 (West)	DQFAD/D080174013A
EP-23	MBS 1 (East)	DQFAD/D080174004A

<sup>1</sup> This is the sum of PM<sub>10</sub> and PM Condensables.

<sup>2</sup> This is the sum of PM<sub>10</sub> and PM Condensables.

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
EP-25	State Farm 1 (North)	DQFAD/E080183349A
EP-27	State Farm 1 (South)	DQFAD/E080183348A
EP-29	Natural gas fired emergency generator	QT13068ANAY
S-5, S-6	Stacks	

**EMISSION UNITS WITHOUT LIMITATIONS**

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

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
INS-01	Parts washer – water based	
INS-04	Two 250 gallon above ground fuel oil tanks	
EP-07	Gas Turbine Unit 6	W1-71
EP-13	Diesel Storage Tank #1, 1,250 gal	
INS-06	Water treatment (Chlorination Units)	
INS-07	Water treatment (6,000 gallon sulfuric acid tank)	
EP-14	Diesel Storage Tank #2, 1,250 gal	
EP-16	Diesel Storage Tank #3, 3,000 gal	
EP-18	Diesel Storage Tank #4, 3,000 gal	
EP-20	Diesel Storage Tank #5, 3,000 gal	
EP-22	Diesel Storage Tank #6, 1,500 gal	
EP-24	Diesel Storage Tank #7, 1,500 gal	
EP-26	Diesel Storage Tank #8, 1,500 gal	
EP-28	Diesel Storage Tank #9, 1,500 gal	
INS-08	Paved haul road for biomass delivery	
INS-09	Truck unloading of biomass	
INS-10	Biomass storage pile loadout	

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

1. Correspondence dated August 4, 2009, from Ms. Kyra L. Moore (Permits Section Chief, Missouri Air Pollution Control Program) addressed to Mr. Tad Johnsen (Power Plant Superintendent, Columbia Water and Light Department).<sup>3</sup>
2. Acid Rain Permit OP2007-072
3. Construction Permit 122007-006 Section (5) four diesel generators and storage tanks.
4. Construction Permit 042004-013 Section (5) diesel generator
5. Construction Permit 082003-003 Section (5) diesel generator
6. Construction Permit 092000-018 Section (5) diesel generators and storage tanks

<sup>3</sup> Construction permit 042008-003 expired March 10, 2010, and was replaced by the referenced correspondence.

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## II. Plant Wide Emission Limitations

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

### **Monitoring:**

The permittee shall calibrate, maintain and operate all emission monitoring instruments and emission control equipment according to the manufacturer's recommendations.

### **Recordkeeping:**

The permittee shall record all inspections and corrective actions on the appropriate forms.

### **Reporting<sup>4</sup>:**

1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance, to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. The permittee shall submit an annual certification<sup>5</sup> 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by April 1<sup>st</sup>, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5<sup>th</sup> Street, Kansas City, KS 66101, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

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<sup>4</sup> Refer to Section V. General Permit Requirements, **10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements**, page 31, for additional details, including semi-annual reporting of monitoring data.

<sup>5</sup> Refer to Section V. General Permit Requirements, 10 CSR 10-6.065(6)(C)3.E Compliance Certification, page 32, for more details.

### 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.

<b>Group 1 Boilers</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
EP-01	Boiler Unit #6	382	spreader stoker boiler	Springfield Boiler Co.	1957
EP-02	Boiler Unit #7	16935	spreader stoker boiler	Erie City Iron Works	1965

<p style="text-align: center;"><b>Group 1 Permit Condition 1</b> 10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating 40 CFR Part 64 Compliance Assurance Monitoring</p>
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**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.26 pounds per million BTU of heat input.

**Monitoring:**

Table 1. Columbia Municipal Power Plant - CAM Monitoring Approach for Boiler 6 and Boiler 7	
Particulate Matter (PM) Compliance Indicator	
Indicator	Opacity
Measurement Approach	Continuous Opacity Monitoring System (COMS)
Indicator Range	<p>Based on information supplied by the Permittee, typical opacity levels during normal operation is in the range of 2-5%.</p> <p>An excursion is defined as a 1-hour block average opacity equal to or greater than 21%. Excursions trigger an inspection, corrective action, and a reporting requirement. The excursion level may be modified if indicated based upon results of future performance testing.</p> <p>Performance testing for compliance with the applicable PM emission limit shall be performed within 1 year of issuance or the Part 70 permit renewal, and every 3 years thereafter for the life of the Part 70 permit, unless that permit has been legally modified.</p>
Performance Criteria	
Data Representativeness	Both boilers discharge to a common emission control device (i.e., a 10-compartment, reverse air cleaning baghouse) and a common stack with full bypass capability. The common stack is equipped with a COMS located downstream of the baghouse. The COMS complies with the applicable version of 40 CFR Part 60, Appendix B, Performance Specification 1 (PS-1).
Verification of Operational Status	Not applicable since the selected monitoring approach utilizes existing COMS that were initially installed and evaluated per the applicable version of PS-1.
QA/QC Practices and Criteria	Perform a daily zero and calibration drift check, periodic cleaning of optical surfaces and other periodic QA/QC checks as specified in applicable version of PS-1.
Monitoring Frequency	Continuous [i.e., the COMS is to complete a minimum of one cycle (i.e., sampling, analyzing, and data recording) for each successive 10-second period].
Data Collection Procedure	
Averaging Period	The data acquisition system is to reduce the 10-second data points to 6-minute and 1-hour block averages.
Reporting	Summary information on the number, duration, and cause for any excursions and COMS downtime will be reported on a semiannual basis in the installation's Part 70 semiannual monitoring report that is submitted in accordance with 10 CSR 10-6.065.

<p><b>Group 1 Permit Condition 2</b>          10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds</p>
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**Emission Limitation:**

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere in excess of eight pounds (8 lbs.) of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three (3)-hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (μg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 μg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 μg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 μg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 μg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 μg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Monitoring:**

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.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. The permittee shall report the annual average sulfur content in the annual emission inventory report.

**Group 1 Permit Condition 3**  
 10 CSR 10-6.270 Acid Rain Source Permits Required  
 40 CFR Part 72 through Part 76

**Emission Limitation:**

Emissions of sulfur dioxide shall not exceed the total number of allowances the installation holds in accordance with 40 CFR 72.9 and issued Acid Rain Permit OP2007-072<sup>6</sup>.

**Monitoring:**

The permittee shall follow all appropriate monitoring requirements detailed in 40 CFR 72 through 76.

**Record Keeping:**

The permittee shall follow all appropriate record keeping requirements detailed in 40 CFR 72 through 76.

**Reporting:**

The permittee shall follow all appropriate reporting requirements detailed in 40 CFR 72 through 76.

<sup>6</sup> The acid rain permit expires December 31, 2011.

**Group 1 Permit Condition 4**

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  
 10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program  
 10 CSR 10-6.368 Control of Mercury Emissions From Electric Generating Units

**Emission Limitation:**

The permittee shall obtain CAIR Source Permit for Boilers #6 and #7.

**Monitoring/Record Keeping:**

The permittee shall retain the most current CAIR permit issued to this installation on-site.

<b>EP-03 Boiler</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
EP-03	Boiler Unit #8	22765	Natural Gas Fired Boiler	Babcock & Wilcox	1970

**EP-03 Permit Condition 1**

10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter  
 From Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.26 pounds per million BTU of heat input.

**EP-03 Permit Condition 2**

10 CSR 10-6.270 Acid Rain Source Permits Required  
 40 CFR Part 72 through Part 76

**Emission Limitation:**

Emissions of sulfur dioxide shall not exceed the total number of allowances the installation holds in accordance with 40 CFR 72.9 and issued Acid Rain Permit # OP2007-072<sup>7</sup>.

**Monitoring:**

The permittee shall follow all appropriate monitoring requirements detailed in 40 CFR 72 through 76.

**Record Keeping:**

The permittee shall follow all appropriate record keeping requirements detailed in 40 CFR 72 through 76.

**Reporting:**

The permittee shall follow all appropriate reporting requirements detailed in 40 CFR 72 through 76.

<sup>7</sup> The acid rain permit expires December 31, 2011.

**EP-03 Permit Condition 3**

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  
 10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program

**Emission Limitation:**

The permittee shall obtain a CAIR Source Permit for Boiler #8.

**Monitoring/Record Keeping:**

The permittee shall retain the most current CAIR permit issued to this installation on-site.

**Group EP-08A - North Coal Transfer System**

Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
EP-08	north transfer systems		North coal conveyor, load-out to north bucket elevator North coal bucket elevator North coal train unloading		pre-1971

**EP-08A Permit Condition Group 1**

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

The permittee shall not discharge into the atmosphere from this group any visible emissions in excess of forty percent (40%).<sup>8</sup>

**Group EP-08B – South Coal Transfer System**

Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
EP-08	south transfer systems		South coal conveyor, load-out to storage pile South coal conveyor, load-out to south bucket elevator Screw conveyor, bucket elevator to storage bunkers South coal bucket elevator South coal train unloading		post-1971

**EP-08B Permit Condition Group 1**

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

The permittee shall not discharge into the atmosphere from this group any visible emissions in excess of twenty percent (20%).<sup>9</sup>

<sup>8</sup> Refer to *Core Requirement* 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, page 27, for monitoring, record keeping and reporting.

<sup>9</sup> Refer to *Core Requirement* 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, page 27, for monitoring, record keeping and reporting.

Shelter Insurance Group					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
EP-11	Shelter Unit #1	3512B/CCMC00125	diesel powered generator	Caterpillar	1999
EP-12	Shelter Unit #2	3512B/CCMC00128			

**Shelter Insurance Group Permit Condition 1**

10 CSR 10-6.060 *Construction Permits Required*,  
Permit Number: 092000-018, Special Condition 1.A.<sup>10</sup>

**Emission Limitation:**

The permittee shall not emit more than 40.0 tons of NO<sub>x</sub> from the two (2) diesel power generators located at Shelter Insurance building in the City of Columbia, in any consecutive twelve-month period.

**Record Keeping:**

The permittee shall use Attachment E or equivalent form approved by the Department, to demonstrate compliance with this condition.

**Shelter Insurance Group Permit Condition 2**

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

**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) of sulfuric acid or sulfur trioxide or any combination of those gases per cubic meter averaged on any consecutive three hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ))	Annual arithmetic mean
	0.14 ppm (365 $\mu\text{g}/\text{m}^3$ )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$ )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times in any 5 consecutive days

<sup>10</sup> The permittee requested this limit as a part of the application.

Pollutant	Concentration by Volume	Remarks
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Monitoring:**

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.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. The permittee shall report the annual average sulfur content in the annual emission inventory report.

**Shelter Insurance Group Permit Condition 3**  
 40 CFR Part 63, MACT Subpart ZZZZ  
 63.6590(b)(3)

**Emission Limitation:**

The permittee will demonstrate less than 100 hours of operation annually in order to qualify as a “limited use stationary RICE”.

**Record Keeping:**

The permittee will keep track of the date, time and duration that each unit operates and a cumulative total for the year in order to demonstrate that each unit operates less than 100 hours annually and meets the definition of limited use in the rule.

<b>EP-15 Diesel generator at DANA Corporation</b>					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
EP-15	Diesel generator at DANA Corporation	2000DQKC/F010257477	diesel powered generator	Onan	2003

**EP-15 Permit Condition 1**  
 10 CSR 10-6.060 *Construction Permits Required*,  
 Permit Number: 082003-003, Special Condition 1.A.<sup>11</sup>

**Emission Limitation:**

City of Columbia – DANA Corporation shall emit less than forty (40) tons nitrogen oxides (NO<sub>x</sub>) from the 2000 KW peaking unit in any consecutive twelve (12) month period.

<sup>11</sup> City of Columbia - DANA Corporation voluntarily requested to establish this emission limitation. The Missouri Air Pollution Control Program granted the City of Columbia - DANA Corporation’s request to establish this emission limitation under the authority provided by Missouri Rule 10 CSR 10-6.060 Paragraphs (6)(E)3. and (12)(A)10. Without the voluntary limit, the review would have been conducted under 10 CSR 10-6.060 Section (8) Attainment and Unclassified Area Permits (Prevention of Significant Deterioration).

**Record Keeping:**

The permittee shall use Attachment F or equivalent form approved by the Department, to demonstrate compliance with this condition.

**EP-15 Permit Condition 2**  
 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

**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) of sulfuric acid or sulfur trioxide or any combination of those gases per cubic meter averaged on any consecutive three hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ))	Annual arithmetic mean
	0.14 ppm (365 $\mu\text{g}/\text{m}^3$ )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$ )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 $\mu\text{g}/\text{m}^3$	24-hour average not to be exceeded more than once in any 90 consecutive days

**Monitoring:**

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.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. The permittee shall report the annual average sulfur content in the annual emission inventory report.

**EP-15 Permit Condition 3**  
 40 CFR Part 63, MACT Subpart ZZZZ  
 63.6590(b)(1)(ii) & 63.6645(f)

**Emission Limitation:**

The permittee will demonstrate less than 100 hours of operation annually in order to qualify as a “limited use stationary RICE”.

**Record Keeping:**

The permittee will keep track of the date, time and duration that each unit operates and a cumulative total for the year in order to demonstrate that each unit operates less than 100 hours annually and meets the definition of limited use in the rule.

**Reporting:**

If the permittee is required to submit an Initial Notification but is otherwise not affected by the requirements of this subpart, in accordance with 63.6590(b), your notification should include the information in 63.9(b)(2)(i) through (v), and a statement that your stationary RICE has no additional requirements and explain the basis of the exclusion.

Water Treatment Plant Group					
Emission Point	Emission Point Description	Equipment Number	Equipment Description	Mfgr	Install Date
EP-17	Unit #1	20000QKC/I010287041	diesel powered	Onan	2003
EP-19	Unit #2	2000DQKC/I010287042	generators		

**Water Treatment Plant Group Permit Condition 1**

10 CSR 10-6.060 *Construction Permits Required*,  
 Permit Number: 042004-013, Special Condition 2.A.<sup>12</sup>

**Emission Limitation:**

The permittee shall emit less than forty (40) tons nitrogen oxides (NO<sub>x</sub>) from the two 2000 kW peaking units in any consecutive twelve (12) month period.

**Record Keeping:**

The permittee shall use Attachment G or equivalent form approved by the Department, to demonstrate compliance with this condition.

**Water Treatment Plant Group Permit Condition 2**

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

**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.

<sup>12</sup> City of Columbia voluntarily requested to establish this emission limitation. The Missouri Air Pollution Control Program granted the City of Columbia’s request to establish this emission limitation under the authority provided by Missouri Rule 10 CSR 10-6.060 Paragraphs (6)(E)3. and (12)(A)10. Without the voluntary limit, the review would have been conducted under 10 CSR 10-6.060 Section (8) Attainment and Unclassified Area Permits (Prevention of Significant Deterioration).

2. Stack gasses shall not contain more than thirty-five milligrams (35 mg) of sulfuric acid or sulfur trioxide or any combination of those gases per cubic meter averaged on any consecutive three hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 µg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Monitoring:**

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.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. The permittee shall report the annual average sulfur content in the annual emission inventory report.

**Water Treatment Plant Group Permit Condition 3**  
 40 CFR Part 63, MACT Subpart ZZZZ  
 63.6590(b)(3)

**Emission Limitation:**

The permittee will demonstrate less than 100 hours of operation annually in order to qualify as a “limited use stationary RICE”.

**Record Keeping:**

The permittee will keep track of the date, time and duration that each unit operates and a cumulative total for the year in order to demonstrate that each unit operates less than 100 hours annually and meets the definition of limited use in the rule.

<b>Missouri Book Services (MBS) and State Farm Insurance Group</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
EP-21	MBS Unit #1 (West)	DQFAD/D080174013A	diesel powered generator	Cummins	2008
EP-23	MBS Unit #2 (East)	DQFAD/D080174004A	diesel powered generator	Cummins	2008
EP-25	State Farm Unit #1 (North)	DQFAD/E080183349A	diesel powered generator	Cummins	2008
EP-27	State Farm Unit #2 (South)	DQFAD/E080183348A	diesel powered generator	Cummins	2008

**MBS and State Farm Insurance Group Permit Condition 1**  
 10 CSR 10-6.060 *Construction Permits Required*,  
 Permit Number: 122007-006, Special Condition 1.A.<sup>13</sup>

**Emission Limitation:**

City of Columbia - Remote Generators at MBS and State Farm located in the City of Columbia shall emit less than 40 tons of nitrogen oxides (NO<sub>x</sub>) in any consecutive twelve-month period from the four diesel generators.

**Record Keeping:**

The permittee shall use Attachment H or equivalent form approved by the Department, to demonstrate compliance with this condition.

**MBS and State Farm Insurance Group Permit Condition 2**  
 10 CSR 10-6.060 *Construction Permits Required*,  
 Permit Number: 122007-006, Special Condition 2.A.

**Operation Limitation/Equipment Specifications:**

The permittee shall fire only No. 2 fuel oil with sulfur content not greater than 0.05 percent by weight in the four diesel generators.

**Monitoring:**

The permittee shall demonstrate compliance by obtaining the fuel oil sulfur content from the fuel vendor or testing each shipment of fuel in accordance with American Society of Testing and Materials (ASTM) Method D (2622-98), Sulfur in Petroleum Products by X-Ray Fluorescence Spectrometry.

**MBS and State Farm Insurance Group Permit Condition 3**  
 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

**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.

<sup>13</sup> City of Columbia voluntarily requested to establish this emission limitation. The Missouri Air Pollution Control Program granted the City of Columbia's request to establish this emission limitation under the authority provided by Missouri Rule 10 CSR 10-6.060 Paragraphs (6)(E)3. and (12)(A)10. Without the voluntary limit, the review would have been conducted under 10 CSR 10-6.060 Section (8) Attainment and Unclassified Area Permits (Prevention of Significant Deterioration).

2. Stack gasses shall not contain more than thirty-five milligrams (35 mg) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) of May 30, 2004 version & 10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 µg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Monitoring:**

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.

**Record Keeping:**

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. The permittee shall report the annual average sulfur content in the annual emission inventory report.

**MBS and State Farm Insurance Group Permit Condition 4**

40 CFR Part 60, NSPS Subpart IIII

**Operational Limitations:**

1. You must operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4204 according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. [§60.4206]
2. Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a). [§60.4207(a)]
  - a) Sulfur content: 500 parts per million (ppm) maximum; and [§80.51 O(a)(1)]
  - b) A minimum cetane index of 40; or a maximum aromatic content of 35 volume percent. [§80.51 O(a)(2)(i) and (ii)]

3. Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [§60.4207(b)]
  - a) Sulfur content: 15 ppm maximum for nonroad diesel fuel; and [§80.510(b)(1)(i)]
  - b) A minimum cetane index of 40; or a maximum aromatic content of 35 volume percent. [§80.510(b)(2)(i) and (ii)]
4. Owners and operators of pre-2011 model year stationary CI ICE subject to this subpart may petition the Administrator for approval to use remaining non-compliant fuel that does not meet the fuel requirements of Paragraphs (a) and (b) of this section beyond the dates required for the purpose of using up existing fuel inventories. If approved, the petition will be valid for a period of up to 6 months. If additional time is needed, the owner or operator is required to submit a new petition to the Administrator. [§60.4207(c)]

**Record Keeping:**

The permittee shall maintain an accurate record of the diesel fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and compliant content will be acceptable.

**Reporting:**

The permittee shall certify annually that the affected units have been operated and maintained according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer.

**MBS and State Farm Insurance Group Permit Condition 5**

40 CFR Part 63, MACT Subpart ZZZZ  
63.6590(b)(1)(ii) & 63.6645(f)

**Emission Limitation:**

The permittee will demonstrate less than 100 hours of operation annually in order to qualify as a "limited use stationary RICE".

**Record Keeping:**

The permittee will keep track of the date, time and duration that each unit operates and a cumulative total for the year in order to demonstrate that each unit operates less than 100 hours annually and meets the definition of limited use in the rule.

**Reporting:**

If the permittee is required to submit an Initial Notification but is otherwise not affected by the requirements of this subpart, in accordance with 63.6590(b), your notification should include the information in 63.6590(b)(2)(i) through (v), and a statement that your stationary RICE has no additional requirements and explain the basis of the exclusion.

<b>EP-29 emergency generator</b>					
<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>	<b>Equipment Description</b>	<b>Mfgr</b>	<b>Install Date</b>
EP-29	natural gas fired emergency generator	QT13068ANAY			2010

<p><b>EP-29 Permit Condition 1</b>          40 CFR Part 60, NSPS Subpart JJJJ</p>
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**Operational Limitation:**

You must operate and maintain stationary spark ignition (SI) internal combustion engines (ICE) that achieves the emission standards as required in §60.4233 over the entire life of the engine.

**Compliance Requirements for Owners and Operators:**

1. You must demonstrate compliance according to one of the methods specified in Subsection (1)(A) or (1)(B) of this section. [§60.4243(b)]
  - a) Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in Paragraph §60.4243(a) of this section (included below). [§60.4243(b)(1)]
    - i. If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. [§60.4243(a)(1)]
    - ii. If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to §60.4243 (a)(2)(i) through (iii), as appropriate. [§60.4243(a)(2)]
  - b) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in §60.4233(d) or (e) and according to the requirements specified in §60.4244, as applicable, and according to Paragraph §60.4243(b)(2)(i) (included below). [§60.4243(b)(2)]
    - i. You must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup to demonstrate compliance. [§60.4243(b)(2)(i)]
2. Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines,

any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited. [§60.4243(d)]

3. Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operation, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233. [§60.4243(e)]

**Notifications, Reporting and Recordkeeping:**

Owners or operators of stationary SI ICE must meet the following notification, reporting and record keeping requirements. [§60.4245]

1. You must keep records of the information in Subsections (1)(A) through (1)(D) of this section. [§60.4245(a)]
  - a) All notifications submitted to comply with this subpart and all documentation supporting any notification. [§60.4245(a)(1)]
  - b) Maintenance conducted on the engine. [§60.4245(a)(2)]
  - c) For a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable. [§60.4245(a)(3)]
  - d) For a non-certified engine or a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards. [§60.4245(a)(4)]
2. If subject to performance testing, you must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. [§60.4245(d)]

<b>Stacks Group</b>	
<b>ERP ID</b>	<b>ERP Description</b>
S-5	Main Stack
S-6	Boiler Unit Eight

**Stacks Group Permit Condition 1**  
 10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

The permittee shall not discharge into the atmosphere from this group any visible emissions in excess of forty percent (40%).<sup>14</sup>

<sup>14</sup> Refer to *Core Requirement* 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, page 27, for monitoring, record keeping and reporting.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - (B) Yard waste, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
      - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
      - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
      - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) 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.
- (4) Columbia Municipal Power Plant may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Columbia Municipal Power Plant fails to comply with the provisions or any condition of the open burning permit.
  - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

<b>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</b>
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- 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 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 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.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **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 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

#### **10 CSR 10-6.100 Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

#### **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) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) 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.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **40 CFR Part 98 Mandatory Greenhouse Gas Reporting**

##### *§ 98.1 Purpose and scope.*

- 1) This part establishes mandatory greenhouse gas (GHG) reporting requirements for owners and operators of certain facilities that directly emit GHG as well as for certain fossil fuel suppliers and industrial GHG suppliers. For suppliers, the GHGs reported are the quantity that would be emitted from combustion or use of the products supplied.
- 2) Owners and operators of facilities and suppliers that are subject to this part must follow the requirements of subpart A and all applicable subparts of this part. If a conflict exists between a provision in subpart A and any other applicable subpart, the requirements of the subparts B through PP of this part shall take precedence.

#### **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**

**Emission Limitation:**

- 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.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.
    - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

#### **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 10-3.090 Restriction of Emission of Odors** **This requirement is not federally enforceable.**

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.

#### **10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants**

##### **Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

##### **Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.

- (2) If a violation is noted, 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.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

**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.
  - 5) 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's 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 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 semi-annual report shall be reported on the schedule specified in this permit, and no later than ten 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 days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten 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)3.E Compliance Certification**

Compliance certification. The permit must include requirements for certification of compliance with terms and conditions contained in the permit that are federally enforceable, including emissions limitations, standards or work practices. The permit shall specify—

- 1) The frequency (which shall be annually unless the applicable requirement specifies submission more frequently) of compliance certifications;
- 2) The means for monitoring compliance with emissions limitations, standards and work practices contained in applicable requirements;
- 3) A requirement that the compliance certification include the following:
  - i) The identification of each term or condition of the permit that is the basis of the certification;
  - ii) The permittee's current compliance status, as shown by monitoring data and other information reasonably available to the permittee;
  - iii) Whether compliance was continuous or intermittent;
  - iv) The method(s) used for determining the compliance status of the installation, currently and over the reporting period; and
  - v) Such other facts as the permitting authority may require to determine the compliance status of the source;
- 4) A requirement that all compliance certifications be submitted to the administrator as well as to the permitting authority;
- 5) Additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the Act; and
- 6) Any other provisions as the permitting authority may require.

#### **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.

**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)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 semi-annually (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's 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street,

Kansas City, KS 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven 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 Air Pollution Control Program 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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 Tad A. Johnsen, Power Plant Superintendent. 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 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) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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 C**

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 March 16, 2004, and found to be complete May 28, 2004;
- 2) 2008 Emissions Inventory Questionnaire;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

In reviewing of the application, the permitting authority has determined that the installation is subject to the following regulation(s) for the reasons stated.

#### **10 CSR 10-6.362 Clean Air Interstate Rule Annual NO<sub>x</sub> Trading Program**

and

#### **10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO<sub>x</sub> Trading Program**

(This CAIR program was adopted after the permittee submitted their application.) Units 6, 7 and 8 are subject based on the following:

*(1) Applicability.*

*(A) Except as provided in Subsection (1)(B) of this rule—*

*1. The following units in this state shall be Clean Air Interstate Rule (CAIR) nitrogen oxides (NO<sub>x</sub>) units, and any source that includes one (1) or more such units shall be a CAIR NO<sub>x</sub> source, subject to the requirements of this rule: any stationary, fossil-fuel-fired boiler or stationary, fossil-fuel-fired combustion turbine serving at any time, since the later of November 15, 1990, or the startup of the unit's combustion chamber, a generator with nameplate capacity of more than twenty-five (25) megawatts electric (MWe) producing electricity for sale.*

#### **10 CSR 10-6.366 Clean Air Interstate Rule SO<sub>x</sub> Trading Program**

(This CAIR program was adopted after the permittee submitted their application.) Units 6 and 7 are subject based on the following:

*(1) Applicability.*

*(A) Except as provided in Subsection (1)(B) of this rule:*

*1. The following units in this state shall be Clean Air Interstate Rule (CAIR) sulfur dioxide (SO<sub>2</sub>) units, and any source that includes one or more such units shall be a CAIR SO<sub>2</sub> source, subject to the requirements of this rule: any stationary, fossil-fuel-fired boiler or stationary, fossil-fuel-fired combustion turbine serving at any time, since the later of November 15, 1990, or the startup of the unit's combustion chamber, a generator with nameplate capacity of more than twenty-five (25) megawatts electric (MWe) producing electricity for sale.*

**10 CSR 10-6.368 Control of Mercury Emissions From Electric Generating Units**

(This CAMR program was adopted after the permittee submitted their application.) Units 6 and 7 are subject based on the following:

*(1) Applicability.*

*(A) Except as provided in Subsection (1)(B) of this rule—*

*1. The following units in this state shall be mercury (Hg) Budget units, and any source that includes one (1) or more such units shall be an Hg Budget source, subject to the requirements of this rule: Any stationary, coal-fired boiler or stationary, coal-fired combustion turbine serving at any time, since the later of November 15, 1990, or the startup of the unit's combustion chamber, a generator with nameplate capacity of more than twenty-five (25) megawatts electric (MWe) producing electricity for sale.*

**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 does not apply because the installation is in an ozone attainment area.

**40 CFR Part 60, NSPS Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971**

The permittee does not have any boilers that meet the applicability requirements of Subpart D, The Power Plant has two coal fired boilers (Boilers #6 & #7) and one natural gas fired boiler (Boiler #8). Boiler #6 was constructed in 1957, and has a maximum design rate of 248 million BTUs per hour. Boiler #7 was constructed in 1965, and has a maximum design rate of 271 million BTUs per hour and Boiler #8 was constructed in 1970, and has a maximum design rate of 422 million BTUs per hour. The boilers were constructed before 1971, and therefore are not subject to Subpart D by 40 CFR 60.40(c).

*Except as provided in Paragraph (d) of this section any facility under Paragraph (a) of this section that commenced construction or modification after August 17, 1971, is subject to the requirements of this subpart.*

**40 CFR Part 60, NSPS Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978**

Columbia Municipal Power Plant does not have any boilers that meet the applicability requirements of Subpart Da. 40 CFR 60.40a(a)(2). reads:

*For which construction or modification is commenced after September 1, 1978.*

**40 CFR Part 60, NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units**

The permittee does not have any boilers that meet the applicability requirements of Subpart Db. 40 CFR 60.40b(a) reads:

*The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour),*

**40 CFR Part 60, NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

The permittee does not have any boilers that meet the applicability requirements of Subpart Dc. The boilers were constructed before 1971, and therefore are not subject to Subpart Dc. 40 CFR 60.40c(a) reads:

*Except as provided in Paragraph (d) of this section the affected facility to which this subpart applies is each steam generating unit for which construction, modification or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).*

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

The permittee does not have any stationary gas turbines that meet the applicability requirements for Subpart GG. The permittee has a natural gas fired turbine with a maximum design rate of 189 million Btu per hour that was constructed in 1963. The turbine was constructed before 1977 and therefore it is not subject to Subpart GG. 40 CFR 60.330(b) reads:

*Any facility under Paragraph (a) of this section which commences construction, modification or reconstruction after October 3, 1977 is subject to the requirements of this part except as provided in Paragraphs (e) and (f) of §60.332.*

**40 CFR Part 60, NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978**

The permittee does not have any storage tanks that meet the applicability requirements of Subpart K. The Power Plant has two tanks for the storage of No. 2 fuel oil. One tank has a capacity of 480,580 gallons (EP-04) while the other tank has a capacity of 2,320,704 gallons (EP-05).

Tank EP-04 was constructed in 1965, and is therefore not subject to Subpart K by 40 CFR 60.110(c)(2), which reads:

Subject to the requirements of this subpart is any facility under Paragraph (a) of this section which:

Has a capacity greater than 246,052 liters (65,000 gallons) and commences construction or modification after June 11, 1973, and prior to May 19, 1978.

Tank EP-05 was constructed in 1975, but is not subject to Subpart K. Subpart K applies only to storage tanks for petroleum liquids. No. 2 fuel oil is not considered petroleum liquid by 40 CFR 60.111 (b), which reads:

*Petroleum liquids means petroleum, condensate, and any finished or intermediate products manufactured in a petroleum refinery but does not mean Nos. 2 through 6 fuel oils as specified in ASTM D396-78, 89, 90, 92, 96, or 98 gas turbine fuel oils Nos. 2-GT through 4-GT as specified in ASTM D2880-78 or 96 or diesel fuel oils Nos. 2-D and 4-D as specified in ASTM D975-78, 96, or 98a.*

*(These three methods are incorporated by reference-see §60.17.)*

**40 CFR Part 60, NSPS 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 permittee does not have any storage tanks that meet the applicability requirements of Subpart Ka. 40 CFR 60.110a(a) reads:

*Affected facility: Except as provided in Paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a storage capacity greater than 151,416 liters (4,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978.*

**40 CFR Part 60, NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

The permittee does not have any storage tanks that meet the applicability requirements of Subpart Kb. 40 CFR 60.110b(a) reads:

*Except as provided in Paragraph (b) of this section the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters ( $m^3$ ) that is used to store volatile organic liquids (VOL) for which construction; reconstruction or modification is commenced after July 23, 1984.*

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

The previous Part 70 Operating Permit for the permittee mistakenly contained requirements to comply with 40 CFR Part 60, NSPS Subpart Y. The Power Plant does not meet the applicability requirements of Subpart Y. The provisions of this subpart are only applicable to coal preparation facilities by 40 CFR 60.250 (a):

*The provisions of this subpart are applicable to any of the following affected facilities in coal preparation plants which process more than 181 Mg (200 tons) per day: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems.*

Columbia Municipal Power Plant does not meet the definition of a coal preparation facility as stated in 40 CFR 60.251(a):

*Coal preparation plant means any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying.*

The permittee does not process coal by breaking, crushing, screening, wet or dry cleaning, thermal drying, or any other method. Subpart Y was included in the initial application because the grating used at the coal unloading point was thought to be considered a screen. This grate is not considered a screening operation according to 40 CFR Part 60, NSPS Subpart 000. 40 CFR 60.671 reads:

*Screening operation means a device for separating material according to size by passing undersize material through one or more mesh surfaces (screens) in series, and retaining oversize material on the mesh surfaces (screens).*

The coal received at the Power Plant has already met the plant's size specifications as provided in a contract with the coal supplier. The grate is in place solely as a safety measure and does not separate or screen the coal in any manner. Thus there is not even a need for screening.

**Title 40 PART 60 — NSPS - Subpart KKKK—Standards of Performance for Stationary Combustion Turbines**

**§ 60.4300 What is the purpose of this subpart?**

This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005.

The only combustion turbine at this facility is EP-07 (Gas Turbine Unit 6, equipment number W1-71). This unit is not subject to this regulation due to the installation date being in 1963, well before the applicability date of the regulation of February 18, 2005.

**10 CSR 10-6.350 - Emission Limitation and Emissions Trading of Oxides of Nitrogen**

The permittee is exempt from this rule by 10 CSR 10-6.350(1)(F), which reads:

*(F) The requirements of Sections (3), (4), and (5) of this rule will not apply to any entity or source subject to and implementing the requirements of 10 CSR 10-6.364.*

**40 CFR Part 65 - Consolidated Federal Air Rule**

Boiler #8 is exempt from the requirements of 40 CFR Part 65 because it is a peaking unit.

Appendix E of 40 CFR Part 75 provides the following exemption for peaking units:

*1. Applicability*

*1.1 Unit Operation Requirements*

*This NO<sub>x</sub> emissions estimation procedure may be used in lieu of a continuous NO<sub>x</sub> emission monitoring system (lb/MMBtu) for determining the average NO<sub>x</sub> emission rate and hourly NO<sub>x</sub> rate from gas-fired peaking units and oil-fired peaking units as defined in §72.2 of this chapter. If a unit's operations exceed the levels required to be a peaking unit, the owner or operator shall install and certify a NO<sub>x</sub>-diluent continuous emission monitoring system no later than December 31 of the following calendar year. If the required CEMS has not been installed and certified by that date, the owner or operator shall report the maximum potential NO<sub>x</sub> emission rate (MER) (as defined in §72.2 of this chapter) for each unit operating hour; starting with the first unit operating hour after the deadline and continuing until the CEMS has been provisionally certified. The provision of §75.12 apply to excepted monitoring systems under this appendix.*

The definition of a peaking unit is provided at 40 CFR 72.2:

*Peaking unit means:*

*(1) A unit that has: (i) An average capacity factor of no more than 10.0 percent during the previous three calendar years and (ii) A capacity factor of no more than 20.0 percent in each of those calendar years.*

40 CFR Part 72.6 provides the following exemptions:

*(1) A simple combustion turbine that commenced commercial operation before November 15, 1990.*

*(2) Any unit that commenced commercial operation before November 15, 1990 and that did not, as of November 15, 1990, and does not currently serve a generator with a nameplate capacity of greater than 25 MW.*

### **10 CSR 10-6.061 Construction Permit Exemptions**

The rule *10 CSR 10-6.060 Construction Permits Required* does not apply to the Generac (model/serial no. QT13068ANAY with a maximum hourly heat input capacity of 1.84 million Btus per hour) emergency generator according to the following exemption:

*(A) Exempt Emission Units.*

*1. The following combustion equipment is exempt from 10 CSR 10-6.060 if the equipment emits only combustion products, and the equipment produces less than one hundred fifty (150) pounds per day of any air contaminant:*

*A. Any combustion equipment using exclusively natural gas or liquefied petroleum gas or any combination of these with a capacity of less than ten (10) million British thermal units (Btus) per hour heat input;*

### **Construction Permit Revisions**

No construction permit revisions were made; however, Construction Permit 092003-019 is not incorporated by reference because it was superseded by Construction Permit 042004-013.

### **New Source Performance Standards (NSPS) Applicability**

The permittee does have emission units subject to the following federal regulations:

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

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

### **Maximum Achievable Control Technology (MACT) Applicability**

The permittee does have emission units subject to the following federal regulations:

#### **40 CFR Part 63, MACT Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

The permittee does not have any emission units subject to these federal regulations:

#### **40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS)**

### **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.

There are two units that are subject to the CAM requirements; Boiler #6 and Boiler #7. The permittee submitted Enclosure 1 below with their application, March 2004. The emission rate calculations show that Boilers #6 and #7 would be subject to the requirements of CAM. However, at the time of the application submittal, they were subject to 40 CFR Part 63, Subpart DDDDD, National Emission

Standards for Hazardous Air Pollutants from Industrial, Commercial, and Institutional Boilers and Process Heaters, which provided an exemption to the CAM requirements. Since that time, the Court of Appeals for the District of Columbia Circuit vacated Subpart DDDDD, and in turn removed the permittee's exemption. Therefore, as the emission calculations demonstrate, the permittee is now subject to the requirements of CAM. The statements of exemption found in Enclosure 1 are no longer available.

**Other Regulatory Determinations**

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

*(3)(C)2.A. Sulfur Dioxide per Million BTUs Analysis<sup>15</sup>*

This analysis was done at maximum design rate. Since the analysis demonstrates that these units are well in compliance under their highest emission rate, this demonstrates they will always be in compliance with (3)(C)2.A.

Unit Descript.	BOILER UNIT #6	BOILER UNIT #7
Maximum Fuel Usage Per Hour from 2008 EIQ	9.36	14.01
Emission Factor from 2008 EIQ	42.75	42.75
Emission Factor Unit of Measure	LBS./TONS	LBS./TONS
Maximum Hourly Emission Rate in lbs. per hour	400	599
Three Hour Max. Emission Rate in lbs. per hour	1,201	1,797
Maximum Hourly Design Rate in Millions of BTUs	248	371
Three Hour Max. Design Rate in Millions of BTUs	744	1113
Three Hour Average SOx Emission Rate in lbs. per Millions of BTUs	1.6	1.6
Three Hour SOx Emission Limit in lbs. per Millions of BTUs	8.0	8.0
Percent of Emission Limit (Compliance if less than 100%)	20.2%	20.2%

<sup>15</sup> This analysis does not include Boiler Unit #8. 10 CSR 10-6.260 provides an exemption for natural gas fired combustion equipment at Paragraph (1)(A)2.

**10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating**

*(4)(B) Particulate Matter per Million BTUs Analysis*

This analysis was done at maximum design rate. Since the analysis demonstrates that these units are well in compliance under their highest emission rate, this demonstrates they will always be in compliance with (4)(B).

<b>Unit Descript.</b>	<b>BOILER UNIT #6</b>	<b>BOILER UNIT #7</b>	<b>BOILER UNIT #8</b>
Maximum Fuel Usage Per Hour from 2008 EIQ	9.36	14.01	0.40
Emission Factor from 2008 EIQ	1.09	1.09	7.60
Emission Factor Unit of Measure	LBS./TONS	LBS./TONS	LBS./MILLION CUBIC FEET
Maximum Hourly Emission Rate in lbs. per hour	10.24	15.30	3.06
Maximum Hourly Design Rate in Millions of BTUs	248	371	422
Hourly PM10 Emission Rate in lbs. per Millions of BTUs	0.04	0.04	0.01
Percent of Emission Limit 0.26 lbs. per million BTUs (Compliance if less than 100%)	15.9%	15.9%	2.8%

**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 Air Pollution Control Program'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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Randy E. Raymond  
Environmental Engineer

### Enclosure 1. CAM Calculations

#### Columbia Municipal Power Plant CAM Determination

**Background:**

Emission Unit: EU0010 Boiler Unit 6 - Coal Fired  
 EU0020 Boiler Unit 7 - Coal Fired  
 Installation year: B6 - 1957, B7 - 1965  
 Construction Permit: Not applicable at time of installations  
 Air Pollutant Controlled: PM<sub>10</sub>  
 Control Technology: Centrifugal Collector 75.00%  
 Fabric Filter High Temperature 99.00%  
 99.75% Overall Control Efficiency

**Applicability:**

1. Is the emission unit subject to an emission limitation or standard for the applicable regulated air pollutant?

yes  no

Per Conditions of Operating Permit #: OP1999109

10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning  
 Equipment Used for Indirect Heating

Particulate Matter Emission Limitation: 0.26 pounds per million BTU

2. Is the control device used to achieve compliance with the emission limitation or standard?

yes  no

Boiler	Fuel Type	MHDR (MMBtu/hr)	MHDR (fuel tons/hr)
Boiler Unit 6	Bituminous Coal	248	8.83
Boiler Unit 7	Bituminous Coal	371	13.21
Total		619	22.04

MHDR = 22.04 tons/hr  
 PM Emission Factor\* = 66 lbs/ton fuel combusted  
 Pre-control Potential to Emit = 1,455 lbs/hr  
 Pre-control Potential to Emit = 2.35 lb/MMBtu/hr uncontrolled >> 0.26 lb/MMBtu

\* AP-42 identifies spreader stoker boiler (SCC 1-01-002-04) to have an uncontrolled "PM" emission factor of 66 pounds per ton of fuel combusted.

Columbia Municipal Power Plant  
CAM Determination

3. Qualifies for emission limitation or standards exemptions?

yes       no

(i) Sources subject to section 111 (NSPS) or 112 (NESHAP) of the CAA promulgated after 11/15/1990.  
If so, exempt.

yes       no      40 CFR Part 63 NESHAP MACT DDDDD

(ii) Sources regulated under the stratospheric ozone protection requirements? If so, exempt.

yes       no

(ii) Sources subject to the acid rain program, emissions trading program, or emission caps? If so, exempt.

yes\*       no      \* Subject to acid rain program, however opacity required not specifically PM.

Part 75 continuous opacity requirements deferred to 10 CSR 10-220

(iv) Qualifies as a municipally-owned utility unit that produces electricity during periods of peak electrical demand or emergency situations? If so, exempt.

yes       no

3(b). If not exempt, does the pre-control potential to emit exceeds or is equivalent to the major source threshold?

yes       no

	MHDR=	22.04 tons/hr	
	Operation rate=	8,760 hours/yr	
PM	Emission Factor* =	66 lbs/ton	
	Pre-control Potential to Emit =	6,371 tons/yr	>> 100 tons/yr

\* AP-42 identifies spreader stoker boiler (SCC 1-01-002-04) to have an uncontrolled "PM" emission factor of 66 pounds per ton of fuel combusted.

Compliance Assurance Monitoring Approach:

All sources at installation exempt from CAM

CERTIFIED MAIL: 70082810000020166995  
RETURN RECEIPT REQUESTED

Mr. Tad A. Johnsen  
Columbia Municipal Power Plant  
P.O. Box 6015  
Columbia, MO 65205-6015

Re: Columbia Municipal Power Plant, 019-0002  
Permit Number: **OP2010-130**

Dear Mr. Johnsen:

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 643.075.6 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 do not hesitate to contact Randy Raymond at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:rrk

Enclosures

c: Northeast Regional Office  
PAMS File: 2004-03-084