



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

November 10, 2020

Frank Schneider
Compliance
Dogwood Energy Facility
25111 East 175th Street
Pleasant Hill, MO 64080

RE: New Source Review Permit Correction - Permit Number: 082020-015A
Project Number: 2020-10-011; Installation Number: 037-0056

Dear Frank Schneider:

The Air Pollution Control Program received an email from Dogwood Energy Facility on October 9, 2020 identifying an incorrect reference to Special Condition 8 of permit 042009-009 in Special Condition 5 of permit 082020-015. The 100 tpy VOC emissions limit in Special Condition 8 of permit 042009-009 was superseded in permit 082020-015 but, the reference to it was included in Special Condition 5 by mistake. The Air Pollution Control Program agrees with Dogwood Energy Facility and is issuing this permit correction to remove the incorrect reference from Special Condition 5.

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.oa.mo.gov/ahc.

If you have any questions regarding this correction, please do not hesitate to contact Jared Rhodes, 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:jara
Enclosures

c: Kansas City Regional Office
PAMS File: 2020-10-011



Recycled paper

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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."

Dogwood Energy Facility
Cass County, S13, T46N, R31W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 5 found in the previously issued construction permit 082020-015 issued by the Air Pollution Control Program.

5. **Performance Testing**
 - A. Stack tests shall be performed on each turbine (EU 1A and EU 2A) operating in the combined cycle mode without the duct burner running to verify that the emission limitations set in Special Condition 5 and 6 of Permit 042009-009 and Special Condition 3 of Permit 082020-015 are not exceeded. These tests shall be conducted in accordance with the Stack Test Procedures outlined in Special Condition 5. C through 5. H of this permit.
 - B. Stack tests shall be performed on each combustion turbine, duct burner, and heat recovery boiler train (EP 1 and EP 2) operating in the combined cycle mode with the duct burner running to verify that the emission limitations set in Special Condition 7. C and 7. D of Permit 042009-009 and Special Condition 4. A and 4. B of Permit 082020-015 are not exceeded. These tests shall be conducted in accordance with the Stack Test Procedures outlined in Special Condition 5. C through 5. H of this permit.
 - C. The emission tests required by this permit for the turbines shall be conducted in accordance with the following methods and procedures.
 - 1) The test methods and procedures outlined in EPA Method 10, shall be adhered to by Dogwood Energy Facility in testing for CO.
 - 2) The test methods and procedures outlined in EPA Method 5 and 202, shall be adhered to by Dogwood Energy Facility in testing for PM10.
 - 3) The test methods and procedures outlined in EPA Method 25A and Method 18 shall be adhered to by Dogwood Energy Facility in

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SPECIAL CONDITIONS:

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

- testing for VOC.
- D. Testing shall be conducted in two different load ranges. High load range shall be greater than 70% load. Low load range shall be less than or equal to 70% load. Three tests runs shall be conducted at each load range.
 - E. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up of modified equipment for commercial operation and shall be conducted in accordance with the Stack Test Procedures outlined in Special Condition 5.A and 5.B.
 - F. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
 - G. One electronic copy of a written report of the performance test results shall be submitted to StackTesting@dnr.mo.gov within 60 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 U.S. EPA Method for at least one sample run.
 - H. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations, specifically:
 - 1) The load during each test run,
 - 2) The heat input to the combustion turbine during each test run,
 - 3) The heat input rate to the duct burners during each test run,
 - 4) The turbine inlet temperature during each test run, and
 - 5) The ammonia injection rate during each test run.