



INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2013-058
Expiration Date: OCT 07 2018
Installation ID: 019-0045
Project Number: 2012-12-044

Installation Name and Address

Christian Health Systems - Boone Hospital Center
1600 East Broadway
Columbia, MO 65201
Boone County

Parent Company's Name and Address

BJC Health System
8300 Eager Road Suite 600A, Risk Management
St. Louis, MO 63110

Installation Description:

Christian Health Systems – Boone Hospital Center is a full service hospital managed by BJC Health Systems in St. Louis, Missouri. It is a regional referral center that provides progressive healthcare programs, services and technology to people in 26 mid-Missouri counties.

OCT 08 2013

Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.020(2)(I)24 and 10 CSR 10-6.065(5)(C)2, Voluntary Limitation(s)	5
PERMIT CONDITION PW002	5
10 CSR 10-6.020(2)(I)24 and 10 CSR 10-6.065(5)(C)2, Voluntary Limitation(s).....	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
BOILERS.....	7
PERMIT CONDITION (EP01, EP03, EP12, and EP13)-001	7
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	7
PERMIT CONDITION (EP01, EP03, EP12, and EP13)-002	8
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	8
PERMIT CONDITION (EP01, EP03, EP12, and EP13)-003	9
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations	9
40 CFR Part 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	9
BOILERS.....	11
PERMIT CONDITION (EP17A and EP17B)-001.....	11
10 CSR 10-6.070, New Source Performance Regulations	11
40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	11
PERMIT CONDITION (EP17A and EP17B)-002.....	13
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	13
PERMIT CONDITION (EP17A and EP17B)-003.....	14
10 CSR 10-6.060, Construction Permits Required.....	14
Construction Permit 102005-016, Issued October 21, 2005	14
EMERGENCY GENERATORS	14
PERMIT CONDITION (EP16A through EP16C)-001	14
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	14
IV. CORE PERMIT REQUIREMENTS	16
V. GENERAL PERMIT REQUIREMENTS.....	24
VI. ATTACHMENTS	28
ATTACHMENT A	29
ATTACHMENT B	30
Method 22 Opacity Observations	30
ATTACHMENT C	31
Method 9 Opacity Observations	31
ATTACHMENT D	32
ATTACHMENT E.....	33
ATTACHMENT E.....	34
ATTACHMENT F.....	35
ATTACHMENT G	36

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Christian Health Systems – Boone Hospital Center is a full service hospital managed by BJC Health Systems in St. Louis, Missouri. It is a regional referral center that provides progressive healthcare programs, services and technology to people in 26 mid-Missouri counties.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.37	0.25	0.25	0.15	1.14
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.36	0.25	0.25	0.15	1.13
Sulfur Oxides (SO _x)	0.55	0.02	0.02	0.01	1.34
Nitrogen Oxides (NO _x)	5.03	2.33	2.33	2.02	5.70
Volatile Organic Compounds(VOC)	0.33	0.18	0.18	0.11	0.85
Carbon Monoxide (CO)	2.78	2.72	2.72	1.70	11.85
Lead (Pb)	-	-	-	-	-
Hazardous Air Pollutants (HAPs)	-	-	-	-	-
Ammonia (NH ₃)	0.02	0.02	0.02	0.01	0.07

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP01	13.5 MMBtu/hr Boiler
EP03	13.5 MMBtu/hr Boiler
EP12	8.37 MMBtu/hr Boiler
EP13	8.37 MMBtu/hr Boiler
EP16A	15.2 MMBtu/hr Emergency Generator
EP16B	15.2 MMBtu/hr Emergency Generator
EP16C	20.3 MMBtu/hr Emergency Generator
EP17A	16.74 MMBtu/hr Boiler
EP17B	16.74 MMBtu/hr Boiler

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Underground Storage Tank A – Distillate Oil No. 2 (EP14)

Underground Storage Tank B – Distillate Oil No. 2 (EP15)

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 on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)24 and 10 CSR 10-6.065(5)(C)2, Voluntary Limitation(s)

Emission Limitation

The permittee shall emit less than 100.0 tons of nitrogen oxides (NO_x) in any consecutive 12-month period from the entire installation.

Monitoring/Recordkeeping

1. The permittee shall maintain the monthly and the sum of the most recent consecutive twelve (12) month records of NO_x emissions emitted into the atmosphere from the entire installation.
2. Attachment F or equivalent forms approved by the Air Pollution Control Program (APCP) shall be used for recordkeeping.
3. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City MO 65102, no later than ten (10) days after the end of the month if the 12-month cumulative NO_x totals show the Source exceeded the emission limitation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.020(2)(I)24 and 10 CSR 10-6.065(5)(C)2, Voluntary Limitation(s)

Operational Limitation

The permittee shall not combust fuel that contains more than 0.27 weight percent sulfur.

Monitoring/Recordkeeping

1. The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by Section V of this permit.

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 on the date of permit issuance.

Boilers		
Emission Unit	Description	Manufacturer/Model #
EP01	13.5 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 1975	Cleaver-Brooks/CB-300HP
EP03	13.5 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 1975	Cleaver-Brooks/CB-300HP
EP12	8.37 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 2000	Cleaver-Brooks/CB-200-150
EP13	8.37 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 2000	Cleaver-Brooks/CB-200-150

PERMIT CONDITION (EP01, EP03, EP12, and EP13)-001

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

Emission Limitation

No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.

Monitoring/Recordkeeping

1. The permittee shall maintain records of the fuel burned (natural gas or No. 2 fuel oil) and verify the sulfur content. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting

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

PERMIT CONDITION (EP01, EP03, EP12, and EP13)-002

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

Emission Limitation

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings 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.

Recordkeeping

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), 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 (see Attachment D), which may contribute to visible emissions; and,
5. The permittee shall maintain records of all U.S. EPA Method 9 (see Attachment C) opacity tests performed.

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EP01, EP03, EP12, and EP13)-003

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

Compliance Dates

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

Work Practice Standards

For Boilers EP01, EP03, EP12, and EP13:

The permittee shall conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223. [§63.11201(b) and Table 2 to Subpart JJJJJ]

For Boilers EP01 and EP03 only:

The permittee shall have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this condition satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:

[§63.11201(b) and Table 2 to Subpart JJJJJ]

1. A visual inspection of the boiler system
2. An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints
3. An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator
4. A list of major energy conservation measures that are within the facility's control
5. A list of the energy savings potential of the energy conservation measures identified, and
6. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments

General Compliance Requirements

At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]

Initial Compliance Requirements

1. The permittee shall conduct a performance tune-up according to §63.11223(b) and submit a signed statement in the Notification of Compliance Status report that indicates a tune-up of the boiler was conducted. [§63.11214(b)]
2. The permittee shall submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to Subpart JJJJJ and is an accurate depiction of your facility for EP01 and EP03. [§63.11214(c)]

Continuous Compliance Requirements

1. The permittee shall conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee shall conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]
2. The permittee shall conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (a) through (g) below. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(3)]
 - d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.11223(b)(5)]
 - f) Maintain on-site and submit, if requested by the Director, biennial report containing the information in f(i) through (iii) below. [§63.11223(b)(6)]
 - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [§63.11223(b)(6)(iii)]
 - g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [§63.11223(b)(7)]

Notifications and General Provisions

1. The permittee shall submit notifications as specified in §63.11225
2. The permittee shall comply with the applicable General Provisions in §63.1 through 63.15 according to Table 8 to 40 CFR Part 63, Subpart JJJJJ

Recordkeeping

1. The permittee shall maintain applicable records as specified in §63.11225.
2. These records shall be made available for inspection to Department of Natural Resources' personnel upon request.
3. All records shall be retained for five years.

Reporting

1. The permittee shall submit applicable reports as specified in §63.11225.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Boilers		
Emission Unit	Description	Manufacturer/Model #
EP17A	16.47 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 2006	Superior/MM193A-7B
EP17B	16.47 MMBtu/hr Boiler; Fuel: Natural Gas and No. 2 Distillate Oil; Constructed 2006	Superior/MM193A-7B

PERMIT CONDITION (EP17A and EP17B)-001

10 CSR 10-6.070, New Source Performance Regulations

40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Limitation***Sulfur Dioxide (SO₂):***

1. The permittee shall not cause to be discharged into the atmosphere any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. [§60.42c(d)]
2. Compliance with these SO₂ emission limits and fuel oil sulfur limits shall be determined on a 30-day rolling average basis. [§60.42c(g)]
3. Compliance with the emission limits or fuel oil sulfur limits may alternatively be determined based on a certification from the fuel supplier. [§60.42c(h)(1)]
4. These SO₂ emission limits and fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. [§60.42c(i)]

Operational Limitation

These emission units shall be limited to burning either distillate fuel oil that contains not more than 0.5 weight percent sulfur on a 30-day rolling average basis, or natural gas.

Monitoring/Recordkeeping*Sulfur Dioxide (SO₂):*

1. The permittee shall maintain documentation supporting that the fuel used in these emission units for any given time period is either distillate fuel oil that contains not more than 0.5 weight percent sulfur on a 30-day rolling average basis, or natural gas.
2. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. As an alternative, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(1) and §60.48c(g)(2)]
3. Fuel supplier certification for distillate fuel oil shall include the following information: [§60.48c(f)]
 - a) The name of the oil supplier
 - b) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c
 - c) Sulfur content of distillate fuel oil by weight percent
4. Note: Fuel supplier certification is not required for the pipeline grade natural gas.
5. The permittee shall maintain all records required for SO₂ under this permit condition for a period of two years following the date of such record. [§60.48c(i)]

Reporting*Sulfur Dioxide (SO₂):*

1. The permittee shall submit an annual report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. This report shall include the following information: [§60.48c(e)]
 - a) Calendar dates covered in the reporting period,
 - b) Records of the amounts of each fuel combusted during each day,
 - c) Each 30-day average sulfur content by weight percent calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
 - d) Each 30-day average percent of potential SO₂ emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.
 - e) Records of any fuel supplier certifications, as described in (3) in the Monitoring/Recordkeeping section of this permit condition.
 - f) 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 distillate fuel oil combusted during the time period being reported.”
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EP17A and EP17B)-002

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

Emission Limitation

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings 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.

Recordkeeping

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), 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 (see Attachment D), which may contribute to visible emissions; and,
5. The permittee shall maintain records of all U.S. EPA Method 9 (see Attachment C) opacity tests performed.

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EP17A and EP17B)-003

10 CSR 10-6.060, Construction Permits Required

Construction Permit 102005-016, Issued October 21, 2005

Emission Limitation

The permittee shall emit less than 40 tons of sulfur oxides (SO_x) from the two Superior 400 boiler horsepower (hp) boilers in any consecutive 12 month period. [Special Condition 1A]

Monitoring/Recordkeeping

The permittee shall maintain the monthly and the sum of the most recent consecutive 12 month records of SO_x emissions from the two boilers. Attachment G or equivalent forms approved by the Air Pollution Control Program shall be used for recordkeeping. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 1B]

Reporting

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

Emergency Generators		
Emission Unit	Description	Manufacturer/Model #
EP16A	Emergency Generator; 15.12 MMBtu/hr; Fuel: No. 2 Distillate Fuel Oil; Constructed 2006	Caterpillar/3512B
EP16B	Emergency Generator; 15.12 MMBtu/hr; Fuel: No. 2 Distillate Fuel Oil; Constructed 2006	Caterpillar/3512B
EP16C	Emergency Generator; 20.3 MMBtu/hr; Fuel: No. 2 Distillate Fuel Oil; Constructed 2006	Caterpillar/3516B

PERMIT CONDITION (EP16A through EP16C)-001

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

Emission Limitation

1. Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
2. Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications

The emission unit shall be limited to burning No. 2 fuel oil.

Monitoring/Recordkeeping

1. The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting

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

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Christian Health Systems - Boone Hospital Center may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Christian Health Systems - Boone Hospital Center fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
- a) Name and location of installation;
- b) Name and telephone number of person responsible for the installation;
- c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
- d) Identity of the equipment causing the excess emissions;
- e) Time and duration of the period of excess emissions;
- f) Cause of the excess emissions;
- g) Air pollutants involved;

- h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under 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. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. 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 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on 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) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of 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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the 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. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - 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 §82.106.
- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - 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 as specified 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*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.

- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the 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, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 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 annual 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 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 semi-annually (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 the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by Randy Morrow, 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (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,
- 2) 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,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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 C
Method 9 Opacity Observations

Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

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

YES NO Signature of Observer

Attachment E

Calculations Demonstrating Compliance with 10 CSR 10-6.260

Indirect Heating Units

The Emission Limit for indirect heating units is eight lb SO₂/MMBtu heat input. [10 CSR 10-6.260(3)(C)2.A]

SO₂ Emission Rate from Natural Gas Combustion

The AP-42 emission factor for SO_x emissions from natural gas combustion is 0.6 lb per 10⁶ cubic feet. (AP-42 Table 1.4-2)

To demonstrate that natural gas combustion emissions comply with the SO₂ emission limit established by 10 CSR 10-6.260, convert the SO_x emission factor to *pounds per million Btu* of heat input, which is the unit measurement of the emission standard:

$$0.6 \text{ lb SO}_x/10^6 \text{ ft}^3 \times \text{ft}^3/1050 \text{ Btu} = \underline{0.0006 \text{ pounds per million Btu}}$$

SO₂ Emission Rate from Fuel Oil Combustion

Heating value of No. 2 fuel oil is 140,000 Btu/gallon. AP-42 Table 1.3-1 lists the SO₂ emission factor for fuel oil combustion as 142S pounds per 1000 gallons, where S is the percent sulfur content by weight.

SO₂ Emissions:

$$142(0.27) \text{ lb}/1000 \text{ gal.} \times \text{gal.}/140,000 \text{ Btu} \times 1,000,000 \text{ Btu/MMBtu} = \underline{0.274 \text{ lb/MMBtu}}$$

Conclusion: SO_x emissions resulting from the combustion of either natural gas or fuel oil in the indirect heating equipment at the installation will comply with the emission limit 8 lb SO₂/MMBtu heat input.

Attachment E SO₂ Compliance Demonstration

This attachment presents calculations that demonstrate that Permit Condition PW001 will ensure that the permittee's emissions will not exceed 100 tons per year of sulfur dioxide.

General Assumptions:

- Conversion of all sulfur in the fuel to SO₂.
- Assume that combustion boilers burn fuel oil continuously, year around.

SO₂ PTE of Boilers

- Heating value of No. 2 fuel oil is 140 MMBtu/1000 gallons. [EPA Document AP-42, Chapter 1.3]

EU ID #	Description	MHDR (MMBtu/hr)
EP01	Combustion Boiler	13.5
EP03	Combustion Boiler	13.5
EP12	Combustion Boiler	8.37
EP13	Combustion Boiler	8.37
EP17	Combustion Boiler	16.74
EP17	Combustion Boiler	16.74
	Total heat capacity	77.22

SO₂ Emission Factor = 142(S) lb/1000 gal where S is 0.27%. [EPA Document AP-42, Table 1.3-1]

$$PTE\ SO_2 = \frac{77.22\ MMBtu}{hr} \times \frac{1000\ gal}{140\ MMBtu} \times \frac{142 \times 0.27\ lb}{1000\ gal} \times \frac{8760\ hr}{year} \times \frac{ton}{2000\ lb} = 92.62\ tons/year$$

SO₂ PTE of Emergency Generators:

EU ID #	Description	MHDR (MMBtu/hr)
EP16A	Caterpillar Generator	15.12
EP16B	Caterpillar Generator	15.12
EP16C	Caterpillar Generator	20.3
	Total heat capacity	50.54

SO₂ Emission Factor = 0.29 lb/MMBtu. [EPA Document AP-42, Table 3.3-1]

$$PTE\ SO_2 = \frac{50.54\ MMBtu}{hr} \times \frac{0.29\ lb}{MMBtu} \times \frac{500\ hr}{year} \times \frac{ton}{2000\ lb} = 3.66\ tons/year$$

Sum of SO₂

$$PTE\ SO_2 = 92.62\ tons + 3.66\ tons = 96.28\ tons$$

96.28 tons of SO₂ is below the major source threshold of 100 tons.

Attachment FMonthly NO_x Compliance Worksheet

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

	Column A	Column B	Column C	Column D	
Emission Unit	Natural Gas Usage (in 10 ⁶ scf)	Emission Factor (lb/10 ⁶ scf)	Fuel Oil No. 2 Usage (in 1000 gal)	Emission Factor (lb/1000 gal)	NO _x Emissions ¹ (tons)
EP1		100		24	
EP3		100		24	
EP12		50		10	
EP13		50		10	
EP17A		50		10	
EP17B		50		10	
EP16A				604	
EP16B				604	
EP16C				604	
Total NO _x Emissions for This Month ²					
12 Month NO _x Emissions from Previous Month's Worksheet ³					
Monthly NO _x Emissions from Previous Year's Worksheet ⁴					
Current 12 Month Total NO _x Emissions ⁵					

$$\frac{1}{2000}(\text{Column A} \times \text{Column B}) + (\text{Column C} \times \text{Column D})$$
 Emission Factors taken from AP-42 Compilation of Air Pollutant Emission Factors, Fifth Edition, Section 1.3, Fuel Oil Combustion, Section 1.4 Natural Gas Combustion, and Section 3.3 Gasoline and Diesel Industrial Engines. EP12, EP13, and EP17 are controlled by low NO_x burners.

²Sum of NO_x emissions reported for all emission units for the month

³Running 12 month total NO_x emissions from the previous month's worksheet

⁴NO_x emissions reported for this month in the last calendar year

⁵Amount reported for (³) minus the amount reported for (⁴) plus the amount reported in (²), not to exceed 100.0 tons in any consecutive 12 month period

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received December 21, 2012;
- 2) 2011 Emissions Inventory Questionnaire, received April 27, 2012; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

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

This rule does not apply to fuel burning equipment used for indirect heating therefore it does not apply to the boilers. [10 CSR 10-6.400(1)(B)6]

This rule does not apply to units exempt from construction permitting under 10 CSR 10-6.061 and therefore does not apply to the emergency generators. [10 CSR 10-6.400(1)(B)8]

Construction Permit History

1. Construction Permit 1176-006, Issued November 9, 1976
This permit was issued for the installation of a Wolverine Incinerator.
2. Construction Permit 0984-001, Issued September 18, 1984
This permit was issued for the installation of a Shenandoah P20M-3G Incinerator.
3. Construction Permit 102001-009, Issued September 19, 2001
This permit was issued for the addition of a 300 kW emergency generator, two 200 hp boilers and two 20,000 gallon underground storage tanks.

Special Condition 1A of this construction permit limits the discharge of NO_x. This limit was not included because the 300 kW emergency generator has been removed from service and the two boilers have an uncontrolled potential to emit NO_x of less than the 40 ton limit. The underground storage tanks, which hold No. 2 Distillate Oil do not emit NO_x.

4. No Construction Permit Required Determination Project No. 2003-10-082, Completed January 7, 2004

This determination was made for the addition of two emergency generators

5. Construction Permit 102005-016, Issued October 21, 2005

This permit was issued for two dual-fuel fired 400 hp boilers. This permit contains special conditions which are included in Permit Condition (EP17A and EP17B)-003.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

This Subpart applies to each steam generating unit that was constructed, modified, or reconstructed after June 9, 1989, with a maximum design heat input capacity between ten and 100 MMBtu/hr. The sulfur dioxide standard under this rule was applied to the two 16.74 MMBtu/hr boilers (EP17A and EP17B) that were constructed in 2006. There was no applicable particulate matter or opacity standard for these units because they are less than 30 million Btu/hour each.

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*

The 20,000 gallon tanks store fuel oil which has a true vapor pressure of less than 15.0 kPa and therefore this rule does not apply. [§60.110b(b)]

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

Boilers EP01, EP03, EP12, and EP13 are all considered existing, institutional, oil boilers at an area source of HAP and are therefore subject to this rule. [63.11194(a)(1)]

Boilers EP17A and EP17B are not subject to this rule because they are subject to 40 CFR Part 60 Subpart Dc. [§63.11195(b)]

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

The emergency engines are not subject to this rule because they are existing institutional emergency stationary RICE located at an area source of HAP. [§63.6590(b)(3)(viii)]

An institutional emergency stationary RICE is an emergency stationary RICE used in institutional establishments such as medical centers, nursing homes, research centers, institutions of higher education, correctional facilities, elementary and secondary schools, libraries, religious establishments, police stations, and fire stations.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 42,105 tons, classifying the installation as a minor source of GHGs.

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

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	39.83
CO ₂ e	42,105
HAP	0.68
NO _x	100.0
PM ₁₀	9.67
PM ₂₅	9.06
SO _x	96.13
VOC	44.22

Other Regulatory Determinations

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

This rule applies to the boilers. This rule does not apply to the emergency generators because they are internal combustion engines operated outside of the Kansas City and St. Louis metropolitan areas. [10 CSR 10-6.220(1)(A)]

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

This rule applies to all of the boilers and emergency generators except units EP17A and EP17B because they are subject to a sulfur compound emission limit under 40 CFR Part 60 Subpart Dc.

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

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

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

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

Prepared by:

Colin Janssen
Environmental Engineer II

Mr. Randy Morrow
Christian Health Systems - Boone Hospital Center
1600 East Broadway
Columbia, MO 65201

Re: Christian Health Systems - Boone Hospital Center, 019-0045
Permit Number: **OP2013-058**

Dear Mr. Morrow:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Colin Janssen at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/cjk

Enclosures

c: Northeast Regional Office
PAMS File: 2012-12-044