



## 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:** OP2016-027  
**Expiration Date:** OCT 07 2021  
**Installation ID:** 171-0015  
**Project Number:** 2014-06-027

**Installation Name and Address**

Unionville Power Station  
P.O. Box 754  
Springfield, MO 65807-0754  
Putnam County

**Parent Company's Name and Address**

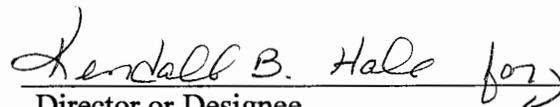
Associated Electric Cooperative, Inc.  
2814 S. Golden Ave, P.O. Box 754  
Springfield MO, 65807-0754

**Installation Description:**

The Unionville Power Station consists of one 1,000,000 gallon distillate oil storage tank and two simple cycle General Electric (GE) 22.5 megawatts (MW) combustion turbine units. Both units are designed to combust primarily distillate fuel oil, but can be converted to burn natural gas. The two combustion turbines are used primarily for electricity generation during peak demand periods or during emergencies. The units were put into service on June 12, 1976, and June 15, 1976, respectively. Two 500 horsepower (hp) diesel engines are used to start and move the turbines up to a speed of approximately 3300 revolutions per minute.

Unionville Power Station is a major source of Nitrogen Oxides (NO<sub>x</sub>) and Sulfur Oxides (SO<sub>x</sub>).

  
Prepared by  
David Buttig  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

OCT 07 2016

Effective Date

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

The Unionville Power Station consists of one 1,000,000 gallon distillate oil storage tank and two simple cycle General Electric (GE) 22.5 megawatts (MW) combustion turbine units. Both units are designed to combust primarily distillate fuel oil, but can be converted to burn natural gas. The two combustion turbines are used primarily for electricity generation during peak demand periods or during emergencies. The units were put into service on June 12, 1976, and June 15, 1976, respectively. Two 500 horsepower (hp) diesel engines are used to start and move the turbines up to a speed of approximately 3300 revolutions per minute. The Unionville Power Station is a major source of Nitrogen Oxides (NO<sub>x</sub>) and Sulfur Oxides (SO<sub>x</sub>). The facility is not on the list of named sources and therefore fugitive emissions do not count towards major source applicability.

| <b>Reported Air Pollutant Emissions, tons per year</b>         |             |             |             |             |             |
|--|-------------|-------------|-------------|-------------|-------------|
| <b>Pollutants</b>  | <b>2014</b> | <b>2013</b> | <b>2012</b> | <b>2011</b> | <b>2010</b> |
| <b>Particulate Matter<br/>≤ Ten Microns (PM<sub>10</sub>)</b>  | --          | --          | 0.01        | 0.0283      | 0.0412      |
| <b>Particulate Matter<br/>≤ 2.5 Microns (PM<sub>2.5</sub>)</b> | --          | --          | 0.01        | 0.0277      | 0.0402      |
| <b>Sulfur Oxides<br/>(SO<sub>x</sub>)</b>                      | 0.03        | 0.05        | 0.13        | 0.1089      | 0.3968      |
| <b>Nitrogen Oxides<br/>(NO<sub>x</sub>)</b>                    | 0.42        | 0.63        | 1.45        | 2.2006      | 3.198       |
| <b>Volatile Organic<br/>Compounds(VOC)</b>                     | --          | --          | 0.20        | 0.2026      | 0.2047      |
| <b>Carbon Monoxide<br/>(CO)</b>                                | --          | --          | --          | 0.0082      | 0.0119      |
| <b>Hazardous Air Pollutants<br/>(HAPs)</b>                     | --          | --          | 0.0051      | 0.0051      | 0.0073      |
| <b>Ammonia (NH<sub>3</sub>)</b>                                | 0.01        | 0.01        | 0.03        | 0.0527      | --          |

### 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.

| <b>EIQ Emission Unit #</b> | <b>Description of Emission Unit</b>                       |
|----------------------------|---|
| EP-02                      | 22.5 MW GE MS 5000 Simple Cycle Combustion Turbine Unit 1 |
| EP-03                      | 22.5 MW GE MS 5000 Simple Cycle Combustion Turbine Unit 2 |
| --                         | Diesel Engines 1 and 2 only used for start-up             |

**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.

Description of Emission Source

---

Fixed Fuel Oil Storage Tank – 1,000,000 gallon capacity, EP#1

700 gallon lube oil system built (2)

Unit Sumps Discharge

Propane Cylinder Storage

3,000 gallon fuel oil unloading storage tank

Miscellaneous Hydraulic Equipment

Transformer Oil in Transformers

500 gallon fuel storage tanks for diesel generator start-up (2)

## **II. Plant Wide Emission Limitations**

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

None

### 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>PERMIT CONDITION 1</b>                                   |   |                          |
|---|---|--------------------------|
| 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds |   |                          |
| Emission Unit   | Description   | Manufacturer/<br>Model # |
| EP-02   | Distillate Fuel Oil Fired, 22.5 MW Simple Cycle Combustion Turbine, 300.5 MMBtu/h, 1976, Unit 1 | GE MS 5000               |
| EP-03   | Distillate Fuel Oil Fired, 22.5 MW Simple Cycle Combustion Turbine, 300.5 MMBtu/h, 1976, Unit 2 | GE MS 5000               |

*On November 30, 2015 this regulation was rescinded and replaced with 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions. However, 6.260 is still contained in the State Implementation Plan (SIP) and will continue to be an applicable requirement until removed from the SIP.*

**Emission Limitation:**

Emissions from this source operation shall not contain more than 500 parts per million by volume (ppmv) of sulfur dioxide or more than 35 milligrams per cubic meter (mg/m<sup>3</sup>) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

**Operational Limitation:**

The emission units shall be limited to burning fuel oil with a sulfur content of no more than 0.5% sulfur by weight. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396-Table 1 and ASTM D975-Table 1, are fuel oil No. 1 and No. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. However, these units are not limited to the known fuel oils listed above, but are limited to fuel oils based solely on having a percent sulfur by weight content of 0.5% or less.

**Monitoring:**

The permittee shall monitor the percent of sulfur in the fuel oil. The sulfur content can be vendor supplied or installation generated.

**Record Keeping:**

The installation shall maintain records of the fuel type used verifying a sulfur content less than 0.5% by weight. Purchase receipts, analyzed samples or certificates that verify the fuel type as a grade level with a sulfur content less than 0.5% by weight will also be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff Director in advance may be used.

**Reporting:**

- 1) The permittee shall report any change of fuel type that causes an exceedance of the sulfur limitation to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten days following the discovery of the exceedance.
- 2) The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

| <b>PERMIT CONDITION 2</b>  |  |                          |
|--|--|--------------------------|
| 40 CFR Part 63, Subpart ZZZZ, <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> |  |                          |
| Emission Unit  | Description  | Manufacturer/<br>Model # |
| --   | Two (2) Diesel Black Start Engines: MHDR 500 hp;<br>Construction date 1976; Diesel fuel fired. | NA                       |

**Operational Requirements:**

- 1) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
- 2) At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. [§63.6605(b)]

**Work Practice Standards:**

- 1) For each Black Start stationary CI RICE, the permittee must meet the following requirement, except during periods of startup.
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [Table 2d To Subpart ZZZZ, item #4]
- 2) During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [§63.6625(h)]

**Continuous Compliance:**

- 1) The permittee shall: [Table 6 to Subpart ZZZZ of Part 63]
  - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - b) Develop and follow the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**Recordkeeping Requirements:**

- 1) The Permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the facility’s own maintenance plan. [§63.6655(e)]
- 2) The permittee must keep the following records:
  - a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
  - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
  - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
  - f) Records required in Table 6 of MACT ZZZZ to show continuous compliance with each emission or operating limitation that applies to you. [§63.6655(d)]

**Reporting:**

- 1) The Permittee must report each instance in which the emission unit did not meet each emission limitation or operating limitation in Table 2d to MACT ZZZZ that applies. These instances are deviations from the emission and operating limitations in MACT ZZZZ. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)].
- 2) These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- 3) The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

| <b>PERMIT CONDITION 3</b>                                  |   |                      |
|--|---|----------------------|
| <i>10 CSR 10-6.261 Control of Sulfur Dioxide Emissions</i> |   |                      |
| EIQ Reference #  | Description   | Manufacturer/Model # |
| EP-02  | Distillate Fuel Oil Fired, 22.5 MW Simple Cycle Combustion Turbine, 300.5 MMBtu/h, 1976, Unit 1 | GE MS 5000           |
| EP-03  | Distillate Fuel Oil Fired, 22.5 MW Simple Cycle Combustion Turbine, 300.5 MMBtu/h, 1976, Unit 2 | GE MS 5000           |
| --   | Two (2) Diesel Black Start Engines: MHDR 500 hp; Construction date 1976; Diesel fuel fired.     | NA                   |

**Fuel Requirements:**

The permittee shall limit the distillate fuel oil sulfur content to 8,812 ppm. [10 CSR 10-6.261(3)(C)]

**Compliance Demonstration/Recordkeeping:**

- 1) The permittee shall maintain fuel delivery records indicating the sulfur content of the fuel meets the requirements of this permit condition. These records shall include:
  - a) The name, address, and contact information of the fuel supplier;
  - b) The type of fuel;
  - c) The sulfur content or maximum sulfur content expressed in ppm sulfur; and
  - d) The heating value of the fuel.
- 2) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the director. [10 CSR 10-6.261(4)(F)]
- 3) The permittee must furnish the director all data necessary to determine compliance status. [10 CSR 10-6.261(4)(G)]

**Reporting:**

- 1) The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).
- 2) The permittee shall report to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

## 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), the Code of State Regulations (CSR), and local ordinances 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) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten 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 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 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.

- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) 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.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **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.

**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 10-6.165 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**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, Compliance/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 semiannual 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)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.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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/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 applicable 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, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be

required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.020(2)(R)39 Responsible Official**

The application utilized in the preparation of this permit was signed by Todd A. Tolbert, Supervisor, Air Quality. On November 11, 2014, the Air Pollution Control Program was informed that Todd Tolbert is no longer the responsible official and Gabe Fleck, Manager, Gas Plant Operations, is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

**VI. Attachments**

None.

## 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 June 09, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received April 30, 2014; and
- 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 the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

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

During review of the permit application, it was found that the two black start engines were subject to this regulation since the facility is not a major source of HAPs emissions.

### 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* is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

This regulation applies to sources of visible emissions throughout the state of Missouri. The turbines and black-start generators are internal combustion engines and are not subject to this regulation by 10 CSR 10-6.220(1)(a).

10 CSR 10-6.350, *Emission Limitations and Emissions Trading of Oxides of Nitrogen* is not applicable because the combustion turbines have a nameplate capacity of less than twenty-five megawatts each, therefore, they are not subject to this regulation.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* is not applicable because the facility only burns liquids and gases which are excluded in the rule.

### Construction Permit Revisions

The following revisions were made to construction permits for this installation:

No construction permits have been issued to this facility.

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

40 CFR Part 60, 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* is not applicable because the 1,000,000 gallon capacity storage tank, EP#1 is used solely as storage for distillate fuel oil (No. 2 fuel oil) which is not defined as a petroleum liquid.

40 CFR Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines* is not applicable because the turbines at this facility were built in 1976 which is prior to the compliance date of October 3, 1977 stated in the regulation.

40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable because the diesel engines used for turbine start-up were installed in 1976 prior to the compliance date of July 11, 2006 stated in the regulation.

40 CFR Part 60, Subpart KKKK, *Standards of Performance for Stationary Combustion Turbines* is not applicable because the turbines at this facility were built in 1976 which is prior to the compliance date of February 2, 2005 stated in the regulation.

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

40 CFR Part 63, Subpart YYYY, *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* is applicable because the source is classified as an:

*Existing stationary combustion turbine.* A stationary combustion turbine is existing if you commenced construction or reconstruction of the stationary combustion turbine on or before January 14, 2003. A change in ownership of an existing stationary combustion turbine does not make that stationary combustion turbine a new or reconstructed stationary combustion turbine.

Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification.

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

MACT ZZZZ has been applied to the two diesel engines and is included as Permit Condition 2. These engines are only used for the startup of the turbines and are therefore considered black start generators.

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

None

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

- Is subject to an emission limitation or standard, and

- Uses a control device to achieve compliance, and
  - Has pre-control emissions that exceed or are equivalent to the major source threshold.
- 40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

**Updated Potential to Emit for the Installation**

| Pollutant        | Potential to Emit (tons/yr) <sup>1,2</sup> |
|------------------|--|
| CO               | 8.77                                       |
| HAP              | 0.788                                      |
| NO <sub>x</sub>  | 2,328                                      |
| PM <sub>10</sub> | 30.11                                      |
| PM <sub>25</sub> | 29.42                                      |
| SO <sub>x</sub>  | 1342.206                                   |
| VOC              | 1.09                                       |
| NH <sub>3</sub>  | 55.45                                      |

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

<sup>2</sup>The start-up engines were evaluated at 500 hours of uncontrolled annual operation.

**Other Regulatory Determinations**

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Compliance with the limit of 0.5% sulfur content of the distillate fuel is demonstrated below:

**SO<sub>2</sub>**

$$\text{Distillate Oil SO}_2 \text{ emission factor (lbs / MMBtu)} = \frac{142(0.5) \text{ lbs}/10^3 \text{ gal}}{140 \text{ MMBtu} / 10^3 \text{ gal}} = 0.507 \text{ lb/MMBtu}$$

(AP - 42 Table 1.3 - 1(9/98))

$$\text{ppmv SO}_2 = \left( \frac{0.507 \text{ lb}}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{\text{ppmw}}{1.660\text{E}^{-7} \text{ lb/scf}} \right) \times \left( \frac{0.45 \text{ ppmv}}{\text{ppmw}} \right) = 133.22 \text{ ppmv}$$

(Appendix A – 7 to Part 60)

**SO<sub>3</sub>**

$$\text{Distillate Oil SO}_3 \text{ emission factor (lbs / MMBtu)} = \frac{2(0.5) \text{ lbs}/10^3 \text{ gal}}{140 \text{ MMBtu} / 10^3 \text{ gal}} = 0.007 \text{ lb/MMBtu}$$

(AP - 42 Table 1.3 - 1(9/98))

$$\text{ppmv SO}_3 = \left( \frac{0.007 \text{ lb}}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{1.602 \times 10^7 \text{ mg ft}^3}{\text{lb m}^3} \right) = 11.088 \frac{\text{mg}}{\text{m}^3}$$

(Appendix A – 7 to Part 60)

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

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

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

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

## Response to Public Comments

A draft of the AECI Unionville Power Station Part 70 Operating Permit was placed on public notice on November 25, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on January 16, 2015 from Mark Smith, Air Permitting and Compliance Branch Chief at Environmental Protection Agency Region 7. The five (5) comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

### **EPA Comment #1:**

First, the customary practice of MDNR is to include and specify the regulated air pollutant(s) that make the source major and therefore subject to a Part 70 operating permit in the Installation Description on the permit cover sheet and the Installation Description and Equipment Listing section of the permit. However, the installation description on the cover page of the Unionville Power Station draft permit and installation description on page 3 does not indicate the pollutant(s) which create the need for a Part 70 /Title V operating permit. Therefore, EPA recommends MDNR consider listing the major air pollutant(s) in the installation description that makes the source subject to Title V.

### **Missouri Air Pollution Control Program Response to EPA Comment #1:**

The major air pollutants of AECI Unionville Power station have been listed on both the cover page and the installation description on page 3. The major pollutants of AECI Unionville Power Station are SO<sub>x</sub> and NO<sub>x</sub>.

### **EPA Comment #2:**

Second, **Plant Wide Emission Limitations, Section II**, includes **Permit Condition PW001** which incorporates the applicable requirements from 10 CSR 10-6.220, *Restriction of Emissions of Visible Contaminants*. This exact applicable requirement, with the identical regulatory reference citation, is included as a **Core Permit Requirement in Section IV**. EPA suggests MDNR provide an explanation of the reasoning behind incorporating only the Core Permit Requirement for 10 CSR 10-6.220, as a plant wide permit condition.

### **Missouri Air Pollution Control Program Response to EPA Comment #2:**

Permit Condition PW001 has been removed from the operating permit. The turbines and black-start generators are internal combustion engines and are not subject to this regulation by 10 CSR 10-6.220(1)(a).

### **EPA Comment #3:**

Third, **Permit Condition 2** incorporates the applicable requirements from 40 CFR Part 63, Subpart ZZZZ; *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (RICE NESHAPs) associated with two (2) 500

horsepower compression ignition (CI) (diesel fuel-fired) engines. The **Permit Condition 2** in the draft Part 70 operating permit includes a tabular summary of the applicable requirements; detailed operational requirements; detailed work practice standards; continuous compliance requirements; record keeping requirements and reporting requirements. EPA has compared the draft permit condition with the most recent version of the RICE NESHAPs and has the following to offer for MDNR consideration.

- §63.6604 details fuel specifications for owners and operators of stationary CI RICE, however, these specifications are not included as a permit requirement.
- §63.6625 (f) requires installation of a non-resettable hour meter if one is not already installed; however the permit condition does not mention this requirement.
- 6625 (h) requires owner and operators to minimize time spent at idle during startup and to minimize engine startup time to a period need for appropriate and safe loading of the engine; however this requirement is not part of Permit Condition 2.
- §63.6640 (f) describes the continuous compliance demonstration requirements; which are not included in the draft Permit Condition 2.
- §63.6650 (h) provides requirements for annual reporting which are not addressed in Permit Condition 2.
- §63.6655 (a) and §63.6655 (d) detail record keeping requirements that are not mentioned in the draft Permit Condition 2.

EPA recommends MDNR re-review the requirements of 40 CFR Part 63, Subpart ZZZZ to determine if there are additional applicable requirements which should be included in **Permit Condition 2**. If these or other requirements, which on the surface appear to be applicable but are determined to not apply, added explanation in the **Statement of Basis** is suggested.

### **Missouri Air Pollution Control Program Response to EPA Comment #3:**

§§63.6604, 63.6625(f), 63.6640(f), and 63.6650(h) are for emergency generators. The units mentioned in this permit condition are black-start generators and therefore these requirements are not applicable to the emission units.

§§63.6625(f), 63.6655(a), and 63.6655(d) have been added to Permit Condition 2.

### **EPA Comment #4:**

Fourth, based on the potential to emit (PTE) table included in the Statement of Basis, the Unionville Power Station is considered an area hazardous air pollutant (HAP) source. To date, MDNR has not accepted and taken over the compliance responsibilities of the area source RICE NESHAPs and as such relies on the EPA to monitor and manage area source compliance. However, the compliance notification and reporting included in **Permit Condition 2** is non-specific regarding the reporting requirements the permittee must follow. EPA contends that if the EPA is responsible for compliance, then the EPA should be the primary recipient of the compliance notifications and reports; with MDNR receiving duplicate copies. Therefore, EPA recommends MDNR add specific clarifying language into the permit condition to show EPA as the primary compliance information recipient related to HAPs and MDNR as secondary.

**Missouri Air Pollution Control Program Response to EPA Comment #4:**

EPA has been listed in the reporting section of Permit Condition 2 as the recipient of notifications and reports with the APCP receiving them as well.

**EPA Comment #5:**

Finally, MDNR's customary practice within emission unit specific emission permit conditions written around New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPS), has been to include a specific federal regulatory citation in brackets at the end of every applicable requirement. This customary approach is to meet the requirements specified in 10 CSR 10-6.065(6) (C) 1. A (I). The Unionville Power Station draft operating permit includes several emission unit specific emission limitations as required by 40 CFR Part 63, Subpart ZZZZ. However, some of the requirements associated with these federal standards do not include a reference to the authority for the term or condition. Therefore, EPA recommends that MDNR add the appropriate regulatory citation to the operating permit emission unit specific emission limitations written to incorporate 40 CFR Part 63, Subpart ZZZZ requirements.

**Missouri Air Pollution Control Program Response to EPA Comment #5:**

Missing regulatory citations have been incorporated into Permit Condition 2.

Mr. Gabe Fleck  
Unionville Power Station  
P.O. Box 754  
Springfield, MO 65807-0754

Re: Unionville Power Station, 171-0015  
Permit Number: OP2016-027

Dear Mr. Fleck:

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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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

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

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

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

MJS:dbj

Enclosures

c: PAMS File: 2014-06-027



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

## DEPARTMENT OF NATURAL RESOURCES

[www.dnr.mo.gov](http://www.dnr.mo.gov)

OCT 07 2016

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