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: OP2018-029
Expiration Date: APR 02 2023
Installation ID: 163-0047
Project Number: 2017-02-057

**Installation Name and Address**
Peno Creek Energy Center
16303 Industrial Park Road
Bowling Green, MO 63334
Pike County

**Parent Company's Name and Address**
Ameren Corporation
1901 Chouteau Avenue
St. Louis MO, 63103

**Installation Description:**
This installation generates electrical power for distribution and sale. It is operated as a peaking unit, generating power during periods of high electrical demand. The installation consists of four dual-fuel fired Pratt & Whitney FT8 Twin Pacs (turbines), each with the nominal capacity to produce 60 Megawatts (MW) of electrical power; total installation generation nominal capacity is 240 MW of electrical power. The turbines combust either pipeline quality natural gas or No.2 Fuel Oil. There is also a 1.3 million-gallon fuel oil tank on site. Each Pratt & Whitney FT8 Twin Pac consists of two combustion turbines coupled to a single electrical generator.

Prepared by
Adam Brooks EIT
Operating Permit Unit

Signed
Director or Designee
Department of Natural Resources

**Effective Date**
APR 02 2018
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I. Installation Equipment Listing

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.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT1A</td>
<td>Pratt &amp; Whitney FT8 simple-cycle combustion turbine</td>
</tr>
<tr>
<td>CT1B</td>
<td>Pratt &amp; Whitney FT8 simple-cycle combustion turbine</td>
</tr>
<tr>
<td>CT2A</td>
<td>Pratt &amp; Whitney FT8 simple-cycle combustion turbine</td>
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<td>Pratt &amp; Whitney FT8 simple-cycle combustion turbine</td>
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<tr>
<td>CT4B</td>
<td>Pratt &amp; Whitney FT8 simple-cycle combustion turbine</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC 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
No. 2 Fuel Oil storage tank for combustion turbines, 1.3 million gallons
8 Lubricating oil tanks, 42 gallons each
4 Generator lubricating oil reservoirs, 450 gallons each
Maintenance transformer oil tank, 333 gallons
2 Auxiliary transformer oil tanks, 314 gallons each
Parts Washer
II. Plant Wide Emission Limitations

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

None
### III. Emission Unit Specific Emission Limitations

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

#### PERMIT CONDITION 1 (CO)

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 112001-007

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<tr>
<th>Emission Unit</th>
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</table>
| CT1A          | Combustion Turbine Units 1A and 1B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT1B          | Combustion Turbine Units 1A and 1B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT2A          | Combustion Turbine Units 2A and 2B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT2B          | Combustion Turbine Units 2A and 2B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT3A          | Combustion Turbine Units 3A and 3B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT3B          | Combustion Turbine Units 3A and 3B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT4A          | Combustion Turbine Units 4A and 4B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
| CT4B          | Combustion Turbine Units 4A and 4B (Simple Cycle)  
Generating Capacity: 60 MW total  
MHDR: 300 MMBtu/hr each (natural gas combustion)  
266 MMBtu/hr each (No. 2 oil combustion)  
Installation Date: 2001  
Fuel Type: Natural Gas and No. 2 Fuel Oil | Pratt & Whitney/ FT8  
Pratt & Whitney/ FT8 |
**Emissions Limitation:**
The permittee shall emit into the atmosphere from all eight turbine engines (CT1A, CT1B, CT2A, CT2B, CT3A, CT3B, CT4A, and CT4B) no more than 100 tons of carbon monoxide (CO) in any consecutive 12-month period. [Special Condition 1]

**Control Equipment:**
The permittee shall control CO emissions from each turbine engine using a CO catalyst. The CO catalyst shall be operated and maintained in accordance with the manufacturer's specifications at all times the turbine engines are in operation. [Special Condition 8]

**Continuous Emission Monitoring System (CEMS):**
1) The permittee shall install, calibrate, maintain and operate continuous emissions monitoring systems (CEMS) and record the output of the systems for measuring CO emissions discharged to the atmosphere. These systems shall be placed in an appropriate location on each turbine engine's flue gas exhaust such that accurate readings are possible. The output data from the CEMS shall be used in demonstrating compliance with the CO emissions limitations. [Special Condition 14]
2) The CEMS shall be installed and operated according to the guidelines in 40 CFR Part 60, Appendix B for CO. [Special Condition 15]

**Recordkeeping:**
The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of CO emissions from the eight turbine engines. The permittee shall use Attachment 1 *Monthly CO Emissions Tracking Records*, or an equivalent form, to demonstrate compliance with the CO emission limitation. These records shall be maintained on-site for five years and shall be made available for inspection to the Department of Natural Resources' personnel upon request. [Special Condition 4]

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than thirty days after the end of the month during which the *Monthly CO Emissions Tracking Records* (Attachment 1) indicates that the source exceeded the CO emission limitation. [Special Condition 6]
2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification required by Section V of this permit.
PERMIT CONDITION 2 (NOx)

10 CSR 10-6.060 Construction Permits Required
Construction Permit 112001-007
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines

Note: The nitrogen oxides limits in 40 CFR Part 60 Subpart GG apply to the emission units of this permit condition. However, the emission limits in Construction Permit 112001-007 are more stringent; therefore, the limits from Subpart GG are not listed as permit conditions. The monitoring, recordkeeping, and reporting requirements from Subpart GG are included.

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<tr>
<th>Emission Unit</th>
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<tr>
<td>CT1A</td>
<td>Combustion Turbine Units 1A and 1B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td>Pratt &amp; Whitney/ FT8 Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td>CT1B</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CT2A</td>
<td>Combustion Turbine Units 2A and 2B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td>Pratt &amp; Whitney/ FT8 Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td>CT2B</td>
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<td>Combustion Turbine Units 3A and 3B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
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<td>CT3B</td>
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<td>Combustion Turbine Units 4A and 4B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
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</tr>
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<td>CT4B</td>
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</table>
**Emissions Limitation:**
The permittee shall emit into the atmosphere from all eight turbine engines (CT1A, CT1B, CT2A, CT2B, CT3A, CT3B, CT4A, and CT4B) no more than 100 tons of nitrogen oxides (NOₓ) in any consecutive 12-month period. [Special Condition 2]

**Control Equipment:**
1) The permittee shall control NOₓ emissions from each turbine engine using water injection. The water injection shall achieve a NOₓ emission rate of 25 parts per million by volume (ppmvd) corrected to 15 percent (%) oxygen on a dry basis when natural gas is burned in the combustion turbines. The water injection shall achieve a NOₓ emission rate of 42 parts per million by volume (ppmvd) corrected to 15 percent (%) oxygen on a dry basis when distillate oil is burned in the combustion turbines. The water injection shall be operated and maintained in accordance to manufacturer’s specifications at all times the turbine engines are in operation. [Special Condition 9]

2) Stationary gas turbines using water or steam injection for control of NOₓ emissions are exempt from meeting the NOₓ emission concentration limitation when ice fog is deemed a traffic hazard by the permittee. [§60.332(f)]

**Monitoring:**
1) The permittee shall install, calibrate, maintain, operate, and quality-assure continuous emission monitoring systems (CEMS) consisting of NOₓ and O₂ monitors and record the output of the systems for measuring NOₓ emissions discharged to the atmosphere. These systems shall be placed in an appropriate location on each turbine engine’s flue gas exhaust such that accurate readings are possible. The output data from the CEMS shall be used in demonstrating compliance with the NOₓ emissions limitations. [Special Condition 14]

2) The CEMS shall be installed, certified, maintained and operated as follows: [§60.334(b)]

   a) Each CEMS must be installed and certified according to PS 2 and 3 (for diluent) of 40 CFR part 60, appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. Appendix F, Procedure 1 is not required. The relative accuracy test audit (RATA) of the NOₓ and diluent monitors may be performed individually or on a combined basis, i.e., the relative accuracy tests of the CEMS may be performed either:
      i) On a ppm basis (for NOₓ) and a percent O₂ basis for oxygen; or
      ii) On a ppm at 15 percent O₂ basis

   b) As specified in §60.13(e)(2), during each full unit operating hour, each monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hour.

   c) For purposes of identifying excess emissions, CEMS data must be reduced to hourly averages as specified in §60.13(h).
      i) For each unit operating hour in which a valid hourly average is obtained for both NOₓ and diluent, the data acquisition and handling system must calculate and record the hourly NOₓ emissions in the units of the applicable NOₓ emission standard under §60.332(a), i.e., percent NOₓ by volume, dry basis, corrected to 15 percent O₂ and International Organization for Standardization (ISO) standard conditions (if required as given in §60.335(b)(1)). For any hour
in which the hourly average O₂ concentration exceeds 19.0 percent O₂, a diluent cap value of 19.0 percent O₂ may be used in the emission calculations.

ii) A worst case ISO correction factor may be calculated and applied using historical ambient data. For the purpose of this calculation, substitute the maximum humidity of ambient air (H₀), minimum ambient temperature (T₀), and minimum combustor inlet absolute pressure (P₀) into the ISO correction equation in §60.335(b)(1).

iii) The CEMS may be used to meet the requirements of this section, except that the missing data substitution methodology provided for at 40 CFR Part 75, Subpart D, is not required for purposes of identifying excess emissions. Instead, periods of missing CEMS data are to be reported as monitor downtime in the excess emissions and monitoring performance report required in §60.7(c).

3) The steam or water to fuel ratio or other parameters that are continuously monitored as described in paragraph 1 above shall be monitored during the performance test required under §60.8, to establish acceptable values and ranges. The permittee may supplement the performance test data with engineering analyses, design specifications, manufacturer's recommendations and other relevant information to define the acceptable parametric ranges more precisely. The permittee shall develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NOₓ emission controls. The plan shall include the parameter(s) monitored and the acceptable range(s) of the parameter(s) as well as the basis for designating the parameter(s) and acceptable range(s). Any supplemental data such as engineering analyses, design specifications, manufacturer's recommendations and other relevant information shall be included in the monitoring plan. [§60.334(g)]

**Testing methods and procedures:**
The permittee shall adhere to the rules within 40 CFR §60.335.

**Recordkeeping:**
The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of NOₓ emissions from the eight turbine engines. The permittee shall use Attachment 2 *Monthly NOₓ Emissions Tracking Records*, or an equivalent form, to demonstrate compliance with the NOₓ emission limitation. These records shall be maintained on-site for five years and shall be made available for inspection to the Department of Natural Resources' personnel upon request. [Special Condition 5]

**Reporting:**
1) *Ice fog.* Each period during which an exemption provided in §60.332(f) is in effect shall be reported in writing to the Director quarterly. For each period the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated shall be reported. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than thirty days after the end of the month during which the *Monthly NOₓ Emissions Tracking Records* (Attachment 2) indicates that the source exceeded the NOₓ emission limitation. [Special Condition 7]

3) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification required by Section V of this permit.
PERMIT CONDITION 3 (SOx)

10 CSR 10-6.060 Construction Permits Required
Construction Permit 112001-007
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines

Note: The sulfur oxides limits in 40 CFR Part 60 Subpart GG apply to the emission units of this permit condition. However, the emission limits in Construction Permit 112001-007 are more stringent; therefore, the limits from Subpart GG are not listed as permit conditions. The monitoring, recordkeeping, and reporting requirements from Subpart GG are included.

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<td>CT1B</td>
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<td>Pratt &amp; Whitney/ FT8</td>
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<td>CT2A</td>
<td>Combustion Turbine Units 2A and 2B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
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<td>Combustion Turbine Units 4A and 4B (Simple Cycle) Generating Capacity: 60 MW total MHDR: 300 MMBtu/hr each (natural gas combustion) 266 MMBtu/hr each (No. 2 oil combustion) Installation Date: 2001 Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
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<td>CT4B</td>
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</table>
Operational Limitation:
All natural gas and/or fuel oil combusted in the equipment covered with this permit shall have a sulfur content of 0.05 percent by weight or less. [Special Condition 3]

Monitoring:
Frequency of determining the sulfur content of fuel: [§60.334(i)]
1) While operating on diesel fuel: [§60.334(i)(i)]
   For fuel oil, the permittee shall use one of the total sulfur sampling options and the associated sampling frequency described in Sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of Appendix D to 40 CFR Part 75 (i.e., flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with fuel oil already in the intended storage tank).
2) While operating on natural gas: [§60.334(i)(2)]
   The permittee shall demonstrate that the gaseous fuel meets the definition of natural gas in 40 CFR 60.331(u) using one of the methods in 60.334(h)(3) to negate the need to monitor the total sulfur content of the gaseous fuel combusted in the turbines.

Testing methods and procedures:
The permittee shall adhere to the rules within 40 CFR §60.335.

Reporting:
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance or deviation from this permit condition.
2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification required by Section V of this permit.
PERMIT CONDITION 4

10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program
10 CSR 10-6.366 Clean Air Interstate Rule SO2 Trading Program
CAIR Permits Required

Note: The Entire CAIR Permit is included as Attachment 4 to this permit.

The Clean Air Interstate Rule (CAIR) has been replaced by the Cross State Air Pollution Rule (CSAPR), however a CAIR Permit is being issued to this installation because the CAIR regulations have not been removed from the Missouri State Implementation Plan (SIP) at this time. The permittee is not required to hold CAIR allowances and therefore no violation of CAIR is possible. Once the CAIR regulations are removed from the SIP and replaced with CSAPR, this permit condition will expire and the limitation thereof will no longer apply to the installation. No action on the part of the permittee is required to remove this permit condition from the operating permit.

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**Emission Limitation:**
The permittee shall obtain a CAIR Permit for the combustion units (CT1A through CT4B) pursuant to Title IV of the Clean Air Act.

**Monitoring/Recordkeeping:**
1) The permittee shall retain the CAIR permit issued to this installation onsite.
2) The permittee shall make the CAIR permit available to any Missouri Department of Natural Resources' personnel upon request

**Reporting:**
The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the annual compliance certification required by Section V of this permit.
### PERMIT CONDITION 5

40 CFR Parts 70 and 97 Cross State Air Pollution Rule  
10 CSR 10-6.372 Cross-State Air Pollution Rule Annual NOₓ Trading Allowance Allocations  
10 CSR 10-6.374 Cross-State Air Pollution Rule Ozone Season NOₓ Trading Allowance Allocations  
10 CSR 10-6.376 Cross-State Air Pollution Rule Annual SO₂ Trading Allowance Allocations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT1A, CT1B</td>
<td>Combustion Turbine Units 1A and 1B (Simple Cycle)</td>
<td>Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td></td>
<td>Generating Capacity: 60 MW total</td>
<td></td>
</tr>
<tr>
<td></td>
<td>MHDR: 300 MMBtu/hr each (natural gas combustion)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>266 MMBtu/hr each (No. 2 oil combustion)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Installation Date: 2001</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td></td>
</tr>
<tr>
<td>CT2A, CT2B</td>
<td>Combustion Turbine Units 2A and 2B (Simple Cycle)</td>
<td>Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td></td>
<td>Generating Capacity: 60 MW total</td>
<td></td>
</tr>
<tr>
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<td>MHDR: 300 MMBtu/hr each (natural gas combustion)</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Installation Date: 2001</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td></td>
</tr>
<tr>
<td>CT3A, CT3B</td>
<td>Combustion Turbine Units 3A and 3B (Simple Cycle)</td>
<td>Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td></td>
<td>Generating Capacity: 60 MW total</td>
<td></td>
</tr>
<tr>
<td></td>
<td>MHDR: 300 MMBtu/hr each (natural gas combustion)</td>
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<tr>
<td></td>
<td>Installation Date: 2001</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td></td>
</tr>
<tr>
<td>CT4A, CT4B</td>
<td>Combustion Turbine Units 4A and 4B (Simple Cycle)</td>
<td>Pratt &amp; Whitney/ FT8</td>
</tr>
<tr>
<td></td>
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<td>Installation Date: 2001</td>
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</tr>
<tr>
<td></td>
<td>Fuel Type: Natural Gas and No. 2 Fuel Oil</td>
<td></td>
</tr>
</tbody>
</table>

The TR subject units, and the unit-specific monitoring provisions, at this source are identified in the following table. These units are subject to the requirements for the TR NOₓ Annual Trading Program, TR NOₓ Ozone Season Group 2 Trading Program, and TR SO₂ Group 1 Trading Program.
<table>
<thead>
<tr>
<th>Parameter</th>
<th>Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO₂ monitoring) and 40 CFR part 75, subpart H (for NOₓ monitoring)</th>
<th>Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D</th>
<th>Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E</th>
<th>Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19</th>
<th>EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E</th>
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</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>-----</td>
<td>CT1A, CT1B, CT2A, CT2B CT3A, CT3B, CT4A, CT4B</td>
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<td>-----</td>
</tr>
<tr>
<td>NOₓ</td>
<td>CT1A, CT1B, CT2A, CT2B CT3A, CT3B, CT4A, CT4B</td>
<td>-----</td>
<td>-----</td>
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<tr>
<td>Heat Input</td>
<td>-----</td>
<td>CT1A, CT1B, CT2A, CT2B CT3A, CT3B, CT4A, CT4B</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
</tr>
</tbody>
</table>

1) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NOₓ Annual Trading Program), 97.830 through 97.835 (CSAPR NOₓ Ozone Season Group 2 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.

2) The permittee shall submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA’s website at [http://www.epa.gov/airmarkets/emissions/monitoringplans.html](http://www.epa.gov/airmarkets/emissions/monitoringplans.html).

3) If the permittee wants to use an alternative monitoring system, the permittee shall submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NOₓ Annual Trading Program), 97.835 (CSAPR NOₓ Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative monitoring system is available on the EPA’s website at [http://www.epa.gov/airmarkets/emissions/petitions.html](http://www.epa.gov/airmarkets/emissions/petitions.html).
4) If the permittee wants to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO\textsubscript{x} Annual Trading Program), 97.830 through 97.834 (CSAPR NO\textsubscript{x} Ozone Season Group 2 Trading Program), and/or 97.630 through 97.634 (CSAPR SO\textsubscript{2} Group 1 Trading Program), the permittee shall submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO\textsubscript{x} Annual Trading Program), 97.835 (CSAPR NO\textsubscript{x} Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO\textsubscript{2} Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA’s website at [http://www.epa.gov/airmarkets/emissions/petitions.html](http://www.epa.gov/airmarkets/emissions/petitions.html).

5) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO\textsubscript{x} Annual Trading Program), 97.830 through 97.834 (CSAPR NO\textsubscript{x} Ozone Season Group 2 Trading Program), and 97.630 through 97.634 (CSAPR SO\textsubscript{2} Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with §70.7(e)(2)(i)(B), may be used to add or change this unit’s monitoring system description.

**CSAPR NO\textsubscript{x} Annual Trading Program Requirements:**

1) **Designated representative requirements.** The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with §§97.413 through 97.418. [§97.406(a)]

2) **Emissions monitoring, reporting, and recordkeeping requirements.** [§97.406(b)]

   a) The permittee, and the designated representative, of each CSAPR NO\textsubscript{x} Annual source and each CSAPR NO\textsubscript{x} Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of §97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), §97.431 (initial monitoring system certification and recertification procedures), §97.432 (monitoring system out-of-control periods), §97.433 (notifications concerning monitoring), §97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and §97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements). [§97.406(b)(1)]

   b) The emissions data determined in accordance with §§97.430 through 97.435 shall be used to calculate allocations of CSAPR NO\textsubscript{x} Annual allowances under §97.411(a)(2) and (b) and §97.412 and to determine compliance with the CSAPR NO\textsubscript{x} Annual emissions limitation and assurance provisions under §97.406(c), provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with §§97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero. [§97.406(b)(2)]

3) **NO\textsubscript{x} emissions requirements.** [§97.406(c)]

   a) **CSAPR NO\textsubscript{x} Annual emissions limitation.** [§97.406(c)(1)]

      i) As of the allowance transfer deadline for a control period in a given year, the permittee shall hold, in the source's compliance account, CSAPR NO\textsubscript{x} Annual allowances available for deduction for such control period under §97.424(a) in an amount not less than the tons of total NO\textsubscript{x} emissions for such control period from all CSAPR NO\textsubscript{x} Annual units at the source. [§97.406(c)(1)(i)]

      ii) If total NO\textsubscript{x} emissions during a control period in a given year from the CSAPR NO\textsubscript{x} Annual units at a CSAPR NO\textsubscript{x} Annual source are in excess of the CSAPR NO\textsubscript{x} Annual emissions limitation set forth in §97.406(c)(1)(i), then: [§97.406(c)(1)(ii)]
The permittee shall hold the CSAPR NO\textsubscript{x} Annual allowances required for deduction under §97.424(d); and [§97.406(c)(1)(ii)(A)]

(2) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act. [§97.406(c)(1)(ii)(B)]

b) CSAPR NO\textsubscript{x} Annual assurance provisions. [§97.406(c)(2)]

i) If total NO\textsubscript{x} emissions during a control period in a given year from all CSAPR NO\textsubscript{x} Annual units at CSAPR NO\textsubscript{x} Annual sources in Missouri exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative’s share of such NO\textsubscript{x} emissions during such control period exceeds the common designated representative’s assurance level for Missouri and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO\textsubscript{x} Annual allowances available for deduction for such control period under §97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with §97.425(b), of multiplying— [§97.406(c)(2)(i)]

(1) The quotient of the amount by which the common designated representative’s share of such NO\textsubscript{x} emissions exceeds the common designated representative’s assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in Missouri for such control period, by which each common designated representative’s share of such NO\textsubscript{x} emissions exceeds the respective common designated representative’s assurance level; and [§97.406(c)(2)(i)(A)]

(2) The amount by which total NO\textsubscript{x} emissions from all CSAPR NO\textsubscript{x} Annual units at CSAPR NO\textsubscript{x} Annual sources in Missouri for such control period exceed the state assurance level. [§97.406(c)(2)(i)(B)]

ii) The permittee shall hold the CSAPR NO\textsubscript{x} Annual allowances required under §97.406(c)(2)(i), as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after the year of such control period. [§97.406(c)(2)(ii)]

iii) Total NO\textsubscript{x} emissions from all CSAPR NO\textsubscript{x} Annual units at CSAPR NO\textsubscript{x} Annual sources in Missouri during a control period in a given year exceed the state assurance level if such total NO\textsubscript{x} emissions exceed the sum, for such control period, of Missouri NO\textsubscript{x} Annual trading budget under §97.410(a) and the state’s variability limit under §97.410(b). [§97.406(c)(2)(iii)]

iv) It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO\textsubscript{x} emissions from all CSAPR NO\textsubscript{x} Annual units at CSAPR NO\textsubscript{x} Annual sources in Missouri during a control period exceed the state assurance level or if a common designated representative’s share of total NO\textsubscript{x} emissions from the CSAPR NO\textsubscript{x} Annual units at CSAPR NO\textsubscript{x} Annual sources in Missouri during a control period exceeds the common designated representative’s assurance level. [§97.406(c)(2)(iv)]

v) To the extent the permittee fails to hold CSAPR NO\textsubscript{x} Annual allowances for a control period in a given year in accordance with §97.406(c)(2)(i) through (iii), [§97.406(c)(2)(v)]

(1) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and [§97.406(c)(2)(v)(A)]
(2) Each CSAPR NOx Annual allowance that the permittee fails to hold for such control period in accordance with §97.406(c)(2)(i) through (iii) and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAAA and the Clean Air Act. [§97.406(c)(2)(v)(B)]

c) Compliance periods. [§97.406(c)(3)]
   i) A CSAPR NOx Annual unit shall be subject to the requirements under §97.406(c)(1) for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under §97.430(b) and for each control period thereafter. [§97.406(c)(3)(i)]
   ii) A CSAPR NOx Annual unit shall be subject to the requirements under §97.406(c)(2) for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under §97.430(b) and for each control period thereafter. [§97.406(c)(3)(ii)]

d) Vintage of CSAPR NOx Annual allowances held for compliance. [§97.406(c)(4)]
   i) A CSAPR NOx Annual allowance held for compliance with the requirements under §97.406(c)(1)(i) for a control period in a given year must be a CSAPR NOx Annual allowance that was allocated or auctioned for such control period or a control period in a prior year. [§97.406(c)(4)(i)]
   ii) A CSAPR NOx Annual allowance held for compliance with the requirements under §97.406(c)(1)(ii)(A) and (2)(i) through (iii) for a control period in a given year must be a CSAPR NOx Annual allowance that was allocated or auctioned for a control period in a prior year or the control period in the given year or in the immediately following year. [§97.406(c)(4)(ii)]

e) Allowance Management System requirements. Each CSAPR NOx Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAAA. [§97.406(c)(5)]

f) Limited authorization. A CSAPR NOx Annual allowance is a limited authorization to emit one ton of NOx during the control period in one year. Such authorization is limited in its use and duration as follows: [§97.406(c)(6)]
   i) Such authorization shall only be used in accordance with the CSAPR NOx Annual Trading Program; and [§97.406(c)(6)(i)]
   ii) Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act. [§97.406(c)(6)(ii)]

g) Property right. A CSAPR NOx Annual allowance does not constitute a property right. [§97.406(c)(7)]

4) Title V permit revision requirements. [§97.406(d)]
   a) No Title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NOx Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAAA. [§97.406(d)(1)]
   b) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to §§97.430 through 97.435, and the requirements for a CEMS (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to §75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this
permit may be added to, or changed, in this Title V permit using minor permit modification procedures in accordance with this paragraph and §70.7(e)(2)(i)(B). [§97.406(d)(2)]

5) **Additional recordkeeping and reporting requirements.** [§97.406(e)]
   a) Unless otherwise provided, the permittee shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of five years from the date the document is created. This period may be extended for cause, at any time before the end of five years, in writing by the Administrator. [§97.406(e)(1)]
      i) The certificate of representation under §97.416 for the designated representative for the source and each CSAPR NOx Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under §97.416 changing the designated representative. [§97.406(e)(1)(i)]
      ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAAA. [§97.406(e)(1)(ii)]
      iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NOx Annual Trading Program. [§97.406(e)(1)(iii)]
   b) The designated representative of a CSAPR NOx Annual source and each CSAPR NOx Annual unit at the source shall make all submissions required under the CSAPR NOx Annual Trading Program, except as provided in §97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Part 70. [§97.406(e)(2)]

6) **Liability.** [§97.406(f)]
   a) Any provision of the CSAPR NOx Annual Trading Program that applies to a CSAPR NOx Annual source or the designated representative of a CSAPR NOx Annual source shall also apply to the permittee. [§97.406(f)(1)]
   b) Any provision of the CSAPR NOx Annual Trading Program that applies to a CSAPR NOx Annual unit or the designated representative of a CSAPR NOx Annual unit shall also apply to the permittee. [§97.406(f)(2)]

7) **Effect on other authorities.** No provision of the CSAPR NOx Annual Trading Program or exemption under §97.405 shall be construed as exempting or excluding the permittee, and the designated representative, from compliance with any other provision of the Missouri’s state implementation plan, a federally enforceable permit, or the Clean Air Act. [§97.406(g)]

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**CSAPR NOx Ozone Season Group 2 Trading Program Requirements:**

1) **Designated representative requirements.** The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with §§97.813 through 97.818. [§97.806(a)]

2) **Emissions monitoring, reporting, and recordkeeping requirements.** [§97.806(b)]
   a) The permittee, and the designated representative, of each CSAPR NOx Ozone Season Group 2 source and each CSAPR NOx Ozone Season Group 2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of §97.830 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), §97.831 (initial monitoring system certification and recertification procedures), §97.832 (monitoring system out-of-control periods), §97.833
(notifications concerning monitoring), §97.834 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and §97.835 (petitions for alternatives to monitoring, recordkeeping, and reporting requirements).

b) The emissions data determined in accordance with §§97.830 through 97.835 shall be used to calculate allocations of CSAPR NOx Ozone Season Group 2 allowances under §§97.811(a)(2) and (b) and §97.812 and to determine compliance with the CSAPR NOx Ozone Season Group 2 emissions limitation and assurance provisions under §97.806(c), provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with §§97.830 through 97.835 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

3) NOx emissions requirements— [§97.806(c)]

a) CSAPR NOx Ozone Season Group 2 emissions limitation. [§97.806(c)(1)]

i) As of the allowance transfer deadline for a control period in a given year, the permittee shall hold, in the source's compliance account, CSAPR NOx Ozone Season Group 2 allowances available for deduction for such control period under §97.824(a) in an amount not less than the tons of total NOx emissions for such control period from all CSAPR NOx Ozone Season Group 2 units at the source. [§97.806(c)(1)(i)]

ii) If total NOx emissions during a control period in a given year from the CSAPR NOx Ozone Season Group 2 units at a CSAPR NOx Ozone Season Group 2 source are in excess of the CSAPR NOx Ozone Season Group 2 emissions limitation set forth in §97.806(c)(1)(i), then: [§97.806(c)(1)(ii)]

   (1) The permittee shall hold the CSAPR NOx Ozone Season Group 2 allowances required for deduction under §97.824(d); and [§97.806(c)(1)(ii)(A)]

   (2) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act. [§97.806(c)(1)(ii)(B)]

b) CSAPR NOx Ozone Season Group 2 assurance provisions. [§97.806(c)(2)]

i) If total NOx emissions during a control period in a given year from all base CSAPR NOx Ozone Season Group 2 units at base CSAPR NOx Ozone Season Group 2 sources in Missouri exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NOx emissions during such control period exceeds the common designated representative's assurance level for Missouri and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NOx Ozone Season Group 2 allowances available for deduction for such control period under §97.825(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with §97.825(b), of multiplying— [§97.806(c)(2)(i)]

   (1) The quotient of the amount by which the common designated representative's share of such NOx emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in Missouri for such control period, by which
each common designated representative's share of such NO\textsubscript{x} emissions exceeds the respective common designated representative's assurance level; and [§97.806(c)(2)(i)(A)]

(2) The amount by which total NO\textsubscript{x} emissions from all base CSAPR NO\textsubscript{x} Ozone Season Group 2 units at base CSAPR NO\textsubscript{x} Ozone Season Group 2 sources in Missouri for such control period exceed the state assurance level. [§97.806(c)(2)(ii)(B)]

ii) The permittee shall hold the CSAPR NO\textsubscript{x} Ozone Season Group 2 allowances required under §97.806(c)(2)(i), as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after the year of such control period. [§97.806(c)(2)(ii)]

iii) Total NO\textsubscript{x} emissions from all base CSAPR NO\textsubscript{x} Ozone Season Group 2 units at base CSAPR NO\textsubscript{x} Ozone Season Group 2 sources in Missouri during a control period in a given year exceed the state assurance level if such total NO\textsubscript{x} emissions exceed the sum, for such control period, of the Missouri NO\textsubscript{x} Ozone Season Group 2 trading budget under §97.810(a) and the state's variability limit under §97.810(b). [§97.806(c)(2)(iii)]

iv) It shall not be a violation of 40 CFR Part 97, Subpart EEEEE or of the Clean Air Act if total NO\textsubscript{x} emissions from all base CSAPR NO\textsubscript{x} Ozone Season Group 2 units at base CSAPR NO\textsubscript{x} Ozone Season Group 2 sources in Missouri during a control period exceed the state assurance level or if a common designated representative's share of total NO\textsubscript{x} emissions from the base CSAPR NO\textsubscript{x} Ozone Season Group 2 units at base CSAPR NO\textsubscript{x} Ozone Season Group 2 sources in Missouri during a control period exceeds the common designated representative's assurance level. [§97.806(c)(2)(iv)]

v) To the extent the permittee fails to hold CSAPR NO\textsubscript{x} Ozone Season Group 2 allowances for a control period in a given year in accordance with §97.806(c)(2)(i) through (iii), [§97.806(c)(2)(v)]

(1) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and [§97.806(c)(2)(v)(A)]

(2) Each CSAPR NO\textsubscript{x} Ozone Season Group 2 allowance that the permittee fails to hold for such control period in accordance with §97.806(c)(2)(i) through (iii) and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act. [§97.806(c)(2)(v)(B)]

c) Compliance periods. [§97.806(c)(3)]

i) A CSAPR NO\textsubscript{x} Ozone Season Group 2 unit shall be subject to the requirements under §97.806(c)(1) for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under §97.830(b) and for each control period thereafter. [§97.806(c)(3)(i)]

ii) A base CSAPR NO\textsubscript{x} Ozone Season Group 2 unit shall be subject to the requirements under §97.806(c)(2) for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under §97.830(b) and for each control period thereafter. [§97.806(c)(3)(ii)]

d) Vintage of CSAPR NO\textsubscript{x} Ozone Season Group 2 allowances held for compliance. [§97.806(c)(4)]

i) A CSAPR NO\textsubscript{x} Ozone Season Group 2 allowance held for compliance with the requirements under §97.806(c)(1)(i) for a control period in a given year must be a CSAPR NO\textsubscript{x} Ozone Season Group 2 allowance that was allocated or auctioned for such control period or a control period in a prior year. [§97.806(c)(4)(i)]

ii) A CSAPR NO\textsubscript{x} Ozone Season Group 2 allowance held for compliance with the requirements under §97.806(c)(1)(ii)(A) and (c)(2)(i) through (iii) for a control period in a given year must be a CSAPR NO\textsubscript{x} Ozone Season Group 2 allowance that was allocated or auctioned for a
control period in a prior year or the control period in the given year or in the immediately following year. [§97.806(c)(4)(ii)]

e) **Allowance Management System requirements.** Each CSAPR NOx Ozone Season Group 2 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart EEEEE. [§97.806(c)(5)]

f) **Limited authorization.** A CSAPR NOx Ozone Season Group 2 allowance is a limited authorization to emit one ton of NOx during the control period in one year. Such authorization is limited in its use and duration as follows: [§97.806(c)(6)]

i) Such authorization shall only be used in accordance with the CSAPR NOx Ozone Season Group 2 Trading Program; and [§97.806(c)(6)(i)]

ii) Notwithstanding any other provision of 40 CFR Part 97, Subpart EEEEE, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act. [§97.806(c)(6)(ii)]

g) **Property right.** A CSAPR NOx Ozone Season Group 2 allowance does not constitute a property right. [§97.806(c)(7)]

4) **Title V permit requirements.** [§97.806(d)]

a) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NOx Ozone Season Group 2 allowances in accordance with 40 CFR Part 97, Subpart EEEEE. [§97.806(d)(1)]

b) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to §§97.830 through 97.835, and the requirements for a CEMS (pursuant to 40 CFR Part 75, Subpart H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to §75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this Title V permit using minor permit modification procedures in accordance with this paragraph and §70.7(e)(2)(i)(B). [§97.806(d)(2)]

5) **Additional recordkeeping and reporting requirements.** [§97.806(e)]

a) Unless otherwise provided, the permittee shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of five years from the date the document is created. This period may be extended for cause, at any time before the end of five years, in writing by the Administrator. [§97.806(e)(1)]

i) The certificate of representation under §97.816 for the designated representative for the source and each CSAPR NOx Ozone Season Group 2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under §97.816 changing the designated representative. [§97.806(e)(1)(i)]

ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart EEEEE. [§97.806(e)(1)(ii)]

iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NOx Ozone Season Group 2 Trading Program. [§97.806(e)(1)(iii)]
b) The designated representative of a CSAPR NOx Ozone Season Group 2 source and each CSAPR NOx Ozone Season Group 2 unit at the source shall make all submissions required under the CSAPR NOx Ozone Season Group 2 Trading Program, except as provided in §97.818. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Part 70. [§97.806(e)(2)]

6) Liability. [§97.806(f)]
   a) Any provision of the CSAPR NOx Ozone Season Group 2 Trading Program that applies to a CSAPR NOx Ozone Season Group 2 source or the designated representative of a CSAPR NOx Ozone Season Group 2 source shall also apply to the permittee. [§97.806(f)(1)]
   b) Any provision of the CSAPR NOx Ozone Season Group 2 Trading Program that applies to a CSAPR NOx Ozone Season Group 2 unit or the designated representative of a CSAPR NOx Ozone Season Group 2 unit shall also apply to the permittee. [§97.806(f)(2)]

7) Effect on other authorities. No provision of the CSAPR NOx Ozone Season Group 2 Trading Program or exemption under §97.805 shall be construed as exempting or excluding the permittee, and the designated representative, of a CSAPR NOx Ozone Season Group 2 source or CSAPR NOx Ozone Season Group 2 unit from compliance with any other provision of Missouri's approved State implementation plan, a federally enforceable permit, or the Clean Air Act. [§97.806(g)]

CSAPR SO2 Group 1 Trading Program Requirements:
1) Designated representative requirements. The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with §§97.613 through 97.618. [§97.606(a)]

2) Emissions monitoring, reporting, and recordkeeping requirements. [§97.606(b)]
   a) The permittee, and the designated representative, of each CSAPR SO2 Group 1 source and each CSAPR SO2 Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of §97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), §97.631 (initial monitoring system certification and recertification procedures), §97.632 (monitoring system out-of-control periods), §97.633 (notifications concerning monitoring), §97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and §97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements). [§97.606(b)(1)]
   b) The emissions data determined in accordance with §§97.630 through 97.635 shall be used to calculate allocations of CSAPR SO2 Group 1 allowances under §97.611(a)(2) and (b) and §97.612 and to determine compliance with the CSAPR SO2 Group 1 emissions limitation and assurance provisions under §97.606(c), provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with §§97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero. [§97.606(b)(2)]

3) SO2 emissions requirements. [§97.606(c)]
   a) CSAPR SO2 Group 1 emissions limitation. [§97.606(c)(1)]
      i) As of the allowance transfer deadline for a control period in a given year, the permittee shall hold, in the source's compliance account, CSAPR SO2 Group 1 allowances available for deduction for such control period under §97.624(a) in an amount not less than the tons of
ii) If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in §97.606(c)(1)(i), then: [§97.606(c)(1)(ii)]
   (1) The permittee shall hold the CSAPR SO₂ Group 1 allowances required for deduction under §97.624(d); and [§97.606(c)(1)(ii)(A)]
   (2) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act. [§97.606(c)(1)(ii)(B)]
   
   b) CSAPR SO₂ Group 1 assurance provisions. [§97.606(c)(2)]
   i) If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in Missouri exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative’s share of such SO₂ emissions during such control period exceeds the common designated representative’s assurance level for Missouri and such control period, shall hold (in the assurance account established for the permittee of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under §97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with §97.625(b), of multiplying— [§97.606(c)(2)(i)]
   (1) The quotient of the amount by which the common designated representative’s share of such SO₂ emissions exceeds the common designated representative’s assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in Missouri for such control period, by which each common designated representative’s share of such SO₂ emissions exceeds the respective common designated representative’s assurance level; and [§97.606(c)(2)(i)(A)]
   (2) The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in Missouri for such control period exceed the state assurance level. [§97.606(c)(2)(i)(B)]
   
   ii) The permittee shall hold the CSAPR SO₂ Group 1 allowances required under §97.606(c)(2)(i), as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after the year of such control period. [§97.606(c)(2)(ii)]
   
   iii) Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in Missouri during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the Missouri SO₂ Group 1 trading budget under §97.610(a) and the state’s variability limit under §97.610(b). [§97.606(c)(2)(iii)]
   
   iv) It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in Missouri during a control period exceed the state assurance level or if a common designated representative’s share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR
SO₂ Group 1 sources during a control period exceeds the common designated representative’s assurance level. [§97.606(c)(2)(iv)]

v) To the extent the permittee fails to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with §97.606(c)(2)(i) through (iii), [§97.606(c)(2)(v)]
   1) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and [§97.606(c)(2)(v)(A)]
   2) Each CSAPR SO₂ Group 1 allowance that the permittee fails to hold for such control period in accordance with §97.606(c)(2)(i) through (iii) and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCC and the Clean Air Act. [§97.606(c)(2)(v)(B)]

c) **Compliance periods.** [§97.606(c)(3)]
   i) A CSAPR SO₂ Group 1 unit shall be subject to the requirements under §97.606(c)(1) for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under §97.630(b) and for each control period thereafter. [§97.606(c)(3)(i)]
   ii) A CSAPR SO₂ Group 1 unit shall be subject to the requirements under §97.606(c)(2) for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under §97.630(b) and for each control period thereafter. [§97.606(c)(3)(ii)]

d) **Vintage of CSAPR SO₂ Group 1 allowances held for compliance.** [§97.606(c)(4)]
   i) A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under §97.606(c)(1)(i) for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated or auctioned for such control period or a control period in a prior year. [§97.606(c)(4)(i)]
   ii) A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under §97.606(c)(1)(ii)(A) and (2)(i) through (iii) for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated or auctioned for a control period in a prior year or the control period in the given year or in the immediately following year. [§97.606(c)(4)(ii)]

e) **Allowance Management System requirements.** Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCC. [§97.606(c)(5)]

f) **Limited authorization.** A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows: [§97.606(c)(6)]
   i) Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and [§97.606(c)(6)(i)]
   ii) Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act. [§97.606(c)(6)(ii)]

g) **Property right.** A CSAPR SO₂ Group 1 allowance does not constitute a property right. [§97.606(c)(7)]

4) **Title V permit revision requirements.** [§97.606(d)]
   a) No Title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCC. [§97.606(d)(1)]
b) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to §§97.630 through 97.635, and the requirements for a CEMS (pursuant to 40 CFR Part 75, Subpart B), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to §75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with this paragraph and §70.7(e)(2)(i)(B). [§97.606(d)(2)]

5) Additional recordkeeping and reporting requirements. [§97.606(e)]
   a) Unless otherwise provided, the permittee shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of five years from the date the document is created. This period may be extended for cause, at any time before the end of five years, in writing by the Administrator. [§97.606(e)(1)]
   i) The certificate of representation under §97.616 for the designated representative for the source and each CSAPR SO2 Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under §97.616 changing the designated representative. [§97.606(e)(1)(i)]
   ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC. [§97.606(e)(1)(ii)]
   iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO2 Group 1 Trading Program. [§97.606(e)(1)(iii)]
   b) The designated representative of a CSAPR SO2 Group 1 source and each CSAPR SO2 Group 1 unit at the source shall make all submissions required under the CSAPR SO2 Group 1 Trading Program, except as provided in §97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a Title V operating permit program in 40 CFR Part 70. [§97.606(e)(2)]

6) Liability. [§97.606(f)]
   a) Any provision of the CSAPR SO2 Group 1 Trading Program that applies to a CSAPR SO2 Group 1 source or the designated representative of a CSAPR SO2 Group 1 source shall also apply to the permittee. [§97.606(f)(1)]
   b) Any provision of the CSAPR SO2 Group 1 Trading Program that applies to a CSAPR SO2 Group 1 unit or the designated representative of a CSAPR SO2 Group 1 unit shall also apply to the permittee. [§97.606(f)(2)]

7) Effect on other authorities. No provision of the CSAPR SO2 Group 1 Trading Program or exemption under §97.605 shall be construed as exempting or excluding the permittee, and the designated representative, from compliance with any other provision of Missouri’s state implementation plan, a federally enforceable permit, or the Clean Air Act. [§97.606(g)]
IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

### 10 CSR 10-6.060 Construction Permits Required

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

### 10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.


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.

### 10 CSR 10-6.100 Alternate Emission Limits

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

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

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

2) 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.

3) 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.

### 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 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

**Emission Limitation:**

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2. The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3. Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

### 10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1. The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2. The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

**Emission Limitation:**
The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

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

*This is a State Only permit requirement.*
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

**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 at an installation:
   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.
40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements
The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B</th>
<th>Permit Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065(6)(E)3.C</td>
<td>Extension of Expired Permits</td>
</tr>
</tbody>
</table>
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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov.
   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.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit; this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D  Risk Management Plan Under Section 112(r)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(6)(C)1.E  Title IV Allowances
This permit prohibits emissions which exceed any allowances the installation holds under Title IV of the Clean Air Act.

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

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

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

The permittee is granted an Acid Rain Permit as part this operating permit. The Acid Rain permit appears in Attachment 3. The Acid Rain permit renewal application shall be submitted with the operating permit renewal application.

10 CSR 10-6.065(6)(C)1.F  Severability Clause
In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.
10 CSR 10-6.065(6)(C)1.G General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None


The permittee is granted an Acid Rain Permit as part this operating permit. The Acid Rain permit appears in Attachment 3. The Acid Rain permit renewal application shall be submitted with the operating permit renewal application.

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

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, or AirComplianceReporting@dnr.mo.gov, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated
conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

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

<p>| | |</p>
<table>
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</table>
| 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 permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Ajay K. Arora. Alternate responsible officials for this site include R.H. Deberge, Chris Iselin, and Steve Whitworth. If any of these individuals 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 owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.
This permit shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or

5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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 1
Monthly CO Compliance Worksheet

This sheet covers the period from ____________ to ____________
(month/year)         (month/year)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Hours of Operation (Hours)</th>
<th>Type of Fuel¹</th>
<th>Emission Rate² (lb/hr)</th>
<th>CO Emissions³ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT1A</td>
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<td></td>
</tr>
<tr>
<td>CT1B</td>
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<td></td>
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<tr>
<td>CT2A</td>
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<td>CT3A</td>
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<td>CT4A</td>
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<td>CT4B</td>
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</tbody>
</table>

Total CO Emissions for This Month⁴
12 Month CO Emissions from Previous Month’s Worksheet⁵
Monthly CO Emissions from Previous Year’s Worksheet⁶
Current 12 Month Total CO Emissions⁷

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¹ Type of fuel will either be natural gas or distillate oil
² Emission rate will be based on type of fuel
³ Monthly CO emissions will be based upon CEMS data. In cases when CEMS data is not available:

\[
CO \text{ Emissions} = \frac{\text{hours of operation} \times \text{emission rate}}{2000}
\]

⁴ Sum of CO emissions reported for all combustion turbines for the month
⁵ Running 12 month total CO emissions from the previous month’s worksheet
⁶ CO emissions reported for this month in the last calendar year
⁷ Amount reported for (5) minus the amount reported for (6) plus the amount reported in (4), not to exceed 100 tons in any consecutive 12 month period. Total emissions must include all startup, shutdown, and malfunction emissions.
**ATTACHMENT 2**

Monthly NO\textsubscript{x} Compliance Worksheet

This sheet covers the period from ____________ to _____________
(month/year) (month/year)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Hours of Operation (Hours)</th>
<th>Type of Fuel\textsuperscript{1}</th>
<th>Emission Rate\textsuperscript{2} (lb/hr)</th>
<th>CO Emissions\textsuperscript{5} (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT1A</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>CT1B</td>
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<td>CT4A</td>
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<tr>
<td>CT4B</td>
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</tbody>
</table>

Total CO Emissions for This Month\textsuperscript{4}

12 Month CO Emissions from Previous Month’s Worksheet\textsuperscript{5}

Monthly CO Emissions from Previous Year’s Worksheet\textsuperscript{6}

Current 12 Month Total NO\textsubscript{x} Emissions\textsuperscript{7}

\textsuperscript{1} Type of fuel will either be natural gas or distillate oil
\textsuperscript{2} Emission rate will be based on type of fuel
\textsuperscript{3} Monthly NO\textsubscript{x} emissions will be based upon CEMS data. In cases when CEMS data is not available:

\[ NOx \text{ Emissions} = \frac{\text{hours of operation} \times \text{emission rate}}{2000 \text{ (lb/ton)}} \]

\textsuperscript{4} Sum of NO\textsubscript{x} emissions reported for all combustion turbines for the month
\textsuperscript{5} Running 12 month total NO\textsubscript{x} emissions from the previous month’s worksheet
\textsuperscript{6} NO\textsubscript{x} emissions reported for this month in the last calendar year
\textsuperscript{7} Amount reported for (5) minus the amount reported for (6) plus the amount reported in (4), not to exceed 100 tons in any consecutive 12 month period. Total emissions must include all startup, shutdown, and malfunction emissions.
In accordance with Titles IV and V of the Clean Air Act and Missouri State Rule 10 CSR 10-6.270, *Acid Rain Source Permits Required*, the State of Missouri issues this Acid Rain Permit.

**Installation Name:** Ameren Missouri Peno Creek Energy Center  
**ORIS Code:** 7964  
**Unit ID:** Combustion Turbines 1A through 4B

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

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

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

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

**APR 02 2018**  
Date  
**Director or Designee,**  
Department of Natural Resources
# Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: [ ] New  [ ] Revised

## STEP 1
Identify the source by plant name, State, and ORIS code.

- **Plant Name:** Ameren Missouri Peno Creek Energy Center
- **State:** MO
- **ORIS Code:** 7964

## STEP 2
Enter the unit ID# for every affected unit at the affected source in column “a.” For new units, enter the requested information in columns “c” and “d.”

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)</th>
<th>New Units Commence Operation Date</th>
<th>New Units Monitor Certification Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT1A</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CT1B</td>
<td>Yes</td>
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<td></td>
</tr>
<tr>
<td>CT2A</td>
<td>Yes</td>
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<tr>
<td>CT2B</td>
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<tr>
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<tr>
<td>CT3B</td>
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<td></td>
</tr>
<tr>
<td>CT4A</td>
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<td></td>
<td></td>
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<tr>
<td>CT4B</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

EPA Form 7610-16 (rev. 12-03)
STEP 3

Read the standard requirements

Permit Requirements

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

Monitoring Requirements

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

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:
   (i) Hold allowances, as of the allowance transfer deadline, in the unit’s compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
   (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
   (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
   (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.
Nitrogen Oxides Requirements: The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements:

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

Recordkeeping and Reporting Requirements:

1. Except for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
   i. The certificate of representation for the designated representative for the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
      i. The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
      ii. All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
      iii. Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
      iv. Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
2. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability:

1. Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
2. Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
3. No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
4. Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
Step 3, Cont’d.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

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

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source’s obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the certification statement, sign, and date

Certification

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

Name: Mark C. Birk - Designated Representative

Signature: [Signature]

Date: 10/27/15

EPA Form 7810-16 (rev. 12-03)
ATTACHMENT 4
CAIR Permit

TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT

In accordance with Title V of the Clean Air Act and Missouri State Rules 10 CSR 10-6.362, Clean Air Interstate Rule Annual NO\textsubscript{x} Trading Program, 10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO\textsubscript{x} Trading Program, and 10 CSR 10-6.366, Clean Air Interstate Rule SO\textsubscript{x} Trading Program, the State of Missouri issues this CAIR Permit.

Installation Name: Ameren Missouri Peno Creek Energy Center
ORIS Code: 7964
Unit ID: Combustion Turbines 1A through 4B

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

This CAIR Permit applies only to the Combustion Turbines 1A through 4B at Ameren Missouri Peno Creek Energy Center, plant 163-0047.

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

APR 0 2 2018
Date

[Signature]
Director or Designee,
Department of Natural Resources
CAIR Permit Application
(for sources covered under a CAIR SIP)

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

This submission is: X New  □ Revised

| Plant Name | Ameren Missouri Peno Creek Energy Center | State | MO | ORIS/Facility Code | 7964 |

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<th>NOx Ozone Season</th>
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Standard Requirements

(a) Permit Requirements.

1. The CAIR designated representative of each CAIR NOx source, CAIR SOx source, and CAIR NOx Ozone Season source (as applicable) required to have a Title V operating permit and each CAIR NOx unit, CAIR SOx unit, and CAIR NOx Ozone Season unit (as applicable) required to have a Title V operating permit at the source shall:
   1. Submit to the permitting authority a complete CAIR permit application under §66.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §66.121, §96.221, and §96.321 (as applicable); and
   2. Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

2. The owners and operators of each CAIR NOx source, CAIR SOx source, and CAIR NOx Ozone Season source (as applicable) required to have a Title V operating permit and each CAIR NOx unit, CAIR SOx unit, and CAIR NOx Ozone Season unit (as applicable) required to have a Title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for the source and operate the source and the unit in compliance with such CAIR permit.

3. Except as provided in subpart II, III, and III (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NOx source, CAIR SOx source, and CAIR NOx Ozone Season source (as applicable) that is not otherwise required to have a Title V operating permit and each CAIR NOx unit, CAIR SOx unit, and CAIR NOx Ozone Season unit (as applicable) that is not otherwise required to have a Title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NOx source, CAIR SOx source, and CAIR NOx Ozone Season source (as applicable) and such CAIR NOx unit, CAIR SOx unit, and CAIR NOx Ozone Season unit (as applicable).
STEP 3, continued

(b) Monitoring, reporting, and recordkeeping requirements.

1. The owners and operators of the CAIR NOx source, CAIR SO2 source, and CAIR NOx, Ozone Season source (as applicable) and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx, Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subparts HH, HH-I, and HH-IIH (as applicable) of 40 CFR part 96.

2. The emissions measurements recorded and reported in accordance with subparts HH, HH-I, and HH-IIH (as applicable) of 40 CFR part 96 shall be used to determine compliance by each CAIR NOx source, CAIR SO2 source, and CAIR NOx, Ozone Season source (as applicable) with the CAIR NOx, Ozone Season emissions limitation (as applicable) under paragraph (c)(12) of §98.166, §98.206, and §98.326 (as applicable).

(c) Nitrogen oxides emissions requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOx source and each CAIR NOx unit at the source shall hold, in the source's compliance account, CAIR NOx allowances available for compliance deductions for the control period under §98.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOx units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

2. A CAIR NOx unit shall be subject to the requirements under paragraph (c)(1) of §98.156 for the control period starting on the earlier of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §98.157(b)(1), (2), (3), and (5) and for each control period thereafter.

3. A CAIR NOx allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §98.156, for a control period in a calendar year before the year for which the CAIR NOx allowance was allocated.

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

5. A CAIR NOx allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOx Annual Trading Program. No provision of the CAIR NOx Annual Trading Program, the CAIR permit application, or the CAIR permit, or an exemption under §98.156 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

6. A CAIR NOx allowance does not constitute a property right.

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

Sulfur dioxide emission requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO2 source and each CAIR SO2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO2 allowances available for compliance deductions for the control period under §98.254(a) in an amount not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO2 units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

2. A CAIR SO2 unit shall be subject to the requirements under paragraph (c)(1) of §98.206 for the control period starting on the earlier of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §98.270(b)(1), (2), (5) and for each control period thereafter.

3. A CAIR SO2 allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §98.206, for a control period in a calendar year before the year for which the CAIR SO2 allowance was allocated.

4. CAIR SO2 allowances shall be held in, deducted from, or transferred into or among CAIR SO2 Allowance Tracking System accounts in accordance with subparts FF, GG, and HH of 40 CFR part 96.

5. A CAIR SO2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO2 Trading Program. No provision of the CAIR SO2 Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §98.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

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

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

Nitrogen oxides, ozone season emissions requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of both CAIR NOx, Ozone Season source and each CAIR NOx, Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NOx, Ozone Season allowances available for compliance deductions for the control period under §98.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOx, Ozone Season units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

2. A CAIR NOx, Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of §98.326 for the control period starting on the earlier of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §98.370(b)(1), (2), (3), (5) and for each control period thereafter.

3. CAIR NOx, Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §98.326, for a control period in a calendar year before the year for which the CAIR NOx, Ozone Season allowance was allocated.

4. CAIR NOx, Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NOx, Ozone Season Allowance Tracking System accounts in accordance with subparts FF, GG, and HH of 40 CFR part 96.

5. A CAIR NOx, Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOx, Ozone Season Trading Program. No provision of the CAIR NOx, Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §90.305 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

6. A CAIR NOx, Ozone Season allowance does not constitute a property right.

7. Upon recordation by the Administrator under subpart EE, FF, GG, or HH of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NOx, Ozone Season allowance to or from a CAIR NOx, Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.
STEP 3. continued

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

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

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

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

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

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

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

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

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

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

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

(3) Any provision of the CAIR NOx Annual Trading Program, CAIR NOx Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable) that applies to a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) shall also apply to the owners and operators of such unit.
(p) Effect on Other Authorities.
No provision of the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) or CAIR NOx unit, CAIR SO2 unit, and CAIR NOx Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Certification

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

Name  Mark C. Birk  Designated Representative

Signature  

Date  6/27/15
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
This installation generates electrical power for distribution and sale. It is operated as a peaking unit, generating power during periods of high electrical demand. The installation consists of four dual-fuel fired Pratt & Whitney FT8 Twin Pacs (turbines), each with the nominal capacity to produce 60 MW of electrical power; total installation nominal generation capacity is 240 MW of electrical power. The turbines combust predominantly pipeline quality natural gas but are also capable of combusting No. 2 Fuel Oil. The fuel oil is normally tested once a year; however, the turbines are capable of relying only on the fuel oil. There is also a 1.3 million gallon fuel oil tank on site. Each Pratt & Whitney FT8 Twin Pac consists of two combustion turbines coupled to a single electrical generator. Consequently, there are two (2) combustion sources and two (2) exhaust stacks associated with each turbine set. This installation received a New Source Review (NSR) permit in late 2001, which authorized construction of the installation. It has been in operation, producing electrical power, since calendar year 2002.

The combustion turbines are capable of firing either pipeline quality natural gas or distillate oil. The distillate oil has a sulfur content of 0.05 percent (%) by weight or less. Each combustion turbine is equipped with water injection to control NOx emissions to 25 parts per million by volume, dry (ppmvd), when combusting natural gas, and 42 ppmvd when combusting distillate oil. Carbon monoxide is controlled by good combustion practices and by a CO catalyst. The CO catalyst has a nominal control efficiency of 80 percent (%) for CO.

Stack testing for volatile organic compounds and particulate matter was conducted from July 9 through 13, 2002 for compliance reasons as required by construction permit 112001-007. Nitrogen oxides and carbon monoxide CEMs were also verified during this test period. Further details can be found within the following Construction Permit History subsection.

Permit conditions associated with construction permit 112001-007 and 40 CFR Part 60 Subpart GG have been rearranged from the previous operating permit (OP2012-031) in order to make each permit condition a criteria pollutant specific (i.e. CO, NOx, SOx). This was done on request of the installation.

Actual emissions from the previous five years as well as potential emissions are shown in the table following on the next page. Potential emissions from all of the turbines were calculated using data either from the stack testing or using emission factors from AP-42 associated with SCC codes 20100101 and 20100201, the former associated with diesel as the fuel source while the latter is associated with natural gas as the fuel source. Final emission potential rates are based on each individual pollutant’s worst case of the two fuel sources.
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<td>&lt; 100⁷</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAP)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.54⁸</td>
</tr>
</tbody>
</table>

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation.
²PTE was obtained from July 2002 stack testing results for PM, scaled by 96% based on AP-42 Table B.2-2, Category 1.
³PTE was obtained from July 2002 stack testing results for PM, scaled by 90% based on AP-42 Table B.2-2, Category 1.
⁴Emission Factor (EF) obtained AP-42 Table 3.1-2a. Sulfur content for diesel was evaluated at 0.05%.
⁵EFs obtained from AP-42 Table 3.1-1 for Water Injection. Construct Permit 112001-007 limits PTE to less than 100 tpy.
⁶PTE was obtained from July 2002 stack testing results.
⁷EFs obtained from AP-42 Table 3.1-1 for Water Injection. Construct Permit 112001-007 limits PTE to less than 100 tpy.
⁸This value represents the total HAPs emitted. No individual HAP is emitted at or above 10 tons/year.

### 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 24, 2017;
2) 2016 Emissions Inventory Questionnaire, received March 8, 2017;
4) U.S. EPA’s Factor Information Retrieval (FIRE) Date System 6.25;
5) Construction Permit 112001-007, Issued November 16, 2001; and
6) Compliance Test Report for Ameren Energy Generating Company at their Peno Creek Generating Station Units 2 & 3, July 2002

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

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

None.
Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
This rule does not apply because the installation is exempt via 6.260(1)(A)1. Because 6.070 (New Source Performance Regulations) applies and places limits on emissions of sulfur dioxide via NSPS 40 CFR Part 60 Subpart GG.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
The permittee qualifies for the exemption in 6.261(1)(C)2. because the construction permit 112001-007 under Special Condition 3 (see Permit Condition 3) limits the sulfur content of the fuel oil to 0.05% (500 ppm) which is more stringent than the limit from the rule for existing units using distillate fuel (35,249 ppm).

10 CSR 10-6.350, Emission Limitations and Emissions Trading of Oxides of Nitrogen
The requirements of this rule do not apply to sources that are implementing the requirements of 10 CSR 10-6.364. [10 CSR 10-6.350(1)(F)]

10 CSR 10-6.360, Control of NOx Emissions from Electric Generating Units and Nonelectric Generating Boilers
The permittee qualifies for the exemption in 6.360(1)(C), since these units have a federally enforceable condition restricting them to burning only natural gas or fuel oil.

10 CSR 10-6.400, Restriction of Particulate Matter from Industrial Processes
This rule does not apply because the turbines burn natural gas and No. 2 Fuel Oil which do not meet the definition of process weight:
Process weight is defined as the total weight of all materials, including solid fuels, introduced into an emission unit, which may cause any emission of particulate matter, but excluding liquids and gases used solely as fuels and air introduced for purposes of combustion. [10 CSR 10-6.400(2)]

Construction Permit History
The following construction permits have been issued to this installation:
1) Construction Permit 112001-007, Issued November 16, 2001
   This construction permit was issued for the installation of four dual fired Pratt Whitney FT 8 Twin Pacs and a 1.3 million gallon fuel oil storage tank. The permit contains special conditions which are applied in Permit Conditions 1 through 3.

   The construction permit required that deviations/exceedances be reported within ten days. During the review of the previous operating permit the permittee requested 30 days instead, stating it takes them more than ten days to fully investigate the causes of a deviation and report on it. The APCP saw no reason not to extend the limit to 30 days and this limit has been carried over into this operating permit.

   Special Conditions 1 and 2 limit the emission rates of both carbon monoxide (CO) and nitrogen oxides (NOx) to no more than 100 tons per year for each pollutant.
Special Conditions 10 through 13 contain provisions for performance testing. These are one time requirements and were not included in the Operating Permit because they have been satisfied. In July 2002, compliance testing was performed at this installation. The test was accepted by the Air Pollution Control Program on November 26, 2002. The testing established the following emission factors for VOC, PM10, and formaldehyde. These emission factors shall be used for reporting emissions of VOC, PM10, and formaldehyde.

### Natural Gas Fired Emission Factors

<table>
<thead>
<tr>
<th>Unit Tested</th>
<th>PM10</th>
<th>VOC</th>
<th>Formaldehyde*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lb/hr</td>
<td>Lb/MMBtu</td>
<td>Lb/hr</td>
</tr>
<tr>
<td>2A</td>
<td>2.89</td>
<td>0.0125</td>
<td>2.1</td>
</tr>
<tr>
<td>2B</td>
<td>2.55</td>
<td>0.0102</td>
<td>0.81</td>
</tr>
<tr>
<td>Twin Pac 2</td>
<td>5.44</td>
<td>N/A</td>
<td>2.91</td>
</tr>
<tr>
<td>Installation Total</td>
<td>21.76</td>
<td>N/A</td>
<td>11.64</td>
</tr>
</tbody>
</table>

*All formaldehyde samples were below the detection limit. Therefore, formaldehyde emission rates must be considered the maximum possible values, rather than actual quantities.

### Fuel Oil Fired Emission Factors

<table>
<thead>
<tr>
<th>Unit Tested</th>
<th>PM10</th>
<th>VOC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lb/hr</td>
<td>Lb/MMBtu</td>
</tr>
<tr>
<td>3A</td>
<td>12.73</td>
<td>0.051</td>
</tr>
<tr>
<td>3B</td>
<td>12.3</td>
<td>0.052</td>
</tr>
<tr>
<td>Twin Pac 3</td>
<td>25.03</td>
<td>N/A</td>
</tr>
<tr>
<td>Installation Total</td>
<td>100.12</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Special Condition 15 requires the CEMS to be installed and operated according to the guidelines in 40 CFR Part 75 for the NOX and diluent CEMS requirements. Subpart GG of 40 CFR Part 60 also require CEMS for the NOX and diluent to be installed, certified, maintained and operated according to its internal regulations. Subpart GG’s regulations are more stringent than 40 CFR Part 75 therefore this special condition is not cited in Permit Conditions 2 and 3.

Special Condition 16 contains a provision for submittal of either an Intermediate Operating Permit or a Part 70 Operating Permit based on time span of starting up any of the combustion turbine engines as well as due to the emission rate limitations outlined in Special Conditions 1 and 2 (detailed above). However, because this operating permit contains an Acid Rain Permit within, an Intermediate Operating Permit is not applicable. Therefore, this operating permit must be a Part 70 Operating Permit. Submittal of the application for this operating permit satisfies this requirement; therefore, it has not been included as a permit condition in this operating permit. To remain compliant with this requirement, the permittee must submit timely renewal applications as required in 10 CSR 10-6.065, Operating Permits.
New Source Performance Standards (NSPS) Applicability

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

1) NO\textsubscript{x} Limitations

The nitrogen oxides (NO\textsubscript{x}) emission limit established in New Source Review Permit 112001-007 is more stringent than the NO\textsubscript{x} emission limit established in Subpart GG. Calculations demonstrate that the NO\textsubscript{x} emission limit is lower than the Subpart GG NO\textsubscript{x} Emission Limit. The combustion turbines are subject to the requirements of §60.332(a)(l) of 40 CFR Part 60 Subpart GG. However, since the NO\textsubscript{x} emission standard of Subpart GG (152 ppmv when burning natural gas at 15% O\textsubscript{2} dry basis as determined by §60.332(a)(l)) is less stringent than the NO\textsubscript{x} emission limit imposed by New Source Review Permit 112001-007, the NSPS §60.332(a)(l) standard is not listed as a permit condition to these units. Compliance with the NO\textsubscript{x} limit imposed by the New Source Review permit will assure compliance with the §60.332(a)(l) standard.

Per 40 CFR 60.332(b), stationary gas turbines with a heat input load equal to or greater than 107.2 gigajoules per hour (100 MMBtu/hr) have a NO\textsubscript{x} limit determined by the following equation:

\[
STD = 0.0075 \times \frac{14.4}{Y} + F
\]

Where:

STD = allowable NO\textsubscript{x} emissions (% by volume at 15 percent oxygen and on a dry basis), and
Y = manufacturer’s rated heat rate at manufacturer’s rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the Installation. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

Given:

Manufacturer’s Rated Heat Rate = 10,000 Btu/kW-hr

\[
Y = 10,000 \times \frac{Btu}{kW - hr} \times \frac{1.0548kJ}{Btu} \times \frac{1kW}{1,000W} = 10.548 \frac{kJ}{W - hr}
\]

F = NO\textsubscript{x} emission allowance for fuel bound nitrogen as defined in the following table:

<table>
<thead>
<tr>
<th>Fuel Bound Nitrogen</th>
<th>% By Weight</th>
<th>F (NO\textsubscript{x} percent by volume)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N&lt;0.015</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>0.015&lt;N&lt;0.1</td>
<td>0.04N</td>
<td></td>
</tr>
<tr>
<td>0.1&lt;N&lt;0.25</td>
<td>0.04+0.0067(N-0.1)</td>
<td></td>
</tr>
<tr>
<td>N&gt;0.25</td>
<td>0.005</td>
<td></td>
</tr>
</tbody>
</table>

N = the nitrogen content of the fuel (percent by weight)
F = 0.005 (Given that nitrogen percent by weight of natural gas ranges from 0.6 - 5.0%)

STD (NO\textsubscript{x}, Emission Limitation) Calculation

\[
STD = 0.0075 \times \frac{14.4}{10.548} + 0.005 = 0.0152\% \text{ or } 152 \text{ ppmv NO}\textsubscript{x} \text{ at } 15\% \text{ oxygen}
\]

The New Source Review Permit limitation of 25 ppmv of NO\textsubscript{x} is less than the NSPS limitation of 152 ppmv NO\textsubscript{x}. Therefore, because the installation meets the permit limitation of 25 ppmv NO\textsubscript{x} limitation, the limitation contained within Subpart GG is also satisfied.
2) SO$_x$ Limitations

The sulfur oxides (SO$_x$) emission limit established in New Source Review Permit #112001-007 is more stringent than the SO$_x$ emission limit established in Subpart GG. The New Source Review Permit requires the installation to use fuel with 0.05% sulfur content or less. The NSPS requires a sulfur content of 0.8% or less. Therefore, compliance with the New Source Review Permit limitation assures compliance with the limitation in Subpart GG.


The largest tank has a capacity of 1.3 million gallons. This regulation does not apply to storage vessels with a capacity greater than or equal to 39,890 gallons storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). Fuel oil vapor pressure is significantly less than 3.5 kPa.

The rule does not apply to the other tanks at the installation because they are all smaller than 19,813 gallons which is the smallest tank size covered by this subpart.

40 CFR Part 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines

This rule only applies to turbines that commenced construction after February 18, 2005. The turbines at the installation were constructed in 2001.

Maximum Achievable Control Technology (MACT) Applicability

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

This rule only applies to major sources of HAP. Due to CO and NO$_x$ emission limits the installation is indirectly limited to below major HAP emissions.

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 federally enforceable permit conditions from a construction permit limit the emissions from the units to below major source thresholds.
Greenhouse Gas Emissions
This source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting [http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html](http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html).

Other Regulatory Determinations
Previously, 40 CFR Part 60 Subpart GG did not allow flexibility to allow for Peno Creek to be relieved from several monitoring and testing protocols, thus the “Alternative Monitoring and Testing Protocol” letter from US. EPA, dated May 31, 2002, was cited within this installation’s operating permit to meet these requests. The subpart has since changed wording and now permits this flexibility for monitoring and testing relief. The EPA letter is no longer referenced within this operating permit.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This rule applies to all sources of visible emissions, and includes exceptions for emission units that are internal combustion engines. The rule remains a part of the operating permit in Section IV: Core Permit Requirements; however, no monitoring is required because no visible emissions are anticipated to occur during normal operation the emission units.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

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

The draft Part 70 Operating Permit for Ameren Missouri – Peno Creek Energy Center (163-0047) was placed on public notice as of December 1, 2017 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://dnr.mo.gov/env/apcp/permit-public-notices.htm. The Air Pollution Control Program received comments from Ms. Leslye Werner from EPA Region 7. The comments are addressed below.

Comment 1:

Section IV: Core Permits Requirements includes 10 CSR 10-6.250: Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements incorporating the Asbestos Hazard Emergency Response ACT (AHERA) and its regulations for school districts and personnel working on asbestos activities in schools. The requirements associated with 10 CSR 10-6.250 have not been adopted in the EPA approved Missouri State Implementation Plan (SIP) and is therefore a “State Only Requirement,” and EPA recommends MDNR consider adding a “State Only Requirement” designation to 10 CSR 10-6.250.

Response to Comment:

The phrase “This is a State Only permit requirement.” has been added to 10 CSR 10-6.250 in Section IV.
APR 02 2018

Mr. Ajay K. Arora
Peno Creek Energy Center
16303 Industrial Park Road
Bowling Green, MO 63334

Re: Peno Creek Energy Center, 163-0047
Permit Number: OP2018-029

Dear Mr. Arora:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:abj

Enclosures

c: PAMS File: 2017-02-057