Dear Ms. Hines:

Ameren Missouri Rush Island Energy Center is a baseload electric generating station located in Festus, Missouri. The installation consists of two tangentially-fired coal boilers, an auxiliary oil-fired boiler, fuel and ash handling, haul roads, storage piles, and emergency equipment. The installation is a major source of PM, PM$_{10}$, PM$_{2.5}$, SO$_x$, NO$_x$, VOC, CO, and HAPs. The installation has a Part 70 Operating Permit (OP2018-041) that expires May 21, 2023.

Ameren Missouri Rush Island Energy Center was issued Construction Permit No. 062016-014 in June 2016, which authorized changes to be made to the bottom and economizer ash handling systems, fly ash handling systems, and wastewater treatment basin. The bottom ash would be dropped into a water filled trough. The economizer ash would be dry conveyed into troughs using existing conveyors. A submerged flight conveyor was to pull comingled bottom and economizer ash onto a dry flight conveyor which dropped into a three sided bunker. The comingled ash would then be loaded into trucks for shipment offsite. Fly ash from the boilers would be pneumatically conveyed into storage silos. Dry (unconditioned) and wet fly ash was to be loaded into trucks for shipment offsite. Dry fly ash was loaded from the silos into trucks by a telescopic spout or loaded into a batch mixer, wetted, then loaded into trucks from a different spout. Wastewater was to be separated from solids in a settling basin, and the sediment would be loaded onto a pad, then into trucks for shipment offsite.

In June 2017, Ameren Missouri Rush Island Energy Center was issued an amendment to the previous construction permit (062016-014A), which authorized fly ash to be temporarily stored on the wastewater sediment pad during periods of weather and equipment related upsets. This project only slightly increased potential emissions and required no revision of existing operations.
Ameren Missouri Rush Island Energy Center is proposing to amend Construction Permit No. 062016-014 again, this time to modify the fly ash handling system. Specifically, the previous permit is to be revised to include language allowing the utilization of the former Mineral Resource Technologies (MRT) fly ash distribution terminal as an alternate storage location for fly ash. Ameren Missouri Rush Island Energy Center previously indicated in the application for Construction Permit No. 062016-014 that the MRT railcar loading silo and associated loading equipment would continue to be used, but the MRT truck silos and equipment would be abandoned. However, Ameren Missouri Rush Island Energy Center would like to maintain the flexibility to use both the current and MRT fly ash handling systems for rail and truck loading and is requesting authorization to connect the entire former MRT fly ash distribution terminal to the fly ash silos included in Construction Permit No. 062016-014. The MRT terminal will use a vacuum pneumatic conveying system to transfer dry fly ash to the storage silos before being loaded into trucks and/or railcars in a similar manner as the current fly ash silos. Table 1 provides a summary of the MRT system.

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Description</th>
<th>Maximum Design Rate (tons per hour)</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>M-20</td>
<td>Fly ash handling (collection/transfer)</td>
<td>28</td>
<td>Fabric filters</td>
</tr>
<tr>
<td>M-21</td>
<td>Fly ash storage silos (3)</td>
<td>28</td>
<td>Bin vent filters</td>
</tr>
<tr>
<td>M-22</td>
<td>Fly ash tanker loading</td>
<td>28</td>
<td>Fabric filters</td>
</tr>
<tr>
<td>M-23</td>
<td>Fly ash transfer to long term storage</td>
<td>28</td>
<td>Fabric filters</td>
</tr>
</tbody>
</table>

The proposed changes to the fly ash handling system will not impact boiler operation, increase boiler heat rate, or result in any increased utilization above what the boilers are capable of achieving. The addition of the MRT system will increase fly ash storage capacity but will not debottleneck any processes. The maximum design rate of the overall fly ash handling system will remain the same, and this project is simply allowing Ameren Missouri Rush Island Energy Center the flexibility to use the MRT truck silos when discharging ash. This alternating between the current and MRT ash handling will utilize different emission units, but the “new” equipment is essentially the same as the existing equipment. The potential emissions will be the same, regardless of which ash loading equipment is used, because the same processes is taking place. Hence, the potential emissions from the MRT system were accounted for in Construction Permit No. 062016-014, and no additional equipment is being installed; therefore, no increase in emissions is associated with this project.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission,
whose contact information is: Administrative Hearing Commission, United States Post Office
Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102,

If you have any questions regarding this amendment, please contact Ryan Schott, at the
department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at
(573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
Permits Section Chief

KBH:rsj

Enclosures

c: St. Louis Regional Office
   PAMS File: 2018-12-025
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Ameren Missouri Rush Island Energy Center
Jefferson County (S5, T39N, R7E)

1. Control Device Requirement – Filters
   A. Ameren Missouri Rush Island Energy Center shall control emissions from the following equipment/processes using filters, as specified in the permit application.
      1) M-20 Fly ash handling (collection/transfer)
      2) M-21 Fly ash storage silos (3)
      3) M-22 Fly ash tanker loading
      4) M-23 Fly ash transfer to long term storage

   B. The filters shall be operated and maintained in accordance with the manufacturers' specifications.

   C. The filters shall be equipped with gauges or meters which indicate the pressure drop across the control devices. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.

   D. Ameren Missouri Rush Island Energy Center shall monitor and record the operating pressure drop across the filters at least once every 24 hours. The pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

   E. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur when handling coal combustion residuals. The replacement filter material type and weight shall meet or exceed the specifications of the existing filter. The air to cloth ratio or air to filter ratio shall not be increased when filter replacement is performed.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

F. Ameren Missouri Rush Island Energy Center shall maintain a copy of the pneumatic system manufacturer's design specifications and filter manufacturers' performance warranties on site.

G. Ameren Missouri Rush Island Energy Center shall maintain an operating and maintenance log for the baghouses which shall include the following:
   1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.