



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

August 7, 2020

Sybil Chandler
Manager EHS
USDOE National Nuclear Security Administration
14520 Botts Road
Kansas City, MO 64147

RE: New Source Review Permit Amendment - Permit Number: 032018-001A
Project Number: 2020-03-015; Installation Number: 095-2442

Dear Sybil Chandler:

On March 13, 2020, the Missouri Air Pollution Control Program received your request to amend the construction permit (032018-001) for your installation in Jackson County (S27, T47N, R33W). Enclosed with this letter is your amendment. The special conditions of this amendment replace all of the special conditions in Permit 032018-001. Appendix C attached to this amendment also replaces portions of Appendix C in Permit No. 032018-001.

The Kansas City National Security Campus consists of two separate operations. One operation is owned by the Department of Energy (DOE) National Nuclear Security Administration (NNSA) and operated by Honeywell Federal Manufacturing and Technologies. This portion of the facility manufactures non-nuclear components of nuclear weapons. The second operation is owned by CenterPoint and includes units for providing HVAC, hot water, and emergency power to NNSA. The combined installation is referred to as the Kansas City National Security Campus (KCNSC). The production and support activities have separate installation IDs and are permitted separately, but are considered part of the same installation. The production facility (NNSA) operates under ID 093-2442 and Permit No. 032018-001 while the support facility (CenterPoint) operates under ID 095-2450 and Permit No. 022018-007.

NNSA and CenterPoint frequently install emission units with relatively low potential and actual emissions. Permits and amendments are frequently required prior to beginning construction. In order to limit the number of times that the facilities have to apply for permits and amendments, special case de minimis permits (032018-001 and 022018-007) were issued to the installation in 2018. Permit 032018-001 is for NNSA while Permit 022018-007 is for CenterPoint. The special case de minimis permits preapproves the addition of many types of future emission units. The special case de minimis permits also allocates the PM₁₀, NO_x, VOC, and HAPs emissions between NNSA and CenterPoint so that the combined emissions of all these pollutants are below



their respective de minimis levels. The portions allowed for each operation are given below in Table 1.

Table 1: Previous Emission Limits in Permit 032018-001

Pollutants	De Minimis Level	Limits in NNSA Permit 032018-001	Limits in CenterPoint Permit 022018-007
PM ₁₀	15.0	<5.0	<10.0
NO _x	40.0	<2.0	<38.0
VOC	40.0	<39.0	<1.0
Individual HAP	Varies	<SMAL	
Combined HAPs	25.0	<25.0	

After the issuance of Permit No. 032018-001, NNSA realized that for the preapproved combustion processes listed under Emission Point No. 26, a few diesel and gasoline engines were not included. Therefore, this project is for the addition of these diesel and gasoline engines to the preapproved combustion processes. Furthermore, the NO_x emissions will be allocated differently. The NO_x allocations will be revised to give NNSA 4.0 tpy and CenterPoint 36.0 tpy. All other allocations will remain the same.

This permit only modifies Permit 032018-001 for NNSA to add the new engines and to reallocate 4.0 tpy of NO_x to NNSA. Permit 022018-007 for CenterPoint will be modified through another permit action (Project No. 2020-05-033). Besides the special condition limiting the NO_x emissions, the special conditions limiting PM₁₀, VOC, and HAPs from Permit No. 032018-001 are also affected because the diesel and gasoline engines being added to the preapproved list also emit these pollutants. The other special conditions in Permit No. 032018-001 (Conditions 6 through 10) are not affected but are restated in this permit amendment upon request from the installation so that all of the special conditions will be in one document for easy reference.

Appendix C referenced in Permit No. 032018-001 is the original application for that project. Attachments 1, 2, 4 and 5 in the application for the current amendment updates the original attachments with data for the new diesel and gasoline engines but contains no other changes. When referenced in this amendment, Appendix C includes both the original application as well as the updated information from the new amendment application.

According to Permit No. 032018-001, 40 CFR 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*, of the Maximum Achievable Control Technology (MACT) Standards applies to the vapor degreaser (EP-13F1, CE#82312). However, the facility indicated

Sybil Chandler
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that this equipment has since been removed from the site and therefore, the installation is no longer subject to this subpart.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date, was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Chia-Wei Young, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:cya

Enclosures

c: Kansas City Regional Office
PAMS File: 2020-03-015

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Permit No.	032018-001A
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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions: *The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."*

USDOE Kansas City National Security Campus
Jackson County, S27, T47N, R33W

1. **Superseding Condition**

The conditions of this permit supersede all special conditions found in the previously issued construction permit 032018-001 issued by the Air Pollution Control Program.

2. **PM₁₀ Emission Limitation**

A. The United States Department of Energy National Nuclear Security Administration (NNSA) shall emit less than 5.0 tons of PM₁₀ in any consecutive 12-month period from all PM₁₀ emission units in its operation as indicated in Appendix C Attachment 4, including all emission unit added during this permit effective period. As shown in Appendix C Attachments 1, 3, and 4, emissions associated with individual emission units are tracked at the grouped process level.

B. NNSA shall develop and use electronic or written forms to demonstrate compliance with Special Condition 2.A. The forms shall contain, at a minimum, the following information.

- 1) Installation name
- 2) Installation ID
- 3) Permit number
- 4) Current month
- 5) Current 12-month date range
- 6) Monthly throughput for each emission unit with the potential to emit PM₁₀
- 7) PM₁₀ emission factors for each emission unit, see Appendix C, Attachments 1 and 2
- 8) Monthly PM₁₀ emissions for each emission unit calculated using the methods in Appendix C, Attachments 2 and 3
- 9) Monthly PM₁₀ emissions calculated by summing PM₁₀ emissions from all emission units
- 10) Consecutive 12-month rolling PM₁₀ emissions from all emission units, and the sum of all PM₁₀ emissions from all startup, shutdown, and malfunction
- 11) Indication of compliance with Special Condition 2.A.

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SPECIAL CONDITIONS:

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

3. NO_x Emission Limitation

- A. NNSA shall emit less than 4.0 tons of NO_x in any consecutive 12-month period from all NO_x emission units in its operation as indicated in Appendix C, Attachments 5 and 5.a, including all emission units added during this permit effective period. As shown in Appendix C, Attachments 1, 3, and 4, emissions associated with individual emission units are tracked at the grouped process level.
- B. NNSA shall develop and use electronic or written forms to demonstrate compliance with Special Condition 3.A. The forms shall contain, at a minimum, the following information.
- 1) Installation name
 - 2) Installation ID
 - 3) Permit number
 - 4) Current month
 - 5) Current 12-month date range
 - 6) Monthly throughput for each emission unit with the potential to emit NO_x, as indicated in Appendix C, Attachments 5 and 5a
 - 7) NO_x emission factors for each emission unit. See Appendix C, Attachments 5 and 5a
 - 8) Monthly NO_x emissions for each emission unit calculated using the methods in Appendix C, Attachments 3, 5, and 5a
 - 9) Monthly NO_x emissions calculated by summing NO_x emissions from all emission units, as indicated in Appendix C Attachments 5 and 5.a
 - 10) Consecutive 12-month rolling total NO_x emissions from all emission units, and the sum of all NO_x emissions from startup, shutdown, and malfunction.
 - 11) Indication of compliance with Special Condition 3.A.

4. VOC Emission Limitation

- A. NNSA shall emit less than 39.0 tons of VOC in any consecutive 12-month period from all VOC emission units in its operation as indicted in Appendix C, Attachment 4, including all emission units added during this permit effective period. As shown in appendix C Attachments 1, 3, and 4, emissions associated with individual emission units are tracked at the grouped process level.
- B. NNSA shall develop and use electronic or written forms to demonstrate compliance with Special condition 4.A. The forms shall contain, at a minimum, the following information.
- 1) Installation name
 - 2) Installation ID
 - 3) Permit number

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SPECIAL CONDITIONS:

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

- 4) Current month
 - 5) Current 12-month date range
 - 6) Monthly throughput for each emission unit with the potential to emit VOC
 - 7) VOC emission factors for each emission unit, see Appendix C, Attachment 1
 - 8) Monthly VOC emissions for each emission unit calculated using the methods in Appendix C, Attachment 3
 - 9) Monthly VOC emissions calculated by summing VOC emissions from all emission units
 - 10) Consecutive 12-month rolling total VOC emissions from all emission units, and the sum of all VOC emissions from startup, shutdown, and malfunction.
 - 11) Indication of compliance with Special Condition 4.A.
5. HAP Emission Limitations
- A. NNSA shall not exceed the respective SMAL for each individual HAP emissions in any consecutive 12-month period from the combined installation including NNSA (ID 095-2442) and CenterPoint ID (095-2450).
 - B. NNSA shall emit less than 25.0 tons per year of combined HAPs in any consecutive 12-month period from the combined installation including NNSA (ID 095-2442) and CenterPoint ID (095-2450).
 - C. The combined installation (NNSA ID 095-2442 and CenterPoint ID 095-2450) include the following:
 - 1) CenterPoint ID 095-2450: All emission units as indicated in Table 2 of Project 2017-11-005.
 - 2) NNSA 095-2442: All emission units as indicated in Appendix C, Attachment 4, including all emission units added during this permit effective period. As shown in Appendix C Attachments 1, 3, and 4, emissions associated with individual emission units are tracked at the grouped process level.
 - D. NNSA shall develop and use electronic or written forms to demonstrate compliance with Special conditions 5.A. and 5.B. for NNSA ID 095-2442. The forms shall contain, at a minimum, the following information.
 - 1) Installation name
 - 2) Installation ID
 - 3) Permit number
 - 4) Current month
 - 5) Current 12-month date range

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SPECIAL CONDITIONS:

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

- 6) Monthly throughput for each emission unit with the potential to emit HAP
 - 7) Individual HAP emission factors and combined HAP emission factors for each emission unit, see Appendix C, Attachment 1 and that attachment's footnotes.
 - a) Examples of individual HAPs are toluene, hexavalent chromium compounds, and ethylene glycol ethers. There are 187 individual HAPs. Hexavalent chromium compounds and ethylene glycol are example of individual HAPs that each consist of several compounds
 - b) Combined HAPs is the sum of all HAPs emissions
 - 8) Individual HAP emissions for each emission unit at NNSA ID 095-2442 calculated using the methods in Appendix C, Attachments 1 and 3
 - 9) Monthly individual HAP emissions calculated by summing that individual HAP emissions from all emission units at NNSA (ID 095-2442) and CenterPoint (ID 095-2450). NNSA shall account for HAP emissions from CenterPoint (ID 095-2450) by using emission factors from Project No. 2017-11-005 Table 5 and by using CenterPoint's actual emissions or potential emissions. NNSA shall indicate the method being used, actual or potentials.
 - 10) Consecutive 12-month rolling total individual HAP emissions from all emission units at CenterPoint (ID 095-2450) and NNSA (ID 095-2442) and the sum of all individual HAP emissions from startup, shutdown, and malfunction.
 - 11) Individual HAP SMAL obtained from Appendix B or Permit No. 032018-001 or the most recent *Air Pollution Control Program table of Hazardous Air Pollutants Screening Model Action Levels, and Risk Assessment Levels* available at <http://dnr.mo.gov/env/apcp/permits/constpmtguide.htm>.
 - 12) Monthly combined HAP emissions calculated by summing all individual HAP emissions from all emission units at NNSA (ID 095-2442) and CenterPoint (ID 095-2450). NNSA shall account for HAP emissions from CenterPoint (ID 095-2450) using emission factors from Project 2007-11-005 Table 5 and using actual emissions or potential emissions. NNSA shall indicate the methods being used, actuals or potentials
 - 13) Consecutive 12-month rolling total combined HAP emissions from all emission units at NNSA (ID 095-2442) and CenterPoint (ID 095-2450) and the sum of all combined HAP emissions from startup, shutdown, and malfunction
 - 14) Indication of compliance with Special Conditions 5.A. and 5.B.
6. Operational Requirement – VOC Containing Materials
NNSA shall keep all VOC containing chemicals/raw materials in closed containers

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The permittee is authorized to construct and operate subject to the following special conditions: whenever the chemicals/raw materials are in storage, internal transport on-site, or not currently in use inside of or at an emission unit.

7. Permit Reopening - The Director may reopen this permit for any of the following:
 - A. Correct typographical/calculation errors or reflect a more accurate determination of emissions used to establish the permit;
 - B. To reflect newly applicable federal, state, or local requirements with compliance dates after the permit effective date;
 - C. Apply requirements, that are enforceable as a practical matter, and that Missouri may impose on NNSA in Missouri's State Implementation Plan;
 - D. Reduce the permit limits if the Director determines that a reduction is necessary to avoid causing or contributing to
 - 1) a NAAQS or PSD increment violation, or
 - 2) an adverse impact on an air quality related value that has been identified for a Federal Class I area by a Federal Land Manager, or
 - 3) a RAL violation;
 - E. Address other items as determined by the Director.

8. Permit Renewal
 - A. The effective period of this permit is ten years, commencing on the effective date listed on the cover page.
 - B. NNSA shall submit a complete and timely application to the Director to request renewal of this permit. A timely application is one that is submitted at least six months prior to, but no earlier than 18 months prior to, the end of this permit's effective period.
 - 1) If NNSA submits a complete *Application for Authority to Construct* to renew this permit within this time period, then this permit shall continue to be effective until a new permit is issued.
 - 2) If this permit is not renewed, then the following requirements shall apply:
 - a) NNSA shall lose the ability to add new or modify existing emission units to the installation-wide special case de minimis PM₁₀, NO_x, VOC, and HAP limits. The installation-wide special case de minimis limits become static de minimis limits that apply only to the emission units in place at the end of the permit effective period. The addition of new or modified emission units may cause the installation to exceed de minimis.

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

- b) NNSA shall continue to comply with each applicable federal, state, or local requirement that applied either during the permit effective period or prior to the permit effective period.
9. Emission Units Added or Modified During Permit Effective Period
- A. NNSA shall maintain a complete, accurate list of all PM₁₀, NO_x, VOC, and HAP emission units at this installation by using Appendix C, Attachment 4 including all emission units added during this permit effective term, or an equivalent electronic form. All emission units shall be included regardless of the level of potential emissions, actual emissions, or if an emission unit appears to meet an exemption in 10 CSR 10-6.061 *Construction Permit Exemptions*. Before constructing a new emission unit at the installation or modifying an emission unit already listed in Appendix C, Attachment 4, NNSA shall perform the following,
- 1) Add the new emission unit to or update the existing emission unit in Appendix C, Attachment 4. Clearly indicate that the emission unit is new or modified, respectively. Include the date the new construction or modification began construction.
 - 2) Create and assign a unique emission unit identification number to the new emission unit.
 - 3) Use the respective emission factors as indicated in Appendix C, Attachments 1, 2, 5, and 5a.
 - 4) For new emission units that do not match a description as indicated in Appendix C, NNSA shall submit a complete *Application for Authority to Construct* to the Air Pollution Control Program at least 90 days prior to commencing construction of the new emission unit.
 - 5) It is not a violation if NNSA fails to include a very low emitting and difficult to inventory individual emission unit at Special Condition 9.A., B. or D. An example of such an emission unit includes but is not limited to a handheld drill or saw. NNSA calculates emissions towards compliance with the special case de minimis limits using grouped processes where the number of individual emission units comprising a single process may be irrelevant. For example, the addition of a handheld tool may be a new emission unit, however emissions are tracked by the disbursed part number and process type such as dry machining.
10. Record Keeping and Reporting
- A. NNSA shall maintain all records required by this permit for not less than ten years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

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

- B. NNSA shall report all of the following to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov,
- 1) An exceedance report, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
 - 2) An annual report, once annually within 30 days after the end of the calendar year including all of the following,
 - a) Complete, accurate list of all PM₁₀, NO_x, VOC, and HAP emission units at this installation using Appendix C, Attachment 4 or an equivalent electronic form
 - b) Rolling 12-month actual emissions of PM₁₀, NO_x, VOC, and HAPs from this installation for each of the preceding 12 months (i.e. each month's 12-month rolling total during the previous year) with sample calculations for one pollutant at one process following the method as indicated in Appendix C, Attachment 3.
 - c) Indication of the individual and combined HAP emission rates from ID 095-2450 as being potential emissions or actual emissions.
 - d) A signed statement by the responsible official certifying the truth, accuracy, and completeness of the information provided in the report.