STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 032010-013 Project Number: 2009-09-038
Parent Company: City of West Plains
Parent Company Address: 1910 Holiday Lane, West Plains, MO 65775
Installation Name: City of West Plains - 49MW Peaking Power Station
Installation Address: Old Airport Road and Good Hard Drive, West Plains, MO 65775
Location Information: Howell County, S17, T24N, R8W

Application for Authority to Construct was made for:
The installation of a new natural gas line that will run to the two dual fuel gas turbines. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

☐ Standard Conditions (on reverse) are applicable to this permit.
☒ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAR 30 2010

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES
STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources’ personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

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

City of West Plains - 49MW Peaking Power Station
Howell County, S17, T24N, R8W

1. Superseding Condition
   The conditions of this permit supersede all special conditions found in the previously issued construction permits from the Air Pollution Control Program (Permit Number 0199-010 and 0199-010A) except for Special Condition 6 found in Permit Number 0199-010A.

2. Emission Limitation of Nitrogen Oxides (NOₓ)
   A. City of West Plains – 49 Mega Watts (MW) Peaking Power Station shall emit less than 100.0 tons of NOₓ from the installation in any consecutive 12-month period. This limitation applies to the NOₓ emissions from all equipment/processes installed or permitted at the City of West Plains - 49MW Peaking Power Station as of the issuance date of this permit.

   B. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A. City of West Plains - 49MW Peaking Power Station 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.

   C. City of West Plains - 49MW Peaking Power Station 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 during which the records from Special Condition Number 2.B. indicate that the source exceeds the limitation of Special Conditions Number 2.A.

3. Emission Limitation of Carbon Monoxide (CO)
   A. City of West Plains – 49 Mega Watts (MW) Peaking Power Station shall emit less than 100.0 tons of CO from the installation in any consecutive 12-month period. This limitation applies to the CO emissions from all equipment/processes installed or permitted at the City of West Plains - 49MW Peaking Power Station as of the issuance date of this permit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

B. City of West Plains - 49MW Peaking Power Station shall maintain an accurate record of CO emitted into the atmosphere from the entire installation. Attachment B or an equivalent form shall be used for this purpose. City of West Plains - 49MW Peaking Power Station 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.

C. City of West Plains - 49MW Peaking Power Station 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 during which the records from Special Condition Number 3.B. indicate that the source exceeds the limitation of Special Condition Number 3.A.

4. Performance Testing - Natural Gas
   A. The City of West Plains - 49 MW Peaking Power Station shall conduct performance tests during the upcoming winter period beginning December 1, 2010 and ending the last day of February of the following year on both the 24 MW and 25 MW simple cycle gas turbines when burning natural gas to develop emission factors for use in the record keeping requirements of Special Conditions 2 and 3 and to demonstrate compliance with Subpart KKKK, Standards of Performance for Gas Turbines, of the New Source Performance Standards (NSPS).

   B. The City of West Plains - 49 MW Peaking Power Station shall conduct all tests in accordance with the test methods and procedures outlined here and Subpart KKKK of the NSPS.

   C. Emission factors for the purpose of demonstrating compliance with Special Conditions 2 and 3 shall be determined according to approved methods for calculating mass emissions of NO\textsubscript{x} and CO. Winter emissions, defined as the period beginning December 1 and ending the last day of February of the following year, shall be derived from an approved test (or tests) from the same period. Emission factors derived from low load test conditions (i.e. between fifty (50) and seventy-five (75) percent of nameplate generator capacity) shall be utilized when calculating hourly emissions during low load operations. Emission factors derived from mid load test conditions (i.e. between seventy-five (75) and ninety (90) percent of nameplate generator capacity) may be applied when calculating hourly emissions during high load operations. Emission factors
SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

derived from high load test conditions (i.e. between ninety (90) percent of nameplate generator capacity and peak operating load) may be applied when calculating hourly emissions during high load operations. Non-winter mass emissions for NO\textsubscript{x} and CO may be calculated from testing performed during the winter or using emission factor from testing performed during summer months. Until the initial test is performed The City of West Plains - 49 MW Peaking Power Station shall demonstrate compliance with Special Conditions 2 and 3 with the default emission factors found in Attachment A and B.

D. The initial stack test(s) listed in Special Conditions 4.A through 4.C shall be performed during the first winter emissions period, which begins December 1 and ends the last day of February of the following year, after first fire [ref: 40 CFR Part 60.8(a)]. The timeframes for initial testing may be extended upon a written request being submitted to and approved by the Director of the Air Pollution Control Program.

E. The date on which performance tests are conducted must be pre-arranged with the Air Pollution Control Program a minimum of 30 days prior to the proposed test so that a pretest meeting may be arranged if necessary, and to assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form (copy enclosed) may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing.

F. Two copies of a written report of the performance test results shall be submitted to the Director of the Air Pollution Control Program within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA method for at least one sample run.

G. The test report is to fully account for all operational and emission parameters addressed by these permit conditions as well as in Subpart KKKK of the NSPS and any other applicable state or federal rules or regulations.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

5. Water Spray Injection System
   A. The City of West Plains - 49 MW Peaking Power Station shall install, operate, and maintain in operable condition a water spray injection system in both the 24 MW and 25 MW simple cycle turbines to control NOx emissions. The water spray injection systems must be in use at all times when the power station is running, and shall be operated and maintained in accordance with the manufacturer's specifications.

   B. The City of West Plains - 49 MW Peaking Power Station shall maintain an operating and maintenance log for each water spray injection system which shall include the following:

      1) The amount of water used per unit of fuel (i.e. lb. water per gallon fuel oil, lb. water per standard cubic foot of natural gas). These records shall indicate the amount of water used and the amount of fuel used on a daily basis. The amount of water used per unit of fuel shall be maintained within the conditions establish during the performance tests mandated by Special Conditions 4 and 5 of this permit as well as the design conditions specified by the manufacturer's performance warranty.

      2) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and

      3) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

6. The City of West Plains - 49 MW Peaking Power Station shall apply for an amendment to their Intermediate Operating Permit from the Air Pollution Control Program within 90 days of startup of this installation.
City of West Plains - 49MW Peaking Power Station Complete: September 21, 2009
Old Airport Road and Good Hard Drive
West Plains, MO 65775

Parent Company:
City of West Plains
1910 Holiday Lane
West Plains, MO 65775

Howell County, S17, T24N, R8W

REVIEW SUMMARY

- City of West Plains - 49MW Peaking Power Station has applied for authority to install a new natural gas line that will run to the two dual fuel gas turbines.

- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. However, emissions will be below the Screen Modeling Action Levels so they will be considered insignificant.

- Subpart KKKK, Standards of Performance for Stationary Combustion Turbines, of the New Source Performance Standards (NSPS) and Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, applies to this installation.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. 40 CFR Part 63 Subpart YYYY, Combustion Turbines, does not apply since this installation is not a major source for HAPs.

- Water Spray Injection is being used to control emissions associated with the two turbines.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of NOx are above de minimis levels. However, this source will be conditioned below major source levels.

- This installation is located in Howell County, an attainment area for all criteria air pollutants.
This installation is on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2, Category 26 Fossil-fuel-fired steam electric plants of more than 250 million British thermal units per hour heat].

- Ambient air quality modeling was performed to determine the ambient impact of NOx.
- Emissions testing is required for the 24 MW turbine and the 25 MW turbine.
- A revision to your Intermediate Operating Permit application is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The City of West Plains has 49-MW power generation installation (091-0068) that is used as a peaking station during periods of high demand. The installation consists of one 24-MW simple cycle gas turbine (serial number 244557 AEG-Kanis) and one 25-MW simple cycle gas turbine (serial number 282036 AEG-Kanis) both having the capability to burn Fuel Oil #2 and Natural Gas. The dual-fuel turbines utilize a water spray injection control for reducing NOx formation. Currently Fuel Oil #2 is the only fuel being burned by the two gas turbines. Stack testing was performed on the two turbines but only while burning Fuel Oil #2 not natural gas.

This installation has the potential to be a major source for NOx and CO. However the City of West Plains Peaking Station has taken a limit of 100 tons per year of NOx to keep the installation below major levels.

The City of West Plains Peaking Station currently has an Intermediate Operating Permit (OP2004-032) that was issued June 29, 2004 that will need to be amended upon the issuance of this permit. An Intermediate Operating Permit application was received in March 2009 and is currently undergoing technical review.

The following permits have been issued to City of West Plains - 49MW Peaking Power Station from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0199-010</td>
<td>Two turbine peak generators</td>
</tr>
<tr>
<td>0199-010A</td>
<td>Turbine modification</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

The City of West Plains is adding a natural gas line for their dual fuel turbines (EP-01 and EP-02). The City of West Plains did not install a natural gas line to the two turbines.
within two years of the previous permit’s issuance therefore a new permit is necessary. Testing will be required for the two turbines when the natural gas is hooked up to determine the actual emissions from the natural gas use. Currently the City of West Plains can only operate one turbine at a time due to the current natural gas restrictions. This permit is being reviewed as if both turbines can operate simultaneously in order to avoid the City of West Plains having to come in for additional permitting once simultaneous operation is available.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 3.1, *Stationary Gas Turbines for Electricity Generation*. Since there is no new equipment, the potential emissions of the application are based on the combustion of natural gas in the turbines (EP-01 and EP-02), assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>N/D</td>
<td>0.01</td>
<td>16.38</td>
<td>N/D***</td>
</tr>
<tr>
<td>SO$_{x}$</td>
<td>40.0</td>
<td>N/D</td>
<td>0.001</td>
<td>7.94</td>
<td>N/D***</td>
</tr>
<tr>
<td>NO$_{x}$</td>
<td>40.0</td>
<td>&lt;100.0</td>
<td>0.01</td>
<td>322.79</td>
<td>&lt;100.0</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>N/D</td>
<td>0.002</td>
<td>5.21</td>
<td>N/D***</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>&lt;100.0</td>
<td>0.01</td>
<td>74.49</td>
<td>&lt;100.0</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>N/D</td>
<td>0.00</td>
<td>2.55</td>
<td>N/D***</td>
</tr>
</tbody>
</table>

N/D = Not Determined
* Existing Potential Emissions were taken from permit # 0199-010A
** The Installation Conditioned Potential is based on a voluntary limit of 100.0 tons per year of NO$_{x}$. The remaining pollutants are proportionally reduced.
*** The emissions of these pollutants differ depending on which fuel is burned

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of NO$_{x}$ are above de minimis levels.

APPLICABLE REQUIREMENTS

City of West Plains - 49MW Peaking Power Station shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should
be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- **Submission of Emission Data, Emission Fees and Process Information**, 10 CSR 10-6.110
  The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.

- **Operating Permits**, 10 CSR 10-6.065

- **Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**, 10 CSR 10-6.170

- **Restriction of Emission of Odors**, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

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


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

AMBIENT AIR QUALITY IMPACT ANALYSIS

A Screen 3 modeling analysis was performed to determine if the acceptable National Ambient Air Quality Standard (NAAQS) for NOx would be exceeded at or beyond the property line of the West Plains Peaking Station facility. The Screen 3 modeling analysis was ran individually for each turbine. The emission rates for NOx for the 24 MW and 25 MW turbines were 32.5 and 41.2 pounds per hour, respectively. The stack parameters as provided by the applicant are listed in Table 2.
Table 3: Stack Parameters

<table>
<thead>
<tr>
<th>Stack No.</th>
<th>Height (m)</th>
<th>Diameter (m)</th>
<th>Temperature (K)</th>
<th>Gas Exit Velocity (m/s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 MW Turbine</td>
<td>13.1</td>
<td>4.19</td>
<td>627.5</td>
<td>27.43</td>
</tr>
<tr>
<td>25 MW Turbine</td>
<td>15.24</td>
<td>4.57</td>
<td>755.4</td>
<td>21.34</td>
</tr>
</tbody>
</table>

The following table lists the air quality impact for NOx.

Table 4: Air Quality Impact Analysis

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Modeled Impact (µg/m³)</th>
<th>NAAQS (µg/m³)</th>
<th>Levels of Significance (µg/m³)</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>0.456</td>
<td>100.0</td>
<td>1.0</td>
<td>Annual</td>
</tr>
</tbody>
</table>

As indicated in the above table, NOx emissions from the equipment added under this permit are below the Levels of Significant Air Quality Impact listed in 10 CSR 10-6.060 Permits Required therefore no further analysis was needed and are expected to be in compliance with the NAAQS.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required, I recommend this permit be granted with special conditions.

Gerad Fox  
Environmental Engineer  
Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 17, 2009, received September 21, 2009, designating City of West Plains as the owner and operator of the installation.
- Southeast Regional Office Site Survey, dated October 5, 2009.
## ATTACHMENT A: NOx COMPLIANCE WORKSHEET

City of West Plains - 49 MW Peaking Power Station  
Howell County, S17, T24N, R8W  
Project No: 2009-09-038  
Permit No:

This sheet covers the month of ________________ in the year _____________.

**Copy this sheet as needed.**

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
<th>Column D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process</td>
<td>Amount of Fuel Oil #2 Burned (1000 gallons) (Note 1)</td>
<td>NOx Emission Factor (lb/1000 gallon) (Note 2)</td>
<td>Process NOx Emissions (tons) (Note 4)</td>
</tr>
<tr>
<td>Turbine #1 (S/N 244557) (EP - 01F)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Turbine #2 (S/N 282036) (EP - 02F)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process</th>
<th>Amount of Natural Gas Burned (MMCF) (Note 1)</th>
<th>CO Emission Factor (lb/MMCF) (Note 3)</th>
<th>Process CO Emissions (tons) (Note 4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turbine #1 (S/N 244557) (EP - 01N) @ 50&lt;Load&lt;75% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@ 75&lt;Load&lt;90% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@90&lt;Load&lt;100% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Turbine #2 (S/N 282036) (EP - 02N) @ 50&lt;Load&lt;75% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@ 75&lt;Load&lt;90% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@90&lt;Load&lt;100% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total NOx Emissions Calculated for this Month (tons) (Note 5)  
12-Month NOx Emissions Total From Previous Month’s Worksheet (tons) (Note 6)  
Monthly NOx Emissions Total From Previous Year’s Worksheet (tons) (Note 7)  
Current 12-Month Total NOx Emissions (tons) (Note 8)  

Note 1: Total amount of Fuel Oil #2 or Natural Gas (respectively) burned in this process at specific load rate for this month.  
Note 2: NOx emission factor for fuel oil usage will be determined from stack test data. If operating the unit before the stack testing is completed, use 33.4 lb/1000 gallon.  
Note 3: NOx emission factor for natural gas usage will be determined from stack test data. If operating the unit before the stack testing is completed, use 132.6 lb/MMCF.  
Note 4: Column D = (Column B) • (Column C) ÷ (2000 lb/ton)  
Note 5: Sum of emissions reported in Column D.  
Note 6: Running 12-month total of NOx emissions.  
Note 7: NOx Emissions reported for this month in the last calendar year.  
Note 8: Amount reported in Note 5 plus amount reported in Note 6 minus amount reported in Note 7. Less than 100 tons of NOx for the installation indicates compliance.
ATTACHMENT B: CO COMPLIANCE WORKSHEET

City of West Plains - 49 MW Peaking Power Station
Howell County, S17, T24N, R8W
Project No: 2009-09-038
Permit No:

This sheet covers the month of ____________ in the year ____________.

Copy this sheet as needed.

<table>
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<th>Column C</th>
<th>Column D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process</td>
<td>Amount of Fuel Oil #2 Burned (1000 gallons) (Note 1)</td>
<td>CO Emission Factor (lb/1000 gallon) (Note 2)</td>
<td>Process CO Emissions (tons) (Note 4)</td>
</tr>
<tr>
<td>Turbine #1 (S/N 244557) (EP - 01F)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Turbine #2 (S/N 282036) (EP - 02F)</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Process</th>
<th>Amount of Natural Gas Burned (MMCF) (Note 1)</th>
<th>CO Emission Factor (lb/MMCF) (Note 3)</th>
<th>Process CO Emissions (tons) (Note 4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turbine #1 (S/N 244557) (EP - 01N)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@ 50&lt;Load&lt;75% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@ 75&lt;Load&lt;90% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>@90&lt;Load&lt;100% of Peak Load</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Turbine #2 (S/N 282036) (EP - 02N) | | | |
| @ 50<Load<75% of Peak Load | | | |
| @ 75<Load<90% of Peak Load | | | |
| @90<Load<100% of Peak Load | | | |

<table>
<thead>
<tr>
<th>Total CO Emissions Calculated for this Month (tons) (Note 5)</th>
<th>12-Month CO Emissions Total From Previous Month's Worksheet (tons) (Note 6)</th>
<th>Monthly CO Emissions Total From Previous Year's Worksheet (tons) (Note 7)</th>
<th>Current 12-Month Total CO Emissions (tons) (Note 8)</th>
</tr>
</thead>
</table>

Note 1: Total amount of Fuel Oil #2 or Natural Gas (respectively) burned in this process for this month.
Note 2: CO emission factor for fuel oil usage will be determined from stack test data. If operating the unit before the stack testing is completed, use 10.6 lb/1000 gallon.
Note 3: CO emission factor for natural gas usage will be determined from stack test data. If operating the unit before the stack testing is completed, use 30.6 lb/MMCF.
Note 4: Column D = (Column B) • (Column C) ÷ (2000 lb/ton)
Note 5: Sum of emissions reported in Column D.
Note 6: Running 12-month total of NOx emissions.
Note 7: CO Emissions reported for this month in the last calendar year.
Note 8: Amount reported in Note 5 plus amount reported in Note 6 minus amount reported in Note 7. Less than 100 tons of CO for the installation indicates compliance.
Mr. Royce Fugate  
City Administrator/ Engineer  
City of West Plains - 49MW Peaking Power Station  
Old Airport Road and Good Hard Drive  
West Plains, MO 65775  

RE: New Source Review Permit - Project Number: 2009-09-038  

Dear Mr. Fugate:  

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.  

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.  

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.  

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox, at the departments’ Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.  

Sincerely,  

AIR POLLUTION CONTROL PROGRAM  

Kendall B. Hale  
New Source Review Unit Chief  
KBH:grfl  

Enclosures  

C: Southeast Regional Office  
PAMS File: 2009-09-038  

Permit Number: