



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 here in.

Intermediate Operating Permit Number: OP2010-101
Expiration Date: SEP 26 2015
Installation ID: 091-0068
Project Number: 2009-03-036

Installation Name and Address

City of West Plains Peaking Power Station
Old Airport Road and Good Hard Drive
West Plains, MO 65775
Howell County

Parent Company's Name and Address

City of West Plains
P.O. Box 710
West Plains, MO 65775

Installation Description:

The City of West Plains operates two simple cycle peaking units during periods of high demand. These units burn both Fuel Oil No. 2 and natural gas. The installation has obtained voluntary limits on carbon monoxide (CO) and nitrogen oxides (NO_x) in order to obtain this permit.

SEP 27 2010

Effective Date

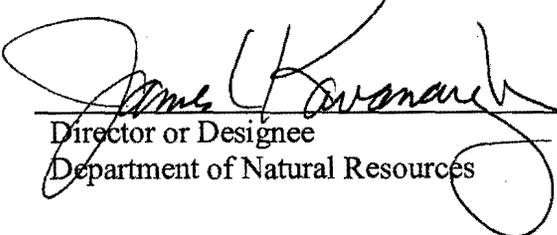

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	2
INSTALLATION DESCRIPTION	2
EMISSION UNITS WITH LIMITATIONS	2
EMISSION UNITS WITHOUT LIMITATIONS	2
DOCUMENTS INCORPORATED BY REFERENCE.....	2
II. PLANT WIDE EMISSION LIMITATIONS.....	2
PERMIT CONDITION PW001	2
10 CSR 10-6.060 Construction Permits Required.....	2
Construction Permit 032010-013, Issued March 30, 2010.....	2
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	2
EU0010 – SHORT DESCRIPTION OF EMISSION UNIT	2
PERMIT CONDITION (EU0010 and EU0020)-001	2
10 CSR 10-60.70, New Source Performance Standards, and.....	2
40 CFR Part 60, Subpart A General Provisions and Subpart GG Standards of Performance for Stationary Gas Turbines	2
IV. CORE PERMIT REQUIREMENTS	2
V. GENERAL PERMIT REQUIREMENTS.....	2
VI. ATTACHMENTS	2
ATTACHMENT A: NO _x COMPLIANCE WORKSHEET	2
ATTACHMENT B: CO COMPLIANCE WORKSHEET	2
ATTACHMENT C: OPERATING/MAINTENANCE LOG	2

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The City of West Plains operates two simple cycle peaking units during periods of high demand. These units burn both Fuel Oil No. 2 and natural gas. The installation has obtained voluntary limits on carbon monoxide (CO) and nitrogen oxides (NO_x) in order to obtain this permit.

Reported Air Pollutant Emissions, tons per year					
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)
2009	0.02	0.003	0.02	0.005	0.01
2008	0.01	0.001	0.009	0.002	0.006
2007	0	0	0	0	0
2006	0.09	0.03	0.50	0.06	0.24
2005	0.06	0.001	0.34	0.05	0

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.

Emission Unit #	Description of Emission Unit
EU0010	Turbine, 24 MW (EP-01)
EU0020	Turbine, 25 MW (EP-02)

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

200,000 gallon above ground storage tank, stores Fuel Oil No. 2

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

Construction Permit 032010-013

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 10-6.060 Construction Permits Required

Construction Permit 032010-013, Issued March 30, 2010

Emission Limitations:

1. The permittee shall emit less than 100.0 tons of NO_x from the installation in any consecutive 12-month period. This limitation applies to the NO_x emissions from all equipment/processes installed or permitted at the installation as of the issuance date of this construction permit. [Special Condition 2A]
2. The permittee 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 this installation as of the issuance date of this construction permit. [Special Condition 3A]

Operational Limitation:

The permittee 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 NO_x 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. [Special Condition 5A]

Performance Testing: [Special Condition 4]

1. The permittee 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 NO_x and CO record keeping requirements and to demonstrate compliance with Subpart GG, *Standards of Performance for Stationary Gas Turbines*, of the New Source Performance Standards (NSPS).
2. The permittee shall conduct all tests in accordance with the test methods and procedures outlined here and in Subpart GG of the NSPS.
3. Emission factors for the purpose of demonstrating compliance with the emission limitations shall be determined according to approved methods for calculating mass emissions of NO_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 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_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 permittee shall demonstrate compliance with the emission limitations using the default emission factors found in Attachment A and B.

4. The initial stack test(s) 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.
5. 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 may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing.
6. 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.
7. The test report is to fully account for all operational and emission parameters addressed by these permit conditions as well as in Subpart GG of the NSPS and any other applicable state or federal rules or regulations.

Record keeping:

1. The permittee shall use Attachment A or an equivalent form approved by the Air Pollution Control Program to demonstrate compliance with the NO_x limitation. [Special Condition 2B]
2. The permittee 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. [Special Condition 3B]
3. The permittee shall maintain an operating and maintenance log for each water spray injection system. Attachment C, or an equivalent form shall include the following: [Special Condition 5B]
 - (a) 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.
 - (b) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - (c) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. 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. [Special Conditions 2B and 3B]

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 during which the records indicate that the source exceeds the NO_x or CO limitations. [Special Conditions 2C and 3C]

2. The permittee shall report any deviations/exceedances of these permit conditions using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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.

EU0010 – SHORT DESCRIPTION OF EMISSION UNIT			
Emission Unit	Description	Manufacturer/Model #	2009 EIQ Reference #
EU0010	Turbine, 24 MW, 250 MMBtu/hr, installed 1999	AEG Kanis, SN 244557	EP01
EU0020	Turbine, 25 MW, 260 MMBtu/hr, installed 1999	AEG Kanis, SN 282036	EP02

PERMIT CONDITION (EU0010 and EU0020)-001

10 CSR 10-60.70, New Source Performance Standards, and
40 CFR Part 60, Subpart A General Provisions and Subpart GG Standards of Performance for
Stationary Gas Turbines

Emission Limitation:

Standard for nitrogen oxides.

(a) On and after the date on which the performance test required by §60.8 is completed, the permittee shall comply with the following: [§60.332(a)]

(1) No permittee shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of: [§60.332(a)(1)]

$$STD = 0.0075 \frac{14.4}{Y} + F$$

Where:

STD = allowable ISO corrected (if required as given in §60.335(b)(1)) NO_x emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

F = NO_x emission allowance for fuel-bound nitrogen as defined in §60.332(a)(4).

(2) The use of F in §60.332(a)(1) is optional. That is, the permittee may choose to apply a NO_x allowance for fuel-bound nitrogen and determine the appropriate F -value in accordance with §60.332(a)(4) or may accept an F -value of zero. [§60.332(a)(3)]

(3) If the permittee elects to apply a NO_x emission allowance for fuel-bound nitrogen, F shall be defined according to the nitrogen content of the fuel during the most recent performance test required under §60.8 as follows, where N is the nitrogen content of the fuel, percent by weight: [§60.332(a)(4)]

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	$0.04(N)$
$0.1 < N \leq 0.25$	$0.004 + 0.0067(N - 0.1)$
$N > 0.25$	0.005

or:

Manufacturers may develop and submit to EPA custom fuel-bound nitrogen allowances for each gas turbine model they manufacture. These fuel-bound nitrogen allowances shall be substantiated with data and must be approved for use by the Administrator before the initial performance test required by §60.8. Notices of approval of custom fuel-bound nitrogen allowances will be published in the Federal Register.

- (b) Stationary gas turbines using water or steam injection for control of NO_x emissions are exempt from §60.332(a) when ice fog is deemed a traffic hazard by the permittee. [§60.332(f)]

Standard for sulfur dioxide.

No permittee shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). [§60.333(b)]

Monitoring/Record keeping:

- (a) Except as provided in §60.334(b), the permittee shall install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine. [§60.334(a)]
- (b) The permittee may, as an alternative to operating the continuous monitoring system described in §60.334(a), install, certify, maintain, operate, and quality-assure a continuous emission monitoring system (CEMS) consisting of NO_x and O₂ monitors. As an alternative, a CO₂ monitor may be used to adjust the measured NO_x concentrations to 15 percent O₂ by either converting the CO₂ hourly averages to equivalent O₂ concentrations using Equation F-14a or F-14b in appendix F to part 75 of this chapter and making the adjustments to 15 percent O₂, or by using the CO₂ readings directly to make the adjustments, as described in Method 20. If the option to use a CEMS is chosen, the CEMS shall be installed, certified, maintained and operated as follows: [§60.334(b)]
 - (1) Each CEMS must be installed and certified according to PS 2 and 3 (for diluent) of 40 CFR Part 60, appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. Appendix F, Procedure 1 is not required. The relative accuracy test audit (RATA) of the NO_x and diluent monitors may be performed individually or on a combined basis, i.e. , the relative accuracy tests of the CEMS may be performed either: [§60.334(b)(1)]
 - (i) On a ppm basis (for NO_x) and a percent O₂ basis for oxygen; or [§60.334(b)(1)(i)]
 - (ii) On a ppm at 15 percent O₂ basis; or [§60.334(b)(1)(ii)]
 - (iii) On a ppm basis (for NO_x) and a percent CO₂ basis (for a CO₂ monitor that uses the procedures in Method 20 to correct the NO_x data to 15 percent O₂). [§60.334(b)(1)(iii)]
 - (2) As specified in §60.13(e)(2), during each full unit operating hour, each monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hour. [§60.334(b)(2)]

- (3) For purposes of identifying excess emissions, CEMS data must be reduced to hourly averages as specified in §60.13(h). [§60.334(b)(3)]
- (i) For each unit operating hour in which a valid hourly average, as described in §60.334(b)(2), is obtained for both NO_x and diluent, the data acquisition and handling system must calculate and record the hourly NO_x emissions in the units of the applicable NO_x emission standard under §60.332(a), i.e., percent NO_x by volume, dry basis, corrected to 15 percent O₂ and International Organization for Standardization (ISO) standard conditions (if required as given in §60.335(b)(1)). For any hour in which the hourly average O₂ concentration exceeds 19.0 percent O₂, a diluent cap value of 19.0 percent O₂ may be used in the emission calculations. [§60.334(b)(3)(i)]
 - (ii) A worst case ISO correction factor may be calculated and applied using historical ambient data. For the purpose of this calculation, substitute the maximum humidity of ambient air (H_o), minimum ambient temperature (T_a), and minimum combustor inlet absolute pressure (P_o) into the ISO correction equation. [§60.334(b)(3)(ii)]
 - (iii) If the permittee has installed a NO_x CEMS to meet the requirements of part 75 of this chapter, and is continuing to meet the ongoing requirements of part 75 of this chapter, the CEMS may be used to meet the requirements of this section, except that the missing data substitution methodology provided for at 40 CFR Part 75, subpart D, is not required for purposes of identifying excess emissions. Instead, periods of missing CEMS data are to be reported as monitor downtime in the excess emissions and monitoring performance report required in §60.7(c). [§60.334(b)(3)(iii)]
- (c) The steam or water to fuel ratio or other parameters that are continuously monitored as described in §60.334(a) shall be monitored during the performance test required under §60.8, to establish acceptable values and ranges. The permittee may supplement the performance test data with engineering analyses, design specifications, manufacturer's recommendations and other relevant information to define the acceptable parametric ranges more precisely. The permittee shall develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NO_x emission controls. The plan shall include the parameter(s) monitored and the acceptable range(s) of the parameter(s) as well as the basis for designating the parameter(s) and acceptable range(s). Any supplemental data such as engineering analyses, design specifications, manufacturer's recommendations and other relevant information shall be included in the monitoring plan. For affected units that are also subject to part 75 of this chapter and that use the low mass emissions methodology in §75.19 of this chapter or the NO_x emission measurement methodology in appendix E to part 75, the permittee may meet the requirements of this paragraph by developing and keeping on-site (or at a central location for unmanned facilities) a quality-assurance plan, as described in §75.19 (e)(5) or in section 2.3 of appendix E and section 1.3.6 of appendix B to part 75 of this chapter. [§60.334(g)]
- (d) The permittee shall: [§60.334(h)]
- (1) Monitor the total sulfur content of the fuel being fired in the turbine, except as provided in §60.334(h)(3). The sulfur content of the fuel must be determined using total sulfur methods described in §60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), ASTM D4084–82, 94, D5504–01, D6228–98, or Gas Processors Association Standard 2377–86 (all of which are incorporated by reference—see §60.17), which measure the major sulfur compounds may be used; and [§60.334(h)(1)]
 - (2) Monitor the nitrogen content of the fuel combusted in the turbine, if the permittee claims an allowance for fuel bound nitrogen (i.e., if an F-value greater than zero is being or will be used

- by the permittee to calculate STD in §60.332). The nitrogen content of the fuel shall be determined using methods described in §60.335(b)(9) or an approved alternative. [§60.334(h)(2)]
- (3) Notwithstanding the provisions of §60.334(h)(1), the permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The permittee shall use one of the following sources of information to make the required demonstration: [§60.334(h)(3)]
- (i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or [§60.334(h)(3)(i)]
- (ii) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required. [§60.334(h)(3)(ii)]
- (4) For any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and for which a custom fuel monitoring schedule has previously been approved, the permittee may, without submitting a special petition to the Administrator, continue monitoring on this schedule. [§60.334(h)(4)]
- (e) The frequency of determining the sulfur and nitrogen content of the fuel shall be as follows: [§60.334(i)]
- (1) Fuel Oil. For Fuel Oil, use one of the total sulfur sampling options and the associated sampling frequency described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of appendix D to part 75 of this chapter (i.e. , flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with Fuel Oil already in the intended storage tank). If an emission allowance is being claimed for fuel-bound nitrogen, the nitrogen content of the oil shall be determined and recorded once per unit operating day. [§60.334(i)(1)]
- (2) Gaseous fuel. Any applicable nitrogen content value of the gaseous fuel shall be determined and recorded once per unit operating day. For permittees that elect not to demonstrate sulfur content using options in §60.334(h)(3), and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined and recorded once per unit operating day. [§60.334(i)(2)]
- (3) Custom schedules. Notwithstanding the requirements of §60.334(i)(2), operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in §60.334(i)(3)(i) and (i)(3)(ii), custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in §60.333. [§60.334(i)(3)]
- (i) The two custom sulfur monitoring schedules set forth in §60.334(i)(3)(i)(A) through (D) and in §60.334(i)(3)(ii) are acceptable, without prior Administrative approval: [§60.334(i)(3)(i)]
- (A) The permittee shall obtain daily total sulfur content measurements for 30 consecutive unit operating days, using the applicable methods specified in this subpart. Based on the results of the 30 daily samples, the required frequency for subsequent monitoring of the fuel's total sulfur content shall be as specified in §60.334(i)(3)(i)(B), (C), or (D), as applicable. [§60.334(i)(3)(i)(A)]

- (B) If none of the 30 daily measurements of the fuel's total sulfur content exceeds 0.4 weight percent (4000 ppmw), subsequent sulfur content monitoring may be performed at 12 month intervals. If any of the samples taken at 12-month intervals has a total sulfur content between 0.4 and 0.8 weight percent (4000 and 8000 ppmw), follow the procedures in §60.334(i)(3)(i)(C). If any measurement exceeds 0.8 weight percent (8000 ppmw), follow the procedures in §60.334(i)(3)(i)(D). [§60.334(i)(3)(i)(B)]
- (C) If at least one of the 30 daily measurements of the fuel's total sulfur content is between 0.4 and 0.8 weight percent (4000 and 8000 ppmw), but none exceeds 0.8 weight percent (8000 ppmw), then: [§60.334(i)(3)(i)(C)]
 1. Collect and analyze a sample every 30 days for three months. If any sulfur content measurement exceeds 0.8 weight percent (8000 ppmw), follow the procedures in §60.334(i)(3)(i)(D). Otherwise, follow the procedures in §60.334(i)(3)(i)(C) (2). [§60.334(i)(3)(i)(C) (1)]
 2. Begin monitoring at 6-month intervals for 12 months. If any sulfur content measurement exceeds 0.8 weight percent (8000 ppmw), follow the procedures in §60.334(i)(3)(i)(D) . Otherwise, follow the procedures in §60.334(i)(3)(i)(C) (3). [§60.334(i)(3)(i)(C) (2)]
 3. Begin monitoring at 12-month intervals. If any sulfur content measurement exceeds 0.8 weight percent (8000 ppmw), follow the procedures in §60.334(i)(3)(i)(D). Otherwise, continue to monitor at this frequency. [§60.334(i)(3)(i)(C) (3)]
- (D) If a sulfur content measurement exceeds 0.8 weight percent (8000 ppmw), immediately begin daily monitoring according to §60.334(i)(3)(i)(A). Daily monitoring shall continue until 30 consecutive daily samples, each having a sulfur content no greater than 0.8 weight percent (8000 ppmw), are obtained. At that point, the applicable procedures of §60.334(i)(3)(i)(B) or (C) shall be followed. [§60.334(i)(3)(i)(D)]
- (ii) The permittee may use the data collected from the 720-hour sulfur sampling demonstration described in section 2.3.6 of appendix D to part 75 of this chapter to determine a custom sulfur sampling schedule, as follows: [§60.334(i)(3)(ii)]
 - (A) If the maximum fuel sulfur content obtained from the 720 hourly samples does not exceed 20 grains/100 scf (i.e. , the maximum total sulfur content of natural gas as defined in §60.331(u)), no additional monitoring of the sulfur content of the gas is required, for the purposes of this subpart. [§60.334(i)(3)(ii)(A)]
 - (B) If the maximum fuel sulfur content obtained from any of the 720 hourly samples exceeds 20 grains/100 scf, but none of the sulfur content values (when converted to weight percent sulfur) exceeds 0.4 weight percent (4000 ppmw), then the minimum required sampling frequency shall be one sample at 12 month intervals. [§60.334(i)(3)(ii)(B)]
 - (C) If any sample result exceeds 0.4 weight percent sulfur (4000 ppmw), but none exceeds 0.8 weight percent sulfur (8000 ppmw), follow the provisions of §60.334(i)(3)(i)(C). [§60.334(i)(3)(ii)(C)]
 - (D) If the sulfur content of any of the 720 hourly samples exceeds 0.8 weight percent (8000 ppmw), follow the provisions of §60.334(i)(3)(i)(D). [§60.334(i)(3)(ii)(D)]
- (f) For each affected unit that elects to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content or fuel nitrogen content under this subpart, the permittee shall submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined as follows: [§60.334(j)]

- (1) Nitrogen oxides. [§60.334(j)(1)]
- (i) For turbines using water or steam to fuel ratio monitoring: [§60.334(j)(1)(i)]
 - (A) An excess emission shall be any unit operating hour for which the average steam or water to fuel ratio, as measured by the continuous monitoring system, falls below the acceptable steam or water to fuel ratio needed to demonstrate compliance with §60.332, as established during the performance test required in §60.8. Any unit operating hour in which no water or steam is injected into the turbine shall also be considered an excess emission. [§60.334(j)(1)(i)(A)]
 - (B) A period of monitor downtime shall be any unit operating hour in which water or steam is injected into the turbine, but the essential parametric data needed to determine the steam or water to fuel ratio are unavailable or invalid. [§60.334(j)(1)(i)(B)]
 - (C) Each report shall include the average steam or water to fuel ratio, average fuel consumption, ambient conditions (temperature, pressure, and humidity), gas turbine load, and (if applicable) the nitrogen content of the fuel during each excess emission. You do not have to report ambient conditions if you opt to use the worst case ISO correction factor as specified in §60.334(b)(3)(ii), or if you are not using the ISO correction equation under the provisions of §60.335(b)(1). [§60.334(j)(1)(i)(C)]
 - (ii) If the permittee elects to take an emission allowance for fuel bound nitrogen, then excess emissions and periods of monitor downtime are as described in §60.334(j)(1)(ii)(A) and (B). [§60.334(j)(1)(ii)]
 - (A) An excess emission shall be the period of time during which the fuel-bound nitrogen (N) is greater than the value measured during the performance test required in §60.8 and used to determine the allowance. The excess emission begins on the date and hour of the sample which shows that N is greater than the performance test value, and ends with the date and hour of a subsequent sample which shows a fuel nitrogen content less than or equal to the performance test value. [§60.334(j)(1)(ii)(A)]
 - (B) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour that a required sample is taken, if invalid results are obtained. The period of monitor downtime ends on the date and hour of the next valid sample. [§60.334(j)(1)(ii)(B)]
 - (iii) For turbines using NO_x and diluent CEMS: [§60.334(j)(1)(iii)]
 - (A) An hour of excess emissions shall be any unit operating hour in which the 4-hour rolling average NO_x concentration exceeds the applicable emission limit in §60.332(a)(1) or (2). For the purposes of this subpart, a “4-hour rolling average NO_x concentration” is the arithmetic average of the average NO_x concentration measured by the CEMS for a given hour (corrected to 15 percent O₂ and, if required under §60.335(b)(1), to ISO standard conditions) and the three unit operating hour average NO_x concentrations immediately preceding that unit operating hour. [§60.334(j)(1)(iii)(A)]
 - (B) A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour, for either NO_x concentration or diluent (or both). [§60.334(j)(1)(iii)(B)]
 - (C) Each report shall include the ambient conditions (temperature, pressure, and humidity) at the time of the excess emission period and (if the permittee has claimed an emission allowance for fuel bound nitrogen) the nitrogen content of the fuel during the period of excess emissions. You do not have to report ambient conditions if you opt to use the worst case ISO correction factor as specified in §60.334(b)(3)(ii), or if you are not using the ISO correction equation under the provisions of §60.335(b)(1). [§60.334(j)(1)(iii)(C)]

- (iv) For permittees that elect, under §60.334(f), to monitor combustion parameters or parameters that document proper operation of the NO_x emission controls: [§60.334(j)(1)(iv)]
 - (A) An excess emission shall be a 4-hour rolling unit operating hour average in which any monitored parameter does not achieve the target value or is outside the acceptable range defined in the parameter monitoring plan for the unit. [§60.334(j)(1)(iv)(A)]
 - (B) A period of monitor downtime shall be a unit operating hour in which any of the required parametric data are either not recorded or are invalid. [§60.334(j)(1)(iv)(B)]
- (2) Sulfur dioxide. If the permittee is required to monitor the sulfur content of the fuel under §60.334(h): [§60.334(j)(2)]
 - (i) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. [§60.334(j)(2)(i)]
 - (ii) If the option to sample each delivery of Fuel Oil has been selected, the permittee shall immediately switch to one of the other oil sampling options (i.e. , daily sampling, flow proportional sampling, or sampling from the unit's storage tank) if the sulfur content of a delivery exceeds 0.8 weight percent. The permittee shall continue to use one of the other sampling options until all of the oil from the delivery has been combusted, and shall evaluate excess emissions according to §60.334(j)(2)(i). When all of the fuel from the delivery has been burned, the permittee may resume using the as-delivered sampling option. [§60.334(j)(2)(ii)]
 - (iii) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime shall include only unit operating hours, and ends on the date and hour of the next valid sample. [§60.334(j)(2)(iii)]
- (3) Ice fog. Each period during which an exemption provided in §60.332(f) is in effect shall be reported in writing to the Administrator quarterly. For each period the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated shall be reported. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. [§60.334(j)(3)]
- (4) Emergency fuel. Each period during which an exemption provided in §60.332(k) is in effect shall be included in the report required in §60.7(c). For each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported. [§60.334(j)(4)]
- (5) All reports required under §60.7(c) shall be postmarked by the 30th day following the end of each 6-month period. [§60.334(j)(5)]

Test methods and procedures:

- (a) The owner or operator shall conduct the performance tests required in §60.8, using either [§60.335(a)]
 - (1) EPA Method 20, [§60.335(a)(1)]
 - (2) ASTM D6522-00 (incorporated by reference, see §60.17), or [§60.335(a)(2)]
 - (3) EPA Method 7E and either EPA Method 3 or 3A in appendix A to this part, to determine NO_x and diluent concentration. [§60.335(a)(3)]

- (4) Sampling traverse points are to be selected following Method 20 or Method 1, (non-particulate procedures) and sampled for equal time intervals. The sampling shall be performed with a traversing single-hole probe or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points. [§60.335(a)(4)]
- (5) Notwithstanding §60.335(a)(4), the permittee may test at few points than are specified in Method 1 or Method 20 if the following conditions are met: [§60.335(a)(5)]
- (i) You may perform a stratification test for NO_x and diluent pursuant to [§60.335(a)(5)(i)]
- (A) [Reserved]
- (B) The procedures specified in section 6.5.6.1(a) through (e) appendix A to part 75 of this chapter. [§60.335(a)(5)(i)(B)]
- (ii) Once the stratification sampling is completed, the permittee may use the following alternative sample point selection criteria for the performance test: [§60.335(a)(5)(ii)]
- (A) If each of the individual traverse point NO_x concentrations, normalized to 15 percent O₂, is within 10 percent of the mean normalized concentration for all traverse points, then you may use 3 points (located either 16.7, 50.0, and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The 3 points shall be located along the measurement line that exhibited the highest average normalized NO_x concentration during the stratification test; or [§60.335(a)(5)(ii)(A)]
- (B) If each of the individual traverse point NO_x concentrations, normalized to 15 percent O₂, is within 5 percent of the mean normalized concentration for all traverse points, then you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid. [§60.335(a)(5)(ii)(B)]
- (6) Other acceptable alternative reference methods and procedures are given in §60.335(c). [§60.335(a)(6)]
- (b) The permittee shall determine compliance with the applicable nitrogen oxides emission limitation in §60.332 and shall meet the performance test requirements of §60.8 as follows: [§60.335(b)]
- (1) For each run of the performance test, the mean nitrogen oxides emission concentration (NO_{xo}) corrected to 15 percent O₂ shall be corrected to ISO standard conditions using the following equation. Notwithstanding this requirement, use of the ISO correction equation is optional for: Lean premix stationary combustion turbines; units used in association with heat recovery steam generators (HRSG) equipped with duct burners; and units equipped with add-on emission control devices: [§60.335(b)(1)]

$$NO_x = (NO_{x_o}) \left(\frac{P_r}{P_o} \right)^{0.5} e^{19(H_o - 0.00633) \left(\frac{288^{\circ}K}{T_a} \right)^{1.53}}$$

Where:

NO_x = emission concentration of NO_x at 15 percent O₂ and ISO standard ambient conditions, ppm by volume, dry basis,

NO_{xo} = mean observed NO_x concentration, ppm by volume, dry basis, at 15 percent O₂,

P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg,

P_o = observed combustor inlet absolute pressure at test, mm Hg,

H_o = observed humidity of ambient air, g H₂O/g air,

e = transcendental constant, 2.718, and

T_a = ambient temperature, K.

- (2) The 3-run performance test required by §60.8 must be performed within 5 percent at 30, 50, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent of peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot be physically achieved in practice. If the turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel. Notwithstanding these requirements, performance testing is not required for any emergency fuel (as defined in §60.331). [§60.335(b)(2)]
- (3) For a combined cycle turbine system with supplemental heat (duct burner), the owner or operator may elect to measure the turbine NO_x emissions after the duct burner rather than directly after the turbine. If the owner or operator elects to use this alternative sampling location, the applicable NO_x emission limit in §60.332 for the combustion turbine must still be met. [§60.335(b)(3)]
- (4) If water or steam injection is used to control NO_x with no additional post-combustion NO_x control and the permittee chooses to monitor the steam or water to fuel ratio in accordance with §60.334(a), then that monitoring system must be operated concurrently with each EPA Method 20, ASTM D6522-00 (incorporated by reference, see §60.17), or EPA Method 7E run and shall be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable §60.332 NO_x emission limit. [§60.335(b)(4)]
- (5) If the permittee elects to claim an emission allowance for fuel bound nitrogen as described in §60.332, then concurrently with each reference method run, a representative sample of the fuel used shall be collected and analyzed, following the applicable procedures described in §60.335(b)(9). These data shall be used to determine the maximum fuel nitrogen content for which the established water (or steam) to fuel ratio will be valid. [§60.335(b)(5)]
- (6) If the permittee elects to install a CEMS, the performance evaluation of the CEMS may either be conducted separately (as described in §60.335(b)(7)) or as part of the initial performance test of the affected unit. [§60.335(b)(6)]
- (7) If the permittee elects to install and certify a NO_x CEMS under §60.334(e), then the initial performance test required under §60.8 may be done in the following alternative manner: [§60.335(b)(7)]
 - (i) Perform a minimum of 9 reference method runs, with a minimum time per run of 21 minutes, at a single load level, between 90 and 100 percent of peak (or the highest physically achievable) load. [§60.335(b)(7)(i)]
 - (ii) Use the test data both to demonstrate compliance with the applicable NO_x emission limit under §60.332 and to provide the required reference method data for the RATA of the CEMS described under §60.334(b). [§60.335(b)(7)(ii)]
 - (iii) The requirement to test at three additional load levels is waived. [§60.335(b)(7)(iii)]
- (8) If the permittee elects under §60.334(f) to monitor combustion parameters or parameters indicative of proper operation of NO_x emission controls, the appropriate parameters shall be continuously monitored and recorded during each run of the initial performance test, to establish acceptable operating ranges, for purposes of the parameter monitoring plan for the affected unit, as specified in §60.334(g). [§60.335(b)(8)]
- (9) To determine the fuel bound nitrogen content of fuel being fired (if an emission allowance is claimed for fuel bound nitrogen), the permittee may use equipment and procedures meeting the requirements of: [§60.335(b)(9)]

- (i) For liquid fuels, ASTM D2597–94 (Reapproved 1999), D6366–99, D4629–02, D5762–02 (all of which are incorporated by reference, see §60.17); or [§60.335(b)(9)(i)]
- (ii) For gaseous fuels, shall use analytical methods and procedures that are accurate to within 5 percent of the instrument range and are approved by the Administrator. [§60.335(b)(9)(ii)]
- (10) If the permittee is required under §60.334(i)(1) or (3) to periodically determine the sulfur content of the fuel combusted in the turbine, a minimum of three fuel samples shall be collected during the performance test. Analyze the samples for the total sulfur content of the fuel using: [§60.335(b)(10)]
 - (i) For liquid fuels, ASTM D129–00, D2622–98, D4294–02, D1266–98, D5453–00 or D1552–01 (all of which are incorporated by reference, see §60.17); or [§60.335(b)(10)(i)]
 - (ii) For gaseous fuels, ASTM D1072–80, 90 (Reapproved 1994); D3246–81, 92, 96; D4468–85 (Reapproved 2000); or D6667–01 (all of which are incorporated by reference, see §60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the prior approval of the Administrator. [§60.335(b)(10)(ii)]
- (11) The fuel analyses required under §60.335(b)(9) and (b)(10) may be performed by the permittee, a service contractor retained by the permittee, the fuel vendor, or any other qualified agency. [§60.335(b)(11)]
- (c) The permittee may use the following as alternatives to the reference methods and procedures specified in this section: [§60.335(c)]
 - (1) Instead of using the equation in §60.335(b)(1), manufacturers may develop ambient condition correction factors to adjust the nitrogen oxides emission level measured by the performance test as provided in §60.8 to ISO standard day conditions. [§60.335(c)(1)]

Reporting:

- (a) 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 each month, if the 12-month cumulative total records show that the source exceeded the limitations above. [Special Condition 5]
- (b) The permittee shall report any deviations/exceedances of these permit conditions using the annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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:
 1. 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;
 2. 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;
 3. 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
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. 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;
 3. 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:
 - A. 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;
 - B. 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;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. 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

4. 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) City of West Plains Peaking Power Station 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 City of West Plains Peaking Power Station 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 Record Keeping. 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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) 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.
- 8) 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

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090 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 record keeping 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 Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program'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, record keeping, 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

This permit was written to give the installation flexibility to operate using either natural gas or Fuel Oil No. 2 in any combination on turbines.

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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's 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 record keeping 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, 901 North 5th Street, Kansas City, KS 66101, 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 Royce Fugate, P.E., Administrator/Engineer. 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 A: NO_x COMPLIANCE WORKSHEET

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

Copy this sheet as needed.

Column A	Column B	Column C	Column D
Process	Amount of Fuel Oil #2 Burned (1000 gallons) (Note 1)	NO_x Emission Factor (lb/1000 gallon) (Note 2)	Process NO_x Emissions (tons) (Note 4)
Turbine #1 (S/N 244557) (EP - 01F)			
Turbine #2 (S/N 282036) (EP - 02F)			
Process	Amount of Natural Gas Burned (MMCF) (Note 1)	NO_x Emission Factor (lb/MMCF) (Note 3)	Process NO_x Emissions (tons) (Note 4)
Turbine #1 (S/N 244557) (EP - 01N)			
@ 50<Load<75% of Peak Load			
@ 75<Load<90% of Peak Load			
@90<Load≤100% of Peak Load			
Turbine #2 (S/N 282036) (EP - 02N)	Amount of Natural Gas Burned (MMCF) (Note 1)	NO_x Emission Factor (lb/MMCF) (Note 3)	Process NO_x Emissions (tons) (Note 4)
@ 50<Load<75% of Peak Load			
@ 75<Load<90% of Peak Load			
@90<Load≤100% of Peak Load			
Total NO _x Emissions Calculated for this Month (tons)		(Note 5)	
12-Month NO _x Emissions Total From Previous Month's Worksheet (tons)		(Note 6)	
Monthly NO _x Emissions Total From Previous Year's Worksheet (tons)		(Note 7)	
Current 12-Month Total NO _x 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: NO_x 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: NO_x 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 NO_x emissions.
- Note 7: NO_x 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 NO_c for the installation indicates compliance..

ATTACHMENT B: CO COMPLIANCE WORKSHEET

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

Copy this sheet as needed.

Column A	Column B	Column C	Column D
Process	Amount of Fuel Oil #2 Burned (1000 gallons) (Note 1)	CO Emission Factor (lb/1000 gallon) (Note 2)	Process CO Emissions (tons) (Note 4)
Turbine #1 (S/N 244557) (EP - 01F)			
Turbine #2 (S/N 282036) (EP - 02F)			
Process	Amount of Natural Gas Burned (MMCF) (Note 1)	CO Emission Factor (lb/MMCF) (Note 3)	Process CO Emissions (tons) (Note 4)
Turbine #1 (S/N 244557) (EP - 01N)			
@ 50<Load<75% of Peak Load			
@ 75<Load<90% of Peak Load			
@90<Load<=100% of Peak Load			
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			
Total CO Emissions Calculated for this Month (tons)		(Note 5)	
12-Month CO Emissions Total From Previous Month's Worksheet (tons)		(Note 6)	
Monthly CO Emissions Total From Previous Year's Worksheet (tons)		(Note 7)	
Current 12-Month Total CO Emissions (tons)		(Note 8)	

- 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 CO 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

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 March 4, 2009;
- 2) 2009 Emissions Inventory Questionnaire, received March 8, 2010;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) webFIRE
- 5) Intermediate Operating Permit OP2004-032; and
- 6) Construction Permit #0199-010.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*. This rule does not apply to internal combustion engines.

Construction Permit Revisions

The following construction permits were issued to this installation:

- 1) Construction Permit 0199-010

This permit was issued January 11, 1999, to authorize the installation of a 55 MW peaking power generation installation consisting of 2-27.5 MW simple cycle gas turbines. Additional equipment installed under this permit includes a 200,000 gallon above ground storage tank used to store Fuel Oil No. 2 and a parts washer.

2) Construction Permit 0199-010A

This permit was issued on August 12, 1999, to amend Construction Permit 0199-010. Special Condition 6 requires performance testing using Fuel Oil #2 in both units to demonstrate compliance with 40 CFR Part 60 Subpart GG and construction permit special conditions. This stack testing was completed and reviewed by the Air Pollution Control Program on December 13, 2000. This testing is discussed further in the NSPS section of this Statement of Basis.

3) Construction Permit #032010-013

This permit was issued March 20, 2010, to authorize the installation of a new natural gas line that will supply fuel to both turbines. All previously established special conditions are superseded, except Special Condition 6 of Construction Permit #0199-010A. The special conditions are included in this operating permit.

This permit applies 40 CFR Part 60 Subpart KKKK to the installation. However, as explained below, the installation is not subject to this regulation. Therefore, all references to Subpart KKKK were changed to Subpart GG, which is the applicable regulation to which the installation must demonstrate compliance.

New Source Performance Standards (NSPS) Applicability

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

§60.110b(b) states that this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).

This regulation does not apply to the storage tank because the capacity of the storage tank is 200,000 gallons, and the maximum true vapor pressure of Fuel Oil No. 2 is approximately 0.06 kPa.

40 CFR Part 60 Subpart GG-Standards of Performance for Stationary Gas Turbines

This regulation applies to the turbines and appears as a unit specific permit condition in this Operating Permit.

40 CFR Part 60 Subpart KKKK,-Standards of Performance for Stationary Combustion Turbines

This subpart establishes emission standards from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005. Subpart A defines modification as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

Construction permit #032010-013 was issued to re-authorize the installation to use natural gas in the turbines, as the supply lines had not been installed within the 2 year timeframe allowed under Construction Permit #0199-010A. Since the two year timeframe expired, a new permit was necessary. However, issuance of this new permit, and subsequent installation of supply lines does not result in the increase of any air pollutant to which a standard applies, or an increase in the emission of any air pollutant to which a standard applies that was not previously emitted. Therefore, the definition of modification is not satisfied and this regulation does not apply.

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T- National Emission Standards for Halogenated Solvent Cleaning

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The installation does not use any of these solvents, therefore this regulation does not apply.

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

This regulation does not apply to the installation because it is not a major source of HAPs.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

Title IV (Acid Rain)

The units were granted a New Unit Exemption on January 24, 2001, and have maintained their exempt status. According to §72.7(f)(2)(i), these units cannot be treated as affected units under the Acid Rain program and are not required to obtain a Part 70 Operating Permit under the Acid Rain provisions. Therefore, operating permit applicability is based on other factors. This installation has potential to emit greater than the major source thresholds, and took voluntary limits through Construction Permit 0199-010, and amendments. Therefore, the installation is eligible for this Intermediate Operating Permit.

To maintain the New Unit Exemption status, the units must remain in compliance with the provisions of §72.7 through §72.7 and §72.10 through §72.13

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

This regulation does not apply, as the definition of process weight excludes liquids and gases used as fuel. Since no other materials are introduced into the turbines, the definition of process weight is not satisfied.

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

This regulation does not apply because sulfur compounds are regulated under 40 CFR Part 60 Subpart GG. Therefore, these units are exempt per 6.260(1)(A)1.

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:

Nicole Weidenbenner, P.E.
Environmental Engineer