



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

DEPARTMENT OF NATURAL RESOURCES

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JUL 24 2009

CERTIFIED MAIL: 70051820000233104732  
 RETURN RECEIPT REQUESTED

Mr. Daniel Hedrick  
 Environmental Analyst  
 City Utilities of Springfield  
 P.O. Box 551  
 Springfield, MO 65801-0551

RE: New Source Review Temporary Permit Request - Project Number: 2009-07-001  
 Installation ID Number: 077-0005, Expiration Date: December 31, 2009  
 Temporary Permit Number: **072009-014**

Dear Mr. Hedrick:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to perform a test burn of renewable fuels at James River Power Station (JRPS) located in Springfield, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

According to your letter dated June 29, 2009, City Utilities is seeking authority to test burn renewable fuels consisting of wood, wood chips and torrefied bio-solid fuel made from waste cellulosic materials (tree trimming, vegetation and wood chips). An outside vendor will supply the dry wood and torrefied wood materials for the test burn.

City Utilities plans to burn fifty tons of dried wood and fifty tons of torrefied wood at one of the James River units. Analysis provided by City Utilities (Table 1) for this project shows an anticipated decrease in emissions for particulate matter less than 10 microns (PM<sub>10</sub>), sulfur oxides (SO<sub>x</sub>) and volatile organic compounds (VOCs), but a slight increase in nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and hazardous air pollutants (HAP) emissions.

Table 1: Projected Emissions Impact from Biofuel Burn for Unit 4

Criteria Air Pollutant	Historical Actual Emission Rate (lb/hr) <sup>1</sup>	Projected Emission Rate (lb/hr) <sup>2</sup>	Historical Actual Emissions 10-hour test burn (tons)	Projected Emissions 10-hour test burn (tons) <sup>3</sup>	Net Emissions Increase/ Reductions 10-hour test burn (tons)
PM <sub>10</sub>	43.6	42.2	0.22	0.21	(0.01)
SO <sub>2</sub>	394	354	1.97	1.77	(0.20)
NO <sub>x</sub>	150	173	0.75	0.87	0.12
VOC	3.8	3.2	0.019	0.016	(0.003)
CO	38	86	0.19	0.43	0.24
Lead	0.01	0.02	0.0	0.0	-
HAPs	1.73	3.19	0.01	0.02	0.01
Sulfuric Acid Mist <sup>4</sup>	N/A	Decrease	-	-	-

<sup>1</sup>Based on 2008 operational data and coal quality. <sup>2</sup>Potential emission rate based on AP-42, Section 1.6 Wood Residue Combustion in Boilers. <sup>3</sup>Emissions based on 10 hour test burn and 85/15 coal/biofuel blend.

<sup>4</sup>A decrease in sulfuric acid mist is expected due to decrease in SO<sub>2</sub> emissions.

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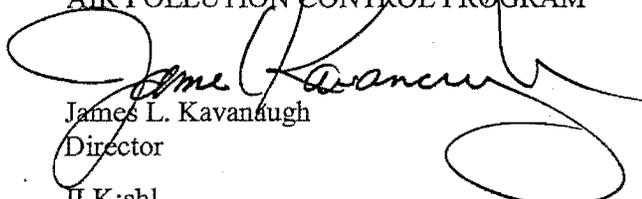
Since all pollutants are expected to have emissions well below 100 tons per year, permission to temporarily burn the biofuels is granted up to the expiration date stated above. In order to continue burning the biofuels at JRPS past the expiration date, City Utilities will need to seek permission from the Air Pollution Control Program.

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045, *Open Burning Restrictions*; 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*; 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*; 10 CSR 10-3.090, *Restriction of Emission of Odors*; and 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Susan Heckenkamp at the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 75 1-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



James L. Kavanagh  
Director

JLK:shl

c: PAMS File: 2009-07-001  
Southwest Regional Office

Temporary Permit Number:

072009-014