

## 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:** OP2018-017  
**Effective Date:** March 4, 2018  
**Installation ID:** 001-0006  
**Project Number:** 2017-08-064  
**Expiration Date:** MAR 04 2023

**Installation Name and Address**


Ameren Missouri Kirksville Combustion  
Turbine  
2805 N. Baltimore St.  
Kirksville, MO 63501  
Adair County

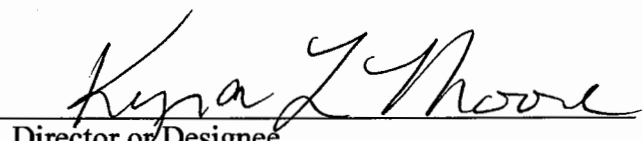
**Parent Company's Name and Address**

Ameren Corporation  
1901 Chouteau Avenue  
St. Louis MO, 63103

**Installation Description:**

The Ameren Missouri Kirksville Combustion Turbine facility consists of one (1) remotely operated, unmanned simple cycle combustion turbine for electric power generation, one (1) 300 HP start up diesel motor, one (1) 225 gallon fuel oil storage tank, and one (1) lube oil storage tank. The design rating of the turbine is 268 MMBtu/hr and it is fueled solely by pipeline grade natural gas. This facility is a major source of nitrogen oxides (NO<sub>x</sub>) and is subject to 40 CFR Part 63, Subpart ZZZZ *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. The facility is located in an attainment area, and is not a named source.

  
Prepared by  
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Operating Permit Unit

  
Director of Designee  
Department of Natural Resources

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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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP1A	300 HP Startup Diesel Engine

### **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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
CT-1	268 MMBtu/hr Combustion Turbine, 13 MW Power Output
TK-1	225 gallon fuel oil storage tank
TK-2	Lube oil storage tank

## **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.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart A General Provisions 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
EP1A-01	300 HP Startup Diesel Engine <sup>1</sup>

<sup>1</sup>Emission unit meets the definition of a black start engine per §63.6675

#### **Operating Limitations:**

- 1) The permittee must meet the following requirements, except during periods of startup: [§63.6603 and Table 2d to Subpart ZZZZ]
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
    - i) Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.
  - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

#### **General Compliance Requirements:**

- 1) The permittee must be in compliance with the emission limitations and operating limitation at all times. [§63.6605(a)]
- 2) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

#### **Monitoring:**

- 1) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(3)]

- 2) The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply. [§63.6625(h)]
- 3) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(i)]

**Continuous Compliance Requirements:**

- 1) The permittee shall demonstrate continuous compliance with each operating limitation, and other requirements in Table 2d to 40 CFR Part 63, Subpart ZZZ that apply according to methods specified in Table 6 to 40 CFR Part 63, Subpart ZZZZ. [§63.6640(a) and Table 6 to MACT ZZZZ]
  - a) Operating and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - b) Develop and follow a maintenance plan created by the permittee which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- 2) The permittee shall report each instance in which the permittee did not meet each emission limitation or operating limitation in Table 2d to 40 CFR Part 63, Subpart ZZZZ that apply. These instances are deviations from the operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations shall be reported according to the requirements in §63.6650. The permittee shall also report each instance in which the permittee did not meet the requirements in Table 8 to 40 CFR Part 63, Subpart ZZZZ that apply. [§63.6640(b)]

**Notifications:**

None

**Recordkeeping and Reporting:**

- 1) The permittee shall submit an annual report according to the requirements in §63.6650(h)(1) through (3). [§63.6650(h)]
  - a) The report shall contain the following information: [§63.6650(h)(1)]
    - i) Company name and address where the engine is located. [§63.6650(h)(1)(i)]
    - ii) Date of the report and beginning and ending dates of the reporting period. [§63.6650(h)(1)(ii)]
    - iii) Engine site rating and model year. [§63.6650(h)(1)(iii)]

- iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6650(h)(1)(iv)]
  - v) Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6650(h)(1)(vii)]
  - vi) If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6650(h)(1)(viii)]
  - vii) If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6650(h)(1)(ix)]
- b) Annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§63.6650(h)(2)]
  - c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6650(h)(3)]
- 2) The permittee shall keep the records described in §63.6655(a)(2) through (a)(5). [§63.6655(a)]
    - a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
    - b) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
    - c) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
    - d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
  - 3) The permittee shall keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each management practice that applies. [§63.6655(d)]
  - 4) The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to a maintenance plan. [§63.6655(e)]
  - 5) The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
  - 6) Records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
  - 7) As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]

- 8) The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds <sup>2</sup>	
<b>Emission Unit</b>	<b>Description</b>
EP1A-01	300 HP Startup Diesel Engine

**Emission Limitation:**

- 1) Emissions from any existing source operation shall not contain more than two thousand parts per million by volume (2000 ppmv) of sulfur dioxide. [10 CSR 10-6.260(3)(A)1.]
- 2) Stack gasses shall not contain more than seventy milligrams (70 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period. [10 CSR 10-6.260(3)(A)1.]

**Monitoring/Recordkeeping:**

As required in Permit Condition 003.

**Reporting:**

The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<sup>2</sup>This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation appears in this operating permit as it is contained in Missouri's SIP and is a federal only requirement. This permit condition will no longer be applicable when EPA takes final action to incorporate 10 CSR 10-6.261 in Missouri's SIP in place of 10 CSR 10-6.260. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.



<b>PERMIT CONDITION 003</b>	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions <sup>3</sup>	
<b>Emission Unit</b>	<b>Description</b>
EP1A-01	300 HP Startup Diesel Engine

**Operational Limitation:**

The permittee shall limit the fuel sulfur content to 35,249 ppm of sulfur. [10 CSR 10-6.261(3)(C)]

**Monitoring/Recordkeeping:**

- 1) The permittee shall demonstrate compliance using: [10 CSR 10-6.261(3)(E)3.]
  - a) Fuel delivery records; or
  - b) Fuel sampling and analysis;
- 2) The permittee shall maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess SO<sub>2</sub> emissions.
- 3) The permittee shall maintain a record of data, calculations, results, records, and reports from any SO<sub>2</sub> emissions fuel deliveries, and/or fuel sampling tests.
- 4) The permittee shall maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
  - a) The name, address, and contact information of the fuel supplier;
  - b) The type of fuel (bituminous or subbituminous coal, diesel, #2 fuel oil, etc.);
  - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
  - d) The heating value of the fuel.
- 5) Sources using fuel sampling and analysis for compliance shall follow the requirements in 10 CSR 10-6.261(5)(D). [10 CSR 10-6.261(4)(D)]
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 7) Records may be kept in either written or electronic form.
- 8) All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<sup>3</sup>This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP, this regulation will be both a state and federal requirement.

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

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 10-6.065 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.

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

**This requirement 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”;
  - 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 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.
- 2) 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.
  - 3) 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.
  - 4) 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,

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

### **10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits**

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](mailto: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.
- 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.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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



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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov). All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto: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](mailto: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**

- 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](mailto: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 Ajay Arora, Vice President of Environmental Services & General Resource Planning. Other Responsible Officials for this installation were added in amended Operating Permit OP2013-010C. These Responsible Officials include R. H.

Deberge, Manager, CTG & Renewable Operations; Chris A. Iselin, Senior Vice President, Power Operations & Energy Management; and Steven C. Whitworth, Senior Director, Environmental Policy & Analysis. If these people terminate employment, or are reassigned different duties such that different people become the responsible persons to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit 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.

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

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

## **VI. Attachments**

None.

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

The Ameren Missouri Kirksville Combustion Turbine facility consists of one (1) remotely operated, unmanned simple cycle combustion turbine for electric power generation, one (1) 300 HP start up diesel motor, one (1) 225 gallon fuel oil storage tank, and one (1) lube oil storage tank. The design rating of the turbine is 268 MMBtu/hr and it is fueled solely by pipeline grade natural gas. This facility is a major source of nitrogen oxides (NO<sub>x</sub>) and greenhouse gases and is subject to 40 CFR Part 63, Subpart ZZZZ *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. The facility is located in an attainment area, is not a names source, and is not subject to any NSPS regulations.

### Updated Potential to Emit for the Installation

The potential to emit was pulled from Operating Permit OP2013-010 as no changes were made to the facility since its issuance. The emergency diesel engine was evaluated at 500 hours of uncontrolled annual operation.

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
PM <sub>10</sub>	7.91
PM <sub>2.5</sub>	7.91
Sulfur Oxides (SO <sub>x</sub> )	4.14
Nitrogen Oxides (NO <sub>x</sub> )	377.95
Volatile Organic Compounds	2.66
Carbon Monoxide (CO)	96.76
Hazardous Air Pollutants (HAP's)	1.24

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

### Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.0049	0.0036	0.0009	0.0032	0.0942
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.0049	0.0036	0.0009	0.0032	0.0942
Sulfur Oxides (SO <sub>x</sub> )	0.0004	0.003	0.0001	0.0003	0.0083
Nitrogen Oxides (NO <sub>x</sub> )	0.3329	0.2458	0.0603	0.2234	6.4629
Volatile Organic Compounds (VOC)	0.0182	0.0134	0.0033	0.0122	0.3525
Carbon Monoxide (CO)	0.0832	0.0614	0.0151	0.0558	1.6157

### 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 August 25, 2017;
- 2) 2016 Emissions Inventory Questionnaire, received March 8, 2017; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

#### *10 CSR 10-6.261 Control of Sulfur Dioxide Emissions*

This rule took effect November 30, 2015. It has been applied in this permit.

### **Other Air Regulations Determined Not to Apply to the Operating Permit**

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

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

This rule is not applicable because the installation is in an ozone attainment area.

### **Construction Permit History**

No construction permits have been issued to this facility

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

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

40 CFR Part 60, Subpart Ka *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

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

These regulations do not apply to the storage tanks. The smallest size tank covered by these regulations is 19,813 gallons. The storage tanks at this installation have capacities less than the applicability threshold.

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

This rule does not apply to the facility as facilities that commenced construction, modification, or reconstruction after October 3, 1977 are affected. The combustion turbine was constructed September 11, 1967, and has not been modified or reconstructed since.

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

This rule applies to owners and operators of compression ignition internal combustion engines that were installed after July 11, 2005. The compression ignition engine at the installation was installed in 1967, therefore this rule does not apply.

40 CFR Part 60, Subpart KKKK *Standards of Performance for Stationary Combustion Turbines*  
This rule does not apply to the combustion turbine because it was installed in 1967, before the applicability date of February 18, 2005.

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

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

This facility is not a major source of HAPs therefore this regulation does not apply to the combustion turbine.

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

The diesel fueled, compression ignition, internal combustion engine is used in case of emergencies and was installed in 1967. It is therefore subject to this rule's requirements for existing, emergency, compression ignition engines that are located at an area source of HAPs.

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

None

#### **Compliance Assurance Monitoring (CAM) Applicability**

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

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

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

#### **Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> 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 CO<sub>2</sub> emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

#### **Other Regulatory Determinations**

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*  
Ameren Missouri Kirksville Combustion Turbine is an unmanned facility and therefore requiring monitoring for particulate matter would cause an unnecessary burden on the permittee. Monitoring and recordkeeping for this regulation have been removed from the Core Permit Requirements section.

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

This rule does not apply to the facility as the only emission units that have the potential to emit visible air contaminants are the engine (EP1A) and turbine (E0010). Internal combustion engines are exempt from this rule per 10 CSR 10-6.220(1)(A).

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

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri's State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP; therefore it must appear in this Operating Permit.

- 300 HP Startup Diesel Engine, EP1A  
This rule applies to the diesel engine and is applied in Permit Condition 002
- 268 MMBtu/hr Combustion Turbine, 13 MW Power Output, E0010  
This rule does not apply to the combustion turbine because it is fueled exclusively with natural gas, per 10 CSR 10-6.260(1)(A)2.

10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions*

- 300 HP Startup Diesel Engine, EP1A  
This rule applies to the diesel engine and is applied in Permit Condition 003
- 268 MMBtu/hr Combustion Turbine, 13 MW Power Output, E0010  
This rule does not apply to the combustion turbine because it is fueled exclusively with natural gas, per 10 CSR 10-6.261(1)(A).

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

- 300 HP Startup Diesel Engine, EP1A
- 268 MMBtu/hr Combustion Turbine, 13 MW Power Output, E0010  
These units are exempt from this rule because the fuels burned in the engines and turbines do not meet the definition of process weight.

**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

On November 9, 2017, we received three comments from Michael Hutcheson, Consultant Engineer, Ameren Corporation. The comments are addressed in the order in which they appear within the letter.

**Comment #1:** The current Part 70 Permit for the Ameren Missouri Kirksville Combustion Turbine facility was issued on March 3rd, 2013 and by law does not expire until March 3rd, 2018. The application for renewal of this permit was submitted in a timely manner in accordance with the timelines set out by the Missouri Code of State Regulations. Ameren expects that the renewal permit will not take effect until the existing permit expires and that MDNR will establish the effective date on the new permit as no earlier than the expiration date on the current permit.

**Response to Comment:** MDNR is aware of Ameren's request to have the renewal permit not to take effect until the existing permit has expired. An "Effective Date" line has been added to the cover page of this permit, and the renewal permit will take effect on the date the previous permit expires.

**Comment #2:** On page 11 of the draft permit under the requirements for 10 CSR 10-6.170, MDNR has required the Kirksville facility to monitor for violation of the no visible emissions at the fence line standard on weekly, biweekly and monthly graduated schedule. Because the Kirksville site is unmanned this schedule represents an unnecessary burden. MO DNR should consider that the facility consists of a single combustion turbine with ancillary processes and does not include any material handling. Therefore the Kirksville facility has no processes which are likely to generate the visible fugitive emissions regulated by this rule. In addition, the site is unmanned making it extremely unlikely that fugitives would be generated from vehicle travel at the facility. Ameren therefore requests that the monitoring frequency be removed and substituted for a requirement to conduct an observation upon request by MO DNR.

**Response to Comment:** The monitoring and recordkeeping for 10 CSR 10-6.170 have been removed from the Core Permit Requirements section and an explanation has been added to the Statement of Basis.

**Comment #3:** On page 13 of the draft permit under the requirements for 40 CFR 82, MO DNR has listed the requirements for 40 CFR 82 Subpart E under paragraph 1). Subpart E labeling requirements apply to manufacturers of ODCs or others who are introducing ODC's into interstate commerce, these requirements do not apply at a combustion turbine facility which does not manufacture, store or transport ODC's or products containing ODCs. Similarly the requirements of Subpart A in Paragraph 3 apply to the Kirksville Combustion Turbine facility.

**Response to Comment:** The language describing Subpart E for 40 CFR Part 82 has been removed.

On November 16, 2017, we received three comments from Leslye Werner, Active Chief, Air Permitting and Compliance Branch, EPA Region 7. The comments are addressed in the order in which they appear within the letter.

**Comment #1:** First, Permit Condition 001 incorporates applicable requirements of 40 CFR part 63, Subpart ZZZZ-*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* that pertain to a 300 HP Startup Diesel Engine, Emission Unit EP1A-01. Permit Condition 001 allows the permittee the option of utilizing an oil analysis program in order to extend the specified oil change requirements. This oil analysis program requires the permittee to monitor and compare Total Acid Number, viscosity, and percent water content against condemning limits. However, Permit Condition 001 does not appear to include a requirement for the permittee to maintain any oil analysis record keeping requirements in Permit Condition 001 to ensure the collection of verifiable compliance information.

Additionally, based on the Updated Potential to Emit for the Installation, in the Statement of Basis, Ameren Missouri Kirksville Combustion Turbine installation is an area hazardous air pollutant (HAP) source. Currently, based on 10 CSR 10-6.070, MDNR relies on EPA for the compliance management of area HAP sources and therefore, the reporting requirements for Permit Condition 001 may not as required by Section V of this operating permit. It may be more appropriate for the compliance reports to be submitted to the Missouri Air Compliance Coordinator at EPA Region 7, with MDNR receiving copies as necessary and MDNR might consider revising the reporting requirement in Permit Condition 001 to reflect this reporting scenario.

**Response to Comment:** §63.6625(i) contains recordkeeping requirements for the oil analysis program and is included in Permit Condition 001 under the *Monitoring* section, condition 3).

*Recordkeeping* and *Reporting* section have been combined for clarification. Annual reports shall now be submitted to the EPA. Recordkeeping to show continuous compliance and hours of operation have also been added to the permit condition.

**Comment #2:** Second, Permit Condition 002 incorporates the requirements from 10 CSR 10-6.260-*Restriction of Emission of Sulfur Compounds* to emission unit EP1A-01, 300 HP Diesel Engine. MDNR provides a footnote which says:

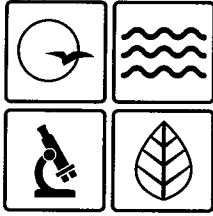
“This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation remains in this operating permit as it is contained in Missouri’s SIP *and remains an applicable federal requirement. This is a federal only requirement* (emphasis added). This permit condition will no longer be applicable when EPA takes final action to incorporate 10 CSR 10-6.261 in Missouri’s SIP in place of 10 CSR 10-6.260. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.”

The requirements incorporated into the Missouri SIP are applicable to appropriate Missouri Facilities and therefore, EPA encourages MDNR consider revising this footnote to improve its accuracy by removing the “*and remains an applicable federal requirement. This is a federal only requirement*” language.

**Response to Comment:** The language in the footnote for Permit Condition 005 has been slightly changed. The footnote still states that the regulation is a federal requirement, but removes one sentence because of redundancy. The regulation is a federal requirement and needs to be clarified in the footnote.

**Comment #3:** Finally, Section IV: *Core Permit Requirements* includes 10 CSR 10-6.50: *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 into 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:** A “State Only Requirement” designation has been added to 10 CSR 10-6.250 in the Core Permit Requirements section.



Missouri Department of dnr.mo.gov  
**NATURAL RESOURCES**  
Eric R. Greitens, Governor Carol S. Comer, Director

**FEB 02 2018**

Mr. Ajay Arora  
Ameren Missouri Kirksville Combustion Turbine  
1901 Chouteau Avenue, MC 601  
St. Louis, MO 63103

Re: Ameren Missouri Kirksville Combustion Turbine, 001-0006  
Permit Number: OP2018-017

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:jsj

Enclosures

c: PAMS File: 2017-08-064

