

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2017-004
Expiration Date: JAN 30 2022
Installation ID: 091-0068
Project Number: 2015-03-100

Installation Name and Address

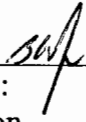
City of West Plains Peak Station
Old Airport Road & Good Hard Drive
West Plains, MO 65775
Howell County

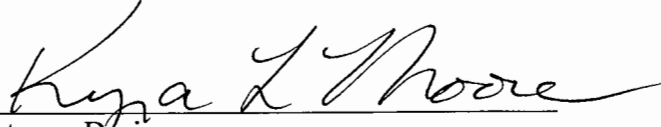
Parent Company's Name and Address

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 primarily burn natural gas, with diesel as an emergency back up.. The installation has obtained voluntary limits on carbon monoxide (CO) and nitrogen oxides (NOx) in order to obtain this permit. It is subject to NSPS Subpart GG and MACT Subpart ZZZZ.


Prepared by:
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

JAN 30 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

2015 EIQ Emission Point #	Description
EP-01	Turbine, 24 MW, 250 MMBTU/hr, installed 1999
EP-02	Turbine, 25 MW, 260 MMBTU/hr, installed 1999
EP-05	Pony Engine #1 – 450 hp diesel black start; installed 1/1/1975
EP-06	Pony Engine #2 – 450 hp diesel black start; installed 1/1/1977

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

2015 EIQ Emission Point #	Description
EP-03	storage tank – 200,000 gal fuel oil #2

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW 1

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 nitrogen oxides (NO_x) from the installation in any rolling 12-month period. [Special Condition 2A]
- 2) The permittee shall emit less than 100.0 tons of carbon monoxide (CO) from the installation in any rolling 12-month period. [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]

Monitoring/Record keeping:

- 1) The permittee shall calculate and record monthly and 12-month rolling total emissions of NO_x, using Attachment B or equivalent, to demonstrate compliance with **Emission Limitation 1)**. [Special Condition 2B]
- 2) The permittee shall calculate and record monthly and 12-month rolling total emissions of CO, using Attachment C or equivalent, to demonstrate compliance with **Emission Limitation 2)**. [Special Condition 3B]
- 3) The permittee shall maintain an operating and maintenance log for each water spray injection system. Attachments D, or equivalent forms, 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 established during the most recent performance test and 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 (Attachment A or equivalent); and
 - c) Maintenance activities, with inspection schedule, repair actions, and replacements, etc (Attachment A or equivalent).
- 4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Conditions 2B and 3B]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded an emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION 1		
10 CSR 10-6.070 New Source Performance Regulations		
40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines		
Emission Unit	Description	Manufacturer/Model #
EP-01	Turbine, 24 MW, 250 MMBTU/hr natural gas, installed 1999	AEG Kanis, SN 244557
EP-02	Turbine, 25 MW, 260 MMBTU/hr natural gas, installed 1999	AEG Kanis, SN 282036

Emission Limitation:

- 1) The permittee shall not 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) & (b)]

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

Where:

STD = 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
F = NO_x emission allowance for fuel-bound nitrogen (optional)
note: West Plains does not use the emission allowance F. If it chooses to in the future, F is defined in §60.332(a)(4).

- 2) Stationary gas turbines using water or steam injection for control of NO_x emissions are exempt from the **Emission Limitation:** when ice fog is deemed a traffic hazard by the permittee. [§60.332(f)]
- 3) 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:

- 1) 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)]
- 2) 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. [§60.334(g)]

- 3) The permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, regardless of whether an existing custom schedule approved by the administrator for Subpart GG requires such monitoring. The permittee shall use the following source of information to make the required demonstration: [§60.334(h)(3)]
 - a) 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)]
- 4) The permittee may elect not to monitor the total sulfur content of the fuel oil combusted in the turbine, regardless of whether an existing custom schedule approved by the administrator for Subpart GG requires such monitoring. The permittee shall use the following sources of information to make the required demonstration:
 - a) The fuel oil quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying the maximum total sulfur content of the fuel.
- 5) The frequency of determining the sulfur and nitrogen content of the fuel shall be as follows:
 - a) 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 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(h)(4)(i)(2)]
- 6) 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. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. Periods of excess emissions and monitor downtime that shall be reported are defined as follows: [§60.334(j)]
 - a) Nitrogen oxides. For turbines using water or steam to fuel ratio monitoring: 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 the Emission Limitation above. 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. The permittee does not have to report ambient conditions if it is not using the ISO correction equation under the provisions of §60.335(b)(1). [§60.334(j)(1)(i)(C)]

- 7) The permittee shall report each period during which an exemption provided in **Emission Limitation:** 2) above is in effect . 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)]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after then end of the month during which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 2	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
EP-05	Pony Engine #1 – 450 hp diesel black start; installed 1/1/1975
EP-06	Pony Engine #2 – 450 hp diesel black start; installed 1/1/1977

Operational Standards:

- 1) The permittee must operate and maintain the emission units according to the manufacturer’s emission-related written instructions or develop it’s own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions [§63.6625(e)]:
- 2) The permittee shall minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty minutes. [§63.6625(h)]
- 3) The permittee shall [Table 2d from §63.6602 and §63.6625(j)]:
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 4) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement 4). The oil analysis must be performed at the same frequency specified for changing the oil in 4). The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 % of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 % from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the

engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine [§63.6625(h)(i)].

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the following records [§63.6655(a)]:
 - a) A copy of each notification and report submitted to comply with permit condition, including all documentation supporting an Initial Notification or Notification of Compliance Status;
 - b) Records of the occurrence and duration of each malfunction of operation;
 - c) Records of performance tests and performance evaluations;
 - d) Records of all required maintenance performed on the air pollution monitoring equipment, using Attachment A or equivalent;
 - e) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
 - f) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
 - g) All records must be maintained for five years.

Reporting:

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

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) 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.

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 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

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

Recordkeeping:

The permittee shall document all readings noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 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.

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”;
 - 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.

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*

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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) 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. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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, Compliance and 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Jeff Hanshaw, Electric Superintendent. 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) MDNR 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 B
 NOx Compliance Worksheet

This worksheet covers the month of _____
 (month/year)

Emission Point	¹ Monthly Usage Fuel Oil #2 (1000 gal)	² NOx Emission Factor (lb/1000 gal)	¹ Monthly Usage Natural Gas (mmft ³)	² NOx Emission Factor (lb/mm ft ³)	³ Total Monthly Emissions (tons/month)
Turbine #1		44.7			
@ 50<Load<75% of Peak Load				194.8	
@ 75<Load<90% of Peak Load				208.3	
@90<Load<100% of Peak Load				242.8	
Turbine #2		51.3			
@ 50<Load<75% of Peak Load				220.4	
@ 75<Load<90% of Peak Load				241.7	
@90<Load<100% of Peak Load				262.7	
⁴Total Monthly Installation-Wide NOx Emissions (tons)					
⁵Total 12-Month Rolling Installation-Wide NOx Emissions (tons)					

¹ Enter total amount of fuel used in month.

² Emission factor sources are stack tests from AUG 2000 (fuel oil) and FEB 2011 (natural gas).

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴Total installation emissions are the sum of the total monthly emissions for each emission point.

⁵12-Month Rolling NOx Emissions = Sum of twelve most recent NOx Compliance Worksheets.

12-Month Rolling Total NOx Emissions less than 100 tons/yr indicates compliance.

ATTACHMENT C
CO Compliance Worksheet

This worksheet covers the month of _____
 (month/year)

Emission Point	¹ Monthly Usage Fuel Oil #2 (1000 gal)	² CO Emission Factor (lb/1000 gal)	¹ Monthly Usage Natural Gas (mmft ³)	² CO Emission Factor (lb/mm ft ³)	³ Total Monthly Emissions (tons/month)
Turbine #1		29.2			
@ 50<Load<75% of Peak Load				198.7	
@ 75<Load<90% of Peak Load				144.9	
@90<Load<100% of Peak Load				142.2	
Turbine #2		19			
@ 50<Load<75% of Peak Load				121.6	
@ 75<Load<90% of Peak Load				75.7	
@90<Load<100% of Peak Load				57.4	
⁴Total Monthly Installation-Wide CO Emissions (tons)					
⁵Total 12-Month Rolling Installation-Wide CO Emissions (tons)					

¹ Enter total amount of fuel used in month.

² Emission factor sources are stack tests from AUG 2000 (fuel oil) and FEB 2011 (natural gas).

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴Total installation emissions are the sum of the total monthly emissions for each emission point.

⁵12-Month Rolling CO Emissions = Sum of twelve most recent CO Compliance Worksheets.

12-Month Rolling Total CO Emissions less than 100 tons/yr indicates compliance.

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal 1,000 gallons
°Fdegrees Fahrenheit	MW megawatt
acfmactual cubic feet per minute	MHDR maximum hourly design rate
BACTBest Available Control Technology	MMBTU Million British thermal units
BMPsBest Management Practices	MMCF million cubic feet
BtuBritish thermal unit	MSDS Material Safety Data Sheet
CAMCompliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs .. National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPS New Source Performance Standards
COcarbon monoxide	NSR New Source Review
CO₂carbon dioxide	PM particulate matter
CO₂ecarbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppm parts per million
dscfdry standard cubic feet	PSD Prevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTE potential to emit
EPEmission Point	RACT Reasonable Available Control Technology
EPAEnvironmental Protection Agency	RAL Risk Assessment Level
EUEmission Unit	SCC Source Classification Code
fpsfeet per second	scfm standard cubic feet per minute
ftfeet	SDS Safety Data Sheet
GACTGenerally Available Control Technology	SIC Standard Industrial Classification
GHGGreenhouse Gas	SIP State Implementation Plan
gpmgallons per minute	SMAL Screening Model Action Levels
grgrains	SO_x sulfur oxides
GWPGlobal Warming Potential	SO₂ sulfur dioxide
HAPHazardous Air Pollutant	tph tons per hour
hrhour	tpy tons per year
hphorsepower	VMT vehicle miles traveled
lbpound	VOC Volatile Organic Compound
lbs/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	

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.

INSTALLATION DESCRIPTION

The City of West Plains has 49-MW power generation installation that is used as a peaking station during periods of high demand. The installation consists of one 24-MW simple cycle gas turbine (serial number 244557 AEG-Kanis) and one 25- MW simple cycle gas turbine (serial number 282036 AEG-Kanis) both having the capability to burn Fuel Oil #2 and Natural Gas. The dual-fuel turbines utilize a water spray injection control for reducing NOx formation. The West Plains Peaking Station is a named installation.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	387.11
HAP	2.90
NO _x	775.35
PM ₁₀	9.22
PM _{2.5}	9.22
SO _x	91.02
VOC	5.15

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation, except for black start RICE, which evaluated at 10 hours per year.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
PM ₁₀	0.01	0.01	0.01	0.01	0.01
PM _{2.5}	0.01	0.01	0.01	0.01	0.01
SO _x	0.01	0.01	0.01	0.01	0.01
NO _x	0.03	0.03	0.03	0.03	0.03
VOC	0.01	0.01	0.01	0.01	0.01
CO	0.01	0.01	0.01	0.01	0.01
HAPs	0.00	0.00	0.00	0.00	0.00

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 30, 2015;
- 2) Construction Permit 0199-010A, issued August 12, 1999;
- 3) Construction Permit 032010-013, issued March 30, 2010;
- 4) 2015 Emissions Inventory Questionnaire, January 9, 2016;
- 5) WebFIRE; and
- 6) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

10 CSR 10-6.100, *Alternate Emission Limits* – this rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220, *Restriction of Visible Air Contaminants* – this rule does not apply to internal combustion engines (1)(A).

10 CSR 10-6.260 and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – this rule is not applied to the two diesel black start engines, EP-05 & -0. They are exempt because federal rules restrict sulfur content of fuel to less than the level in 3(c).

Construction Permit History

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.

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.

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 – 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 rule was promulgated well before the widespread use of low-sulfur fuels. Currently available natural gas and diesel fuels have sulfur contents well below the limits in this rule. Therefore, most sulfur requirements were not stated in Permit Condition 1. These requirements will be applicable if the rules requiring low-sulfur fuels are ever changed.

40 CFR Part 60 Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines – this rule does not apply to the start-up engines because they were constructed prior to July 11, 2005.

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 Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart YYYY Combustion Turbines, does not apply since this installation is not a major source for HAPs.

40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – this rule applies to the black start engines and is applied in Permit Condition 2.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

None

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

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

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

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

Response to Public Comments


A draft of the Intermediate Operating Permit for the City of West Plains Peaking Station was placed on public notice on November 18, 2016, by the Missouri Department of Natural Resources (MDNR). One comment was received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency.

Comment

Permit Condition 2 incorporates the applicable requirements from 40 CFR part 63, Subpart *ZZZZ- National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. If the City of West Plains Peak Station is an area source of hazardous air pollutants (HAPs), as indicated by the potential to emit table in the Statement of Basis, then MDNR relies on EPA for compliance management and all compliance related reporting shall be submitted to the Missouri Air Compliance Coordinator at EPA Region 7, with copies to MDNR as necessary. Therefore, the reporting requirement in Permit Condition 2, should be modified to reflect this reporting scenario.

Response to Comment:

The Reporting section of Permit Condition 2 was modified to have Region VII as the primary recipient of compliance reports with copies going to the Air Program.



Eric R. Greitens, Governor • Carol S. Comer, Acting Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

JAN 30 2017

Mr. Jeff Hanshaw
City of West Plains Peak Station
P.O. Box 710
West Plains, MO 65775

Re: City of West Plains Peak Station, 091-0068
Permit Number: OP2017-004

Dear Mr. Hanshaw:

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

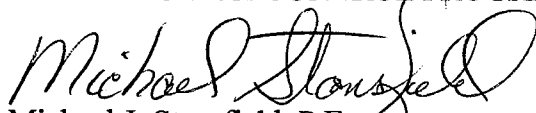
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS/bjj

Enclosures

c: PAMS File: 2015-03-100

