



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

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

www.dnr.mo.gov

APR 03 2015

Mr. Daniel F Cole
Ameren Missouri Callaway Energy Center
P.O. Box 620 Missouri Highway CC
Portland, MO 65251

Re: Ameren Missouri Callaway Energy Center, 027-0026
Permit Number: OP2015-016

Dear Mr. Cole:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 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:ark

Enclosures

c: Robert Cheever, US EPA Region VII
PAMS File: 2013-02-060



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: OP2015-016
Expiration Date: **APR 03 2020**
Installation ID: 027-0026
Project Number: 2013-02-060

Installation Name and Address

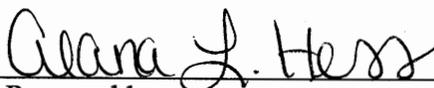
Ameren Missouri Callaway Energy Center
Junction of Missouri Highways CC and O
Portland, MO 65251
Callaway County

Parent Company's Name and Address

Ameren Corporation
1901 Chouteau Avenue
St. Louis, MO 63103

Installation Description:

Ameren Missouri's Callaway Energy Center is an electrical generating installation located in Callaway County. The principal component at this facility is a pressurized water nuclear reactor used to generate electricity; however, the reactor is not a source of air emissions. The air emission units at the facility are ancillary to the reactor and include an auxiliary boiler, emergency electrical generators, and storage tanks. The installation is a Part 70 installation as the facility has the potential to emit greater than 100 tons per year of SO_x and NO_x.



Prepared by
Alana L. Hess
Environmental Engineer III
Operating Permits Unit



Director of Designee
Department of Natural Resources

APR 03 2015

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Ameren Missouri’s Callaway Energy Center is an electrical generating installation located in Callaway County. The principal component at this facility is a pressurized water nuclear reactor used to generate electricity; however, the reactor is not a source of air emissions. The air emission units at the facility are ancillary to the reactor and include an auxiliary boiler, emergency electrical generators, and storage tanks. The installation is a Part 70 installation as the facility has the potential to emit greater than 100 tons per year of SO_x and NO_x.

The installation is not on the List of Named Installations found at 10 CSR 10-6.020(3)(B) Table 2; therefore, fugitive emissions are not counted toward major source applicability.

Reported Air Pollutant Emissions (tpy)					
Pollutants	2012	2011	2010	2009	2008
PM CON	0.002	-	-	-	-
PM ₁₀	0.24	0.59	0.70	0.26	0.71
PM _{2.5}	0.24	-	-	-	-
SO _x	1.85	5.00	6.72	2.53	5.51
NO _x	9.45	20.59	22.03	7.94	18.99
VOC	0.37	0.66	0.62	0.25	0.69
CO	1.72	4.12	4.92	1.82	4.34
HAP	-	-	-	-	0.001

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 Unit #	Description of Emission Unit
B-01	Auxiliary Boiler
B-02	Emergency Diesel Generator A
B-03	Emergency Diesel Generator B
B-04	Security Emergency Diesel Generator
B-05	TSC Emergency Diesel Generator
B-06	EOF Emergency Diesel Generator
B-07	Fire Protection Emergency Diesel Pump A
B-08	Fire Protection Emergency Diesel Pump B
B-12a	Emergency Diesel Generator
B-12b	Emergency Diesel Generator
B-12c	Emergency Diesel Generator
B-12d	Emergency Diesel Generator
IA-11	2,000 Gallon Gasoline Storage Tank
IA-16	500 Gallon Gasoline Storage Tank

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

- ◆ Ten Fuel Oil and Gasoline Portable Pumps for Various Feed Water, Oil, Lubricating and Maintenance Systems (IA-4)
- ◆ Ten Portable Gasoline Generators used for Equipment Power at Various Locations for Maintenance or Start-up Activities (IA-5)
- ◆ Emergency Propane Generator for Microwave Tower (IA-7, 111.5 HP, Onan 55.0 EN, Purchase Order Date 07/21/1983)
- ◆ Emergency Propane Generator for Meteorological Tower (IA-8, 7.5 kW, Onan JB-3DR/8389T, Purchase Order Date 05/04/1972)
- ◆ Portable Diesel Generator A (B-9, 180 kW, Kohler 180ROZJ, Installed in 1995)
- ◆ Portable Diesel Generator B (B-10, 180 kW, Onan 175DFE, Installed in 2003)
- ◆ Two Parts Washers (IA-6, Installed prior to 1997)
- ◆ 300,000 gallon Auxiliary Boiler Fuel Tank (IA-1, Field-Erected, Installed in 1977)
- ◆ Two 100,340 gallon Emergency Fuel Oil Storage Tanks for Emergency Diesel Generators A and B (IA-2, Field-Erected, Installed in 1979)
- ◆ Two 612 gallon Emergency Fuel Oil Day Tanks for the Emergency Diesel Generators A and B (IA-3, Installed in 1979)
- ◆ 10,000 gallon Reclaim Oil Tank (IA-9, Field-Erected, Installed in 1980)
- ◆ 300 gallon Diesel Tank (IA-10, Installed prior to 1997)
- ◆ 700 gallon Diesel Tank (IA-10, Installed prior to 1997)
- ◆ Two 250 gallon Diesel Tanks.
- ◆ 300 gallon Kerosene Storage Tank (IA-12, Installed prior to 1997)
- ◆ 3,000 gallon Security Emergency Diesel Generator Fuel Oil Storage Tank (IA-13, Installed in 1981)
- ◆ 6,000 gallon EOF Emergency Diesel Generator Fuel Oil Storage Tank (IA-14, Installed in 1981)
- ◆ 2,844 gallon TSC Emergency Diesel Generator Fuel Oil Storage Tank (IA-15, Installed in 1981)
- ◆ Unpaved Surveillance and Delivery Roads
- ◆ Temporary Diesel Generators and Diesel Powered Equipment
- ◆ Temporary Fuel Oil Storage Tanks
- ◆ Natural Draft Cooling Tower

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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 CFR and 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.

Auxiliary Boiler		
Emission Unit	Description	Manufacturer/Model #
B-01	123 MMBtu/hr fuel oil #2 fired boiler used primarily for space heating during reactor down times. Installed in 1977.	Combustion Engineering/18-A-13

PERMIT CONDITION (B-01) - 001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not cause or permit emissions to be discharged into the atmosphere from B-01 Auxiliary Boiler any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. As this equipment does not normally operate on lengthy cycles, the opacity shall be monitored once per operating period, but not more than once per month when operating. An operating period shall be defined as continuous or intermittent operation totaling 24 or more hours. The permittee shall conduct opacity readings on this emission unit using one of the following procedures:
 - a) Conduct opacity readings on this emission unit using the procedures contained in EPA Method 22. Readings are only required when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations would be required. If visible emissions are observed, the permittee shall conduct an EPA Method 9 opacity observation to quantify the percent opacity of the visible emissions.
 - b) Conduct opacity readings on this emission unit using the procedures contained in EPA Method 9. Readings are only required when the weather conditions allow.

Recordkeeping:

1. The permittee shall maintain records of all EPA Method 22 observation results, noting whether any air emissions (except for water vapor) were visible from the emission unit. The permittee shall maintain these records using Attachment A or may maintain records on their own forms provided the records contain:
 - a) The date and time of each Method 22 opacity observation.
 - b) Whether visible emissions were or were not observed.
2. The permittee shall maintain records of any equipment malfunctions which contribute to visible emissions deviations when such records are required in accordance with the provisions of 10 CSR 10-6.050. The permittee shall maintain these records using Attachment C or may maintain records on their own forms provided the records contain:
 - a) The date and time of the inspection/maintenance activity or malfunction.

- b) A description of the inspection/maintenance activity.
 - c) A description of the malfunction, the impact of the malfunction on emissions, the duration of the malfunction event, the cause of the malfunction, and a description of actions taken to repair the malfunction.
3. The permittee shall maintain records of all EPA Method 9 opacity observations. The permittee shall maintain these records using Attachment B or may maintain records on their own forms provided the records contain:
 - a) The name of the Method 9 certified observer.
 - b) The date of the Method 9 observer's certification.
 - c) The date and time of the observation.
 - d) Each fifteen second opacity observation.
 - e) The average opacity.
 4. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
 5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an EPA Method 9 opacity observation indicates an exceedance of the opacity limit. 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.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (B-01) - 002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

The permittee shall not cause or allow emissions of SO₂ into the atmosphere from B-01 Auxiliary Boiler in excess of eight pounds of SO₂ per million BTUs actual heat input averaged on any consecutive three-hour time period.

Operational Limitation/Equipment Specifications:

The permittee shall not combust fuel oil #2 with a sulfur content in excess of 0.5 percent sulfur by weight.

Monitoring/Recordkeeping

1. Attachment E contains calculations demonstrating that compliance with the operational limitation demonstrates compliance with the emission limitation.
2. The permittee shall maintain records of the fuel burned and verify the sulfur content. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
3. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance of the emission or operational limitations established by this permit condition. 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.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (B-01) - 003

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart JJJJJ - National Emission Standards for HAP for Industrial, Commercial,
and Institutional Boilers Area Sources

Compliance Dates:

The permittee shall achieve compliance with the applicable provisions of MACT JJJJJ by March 21, 2014. [§63.11196(a)]

Standards:

The permittee shall comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to MACT JJJJJ that applies. [§63.11201(b)]

Table 2 to MACT JJJJJJ – Work Practice Standards, Emission Reduction Measures, and Management Practices

Boiler Subcategory	Work Practice Standards, Emission Reduction Measures, and Management Practices
Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
Existing oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment shall include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:</p> <ul style="list-style-type: none"> (1) A visual inspection of the boiler system, (2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints, (3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the permittee, (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage, (5) A list of major energy conservation measures that are within the permittee's control, (6) A list of the energy savings potential of the energy conservation measures identified, and (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

General Compliance Requirements:

At all times the permittee shall 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 any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]

Initial Compliance Requirements:

1. For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, the permittee shall demonstrate initial compliance no later than the compliance date that is specified in §63.11196. [§63.11210(c)]
2. The permittee shall conduct a performance tune-up according to §63.11223(b) and the permittee shall submit a signed statement in the Notification of Compliance Status report that indicates that the permittee conducted a tune-up of the boiler. [§63.11214(b)]
3. The permittee shall submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to MACT JJJJJ and is an accurate depiction of your facility. [§63.11214(c)]

Continuous Compliance Requirements:

1. The permittee shall conduct a performance tune-up according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee shall conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]
2. The permittee shall conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [§63.11223(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(3)]
 - d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of CO in ppmv and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.11223(b)(5)]
 - f) Maintain on-site and submit, if requested by the Administrator, a report containing the following information: [§63.11223(b)(6)]
 - i) The concentrations of CO in the effluent stream in ppmv and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during

that period. Units sharing a fuel meter may estimate the fuel use by each unit.
[§63.11223(b)(6)(iii)]

- g) If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 days of startup. [§63.11223(b)(7)]

General Provisions:

The permittee shall refer to Table 8 to MACT JJJJJ for 40 CFR Part 63, Subpart A applicability.

Notifications, Recordkeeping, and Reporting:

1. The permittee shall submit the following notifications to the administrator: [§63.11225(a)]
 - a) The permittee shall submit all of the notifications in §§63.7(b) and 63.9(b) and (h) that apply by the dates specified in those sections except as specified in §63.11225(a)(2) and (4). [§63.11225(a)(1)]
 - b) An Initial Notification shall be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard. [§63.11225(a)(2)]
 - c) The permittee shall submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196. The permittee shall submit the Notification of Compliance Status in accordance with §63.11225(a)(4)(i) and (vi). The Notification of Compliance Status shall include the information and certification(s) of compliance in §63.11225(a)(4)(i) through (v), as applicable, and signed by a responsible official. [§63.11225(a)(4)]
 - i) The permittee shall submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). [§63.11225(a)(4)(i)]
 - ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler." [§63.11225(a)(4)(ii)]
 - iii) "This facility has had an energy assessment performed according to §63.11214(c)." [§63.11225(a)(4)(iii)]
 - iv) For units that do not qualify for a statutory exemption as provided in §129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit." [§63.11225(a)(4)(v)]
 - v) The notification shall be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to MACT JJJJJ is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.11225(a)(4)(vi)]
2. The permittee shall prepare and submit to the delegated authority upon request, a biennial compliance certification report for the previous two calendar years containing the information specified in §63.11225(b)(1) through (4). The permittee shall submit the report by March 15 if the permittee had any instance described by §63.11225(b)(3). [§63.11225(b)]
 - a) Company name and address. [§63.11225(b)(1)]
 - b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of MACT JJJJJ. The notification shall include the following certification(s) of compliance, as applicable, and signed by a responsible official: [§63.11225(b)(2)]

- i) “This facility complies with the requirements in §63.11223 to conduct a biennial tune-up, as applicable, of each boiler.” [§63.11225(b)(2)(i)]
- ii) For units that do not qualify for a statutory exemption as provided in §129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(b)(2)(ii)]
- c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [§63.11225(b)(3)]
3. The permittee shall maintain the following records: [§63.11225(c)]
 - a) As required in §63.10(b)(2)(xiv), the permittee keep a copy of each notification and report that the permittee submitted to comply with MACT JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. [§63.11225(c)(1)]
 - b) The permittee shall keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as follows: [§63.11225(c)(2)]
 - i) Records shall identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
 - ii) For each boiler required to conduct an energy assessment, the permittee shall keep a copy of the energy assessment report. [§63.11225(c)(2)(iii)]
 - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]
4. Records shall be in a form suitable and readily available for expeditious review. The permittee shall keep each record for five years following the date of each recorded action. The permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least two years after the date of each recorded action. The permittee may keep the records off site for the remaining three years. [§63.11225(d)]

PERMIT CONDITION (B-01)-004

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0684-003, Issued June 13, 1984

Emission Limitation:

Special Condition 3: Emissions of SO₂ from the auxiliary boiler (B-01) shall not exceed 200.0 tons per calendar year.

Monitoring/Recordkeeping:

1. The permittee shall maintain records of the monthly and calendar year totals of SO₂ emissions from this emission unit. The permittee shall maintain these records using Attachment D or may maintain records on their own forms provided the records contain:
 - a) The date (month and year)
 - b) The actual usage of fuel oil #2 for the month in gallons.
 - c) The weight percent of sulfur contained in the fuel oil.
 - d) Monthly SO₂ emissions in tons calculated using an SO₂ emission factor of 142S lb/1,000 gallons, where S is the weight percent of sulfur contained in the fuel oil.

- e) 12-month rolling total SO₂ emissions in tons.
2. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation. 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.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

Emergency Engines		
Emission Unit	Description	Manufacturer/Model #
B-02	Emergency Diesel Generator A – 8600 HP (58 MMBtu/hr), compression ignition engine. Installed 1979.	Colt Industries PC 2.5
B-03	Emergency Diesel Generator B – 8600 HP (58 MMBtu/hr) compression ignition engine. Installed 1979.	Colt Industries PC 2.5
B-04	Security Emergency Diesel Generator – 644 HP (1.7 MMBtu/hr) compression ignition engine. Installed 1981.	General Allison Detroit Manufacturing V71
B-05	TSC Emergency Generator – 355 HP (0.8 MMBtu/hr) compression ignition engine. Installed 1981	Cummins NT-835GS
B-06	EOF Emergency Generator – 565 HP (1.2 MMBtu/hr) compression ignition engine. Installed 1981.	Cummins KTA-1150-GS-1
B-07	Emergency Diesel Fire Pump A – 255 HP (1.2 MMBtu/hr) compression ignition engine. Installed 1975.	Cummins NT-855-F1
B-08	Emergency Diesel Fire Pump B – 255 HP (1.2 MMBtu/hr) compression ignition engine. Installed 1975.	Cummins NT-855-F1

PERMIT CONDITION (B-02 through B-08) - 001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 0684-003, Issued June 13, 1984

Operational Limitations:

Special Condition 1: The sulfur content of the diesel used in the emergency diesel engines (B-02 through B-08) shall not exceed 0.50 percent sulfur.

Monitoring/Recordkeeping:

1. The permittee shall maintain a record of the sulfur content of the diesel combusted in B-02 through B-08. Fuel purchase receipts, analyzed samples, or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the operational limitation. 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.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<p align="center">PERMIT CONDITION (B-02 through B-08) - 002 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds</p>

Emission Limitations:

1. Emissions from the emergency engines shall not contain more than 500 ppmv of SO₂.
2. Emissions from the emergency engines shall not contain more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation:

The emergency engines shall only combust diesel fuel containing less than 0.05 percent sulfur.

Monitoring/Recordkeeping

1. Attachment E contains calculations demonstrating that compliance with the operational limitation of Permit Condition (B-02 through B-08)-001 demonstrates compliance with the emission limitations of this permit condition.
2. The permittee shall maintain a record of the sulfur content of fuel combusted in B-02 through B-08. Fuel purchase receipts, analyzed samples, or certifications that verify the fuel type and sulfur content will be acceptable.
3. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance of the emission or operational limitations established by this permit condition. 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.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (B-02 through B-08) - 003

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

Requirements:

1. The permittee shall comply with the requirements in Table 2d to MACT ZZZZ that apply. [§63.6603(a)]
2. Beginning January 1, 2015, if the emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), the permittee shall use diesel fuel that meets the requirements in §80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [§63.6604(b)]
3. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall 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. [§63.6625(e)]
4. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
5. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
6. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to MACT ZZZZ. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2d to MACT ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

Table 2d to MACT ZZZZ – Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For each...	The permittee shall meet the following requirement, except during periods of startup...	During periods of startup the permittee shall...
Emergency stationary CI RICE ²	Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹	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.
	Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

¹Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of MACT ZZZZ.

²If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of MACT ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources shall report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

Continuous Compliance:

1. The permittee shall be in compliance with the requirements in MACT ZZZZ that apply at all times. [§63.6605(a)]
2. At all times the permittee shall 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)]
3. The permittee shall demonstrate continuous compliance with each requirement in Table 2d to MACT ZZZZ that applies according to methods specified in Table 6 to MACT ZZZZ. [§63.6640(a)]
4. The permittee shall also report each instance in which the permittee did not meet the requirements in Table 8 to MACT ZZZZ that apply. [§63.6640(e)]
5. The permittee shall operate the emergency stationary RICE according to the requirements in §63.6605(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any

operation for non-emergency situations as allowed by §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]

- i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee 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 permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]
 - iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(i) and (ii), the 50 hours per year for nonemergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
- i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or nonemergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. [§63.6640(f)(4)(i)]
 - ii) The 50 hours per year for nonemergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are

being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

Table 6 to MACT ZZZZ – Continuous Compliance With Emission Limitations, and Other Requirements

For each...	Complying with the requirement to...	The permittee shall demonstrate continuous compliance by...
Existing emergency stationary RICE at an area source of HAP	Work or Management practices	Operating and maintaining the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; or
		Develop and follow a maintenance plan which shall 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.

General Provisions:

The permittee shall refer to Table 8 to MACT ZZZZ for 40 CFR Part 63, Subpart A applicability.

Recordkeeping:

1. The permittee shall keep the records described in §63.6655(a)(1) through (a)(5), (b)(1) through (b)(3) and (c). [§63.6655(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - c) 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)]
2. The permittee shall keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each limitation that applies. [§63.6655(d)]
3. The permittee shall 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 a maintenance plan. [§63.6655(e)]
4. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
5. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. For emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), the permittee shall submit an annual report according to the following requirements: [§63.6640(h)]
 - a) The report shall contain the following information: [§63.6640(h)(1)]
 - i) Company name and address where the engine is located. [§63.6640(h)(1)(i)]
 - ii) Date of the report and beginning and ending dates of the reporting period. [§63.6640(h)(1)(ii)]
 - iii) Engine site rating and model year. [§63.6640(h)(1)(iii)]
 - iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6640(h)(1)(iv)]
 - v) Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6640(h)(1)(v)]
 - vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6640(h)(1)(vi)]
 - vii) Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6640(h)(1)(vii)]
 - viii) If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6640(h)(1)(viii)]
 - ix) If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6640(h)(1)(ix)]
 - b) The first annual report shall cover the calendar year 2015 and shall be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§63.6640(h)(2)]
 - c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6640(h)(3)]

Emergency Engines		
Emission Unit	Description	Manufacturer/Model #
B-12a	Emergency Diesel Generator - 2937 HP (19.5 MMBtu/hr). compression ignition engine. Installed 2010	Caterpillar 3516
B-12b	Emergency Diesel Generator - 2937 HP (19.5 MMBtu/hr). compression ignition engine. Installed 2010	Caterpillar 3516
B-12c	Emergency Diesel Generator - 2937 HP (19.5 MMBtu/hr). compression ignition engine. Installed 2010	Caterpillar 3516
B-12d	Emergency Diesel Generator - 2937 HP (19.5 MMBtu/hr). compression ignition engine. Installed 2010	Caterpillar 3516

PERMIT CONDITION (B-12a through B-12d) - 001
 10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal
 Combustion Engines

Emission Standards:

The permittee shall comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]

Fuel Requirement:

The permittee shall only purchase diesel fuel that meets the requirements of §80.510(b) for nonroad diesel fuel. [§60.4207(b)]

Monitoring:

If the emergency stationary CI internal combustion engine does not meet the standards applicable to non-emergency engines, the permittee shall install a non-resettable hour meter prior to startup of the engine. [§60.4209(a)]

Compliance Requirements:

1. The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]
2. The permittee shall do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a) The permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b) The permittee shall change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c) Meet the requirements of 40 CFR Parts 89, 94, and/or 1068, as they apply. [§60.4211(a)(3)]
3. The permittee shall comply by purchasing an engine certified to the emission standards in §60.4205(b), as applicable, for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
4. The permittee shall operate the emergency stationary ICE according to the requirements in §60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE

under NSPS III, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4211(f)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4211(f)]

- a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
 - b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in §60.4211(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§60.4211(f)(2)]
 - i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee 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 permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]
 - ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§60.4211(f)(2)(ii)]
 - iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§60.4211(f)(2)(iii)]
 - c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]
5. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]
- a) The permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within one year of startup, or within one year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. The permittee shall conduct subsequent

performance testing every 8,760 hours of engine operation or three years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. [§60.4211(g)(3)]

Performance Testing:

If the permittee is required to conduct performance testing in accordance with §60.4211(g)(3), the permittee shall refer to §60.4212 for performance test methods and procedures.

Recordkeeping:

1. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [§60.4214(b)]
2. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

General Provisions:

The permittee shall refer to Table 8 to NSPS IIII for 40 CFR Part 60, Subpart A applicability.

Reporting:

1. For emergency stationary CI ICE operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in §60.4211(f)(3)(i), the permittee shall submit an annual report according to the following requirements: [§60.4214(d)]
 - a) The report shall contain the following information: [§60.4214(d)(1)]
 - i) Company name and address where the engine is located. [§60.4214(d)(1)(i)]
 - ii) Date of the report and beginning and ending dates of the reporting period. [§60.4214(d)(1)(ii)]
 - iii) Engine site rating and model year. [§60.4214(d)(1)(iii)]
 - iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§60.4214(d)(1)(iv)]
 - v) Hours operated for the purposes specified in §60.4211(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §60.4211(f)(2)(ii) and (iii). [§60.4214(d)(1)(v)]
 - vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §60.4211(f)(2)(ii) and (iii). [§60.4214(d)(1)(vi)]
 - vii) Hours spent for operation for the purposes specified in §60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4211(f)(3)(i).
The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§60.4214(d)(1)(vii)]
 - b) The first annual report shall cover the calendar year 2015 and shall be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§60.4214(d)(2)]
 - c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to NSPS IIII is not available in CEDRI at the time that the report is due, the written

report shall be submitted to the Administrator at the appropriate address listed in §60.4.
[§60.4214(d)(3)]

Storage Tanks	
Emission Unit	Description
IA-11	2,000 gallon Unleaded Gasoline Storage Tank. Installed in 1980
IA-16	500 gallon Gasoline Storage Tank

PERMIT CONDITION (IA-11 and IA-16) - 001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for
Source Category: Gasoline Dispensing Facilities

General Requirements:

1. The permittee shall, at all times, 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. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[§63.11115(a)]
2. The permittee shall keep applicable records and submit reports as specified in §63.11125(d) and §63.11126(b). [§63.11115(b)]

Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline:

1. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]
2. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, are considered acceptable for compliance this condition. [§63.11116(d)]

Recordkeeping:

1. The permittee shall keep the following records:
 - a) The permittee shall have records available within 24 hours of a request by the Administrator to document the gasoline throughput. [§63.11116(b)]
 - b) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
[§63.11125(d)(2)]
2. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.

3. All records shall be maintained for five years.

General Provisions:

The permittee shall refer to Table 3 to MACT CCCCCC for 40 CFR Part 63, Subpart A applicability.

Reporting:

The permittee shall report, by March 15 of each year, the report shall include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred. [§63.11126(b)]

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the CFR, the 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. Refer to the regulation for a complete list of allowances.
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 permittee fails to comply with the conditions or any provisions of the permit.
4. Ameren Missouri Callaway Energy Center 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 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 Ameren Missouri Callaway Energy Center 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(2)(N)11, the director shall not issue an open burning permit unless the permittee 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 Recordkeeping: NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §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 §60.2245 - §60.2260, sources shall 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 NSPS Appendix A – Test Methods, Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS 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.

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 §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 §§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 §§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 18 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 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. The permittee shall 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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on 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 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 PM to the Ambient Air Beyond the Premises of Origin

Emission Limitations:

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 PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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/Recordkeeping/Reporting:

1. Due to the size of the property owned by Ameren Missouri at the Callaway Energy Center, no monitoring, recordkeeping, or reporting is being required at this time. If the Missouri Air Pollution Control Program receives any complaints of fugitive PM emissions leaving Callaway Energy Center property, the permittee shall be required to monitor their property boundary to determine if an exceedance has occurred. The permittee shall maintain records of all fugitive emission observations. The permittee shall maintain these records using Attachment F or may maintain records on their own forms provide the records contain:
 - a) The date and time of the observation.
 - b) If visible emissions (except water vapor) were observed.
 - c) If PM was observed on surfaces beyond the property line of origin.
 - d) Whether an equipment malfunction contributed to an exceedance.
 - e) 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 10-6.165 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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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:
2. 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.
 - a) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - b) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - c) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
3. 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 40 CFR Part 82, 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 recordkeeping 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.
4. 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.
 5. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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.
 6. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program 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 CFR and 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 Recordkeeping and Reporting Requirements

1. Recordkeeping
 - 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 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, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or CAM exceedances.
 - d) Submit supplemental reports as required or as needed. 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 10 CSR 10-6.065(6)(C)7.A 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.

- 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 §112(r)

1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) 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 shall 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'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 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 §303 of the Act or §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 EPA and the Air Pollution Control Program 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

1. An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section's 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.

2. §502(b)(10) changes. Changes that, under §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), recordkeeping, 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, 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 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 contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Daniel F Cole, President & CEO of Ameren Services. Mr. Cole is no longer a responsible official for the installation. At the request of the permittee, the following persons have authority to act as responsible officials:

- ◆ Fadi Diya, Senior Vice President of Nuclear Operations and Chief Nuclear Officer
- ◆ Ajay Arora, Vice President Environmental Services and Generation Resource Planning
- ◆ David Neterer, Vice President of Nuclear Operations
- ◆ Barry Cox, Senior Director of Nuclear Operations

If any of these people terminate employment, or are reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee 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 permittee 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

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources receives notice from the EPA that a petition for disapproval of a permit pursuant to §70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
 - b) 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,
 - c) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - d) 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
 - e) 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 G contains a list of abbreviations and acronyms used throughout this permit.

Attachment B

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

Attachment E
 10 CSR 10-6.260 Compliance Demonstration

This attachment is used to verify compliance with the limitations of 10 CSR 10-6.260.

Emission Unit	Description	SO ₂ Emission Factor (lb/Mgal) ¹	SO ₂ Emissions (lb/MMBtu)	SO ₂ Limit (lb/MMBtu)
B-01	Auxiliary Boiler	142S AP-42 Table 1.3-1 (May 2010)	0.51	8.0

¹The permittee is limited to 0.5 weight percent sulfur by Permit Condition (B-01) – 002. The heating value of fuel oil #2 was taken from AP-42 Appendix A (September 1985) to be 140 MMBtu/Mgal.

Emission Unit	Description	SO ₂ Emission Factor (lb/MMBtu)	SO ₂ Emissions (ppmv) ²	SO ₂ Limit (ppmv)
B-02	Emergency Diesel Generator A	1.01S ¹	295	500
B-03	Emergency Diesel Generator B	AP-42 Table 3.4-1 (October 1996)		
B-04	Security Emergency Diesel Generator			
B-05	TSC Emergency Diesel Generator	0.29 AP-42 Table 3.3-1 (October 1996)	169	500
B-06	EOF Emergency Diesel Generator			
B-07	Emergency Diesel Fire Pump A			
B-08	Emergency Diesel Fire Pump B			

¹S = the sulfur content of the fuel

²General equation: ppmv SO₂ = SO₂ Emission Factor ÷ F factor ÷ Conversion Factor

- ♦ The SO₂ emission factor is the emission factor presented in the following table. It assumes that all of the sulfur in the fuel is converted to SO₂ emissions.
- ♦ The F factor is the ratio of gas volume of products of combustion to the heat content of the fuel. For fuel oil the F factor is 10,320 wscf/MMBtu. (NSPS Appendix A Method 19 Table 19-1).
- ♦ The conversion factor is 1.660E⁻⁷ lb/scf per ppmv (NSPS Appendix A Method 19).

Sulfur emissions in the form of SO₃ converted from SO₂ are considered insignificant and it is highly unlikely that the limitations of 10 CSR 10-6.260(3)(B) will ever be exceeded.

Attachment G Abbreviations and Acronyms

°Cdegrees Celsius	m/s meters per second
°Fdegrees Fahrenheit	mgmilligrams
AAQIAambient air quality impact analysis	Mgal 1,000 gallons
acfmactual cubic feet per minute	MW megawatt
BACTBest Available Control Technology	MHDR maximum hourly design rate
BMPsBest Management Practices	MMBtu Million British thermal units
BtuBritish thermal unit	mmHgmillimeters mercury
CAMCompliance Assurance Monitoring	MMscf Million standard cubic feet
CASChemical Abstracts Service	MSDS Material Safety Data Sheet
CEMS Continuous Emission Monitor System	NAAQS National Ambient Air Quality Standards
CFRCode of Federal Regulations	NESHAPs . National Emissions Standards for Hazardous Air Pollutants
COcarbon monoxide	NO_x nitrogen oxides
CO₂carbon dioxide	NSPS New Source Performance Standards
CO_{2e}carbon dioxide equivalent	NSR New Source Review
COMSContinuous Opacity Monitoring System	PM particulate matter
CSRCode of State Regulations	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
dscfdry standard cubic feet	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
dscmdry standard cubic meter	ppm parts per million
EIQEmission Inventory Questionnaire	PSD Prevention of Significant Deterioration
EPEmission Point	psipounds per square inch
EPAEnvironmental Protection Agency	PTE potential to emit
EUEmission Unit	RACT Reasonable Available Control Technology
FGDflue gas desulfurization	RAL Risk Assessment Level
FIREEPA's Factor Information Retrieval System	SCC Source Classification Code
fpsfeet per second	scfm standard cubic feet per minute
ftfeet	SCR selective catalytic reduction
GACTGenerally Available Control Technology	SIC Standard Industrial Classification
GHGGreenhouse Gas	SIP State Implementation Plan
gpmgallons per minute	SMAL Screening Model Action Levels
grgrains	SO_x sulfur oxides
GWPGlobal Warming Potential	SO₂ sulfur dioxide
HAPHazardous Air Pollutant	tph tons per hour
hrhour	tpy tons per year
HPhorsepower	VMT vehicle miles traveled
lbpound	VOC Volatile Organic Compounds
lb/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

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 February 22, 2013
- 2) 2011 Emissions Inventory Questionnaire, received April 30, 2012
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) Construction Permit 0684-003, Issued June 13, 1984
- 5) Construction Permit 0795-012, Issued July 19, 1995
- 6) Construction Permit 1195-010, Issued October 18, 1995
- 7) Construction Permit 0899-013, Issued July 21, 1999
- 8) No Construction Permit Required Determination, Project #2003-03-057, Completed March 14, 2003
- 9) Construction Permit 062010-003, Issued June 4, 2010
- 10) Construction Permit 102010-005, Issued October 8, 2010

Other Air Regulations Determined Not to Apply to the Operating Permit

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

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

This rule does not apply to the boiler or the engines because they use liquid fuel which is excluded from the definition of process weight in 10 CSR 10-6.400(2)(A). This rule does not apply to any of the storage tanks because they are not a source of particulate matter emissions.

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

This rule does not apply to the boiler because it uses fuel oil #2 exclusively. [10 CSR 10-6.405(1)(C)]

Construction Permits

1. Construction Permit 0684-003, Issued June 13, 1984
This permit was issued for an auxiliary boiler, diesel engines for emergency electrical generation, and fuel oil storage tanks. This permit contains special conditions which appear in this operating permit in Permit Condition (B-01)-004 and Permit Condition (B-02 through B-08)-001.
2. Construction Permit 0795-012, Issued July 19, 1995
This was a temporary construction permit issued for the use of two small boilers and an evaporator/vitrification unit to support the cleaning of the site's steam generators. This permit was later amended to reflect a change in the start date of the operation.
3. Construction Permit 1195-010, Issued October 18, 1995
This permit was issued for the installation of a Kohel Model #I80 ROZJ portable diesel generator rated at 180 kW. This permit contains no special conditions.
4. Construction Permit 899-013, Issued July 21, 1999
This temporary construction permit was issued for the installation of eight diesel powered air compressors used to test other equipment. This permit expired on August 31, 1999.

5. No Construction Permit Required Determination, Project 2003-03-057, Completed March 14, 2003
This determination was made for the installation of a 100 kW portable diesel generator.
6. Construction Permit #62010-003, Issued June 4, 2010
This permit was issued for the installation of five emergency generators. These units have been removed from the facility and therefore they do not appear in this operating permit and the special conditions have not been included.
7. Construction Permit 102010-005, Issued October 8, 2010
This permit was issued for the installation of four skid-mounted diesel powered emergency generators. The diesel sulfur content restriction in this permit is equivalent to that required by §80.510(b) (as required by NSPS III); therefore, only §80.510(b) has been applied in this permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D - *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971* and Da - *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978* are not applicable to the installation and have not been applied within this permit. B-01 Auxiliary Boiler has a heat input less than 250 MMBtu/hr.

40 CFR Part 60, Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* is not applicable to the installation and has not been applied within this permit. B-01 Auxiliary Boiler was installed prior to June 19, 1984.

40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is not applicable to the installation and has not been applied within this permit. B-01 Auxiliary Boiler has a heat input greater than 100 MMBtu/hr.

40 CFR Part 60, Subparts 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*, and 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*

These rules do not apply to any of the tanks at the installation. Only three tanks have storage capacities greater than 40,000 gallons. Those three tanks store fuel oil #2 which is specifically exempted in the definitions of petroleum liquid per §60.111(b) and §60.111a(b). Changing the contents of these storage tanks will require a new applicability determination.

40 CFR Part 60, 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*

This rule does not apply to any of the tanks at the installation. Only three tanks have storage capacities greater than 75 m³. Each of those three tanks was installed prior to the applicability date of July 23, 1984.

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

This rule does not apply to emergency engines B-02 through B-08 because they were all manufactured prior to the applicability date of April 1, 2006.

This rule has been applied to emergency compression ignition engines B-12a through B-12d which were manufactured after April 1, 2006.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for HAPs for Stationary RICE*

Engines B-02 through B-08 are subject to this rule and are required to meet the standards for existing compression ignition emergency engines at an area source.

Engines B-12a through B-12d are new stationary RICE located at an area source and meet the requirements of this rule by meeting the requirements of 40 CFR Part 60 Subpart III. [§63.6590(c)(1)]

40 CFR Part 63, Subpart JJJJJ - *National Emission Standards for HAPs for Industrial, Commercial, and Institutional Boilers Area Sources*

The auxiliary boiler (B-01) is subject to this rule. The unit is an existing oil fired boiler as it was installed in 1977.

40 CFR Part 63, Subpart CCCCC - *National Emission Standards for HAPs for Gasoline Dispensing Facilities*

This rule applies to the 2,000 gallon gasoline storage tank (IA-11) and the 500 gallon gasoline storage tank (IA-16). The installation is subject to the requirements for facilities with a gasoline throughput of less than 10,000 gallons per month.

40 CFR Part 63, Subpart Q - *National Emission Standards for HAPs for Industrial Process Cooling Towers*

This rule is only applicable to major sources of HAPs. Since the installation is an area source of HAPs, this rule does not apply. [§63.400(a)]

40 CFR Part 63, Subpart T - *National Emission Standards for Halogenated Solvent Cleaning*

This rule does not apply because the parts washer does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these halogenated HAP solvents

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

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.

Greenhouse Gas Emissions

On May 13, 2010 EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011 all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 96,327 tons, classifying the installation as a minor source of GHGs.

Should the installation's actual emissions exceed the 25,000 metric ton threshold, it would be subject to 40 CFR Part 98 - *Mandatory Greenhouse Gas Reporting Rule*. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their annual EIQ; therefore, the installation's actual CO₂ emissions were not included within this permit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tpy) ¹
CO	61.78
CO ₂ e	96,327
HAP	0.32
NO _x	266.21
PM ₁₀	13.22
PM ₂₅	10.26
SO _x	215.06
VOC	7.04

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- This PTE does not include the following emission units without limitations:
 - Ten Fuel Oil and Gasoline Portable Pumps for Various Feed Water, Oil, Lubricating and Maintenance Systems (IA-4)
 - Ten Portable Gasoline Generators used for Equipment Power at Various Locations for Maintenance or Start-up Activities (IA-5)
 - Emergency Propane Generator for Microwave Tower (IA-7, 111.5 HP, Onan 55.0 EN, Purchase Order Date 07/21/1983)
 - Emergency Propane Generator for Meteorological Tower (IA-8, 7.5 kW, Onan JB-3DR/8389T, Purchase Order Date 05/04/1972)
 - Portable Diesel Generator A (B-9, 180 kW, Kohler 180ROZJ, Installed in 1995)
 - Portable Diesel Generator B (B-10, 180 kW, Onan 175DFE, Installed in 2003)
 - Two Parts Washers (IA-6, Installed prior to 1997)
 - Unpaved Surveillance and Delivery Roads
 - Temporary Diesel Generators and Diesel Powered Equipment
 - Temporary Fuel Oil Storage Tanks
 - Natural Draft Cooling Tower
- The SO_x PTE of B-01 Auxiliary Boiler was limited to 200 tpy per Permit Condition (B-04)-004.
- Emergency engines B-02 – B-08 were evaluated at 400 hours of annual operation per Permit Condition (B-02 through B-08)-001.
- Emergency engines B-12A – B-12d were evaluated at 500 hours of annual operation per Permit Condition (B-12a through B-12d)-001.
- Gasoline storage tanks IA-11 and IA-16 were evaluated at 10,000 gal/month per Permit Condition (IA-11 and IA-16)-001.

Other Regulatory Determinations

Emission Unit Description	Explanation
Ten Fuel Oil and Gasoline Portable Pumps for Various Feed Water, Oil, Lubricating and Maintenance Systems (IA-4)	These emission units match at least one of the following descriptions. They can be moved by hand and/or they emit only products of combustion, produce less than 150 pounds per day of any air contaminant and have heat inputs of less than 1 MMBtu/hr. The APCP has determined that it is not necessary to include units such as this in the operating permit.
Ten Portable Gasoline Generators used for Equipment Power at Various Locations for Maintenance or Start-up Activities (IA-5)	
Portable Diesel Generator A (B-9)	
Portable Diesel Generator B (B-10)	
Portable Emergency Propane Generator for Microwave Tower (IA-7, 111.5 HP, Onan 55.0 EN, Purchase Order Date 07/21/1983)	These emission units emit only products of combustion, produce less than 150 pounds per day of any air contaminant and have heat inputs of less than 10 MMBtu/hr by using exclusively liquefied petroleum gas. The APCP has determined that it is not necessary to include units such as this in the operating permit.
Portable Emergency Propane Generator for Meteorological Tower (IA-8, 7.5 kW, Onan JB-3DR/8389T, Purchase Order Date 05/04/1972)	
Two Parts Washers (IA-6, Installed prior to 1997)	Since VOCs are the only expected regulated pollutant to be emitted from these emission units and there are no regulations governing the emission of VOCs from the units, no regulations were included in the operating permit for these emission units.
300,000 gallon Auxiliary Boiler Fuel Tank (IA-1, Field-Erected, Installed in 1977)	VOC emissions are the only expected emissions of a regulated pollutant from these tanks. As described elsewhere in the Statement of Basis, none of the tanks are subject to NSPS standards and there are no other regulations governing the emission of VOCs from tanks. Therefore, no regulations were included in the operating permit for these emission units.
Two 100,340 gallon Fuel Oil Storage Tanks for Emergency Diesel Generators A and B (IA-2, Field-Erected, Installed in 1979)	
Two 612 gallon Fuel Oil Day Tanks for the Emergency Diesel Generators A and B (IA-3, Installed in 1979)	
10,000 gallon Reclaim Oil Tank (IA-9, Field-Erected, Installed in 1980)	
300 gallon Diesel Tank (IA-10, Installed prior to 1997)	
700 gallon Diesel Tank (IA-10, Installed prior to 1997)	
300 gallon Kerosene Storage Tank (IA-12, Installed prior to 1997)	
3,000 gallon Security Emergency Diesel Generator Fuel Oil Storage Tank (Installed in 1981)	

Emission Unit Description	Explanation
6,000 gallon EOF Emergency Diesel Generator Fuel Oil Storage Tank (Installed in 1981)	
Two 250 gallon Diesel Tanks	
2,844 gallon TSC Emergency Diesel Generator Fuel Oil Storage Tank (Installed in 1981)	
Unpaved Surveillance and Delivery Roads	Emissions from the roads are fugitive PM. As such, the only applicable regulation is 10 CSR 10-6.170 which is already included in the operating permit as a core permit requirement.
Temporary Diesel Generators and Diesel Powered Equipment	Temporary diesel generators and diesel powered equipment such as air compressors may be brought on site during plant outages. They will be used for maintenance activities and emit negligible emissions.
Temporary Fuel Oil Storage Tanks	Temporary fuel oil storage tanks may be brought on site and used during plant outages. These tanks range in size from 300 gallons to 6,000 gallons and emit negligible amounts of VOC's from their vents.
Cooling Tower	Fugitive source with no limitations

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

This rule is applicable to the auxiliary boiler (B-01). Since the boiler was installed after February 24, 1971, the requirements for new sources are applicable. 10 CSR 10-6.220(1)(A) specifically exempts internal combustion engines from the requirements of this rule.

The storage tanks and parts washers at the installation listed in Emission Units Without Limitations are not expected to generate emissions that would result in opacity issues. As such, the rule was not included in the operating permit for those emission units.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

This rule applies to the boiler (B-01) and emergency engines B-02 through B-08.

This rule does not apply to the emergency engines that were installed in 2010 (B-12a through B-12d) because they are subject to a sulfur emission standard under 40 CFR Part 60, Subpart IIII. [10 CSR 10-6.260(1)(A)1]

Response to Comments

The draft Part 70 Operating Permit, Project 2013-02-060, for Ameren Missouri Callaway Energy Center (027-0026) was placed on public notice as of October 18, 2013, for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Friday, October 18, 2013.

On November 5, 2013, the Air Pollution Control Program received comments from Mark A. Smith, Air Permitting and Compliance Branch Chief for EPA Region VII.

EPA Comment #1:

Permit Condition (B-02 through B-08)-001 and Permit Condition (B-02 through B-08)-003 both contain operational limitations which are applicable to the same seven emergency diesel driven equipment.

When more than one emission standard applies to one or more emission units, EPA strongly encourages the permitting authority to consider streamlining in an effort to eliminate redundant limits. EPA's White Paper #2 provides the guidance on streamlining multiple applicable requirements and the basic principles are:

- ◆ Include the most stringent requirement, because that assures compliance with the other requirements;
- ◆ Choose most stringent limit;
- ◆ Choose the most assuring monitoring;
- ◆ Include citation of authority for most stringent and all other sub-assumed requirements;
- ◆ Include recordkeeping and reporting associated with most assuring test; and
- ◆ Provide streamlining demonstration which includes a side-by-side comparison of the requirements in the Statement of Basis.

Therefore, EPA recommends MDNR strongly consider a streamlining approach to the requirements in Permit Conditions (B-02 through B-08)-001 and (B-02 through B-08)-003.

Missouri Air Pollution Control Program Response to Comment #1:

Special Condition 4 of Construction Permit 0684-003 was removed from the permit in an effort to streamline.

EPA Comment #2:

Permit Condition (B-12a through B-12d)-001 and Permit Condition (B-12a through B-12d)-002 both contain operational limitations which are applicable to the same four emergency diesel generator engines. When more than one emission standard applies to one or more emission units, EPA strongly encourages the permitting authority to consider streamlining in an effort to eliminate redundant limits. EPA's White Paper #2 provides the guidance on streamlining multiple applicable requirements and the basic principles are:

- ◆ Include the most stringent requirement, because that assures compliance with the other requirements;
- ◆ Choose most stringent limit;
- ◆ Choose the most assuring monitoring;
- ◆ Include citation of authority for most stringent and all other sub-assumed requirements;
- ◆ Include recordkeeping and reporting associated with most assuring test; and
- ◆ Provide streamlining demonstration which includes a side-by-side comparison of the requirements in the Statement of Basis.

Therefore, EPA recommends MDNR strongly consider a streamlining approach to the requirements in Permit Conditions (B-12a through B-12d)-001 and (B-12a through B-12d)-002.

Missouri Air Pollution Control Program Response to Comment #2:

Special Conditions 1.A and 1.B of Construction Permit 102010-005 were removed from the permit in an effort to streamline.

EPA Comment #3:

The initial compliance requirement in Permit Condition (B-02 through B-08)-003 requires the permittee to comply with the applicable 40 CFR Part 63, Subpart ZZZZ limitations no later than May 3, 2013. This draft operating permit was placed on public notice on October 18, 2013 which is over five months after the initial compliance date. Therefore, the permittee should have met these initial compliance requirements and EPA recommends MDNR remove these initial compliance requirements from the operating permit.

Missouri Air Pollution Control Program Response to Comment #3:

The initial compliance requirements have been removed from the permit.

EPA Comment #4:

Permit Condition (B-01)-003 includes a requirement entitled Compliance Dates which requires the permittee to achieve compliance with all applicable provisions by March 21, 2014. This requirement, as written, is not practically enforceable and EPA would not recognize the condition, due to lack of the specific applicable provisions the permittee is to be in compliance with by March 21, 2014. Therefore, EPA recommends that MDNR specify the applicable provisions the permittee is to comply with by March 21, 2014 in Permit Condition (B-01)-003.

Missouri Air Pollution Control Program Response to Comment #4:

The compliance date requirement has been modified to read: “The permittee shall achieve compliance with the applicable provisions of MACT JJJJJ by March 21, 2014. [§63.11196(a)]”

EPA Comment #5:

Requirement 2 under the work practice standards of Permit Condition (B-01)-003, indicates the energy assessment must include the following with extent of the evaluation of items 1 – 4 appropriate for the on-site technical hours listed in §63.11237. However, there are no items 1 – 4 in this permit condition. Therefore, EPA recommends MDNR amend the reference to reflect the requirements.

Missouri Air Pollution Control Program Response to Comment #5:

The requirement has been modified to read:

The permittee shall comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to MACT JJJJJ. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this condition satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [§63.11201(b)]

Table 2 to MACT JJJJJJ – Work Practice Standards, Emission Reduction Measures, and Management Practices

Boiler Subcategory	Work Practice Standards, Emission Reduction Measures, and Management Practices
Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
Existing oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment shall include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:</p> <ul style="list-style-type: none"> (1) A visual inspection of the boiler system, (2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints, (3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the permittee, (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage, (5) A list of major energy conservation measures that are within the permittee's control, (6) A list of the energy savings potential of the energy conservation measures identified, and (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

EPA Comment #6:

The emission limitations in Permit Condition (B-01)-001 and Permit Condition (B-01)-002 indicate the responsible individual for compliance is either the owner or other person. These are requirements adopted into an operating permit for a specific entity and the compliance responsibility is the permittee. EPA recommends MDNR modify these three requirements to reflect the permittee as the responsible party. Also, the monitoring/recordkeeping requirement 1 in Permit Condition (B-12a through B-12d)-

001 says the generator shall be equipped with a non-resettable meter to record the annual hours of operation for compliance. EPA suggests MDNR modify the wording to indicate the permittee shall equip the generator with a non-resettable meter to record the annual hours of operation for compliance.

Missouri Air Pollution Control Program Response to Comment #6:

The permit has been modified to hold the permittee responsible for the emission limitations in Permit Conditions (B-01)-001 and (B-01)-002.

The monitoring/recordkeeping condition in Permit Condition (B-12a through B-12d)-001 was removed from the permit in a streamlining effort (see Missouri Air Pollution Control Program Response to Comment #2) as it is less stringent than §60.4209(a) included in Permit Condition (B-12a through B-12d)-002.

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).