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: OP2018-004
Expiration Date: FEB 2 1 2023
Installation ID: 510-0038
Project Number: 2016-03-027

Installation Name and Address
Ashley Energy
One Ashley Place
St. Louis, MO 63102
St. Louis City

Parent Company's Name and Address
Ashley Energy LLC
One Ashley Place
St. Louis MO, 63102

Installation Description:
Ashley Energy owns and operates combined heat and power (cogeneration) that provides electricity and steam to customers in St. Louis, Missouri. The facility cogeneration equipment is fueled by natural gas and consists of two small gas turbine generators and two dedicated heat recovery steam generating units. The facility also has three boilers and an emergency diesel generator on-site. Potential emissions of NOx, SOx, and CO are above major thresholds.

Prepared by
Bern Johson
Operating Permit Unit

Director or Designee
Department of Natural Resources

FEB 2 1 2018
Effective Date
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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 Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Gas Turbine Generator #1</td>
</tr>
<tr>
<td>EP-01.1</td>
<td>#1 Heat Recovery Steam Generator</td>
</tr>
<tr>
<td>EP-02</td>
<td>Gas Turbine Generator #2</td>
</tr>
<tr>
<td>EP-02.1</td>
<td>#2 Heat Recovery Steam Generator</td>
</tr>
<tr>
<td>EP-03.1</td>
<td>#3 Package Boiler</td>
</tr>
<tr>
<td>EP-04</td>
<td>#4 Package Boiler</td>
</tr>
<tr>
<td>EP-07</td>
<td>Emergency Diesel Generator</td>
</tr>
<tr>
<td>EP-11</td>
<td>#5 Package Boiler</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.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-08</td>
<td>Diesel Storage Tank (2,500 gallons)</td>
</tr>
<tr>
<td>EP-09</td>
<td>Above ground #6 Fuel Oil Storage Tank (250,000 gallons)</td>
</tr>
<tr>
<td>IS1</td>
<td>Ignition/Back-Up oil (#2 oil firing)</td>
</tr>
<tr>
<td>IS2</td>
<td>Ignition/Back-Up oil storage tank</td>
</tr>
<tr>
<td>IS4</td>
<td>Propane ignition gun</td>
</tr>
<tr>
<td>IS7</td>
<td>Miscellaneous lubrication oil sumps</td>
</tr>
<tr>
<td>IS8</td>
<td>Miscellaneous gas vents (start-up &amp; shut-down only)</td>
</tr>
</tbody>
</table>
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.

The following general conditions apply to all plantwide and emission unit specific conditions in this document, unless otherwise stated.

**Monitoring:**
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer's recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

**Recordkeeping:**
1) The permittee shall record all required record keeping in an appropriate format.
2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3) The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**
1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after end of the month during which the exceedance or event causing the exceedance occurs (unless otherwise specified in the specific condition).
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the semi-annual monitoring report and annual compliance certification.
3) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov
PERMIT CONDITION 1

10 CSR 10-6.060 Construction Permits Required Permit No. 02-08-018A PM
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart Db
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units for Which Construction is Commenced After June 19, 1984

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01.1</td>
<td>#1 Heat Recovery Steam Generator (107.9 MMBTU/hr Low-NOx Duct Burner, installed 2000)</td>
<td>Coen, 40D-13283-1</td>
</tr>
<tr>
<td>EP-02.1</td>
<td>#2 Heat Recovery Steam Generator (107.9 MMBTU/hr Low-NOx Duct Burner, installed 2000)</td>
<td>Coen, 40D-13283-1</td>
</tr>
<tr>
<td>EP-03.1</td>
<td>#3 Package Boiler; 101 MMBTU/hr Natural Gas/Fuel Oil boiler; installed 2002</td>
<td>Nebraska Boiler N5-E-66</td>
</tr>
<tr>
<td>EP-04</td>
<td>#4 Package Boiler; 101 MMBTU/hr Natural Gas/Fuel Oil Boiler; installed 2003</td>
<td>Nebraska Boiler N5-E-66</td>
</tr>
</tbody>
</table>

Emission Limitation:
The permittee shall not allow these emission units to emit NOx in excess of 0.2 pounds of NOx/MMBTU. [40 CFR 60.44b(a)(1)(ii) for EP-1.1 & -2.1; 40 CFR 60.44b(a)(4)(i) for EP-3.1 & -4]

Operational Limitations:
The permittee shall only burn pipeline grade natural gas or number two fuel oil with a sulfur content of 0.5 weight percent or less [Special Condition III.2].

Monitoring:
1) EP-01.1 and -02.1
   a) The permittee shall perform stack testing on one of the two HRSGs every 30 months, plus or minus three months using EPA testing methods to demonstrate compliance with the NOx emission limit specified in this permit condition. If the performance test results show exceedance of the NOx emission limit, the permittee shall perform another test on both HRSGs within 90 days to demonstrate compliance with the NOx emission limit and a subsequent test within 12 months. If the subsequent test demonstrates compliance with the NOx emission limit, the permittee shall be back on the testing schedule of every 30 months. [Attachment E - monitoring plan approved under 40 CFR 60.49b(c)]

2) EP-03.1 and -04
   a) The permittee shall perform stack testing on one of the two package boilers every 30 months, plus or minus three months using EPA testing methods to demonstrate compliance with the NOx emission limit specified in this permit condition. If the performance test results show exceedance of the NOx emission limit, the permittee shall perform another test on both boilers within 90 days to demonstrate compliance with the NOx emission limit and a subsequent test within 12 months. If the subsequent test demonstrates compliance with the NOx emission limit, the permittee shall be back on the testing schedule of every 30 months. [Attachment E - monitoring plan approved under 40 CFR 60.49b(c)]
**Recordkeeping:**

1) The permittee shall maintain records of the following information for each boiler operating day [§60.49b(g)]:
   a) Calendar date;
   b) The average hourly nitrogen oxides emissions rates (expressed as NO₂)(lb/MMBTU input) measured or predicted;
   c) The 30 day average nitrogen oxides emission rates (lb/MMBTU) calculated at the end of each boiler operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 boiler operating days;
   d) Identification of the boiler operating days when the calculated 30 day average nitrogen oxides emissions rates are in excess of the nitrogen oxides emissions standards, with the reasons for such excess emissions as well as a description of the corrective action taken;
   e) Identification of the boiler operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
   f) Identification of the times when emissions data have been excluded from the calculation of average emission rates and the reasons for excluding data;
   g) Identification of “F” factor used for calculations, method of determination, and type of fuel combusted.

2) The permittee shall record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for number two fuel oil and natural gas for each calendar quarter [§60.49b(d)].

**Performance Testing:**

When performance testing is required by a condition of this permit, one electronic copy of a written report of the performance test results shall be submitted to stacktesting@dnr.mo.gov within the timeframe required by the regulation that requires the testing. If no time frame is specified, the report shall be submitted within sixty days. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.

**PERMIT CONDITION 2**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-11</td>
<td>#5 Package Boiler; 99 MMBTU/hr Natural Gas/Fuel Oil Boiler; installed 2009</td>
<td>Coen, 40D-13283-1</td>
</tr>
</tbody>
</table>

Note: the sulfur limitations, along with monitoring, recordkeeping, and recording, only apply when fuel oil is being combusted.

**Emission Limitation:**

The permittee shall not combust oil in this emission unit that contains greater than 0.5 weight percent sulfur, including periods of startup, shutdown and malfunction. [§60.42c(d)]
Operational Limitation:
1) The permittee shall install and operate low NOx Burners on EP-11. [Special Condition III.C.]
2) The permittee shall perform an adjustment or tune up of the combustion process annually. [Special Condition III.D.] It shall be completed in accordance with the requirements of 10 CSR 10-5.510 (B), which currently requires the following items at minimum:
   a) Inspection, adjustment, cleaning or replacement of the fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer;
   b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx and, to the extent practicable, minimize emissions of carbon monoxide; and
   c) Inspection of the air to fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

Monitoring:
The permittee shall demonstrate compliance with Emission Limitation above based on fuel supplier certification. [Special Condition II.E.]

Recordkeeping
1) The permittee shall keep records including the following information:
   a) Calendar dates covered in the reporting period. [§60.48c(e)(1)]
   b) If used to demonstrate compliance, fuel supplier certification is described in 2) below. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [§60.48c(e)(11)]
2) Fuel supplier certification shall include the following information:
   a) For distillate oil:
      i) The name of the oil supplier; and [§60.48c(f)(1)(i)]
      ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c. [§60.48c(f)(1)(ii)]
3) The permittee shall record and maintain records of the amounts of each fuel combusted during each calendar month. [§60.48c(g)(3)]

PERMIT CONDITION 3
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart GG
Standards of Performance for Stationary Gas Turbines

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>#1 Gas Turbine 7.5 MW Generator (64.04 MMBTU/hr ≈ 68.65 gigajoules/hr); installed 1999</td>
<td>Solar/Taurus 60</td>
</tr>
<tr>
<td>EP-02</td>
<td>#1 Gas Turbine 7.5 MW Generator (64.04 MMBTU/hr ≈ 68.65 gigajoules/hr); installed 1999</td>
<td>Solar/Taurus 60</td>
</tr>
</tbody>
</table>

Emission Limitation:
The permittee shall not cause to be discharged into the atmosphere from these emission units any gases which contain nitrogen oxides emissions in excess of:

\[ STD = 0.0150 \frac{14.4}{Y} + F \]
where:

STD = allowable ISO corrected (if required as given in §60.335(b)(1)) NO\textsubscript{x} emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

\[ Y = \text{manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility.} \]

The value of Y shall not exceed 14.4 kilojoules per watt hour, and

\[ F = \text{NOX emission allowance for fuel-bound nitrogen as defined according to the nitrogen content of the fuel during the most recent performance test:} \]

<table>
<thead>
<tr>
<th>Fuel-bound nitrogen (percent by weight)</th>
<th>F (NO\textsubscript{x} percent by volume)</th>
</tr>
</thead>
<tbody>
<tr>
<td>( N \leq 0.15 )</td>
<td>0</td>
</tr>
<tr>
<td>0.015 (&lt; N \leq 0.1 )</td>
<td>0.04 ((N))</td>
</tr>
<tr>
<td>0.1(&lt; N \leq 0.25 )</td>
<td>0.004 + 0.0067((N-0.1))</td>
</tr>
<tr>
<td>( N &gt; 0.25 )</td>
<td>0.005</td>
</tr>
</tbody>
</table>

Where \( N \) = the nitrogen content of the fuel (percent by weight).

[40 CFR 60.332(a)(2)]

**Operational Limitation:**

The permittee shall not burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). [§60.333(b)]

**Monitoring:**

The permittee shall perform stack testing on one of two GTGs every 30 months plus or minus three months using EPA testing methods to demonstrate compliance with the NO\textsubscript{x} emission limit specified in this permit condition. If the performance test results show exceedance of the NO\textsubscript{x} emission limit, the permittee shall perform another test on both GTGs within 90 days to demonstrate compliance with the NO\textsubscript{x} emission limit and a subsequent test within 12 months. If the subsequent test demonstrates compliance with the NO\textsubscript{x} emission limit, the permittee shall be back on the testing schedule of every 30 months [40 CFR 60.334(c)]

**Performance Testing:**

When performance testing is required by a condition of this permit, one electronic copy of a written report of the performance test results shall be submitted to stacktesting@dnr.mo.gov within the timeframe required by the regulation that requires the testing. If no time frame is specified, the report shall be submitted within sixty days. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
PERMIT CONDITION 4
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
Stationary Reciprocating Internal Combustion Engines

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-07</td>
<td>Emergency Diesel Generator; 1350 BHP; installed 1999</td>
<td>Cummins/KTA38-G4</td>
</tr>
</tbody>
</table>

Operational Standards:
1) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]

a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]

b) The permittee may operate the emergency stationary RICE for the purpose specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]

i.) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2). Except as provided in i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

i.) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) through (E)]

1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

4) The power is provided only to the facility itself or to support the local transmission and distribution system.
(5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.

2) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

3) 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.

Monitoring/Recordkeeping:
The permittee shall maintain an operating and maintenance log using Attachment D or an equivalent.

Reporting:
The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-03.1</td>
<td>#3 Package Boiler; 101 MMBTU/hr Natural Gas/Fuel Oil boiler; installed 2002</td>
<td>Nebraska Boiler N5-E-66</td>
</tr>
<tr>
<td>EP-04</td>
<td>#4 Package Boiler; 101 MMBTU/hr Natural Gas/Fuel Oil Boiler; installed 2003</td>
<td>Nebraska Boiler N5-E-66</td>
</tr>
<tr>
<td>EU-07</td>
<td>Emergency Diesel Generator; 1350 BHP; installed 1999</td>
<td>Cummins/KTA38-G4</td>
</tr>
<tr>
<td>EP-11</td>
<td>#5 Package Boiler; 99 MMBTU/hr Natural Gas/Fuel Oil Boiler; installed 2009</td>
<td>Coen, 40D-13283-1</td>
</tr>
</tbody>
</table>

Note: Monitoring & recordkeeping are only required when fuel oil or diesel is combusted.

Emission Limitation:
The permittee shall not cause or permit to be discharged into the atmosphere from the dual-fuel boilers and emergency generator any visible emissions in excess of 20 percent when combusting fuel oil or diesel.

Monitoring:
1) The permittee shall conduct visible emission observations on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to make observations when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further
observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

2) The permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
          (1) The permittee may observe once per month.
          (2) If a violation is noted, monitoring reverts to weekly.

3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

4) The renewal of an operating permit does not require the installation to revert to weekly monitoring; instead, it should continue with the monitoring regime it is under at the time of issuance of the renewal permit.

**Recordkeeping:**
The permittee shall maintain records of all observation results using Attachments B, C and D (or equivalents), noting:
1) Whether any air emissions (except for water vapor) were visible from the emission units;
2) All emission units from which visible emissions occurred;
3) Whether the visible emissions were normal for the process;
4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.
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.

City of St. Louis Ordinance 68657, §15 Open Burning Restrictions
1) No person shall cause, suffer, allow or permit the open burning of refuse.
2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

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 10-6.250 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”; 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.

**10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations**

(Rescinded on February 11, 1979, Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

**10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained**

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

**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>
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<tr>
<td>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.</td>
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<tr>
<th>10 CSR 10-6.065(6)(E)3.C</th>
<th>Extension of Expired Permits</th>
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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.
   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.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. 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.

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<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)6 Permit Shield</th>
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<tr>
<td>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:</td>
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<td>a) The applicable requirements are included and specifically identified in this permit, or</td>
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<td>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.</td>
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<tr>
<td>2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:</td>
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<td>a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,</td>
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<td>b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,</td>
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<td>c) The applicable requirements of the acid rain program,</td>
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<tr>
<td>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</td>
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<td>e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.</td>
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<tr>
<th>10 CSR 10-6.065(6)(C)7 Emergency Provisions</th>
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<tbody>
<tr>
<td>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:</td>
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<td>a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,</td>
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<td>b) That the installation was being operated properly,</td>
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<td>c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and</td>
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<td>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.</td>
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<tr>
<td>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.</td>
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<tr>
<th>10 CSR 10-6.065(6)(C)8 Operational Flexibility</th>
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<tr>
<td>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, as well as EPA Region VII, 11201 Renner Blvd.,</td>
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</table>
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, 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, 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 Michael Stoopa, Regional Director of EH&S. Since that application was received, Ashley Energy has changed ownership. The new Responsible official is Daniel C. Dennis, VP/Chief Operating Officer. If this person terminates
employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit shall be reopened for cause if:

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

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

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

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

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

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

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

## VI. Attachments

Attachments follow.
## Attachment A

### Fugitive Emission Observations

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<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions Beyond Boundary</th>
<th>Abnormal Emissions</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>Yes</td>
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</tbody>
</table>
Attachment B
Visible Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td>Cause</td>
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<td></td>
<td>Corrective Action</td>
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<td></td>
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<td></td>
<td>Initial</td>
</tr>
</tbody>
</table>

*If there are visible emissions, the permittee shall complete the excess emissions columns.*
## Attachment C

<table>
<thead>
<tr>
<th>Time</th>
<th>Readings</th>
<th>Camera Distance (ft)</th>
<th>Camera Angle (deg)</th>
<th>Camera Pitch (deg)</th>
<th>Camera Yaw (deg)</th>
<th>Camera Roll (deg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
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</tbody>
</table>

**Summary of Average Opacity**

<table>
<thead>
<tr>
<th>Summary</th>
<th>Site Name</th>
<th>Angel</th>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Emission Unit</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

Readings ranged from ______ to ______ \% opacity.

Was the emission unit in compliance at the time of evaluation?  

YES  NO  Signature of Observer
Attachment D
Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # ____________________________
ATTACHMENT E
Predictive Emission Monitoring Plan for Duct-Fired HRSGs and Package Boilers

The only parameter that requires continuous monitoring is the flue gas oxygen level. The units do not have staged combustion and are only supplied with primary air. As required per regulation, although not necessary for NOx prediction, steam generating unit load will also be stored in thousands of pounds per hour of steam generation.

Factors correlating the continuously monitored value will be derived from the most recent stack tests on the units utilizing approved EPA methods. Since combustion air is essentially constant on the units because it is supplied by a constant air flow from a combustion turbine axial flow compressor, a direct correlation can be drawn between the percentage of excess oxygen in the flue gas and NOx generation. Monitoring of fuel is not necessary since stack oxygen levels are already monitored and NOx levels can be predicted from these values.

For the initial calculations, NOx concentration data and percent excess oxygen values were derived from EPA protocol tests conducted on the HRSGs by Burns & McDonnell on 1/4/00. Since the emissions from both the gas turbine and HRSG pass through the stack, emissions from the HRSG were determined by taking the differential in NOx concentration between the fired (50% & 100% duct firing) and unfired (0% duct fired) states on the HRSG with the gas turbine at 100% load. A similar process is used to determine correlation factors for the package boilers. As new stack tests are completed, these factors will be updated to reflect the most recent operating data.

Stack oxygen levels will be continuously monitored and the data reported to the plant SCADA system. This data will be downloaded to separate computer storage in spreadsheet format. Hourly averages will be used for prediction of NOx emission levels using the correlations previously established in the spreadsheet where the data of stack oxygen levels is saved. As required per regulation, although not necessary for NOx prediction, steam generating unit load will also be stored in thousands of pounds per hour of steam generation.

The oxygen analyzers will be recalibrated in conjunction with each stack test as required under our Title V Operating Permit, or when a known or suspected inaccuracy is detected. In the event of a loss of data or analyzer failure, best engineering estimates will be employed using available power production data, steam generation data, and fuel consumption data to predict NOx emissions.
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Ashley Energy, formerly Trigen - St. Louis Energy Corporation, owns and operates combined heat and power, also called cogeneration facility, that provides electricity and steam to customers in St. Louis, Missouri. The facility cogeneration equipment is fueled by natural gas and consists of two small gas turbine generators and two dedicated heat recovery steam generating units. The facility also has three boilers and an emergency diesel generator on-site. Potential emissions of NOx, SOx and CO are above major thresholds. Ownership of the facility was transferred to Ashley Energy in September 2017.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>25.73</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>12.61</td>
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<tr>
<td>SOx</td>
<td>6.37</td>
</tr>
<tr>
<td>NOx</td>
<td>363.85</td>
</tr>
<tr>
<td>VOC</td>
<td>12.53</td>
</tr>
<tr>
<td>CO</td>
<td>65.34</td>
</tr>
<tr>
<td>HAPs</td>
<td>2.49</td>
</tr>
</tbody>
</table>

Note: Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. For dual-fired units, the fuel with higher emissions was used.

Reported Air Pollutant Emissions, tons per year

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<thead>
<tr>
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<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>3.51</td>
<td>3.70</td>
<td>4.65</td>
<td>4.61</td>
<td>4.62</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>3.51</td>
<td>3.70</td>
<td>4.65</td>
<td>4.61</td>
<td>4.62</td>
</tr>
<tr>
<td>SOx</td>
<td>0.65</td>
<td>0.51</td>
<td>0.66</td>
<td>0.77</td>
<td>1.37</td>
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<tr>
<td>NOx</td>
<td>41.37</td>
<td>42.11</td>
<td>54.61</td>
<td>52.48</td>
<td>56.51</td>
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<tr>
<td>VOC</td>
<td>2.17</td>
<td>2.45</td>
<td>3.05</td>
<td>2.92</td>
<td>2.38</td>
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<tr>
<td>CO</td>
<td>30.93</td>
<td>36.09</td>
<td>44.85</td>
<td>42.24</td>
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<tr>
<td>HAPs</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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 March 7;
2) 2016 Emissions Inventory Questionnaire, received April 14, 2017;
3) Construction Permit 98-04-027, issued July 13, 1998;
4) Construction Permit 98-10-063, issued January 4, 1999;
5) Construction Permit 98-10-063A, issued February 9, 1999;
6) Construction Permit 02-08-018, issued September 23, 2002;
7) Construction Permit 02-08-018A, issued December 30, 2002;
8) Construction Permit 02-08-018A PM, issued May 3, 2004;
9) Construction Permit 08-04-008, issued October 29, 2008;
10) WebFIRE; and

**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.

The 10 CSR 10-5.220, *Petroleum Liquid Storage, Loading and Transfer*

This regulation does not apply to the installation since the permittee stores only fuel oils having a true vapor pressure less than 1.5 psia at 90 degrees Fahrenheit.

10 CSR 10-5.510 *Control of Emissions of Nitrogen Oxides* – this rule does not apply to any boiler because each is subject to a more stringent state or federal standard (Subpart Db & De) or has never released actual emissions in excess of 30 tons (EP-11 PTE > 1 tpy).

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

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – all combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels are exempt from the requirements of these rules [(1)(A)]. The boilers that are capable of combusting fuel oil are subject to more restrictive standards. [(1)(C)]

10 CSR 10-6.270, *Acid Rain Source Permits Required*

An electric generating unit (EGU) with a generating capacity over 25 MW may be subject to 40 CFR Part 72, *Acid Rain Program*, as adopted by Missouri at 10 CSR 10-6.270. Since the permittee does not have any generators over 25 MW in capacity and supplies less than 219,000 MW-hours on an annual basis to the grid for sale, it is not subject to 40 CFR Part 72 and 10 CSR 10-6.270 per 40 CFR 72.6(b)(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*

These rules do not apply to the units at this facility because there are no generators over 25 MW.
Construction Permit History

Construction Permit 98-04-027, issued July 13, 1998, authorized the installation of a Combined Heat and Power (CHP) system consisting of a new gas turbine generator and a heat recovery steam generator. This construction permit was replaced by Construction Permit 98-10-06.

Construction Permit 98-10-063, issued January 4, 1999, this construction permit was replaced by Construction Permit 98-10-06A.

Construction Permit 98-10-063A, issued February 9, 1999, replaced Construction Permit 98-10-063 and authorized the installation of a Combined Heat and Power system consisting of two new gas turbine generators and two heat recovery steam generators. The facility-wide emission limits were removed because several of the units have been removed; PTE calculations are below the limits, except for CO; and other state and federal rules control emissions. Other conditions are also duplicated by other rules. No conditions from this permit are included.

Construction Permit 99-04-027, issued April 13, 1999, authorized the installation and operation of an Emergency Diesel Generator. Emission limits in this permit are taken from the estimated annual emissions at 500 hours/year in the application, using then-current AP-42 emission factors in lb/hp-hr. All limits and conditions are duplicated by Subpart ZZZZ, which was promulgated after this permit. No conditions from this permit are included.

Construction Permit 02-08-018, issued September 23, 2002, was replaced by Construction Permit 02-08-018A.

Construction Permit 02-08-018A, issued December 30, 2002, was replaced by Construction Permit 02-08-018A PM

Construction Permit 02-08-018A PM, issued May 3, 2004, authorized the installation of two 101 MMBTU/hr natural gas and distillate oil-fired boilers and modified the current method of compliance from Predictive Emissions Monitoring to Continuous Emissions Monitoring. The CEMS for EP-3.1 and -4 have been replaced by PEMS (see Permit Condition 1). All conditions related to the initial startup and performance testing of the units have been fulfilled.

Construction Permit 08-04-008, issued October 29, 2008, authorized the construction of a 99 MMBTU/hr Dual-Fuel Package Boiler. Some limitations and monitoring requirements contained in this construction permit are taken from the requirements of 40 CFR Part 60 Subpart Dc and are included in Permit Condition 2. The emission limitations were tied directly to Subpart Dc compliance and are not repeated in this document.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts K, Ka and Kb

The permittee has a 250,000-gallon fuel oil storage tank which was constructed prior to 1973. Thus, NSPS Subparts K, Ka and Kb do not apply to the storage tank.

40 CFR Part 60, Subpart Db Standards Of Performance For Industrial-Commercial-Institutional Steam Generating Units – The permittee’s two new heat recovery and steam generating units (HRSG) installed...
in 1999 are subject to the NOx requirements of Subpart Db. Emission Units EP-03.1 and -04, Package Boilers #3 and #4, were installed in 2002 and 2003 respectively and are therefore subject to Subpart Db. The PM and SOx limits do not apply when the units are combusting pipeline grade natural gas. If fuel oil is combusted for other than testing/maintenance, the PM and SOx limits will apply. The opacity requirements in Db are duplicated by 10 CSR 10-6.6.220 and are not repeated in Permit Condition 1.

40 CFR Part 60, Subpart Dc Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units - The PM limit does not apply when the unit combusts pipeline grade natural gas. If fuel oil is combusted for other than testing/maintenance, the PM limit will apply. The opacity requirements in Dc are duplicated by 10 CSR 10-6.6.220 and are not repeated in Permit Condition 2.

40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines - this rule was promulgated well before the widespread use of low-sulfur fuels. Currently available natural gas and diesel fuels have sulfur contents well below the limits in this rule. Therefore, most sulfur requirements were not stated in Permit Condition 1. These requirements will be applicable if the rules requiring low-sulfur fuels are ever changed. The permittee’s two new combustion turbines installed in 1999 are subject to the NOx requirements of Subpart GG.

Maximum Achievable Control Technology (MACT) Applicability
40 CFR Part 63 Subpart ZZZZ, National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – EU-07; Emergency Diesel Generator is subject to this subpart.

40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters – is not applicable to the boilers at this facility because it is not a major source for Hazardous Air Pollutants.

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 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. The applicant is required to report the data directly.
to EPA. The public may obtain CO2 emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

**Other Regulatory Determinations**

None

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

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

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

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

A draft of the Part 70 Operating Permit for Ashley Energy was placed on public notice on November 17, 2017, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

Comment #: 1
First, Section V: General Permit Requirements includes requirements from 10 CSR 10-6.065(6)(C)1.E: Title IV Allowances which prohibits emissions that exceed any allowances the installation holds under Title IV of the Clean Air Act. However, Ashley Energy is not subject to the Acid Rain provisions under Title IV of the Clean Air Act. Therefore, EPA believes the requirements of 10 CSR 10-6.065(6)(C)1.E are not applicable to Ashley Energy and suggests MoDNR consider whether or not they belong in this Part 70 operating permit.

Response to Comment:
As the comment correctly states, 10 CSR 10-6.065(6)(C)1.E Title IV Allowances does not apply to Ashley Energy. The rule was removed from the Section V.

Comment #: 2
Second, Section V: General Permit Requirements indicates, in 10 CSR 10-6.020(2)(R)34, the Responsible Official who signed the application utilized in the preparation of this permit was Michael Becker, Managing Member. However, the Application for Authority to Operate in EPA's operating permit record is signed by Michael Stoppa, Regional Director of EH&S. EPA suggests MoDNR consider providing a discussion regarding the change in Responsible Official in the operating permit record (Statement of Basis).

Response to Comment:
The text for Responsible Official was clarified. The change of ownership was already mentioned in the Statement of Basis.

Comment #: 3
Third, Section IV: Core Permit 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 into the EPA approved Missouri State Implementation Plan (SIP) and is therefore a "State Only Requirement," and EPA recommends MoDNR consider adding a "State Only Requirement" designation to 10 CSR 10-6.250.

Response to Comment:
The suggested addition was made.

Comment #: 4
Finally, the Emission Limitation, in Permit Condition 3, requires the permittee to limit discharges into the atmosphere, from Emission Unit EP-01 and Emission Unit EP-02, any gases which contain
nitrogen oxides in excess of the amount calculated using the provided formula. The formula includes the term "F" which equals an emission allowance for fuel-bound nitrogen as "defined in paragraph (a)(4) of this section." Permit Condition 3 does not contain a "paragraph (a)(4)," so EPA recommends MoDNR consider modifying the reference to facilitate an easier determination of the term "F" to be used by the permittee.

Response to Comment:
The table from the rule referenced by "paragraph (a)(4)" was added to the text of the Permit Condition 3. This table provides the value "F" based on nitrogen content of the fuel being combusted.
FEB 21 2018

Mr. Daniel C. Dennis
Ashley Energy
One Ashley Place
St. Louis, MO 63102

Re: Part 70 Operating Permit Renewal
Installation ID: 510-0038, Permit Number: OP2018-004

Dear Mr. Dennis:

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:bjj

Enclosures

c: PAMS File: 2016-03-027