Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
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.

Operating Permit Number: **OP2007-005A**
Expiration Date: January 30, 2012
Installation ID: 021-0004
Project Number: 2007-11-067

Installation Name and Address
KCP&L GMO - Lake Road Station
1413 Lower Lake Road
St. Joseph, MO 64504
Buchanan County

Parent Company's Name and Address
Great Plains Energy
P.O. Box 418679
Kansas City, MO 64141

KCP&L GMO operates an electric power generation installation located in St. Joseph, Missouri. This installation consists of seven boilers, one gas turbine stack & waste heat boiler, and two jet engines (combustion turbines). The company's principal product is electric power production. This significant modification to the current Part 70 Operating Permit is being issued to include the installation of a 358 MMBtu/hr boiler which was authorized by construction permit 062006-001 on June 2, 2006.

JAN 06 2011

Effective Date

James L Kavanaugh

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

KCP&L GMO operates an electric power generation installation located in St. Joseph, Missouri. This installation consists of seven boilers, one gas turbine stack & waste heat boiler, and two jet engines (combustion turbines). The company's principal product is electric power production. This significant modification to the current Part 70 Operating Permit is being issued to include the installation of a 358 MMBtu/hr boiler which was authorized by construction permit 062006-001 on June 2, 2006.

Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Hazardous Air Pollutants (HAPs)
2008	37.89	12.09	3671.51	3193.59	28.35	165.26	18.54
2007	36.69	3.96	3511.72	3547.90	29.76	166.12	18.84
2006	34.62	11.23	2948.41	2868.34	22.47	139.71	20.71
2005	32.83	0.00	3140.06	3223.96	24.65	139.47	24.32
2004	35.39	12.86	2987.24	3262.44	26.87	148.13	27.33

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU-0010	Boiler No.1.
EU-0020	Boiler No.2.
EU-0030	Boiler No.3.
EU-0040	Boiler No.4.
EU-0050	Boiler No. 5, ESP.
EU-0060	Boiler No. 6, ESP and Over-Fire Air
EU-0065	Boiler No. 8
EU-0070	Gas Turbine No. 5 (Combustion Turbine No. 5)
EU-0080	No. 6 Jet Engine (Combustion Turbine No. 6)
EU-0090	No. 7 Jet Engine (Combustion Turbine No. 7)
EU-0260A	Mechanical discharge exhauster located on top of the Fly Ash Silo.
EU-0260B	Mechanical discharge exhauster located on top of the Fly Ash Silo.
EU-0270A	Bin Vent Filter located on top of the fly ash silo.
EU-0270B	Bin Vent Filter located on top of the fly ash silo.

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source	
EU-0100	Unpaved Road.
EU-0110	Coal Car Unloading.
EU-0120	Coal Transfer belts.
EU-0130	Coal Storage.
EU-0140	Fly Ash Temporary Storage
EU-0150	Fly Ash Transfer Tank.
EU-0160	No. 1 Oil Tank (No. 2 Fuel Oil).
EU-0170	No. 3 Oil Tank (No. 2 Fuel Oil).
EU-0180	No. 2 Oil Tank (No. 2 Fuel Oil).
EU-0190	Used Oil Tank.
EU-0200	Diesel Blend Tank.
EU-0210	No. 4 Oil Tank (No. 2 Fuel Oil).
EU-0230	Fugitive Solvent Usage.
EU-0240	Crusher Building (Transferring, Dropping and Coal Crushing).
EU-0250	Truck Dump Area./Reclaim.
EU-0280A	Fly Ash Truck Unloading.
EU-0280B	Fly Ash Truck Unloading.
EU-0290	Conveyor belts 6 and 7.
EU-0300	Conveyor belt 8.
EU-0310	Conveyor belts 1 and 2.
EU-0320	Emergency Coal Stockout Pile.
EU-0330	Conveyor belt 4.
EU-0340	Lime additive area for plant water treatment
EU-0350	No. 5 Oil Tank (No. 2 Fuel Oil).
IA-01	Cooling towers 1, 2 and 3

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) May 25, 2001 Consent Decree between St. Joseph Light & Power Company and the Missouri Department of Natural Resources, Case No. 01CV74164, Div # 1
2) Phase II Acid Rain Permits for Boiler No. 6, Project Number EX0210004020
3) Construction Permit 0389-003
4) Construction Permit 0689-002
5) Construction Permit 0190-009
6) Construction Permit 0196-011
7) Construction Permit 062006-001 - Boiler No. 8.

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 as of the date that this permit is issued.

None.

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 as of the date that this permit is issued.

EU0010 – Boiler No. 1			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0010	Boiler No. 1 & No. 1 Stack, Maximum Design Rate 192 MMBTU/Hr, Primary Fuel – Natural Gas, Secondary Fuel – No. 2 Fuel Oil	Date of Manufacture – 1961	EP01 (2004)

PERMIT CONDITION EU0010-001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:

This emission unit shall be limited to burning natural gas, No. 2 Fuel Oil, and propane.

Monitoring/Recordkeeping:

1. The permittee shall maintain on the premises of the installation calculations, using Appendix M or a similar form created by the permittee, demonstrating compliance with this rule.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION EU0010-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0524 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).

2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to fuel oil with a sulfur content of no more than 0.05 percent sulfur by weight. (Consent Agreement).
2. The emission unit shall be limited to natural gas, No. 2 Fuel Oil and Propane (Consent Agreement).
3. Propane may be burned for light off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system (Consent Agreement).

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the fuel type used verifying a sulfur content less than 0.05 percent by weight (Consent Agreement). Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The following fuel certification deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis, no later than 30 days after the end of the previous quarter:
   a) Submittal of a supplier Certificate for Fuel Oil Sulfur Content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)
   b) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged to Boiler Nos. 1 through 4 and Combustion Turbine Nos. 5 through 7 and shall be completed by KCP&L GMO (Consent Agreement).
2. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0010-003

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment B1 or B2), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,

b) All emission units from which visible emissions occurred, and
c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment B3)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B4)
4. Attachments B1 or B2, B3 and B4 contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0020 – Boiler No. 2			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0020	Boiler No. 2 & No. 2 Stack, Maximum Design Rate 192 MMBTU/Hr, Electric Generation > 100 Million BTU/Hr Except Tangential Primary Fuel – Natural Gas, Secondary Fuel – No. 2 Fuel Oil	Date of Manufacture – 1961	EP02 (2004)

PERMIT CONDITION EU0020-001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:

This emission unit shall be limited to burning natural gas, No. 2 Fuel Oil, and propane.

Monitoring/Recordkeeping:

1. The permittee shall maintain on the premises of the installation calculations, using Appendix M or a similar form created by the permittee, demonstrating compliance with this rule.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION EU0020-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0524 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to fuel oil with a sulfur content of no more than 0.05 percent sulfur by weight. (Consent Agreement).
2. The emission unit shall be limited to natural gas, No. 2 Fuel Oil and Propane (Consent Agreement).
3. Propane may be burned for light off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system (Consent Agreement).

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the fuel type used verifying a sulfur content less than 0.05 percent by weight (Consent Agreement). Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The following fuel certification deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis, no later than 30 days after the end of the previous:
   a) Submittal of a supplier Certificate for Fuel Oil Sulfur Content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)
   b) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged to Boiler Nos. 1 through 4 and Combustion Turbine Nos. 5 through 7 and shall be completed by KCP&L GMO (Consent Agreement).
2. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0020-003

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:

a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment B1 or B2), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment B3)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B4)
4. Attachments B1 or B2, B3 and B4 contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0030 – Boiler No. 3			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0030	Boiler No. 3 & No. 3 Stack, Maximum Design Rate 238 MMBTU/Hr, Primary Fuel – Natural Gas, Secondary Fuel – None	Date of Manufacture – 1938	EP03 (2004)

PERMIT CONDITION EU0030-001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:
This emission unit shall be limited to burning natural gas.

Monitoring/Recordkeeping:
1. The permittee shall maintain on the premises of the installation calculations, using Appendix M or a similar form created by the permittee, demonstrating compliance with this rule.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

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

PERMIT CONDITION EU0030-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:
1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0006 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:
The emission unit shall be limited to natural gas (Consent Agreement).

Monitoring/Recordkeeping:
1. Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:
1. The following fuel certification deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis, no later than 30 days after the end of the previous:
   a) Submittal of a supplier Certificate for Fuel Oil Sulfur Content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)
   b) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged to Boiler Nos. 1 through 4 and Combustion Turbine No. 5 through 7 and shall be completed by KCP&L GMO (Consent Agreement).
2. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0030-003
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:
1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:
1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:

a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment B1 or B2), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment B3)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B4)
4. Attachments B1 or B2, B3 and B4 contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0040 – Boiler No. 4			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0040	Boiler No. 4 & No. 4 Stack, Maximum Design Rate 311 MMBTU/Hr Primary Fuel – Natural Gas, Secondary Fuel – No. 2 Fuel Oil	Date of Manufacture – 1950	EP04 (2004)

PERMIT CONDITION EU0040-001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:
The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:
This emission unit shall be limited to burning natural gas, No. 2 Fuel Oil, and propane.

Monitoring/Recordkeeping:
1. The permittee shall maintain on the premises of the installation calculations, using Appendix M or a similar form created by the permittee, demonstrating compliance with this rule.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

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

PERMIT CONDITION EU0040-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:
1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0524 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to fuel oil with a sulfur content of no more than 0.05 percent sulfur by weight. (Consent Agreement).
2. The emission unit shall be limited to natural gas, No. 2 Fuel Oil and Propane (Consent Agreement).
3. Propane may be burned for light off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the fuel type used verifying a sulfur content less than 0.05 percent by weight (Consent Agreement). Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The following fuel certification deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis, no later than 30 days after the end of the previous:
   a) Submittal of a supplier Certificate for Fuel Oil Sulfur Content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)

b) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged to Boiler Nos. 1 through 4 and Combustion Turbine Nos. 5 through 7 and shall be completed by SJLP (Consent Agreement).

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

PERMIT CONDITION EU0040-003

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment B1 or B2), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment B3)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B4)

4. Attachments B1 or B2, B3 and B4 contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0050 – Boiler No. 5			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0050	Boiler No. 5, ESP, and No. 5 Stack (coal), Maximum Design Rate 336 MMBTU/Hr, Electric Generation natural gas boiler > 100 Million Btu/hr except Tangential. Bituminous/ and sub-bituminous blend coal – dry bottom Primary Fuel – Coal (high or medium sulfur blended w/ low sulfur), Secondary Fuel – Natural Gas	Date of Manufacture – 1957	EP05 (2004)

PERMIT CONDITION EU0050-001

10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.
2. The emission unit shall be limited to burning coal (high or medium sulfur blended w/ low sulfur), natural gas and propane.

Operational Limitation/Equipment Specifications:

1. Periodic monitoring for particulate matter, as defined below, is not required during periods of time greater than one day in which the source does not operate. Calculations based on the use of emission factors suggest that the installation must operate control devices (Electrostatic Precipitators (ESP)) to meet the particulate emission limit for this source. The control device is required to be in service and operational when EU0050 is operation. Exception: Except as defined in 10 CSR 10-6.050, Start-Up, Shutdown, and Malfunction Conditions" and if the unit is running on 100 percent natural gas. Operation of the control device must be maintained using standard manufacturer recommendations and Good Engineering Practices (GEP).

2. An operation and maintenance plan shall be developed in accordance with manufacturer specifications for the ESP.
3. The operation and maintenance plan shall be kept on site and made immediately available to Missouri Department of Natural Resources' personnel upon request.

Monitoring:

1. For particulate matter periodic monitoring compliance, a record of the any stack tests conducted on this unit within the last five years on this unit or any subsequent testing will be maintained and made available immediately for inspection to the Department of Natural Resources upon request.
2. For particulate matter periodic monitoring compliance, the permittee shall monitor three specific parameters that can be used to indicate the ESP's performance. The permittee shall monitor the primary and secondary voltage, primary and secondary current and number of fields on line at least once each week when the unit is on line.
3. The permittee makes a commitment to take timely corrective action during periods of excursions where the indicators of the electrostatic precipitator performance are out of range. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return the operation within the indicator range. An excursion is determined by the average discreet data point over a period of time, or the presence of a monitored abnormal condition. An excursion does not indicate a violation of an applicable requirement. ESP parameters alone are not prima facie evidence of a violation but may be used with other information to establish a violation of a particulate matter limitation.
4. An audible or visual alarm that indicates precipitator trouble will be monitored.
5. Inspection of the rapper operation, T-R set operation, inspection of the ash removal system are required to be included in the operation and maintenance plan. Corrective action measures will be implemented on the occurrence of an abnormal condition. Abnormal conditions will include the following: a T-R set failure, rapper system failure, ash transport system failure.
6. Each major unit overhaul shall be defined in the maintenance plan to include the checking and correct plate electrode alignment, the inspection of the condition collection surface fouling, the mechanical condition of the T-R set and the inspection of the internal structural components. Corrective action procedures will be devised and implemented on the occurrence of an abnormal condition. The appropriate measures for remediation will be implemented in a timely manner.

Recordkeeping:

1. The permittee shall maintain a written or electronic copy of all inspections and any action resulting from the inspection. (See Attachment C – This log or an equivalent created by the permittee must be used to certify compliance with this requirement.)
2. All instrument calibration shall be recorded.
3. Maintain a spare parts inventory by a computerized inventory or other Administrator approved management system.
4. The permittee shall maintain a record of the initial stack testing and any other subsequent testing or test information for particulate matter required from this rule.
5. The permittee shall maintain records of any monitoring or control equipment malfunctions.
6. All records shall be maintained for five years. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) and/or operating parameter range listed above.
2. Reports of any deviations from monitoring other than the operating parameter range, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0050-002

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

This unit shall have COMS installed, calibrated, maintained and operated in accordance with 40 CFR Part 60, Performance Specification 1.

Recordkeeping:

1. The owner or operator shall maintain a file (hard copy or electronic version) of the following information:
   a) All information reported in the quarterly summaries; and
   b) All six (6)-minute opacity averages and daily Quality Assurance (QA)/Quality Control (QC) records.
2. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The owner or operator of this unit shall submit a quarterly written report to the Director, which shall be postmarked no later than the thirtieth day following the end of each calendar quarter and shall include the following emissions data:
   a) A summary including total time for each cause of excess emissions and/or monitoring downtime;
   b) Nature and cause of excess emissions if known;
   c) The six (6)-minute average opacity values greater than the opacity emission requirements;
   d) The date and time identifying each period during which the COMS was inoperative (except for zero and span checks), including the nature and frequency of system repairs or adjustments that were made during these times; and
   e) If no excess emissions have occurred during the reporting period and the COMS has not been inoperative, repaired, or adjusted, this information shall be stated in the report.

2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0050-003

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 1.3490 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to (high sulfur or medium sulfur coal (SO_2 emission potential greater than 1.2 lbs SO_2/MMBTU) blended w/low sulfur (SO_2 emission potential less than 1.2 lbs SO_2/MMBTU)), natural gas and propane. (Consent Agreement).
2. Propane may be burned for light off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system (Consent Agreement).

Monitoring/Recordkeeping:

1. Compliance with the 24-hour daily average for Boiler No. 5 will be determined by using the following procedures. The 24-hour daily block average is defined as a midnight to midnight block

average, which includes SO_2 emission rates for only the hours during which the unit was operating. The Variable Table located in Appendix 1 should be used when making these calculations.

For Boiler No. 5:

$$\left[\frac{\sum_{hour=1}^{24}\left[\left(\frac{\#Coal}{hour}\right)\left(\frac{\#S}{\#Coal}\right)\left(\frac{F_{blend}\times\#SO_2}{\#S}\right)\right]}{\sum_{hour=1}^{24}\left(\frac{mmBtu_{(coal+gas)}}{hour}\right)}\right] \leq 1.349\left(\frac{\#SO_2}{mmBtu}\right) \quad \text{(Consent Agreement)}$$

2. Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
3. Records of the sampling and analysis of the coal blend (including the sulfur and heat content) shall be kept on file at the installation for a period of five years from the date of sampling. (Consent Agreement)
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

Reporting:

1. The following deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis, no later than 30 days after the end of the previous quarter:
   a) Sampling and analysis of coal blend for Boiler No. 5 (including the sulfur and heat content) (Consent Agreement)
   b) Quarterly Excess Emission Report for Boiler No. 5 (Consent Agreement)
2. The permittee shall report any change of fuel type to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the switch of fuel types.
3. The permittee shall report to the Air Pollution Control Program's Enforcement Section no later than ten (10) days after any exceedance of 10 CSR 10-6.260 demonstrated by the appropriate recordkeeping forms.

PERMIT CONDITION EU0050-004

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 63 Subpart A General Provisions

Note: On July 20, 2007, the United States Court of Appeals, District of Columbia Circuit, ordered a full vacatur of 40 CFR Part 63 Subpart DDDDD. The vacatur has the same effect as if this MACT rule was never promulgated. This means there is no longer a September 13, 2007 compliance date for sources affected by this HAP source category. If and when the EPA promulgates an approved version of this MACT, emission unit EU0050 will be re-evaluated for applicability.

EU0060 – Boiler No. 6			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0060	Boiler No. 6, ESP, and Stack, Maximum Design Rate 980 MMBTU/Hr, Bituminous/ and sub-bituminous blend coal Primary Fuel – Coal (high or medium sulfur blended w/ low sulfur), Secondary Fuel – Natural Gas	Date of Manufacture – 1967	EP06 (2004)

PERMIT CONDITION EU0060-001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.
2. The emission unit shall be limited to burning coal (high or medium sulfur blended w/ low sulfur), natural gas, tire derived fuels, and propane

Operational Limitation/Equipment Specifications:

1. The Electrostatic Precipitator (ESP) shall be equipped with an alarm which indicates failure of the power supply. The alarm shall be accompanied with a monitoring device which will continuously monitor transformer-rectifier (T-R) set failure and loss of rapper/vibrator power supply.
2. The ESP shall be operated within the parameters outlined in the operating and maintenance plan when the main boiler flame is on.
3. An operation and maintenance plan shall be developed in accordance with manufacturer specifications for the ESP.
4. The operation and maintenance plan shall be kept on site and made immediately available to Missouri Department of Natural Resources' personnel upon request.

Monitoring:

1. Periodic monitoring is not required during periods of time greater than one day in which the source does not operate.
2. The permittee shall keep records of all particulate matter stack tests performed on the emission unit.

3. The permittee shall monitor four specific parameters to indicate the performance of the ESP once per week during which the emission unit is operational:
   a) Primary and secondary voltage,
   b) Primary and secondary current,
   c) Sparking rate, and
   d) Number of fields on-line.
4. Inspect rapper operation, T-R set operation, plate electrode alignment, collection surfaces for fouling, mechanical condition of the T-R set, internal structural components, and ash removal systems in accordance with the operation and maintenance plan.
5. The permittee shall take corrective action during periods in which operational conditions of the ESP are outside the parameters established in the operation and maintenance plan. A corrective action includes an investigation of the reason for the excursion, evaluation of the problem that created the excursion and necessary follow-up action to return the emission unit to within the operational range allowed by the operation and maintenance plan. Corrective action measures shall be implemented within eight hours plus the period of time until generating capacity is available to meet consumer demand.

Recordkeeping:

1. The permittee shall maintain a written or electronic copy of all inspections and any action resulting from the inspection. (see Attachment C – This log or an equivalent created by the permittee must be used to certify compliance with this requirement.)
2. All instrument calibration shall be recorded.
3. Maintain a spare parts inventory by a computerized inventory or other Administrator approved management system.
4. The permittee shall maintain a record of the initial stack testing and any other subsequent testing or test information for particulate matter required from this rule.
5. The permittee shall maintain records of any monitoring or control equipment malfunctions.
6. All records shall be maintained for five years. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) and/or operating parameter range listed above.
2. Reports of any deviations from monitoring other than the operating parameter range, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0060-002

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any existing source any visible emissions with an opacity greater than 20 percent.

2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

This unit shall have COMS installed, calibrated, maintained and operated in accordance with 40 CFR Part 60, Performance Specification 1.

Recordkeeping:

1. The owner or operator shall maintain a file (hard copy or electronic version) of the following information:
   a) All information reported in the quarterly summaries; and
   b) All six (6)-minute opacity averages and daily Quality Assurance (QA)/Quality Control (QC) records.
2. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The owner or operator of this unit shall submit a quarterly written report to the Director, which shall be postmarked no later than the thirtieth day following the end of each calendar quarter and shall include the following emissions data:
   a) A summary including total time for each cause of excess emissions and/or monitoring downtime;
   b) Nature and cause of excess emissions if known;
   c) The six (6)-minute average opacity values greater than the opacity emission requirements;
   d) The date and time identifying each period during which the COMS was inoperative (except for zero and span checks), including the nature and frequency of system repairs or adjustments that were made during these times; and
   e) If no excess emissions have occurred during the reporting period and the COMS has not been inoperative, repaired, or adjusted, this information shall be stated in the report.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0060-003

10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds
Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 1,400 lbs SO_2/hr actual heat input averaged on a 24-hour rolling block average basis (Consent Agreement). (equivalent to 1.43 lbs SO_2/mmBtu – see statement of basis for calculation)

2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to fuel oil with a sulfur content of no more than 0.05 percent sulfur by weight (Consent Agreement)
2. The emission unit shall be limited to coal (high or medium sulfur blended w/low sulfur), natural gas and Propane (Consent Agreement).
3. Propane may be burned in place of No. 2 Oil or coal for Boiler No. 6, for light off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system.

Monitoring:

1. Compliance monitoring for the 24-hour daily average for Boiler No. 6 consists of the following procedures. The 24-hour daily block average is defined as a midnight to midnight block average, which includes SO_2 emission rates for only the hours during which the unit was operating. The variable table located in Appendix 1 should be used when making these calculations:

$$\left[\frac{\sum_{hour=1}^{24}\left(\frac{\#SO_2}{hour}\right)}{\sum_{hour=1}^{24}\left(operating\ time\ hours\right)}\right] \le 1400\left(\frac{\#SO_2}{hour}\right)$$ (Consent Agreement)

2. Compliance with the emission rate of 1,400 lbs SO_2/hr for Boiler No. 6 will be determined by the continuous emissions monitoring system (CEMS) that is currently operated in accordance with 40 CFR Part 75 (Consent Agreement). Attachment E or an equivalent recordkeeping sheet shall be used to record all information required by this rule and should be available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. Records of the sampling and analysis of the coal blending (including the sulfur and heat content) shall be kept on file at the installation for a period of five years from the date of sampling. (Consent Agreement)
4. The permittee shall maintain an accurate record of the sulfur content of fuel used. The installation shall maintain records of the amount of fuel burned (natural gas or fuel oil) and verify the sulfur content (see Attachments D and E). Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
5. If the requirements of condition 4 can not be met, then compliance to the emission limitations shall be determined by source testing. The heating value of the fuel shall be determined as specified in 10 CSR 10-6.040(2). Source testing to determine compliance shall be performed as specified in 10 CSR 10-6.030(6). The actual heat input shall be determined by multiplying the heating value of the fuel by the amount of fuel burned during the source test period.
6. Other methods approved by the permitting agency in advance may be used to verify compliance.

Recordkeeping:

1. If Monitoring Option 4 is used to verify compliance, then the permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. Attachments D and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
3. If Monitoring Option 5 is used to verify compliance, then the permittee shall maintain records on the premises of all source testing performed.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of the emission limit or sulfur content limit established by 10 CSR 10-6.260, or any malfunction which causes an exceedance.

PERMIT CONDITION EU0060-004

10 CSR 10-6.270
Acid Rain Permits Required

Emission Limitation:

The permittee shall obtain an Acid Rain Source Permit for BoilerNo. 6 pursuant to Title IV of the Clean Air Act. The permittee submitted a Phase II permit application on December 20, 1995, under 10 CSR 10-6.270, "Acid Rain Source Permits Required." Nitrogen Oxide (NOx) and Sulfur dioxide (SO_2)

limitations are referenced in the installation's Phase II Permit. The Phase II Permit (Missouri Department of Natural Resources Permit OP2010-006, ORIS Code 2098) was issued on February 3, 2010, and expires on December 31, 2014.

Monitoring/Recordkeeping:
The permittee shall retain the most current acid rain permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. (See Attachment P).

PERMIT CONDITION EU0060-005

10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program
10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program

Emission Limitation:
The permittee shall obtain a CAIR Source Permit for Boiler No. 6 EU0060.

A CAIR Permit (Missouri Department of Natural Resources Project Number 2008-04-057, ORIS Code 2098) is being issued to the permittee in conjunction with this Title V permit. (See Attachment Q)

Monitoring/Recordkeeping:
The permittee shall retain the most current CAIR permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:
Annual Compliance Certification.
The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

EU0065 – Boiler No. 8			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0065	Boiler No. 8, Maximum Design Rate 358 MMBTU/Hr, Primary Fuel – Natural Gas Secondary Fuel – No. 2 Fuel Oil	Date of Manufacture - 1999 Date of Installation - 6/2/2006	EP10 (2008)

Permit Conditions EU0065-001

10 CSR 10-6.060
Construction Permits Required
Construction Permit 062006-001

Operational Limitations:

1. KCP&L GMO's Lake Road Generating Station shall burn only natural gas or No. 2 Fuel Oil in the Boiler No. 8. [Special Condition 1]
2. The sulfur content of the fuel to be used shall not exceed 0.05 percent by weight. [Special Condition 3]

Emission Limitations:

1. KCP&L GMO's Lake Road Generating Station shall emit less than 40 tons of NO_x from Boiler No. 8 in any consecutive twelve-month period. [Special Condition 2A]
2. KCP&L GMO's Lake Road Generating Station shall emit less than 100 tons of CO from Boiler No. 8 in any consecutive twelve-month period. [Special Condition 2B]

Monitoring:

1. The permittee shall obtain the sulfur content of the fuel oil for each fuel oil delivery from the fuel vendors or conduct their own fuel analysis to evaluate the typical sulfur content weight percent of the fuel oil. [Special Condition 3]
2. The fuel consumption records and statement shall be kept on site for five (5) years and shall be made immediately available to the Missouri Department of Natural Resources' personnel upon request. [Special Condition 3]

Recordkeeping:

1. Attachments N and O, or equivalent forms, shall be used to demonstrate compliance with the emission limitations. [Special Condition 2B]
2. The permittee shall maintain all records for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for the fuels combusted in the boiler. [Special Condition 2C]

Reporting:

KCP&L GMO's Lake Road Generating Station shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeds the NOx and/or CO limitations. [Special Condition 2D]

PERMIT CONDITION EU0065-002

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.14 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:

This emission unit shall be limited to burning natural gas and No. 2 Fuel Oil.

Monitoring/Recordkeeping:

1. The permittee shall maintain on the premises of the installation calculations, using Appendix M or a similar form created by the permittee, demonstrating compliance with this rule.

2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION EU0065-003

10 CSR 10-6.070
New Source Performance Regulations
40 CFR Part 60 Subpart Db
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Emission Limitations

1. No owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere any gases that contain SO_2 in excess of 87 ng/J (0.20 lbs/MMBtu). This standard applies at all times, including during periods of startup, shutdown, or malfunction. [§60.42b(a) and (g)]
2. No owner or operator of an affected facility that can combust oil shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (six-minute average), except for one six-minute period per hour of not more than 27 percent opacity. This standard applies at all times, except during periods of startup, shutdown, or malfunction. [§60.43b(f) and (g)]
3. No owner or operator of an affected facility that combusts only oil or natural gas shall cause to be discharged into the atmosphere any gases that contain NO_x (expressed as NO_2) in excess of the following emission limits which shall apply at all times including periods of startup, shutdown, or malfunction [§60.44b(a) and (h)]

Fuel/stream generating unit type	Nitrogen oxide emission limits (expressed as NO_2) heat input	
	Ng/J	LbsMMBtu
Natural gas and distillate oil:		
Low heat release rate	43	0.10
High heat release rate	86	0.20
Residual oil:		
Low heat release rate	130	0.30
High heat release rate	170	0.40

4. Compliance with the NO_x emission limits is determined on a 30-day rolling average basis. [§60.44b(i)]

Performance test methods and procedures:

1. To determine compliance with the emission limits for NO_x, the owner or operator of an affected facility shall conduct the performance test as required under §60.8 using the continuous system for monitoring NO_x under §60.48(b) using a continuous system for monitoring NO_x as described in §60.48b of this Subpart Db. [§60.46b(e)]

a) For the initial compliance test, NO_x from the steam generating unit is monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the NO_x emission standards. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [§60.46b(3)(1)]

2. To determine compliance with the opacity limit the owner or operator shall conduct an initial performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, using the following procedures and reference methods: [60.46b(d)(1)-(7)]
   a) Method 3A or 3B of Appendix A-2 of 40 CFR Part 60 is used for gas analysis when applying Method 5 of Appendix A-3 of this part or Method 17 of Appendix A-6 of this part.
   b) Method 5, 5B, or 17 of Appendix A of this part shall be used to measure the concentration of PM as follows:
      i) Method 5 of Appendix A of this part shall be used at affected facilities without wet flue gas desulfurization (FGD) systems; and
      ii) Method 17 of Appendix A-6 of this part may be used at facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160° C (320°F). The procedures of Section 8.1 and 11.1 of Method 5B of Appendix A-3 of this part may be used in Method 17 of Appendix A-6 of this part only if it is used after a wet FGD system. Do not use Method 17 of Appendix A-6 of this part after wet FGD systems if the effluent is saturated or laden with water droplets.
      iii) Method 5B of Appendix A of this part is to be used only after wet FGD systems.
   c) Method 1 of Appendix A of this part is used to select the sampling site and the number of traverse sampling points. The sampling time for each run is at least 120 minutes and the minimum sampling volume is 1.7 dscm (60 dscf) except that smaller sampling times or volumes may be approved by the Administrator when necessitated by process variables or other factors.
   d) For Method 5 of Appendix A of this part, the temperature of the sample gas in the probe and filter holder is monitored and is maintained at 160±14ºC (320±25ºF).
   e) For determination of Particulate Matter (PM) emissions, the oxygen or CO2 sample is obtained simultaneously with each run of Method 5, 5B, or 17 of Appendix A by traversing the duct at the same sampling location.
   f) For each run using Method 5, 5B, or 17 of Appendix A, the emission rate expressed in ng/J heat input is determined using:
      i) The O_2 or CO_2 measurements and PM measurements obtained under this section;
      ii) The dry basis F factor; and
      iii) The dry basis emission rate calculation procedure contained in Method 19 of Appendix A of this part.
   g) Method 9 of Appendix A of this part is used for determining the opacity of stack emissions.

Monitoring:

1. The owner or operator of an affected facility that combusts very low sulfur oil is not subject to emissions monitoring requirements beyond maintaining fuel records as described in Paragraphs 5 and 6 in ***Recordkeeping*** below. [§60.47b(f)]
2. The owner or operator of an affected facility subject to an opacity standard who elects not to install a COMS shall conduct a performance test using Method 9 of Appendix A-4 of 40 CFR Part 60 and the procedures in §60.11 to demonstrate compliance with the applicable limit and shall comply with the following (If during the initial 60 minutes of observation all six-minute averages are less than ten

percent and all individual 15-second observations are less than or equal to 20 percent, the observation period may be reduced from three hours to 60 minutes): [§60.48b(a)]

a) The owner or operator shall conduct subsequent Method 9 of Appendix A–4 of this part performance tests using the procedures described above according to the applicable following schedule, as determined by the most recent Method 9 of Appendix A–4 of this part performance test results: [§60.48b(a)(1)(i)-(iv)]
   i) If no visible emissions are observed, a subsequent Method 9 of Appendix A–4 of this part performance test must be completed within twelve calendar months from the date that the most recent performance test was conducted;
   ii) If visible emissions are observed but the maximum six-minute average opacity is less than or equal to five percent, a subsequent Method 9 of Appendix A–4 of this part performance test must be completed within six calendar months from the date that the most recent performance test was conducted;
   iii) If the maximum six-minute average opacity is greater than five percent but less than or equal to ten percent, a subsequent Method 9 of Appendix A–4 of this part performance test must be completed within three calendar months from the date that the most recent performance test was conducted; or
   iv) If the maximum six-minute average opacity is greater than ten percent, a subsequent Method 9 of Appendix A–4 of this part performance test must be completed within 30 calendar days from the date that the most recent performance test was conducted.
b) If the maximum six-minute opacity is less than ten percent during the most recent Method 9 of Appendix A–4 of this part performance test, the owner or operator may, as an alternative to performing subsequent Method 9 of Appendix A–4 of this part performance tests, elect to perform subsequent monitoring using Method 22 of Appendix A–7 of this part according to the following procedures: [§60.48b(a)(2)(i)-(ii)]
   i) The owner or operator shall conduct 10 minute observations (during normal operation) each operating day the affected facility fires fuel for which an opacity standard is applicable using Method 22 of Appendix A–7 of this part and demonstrate that the sum of the occurrences of any visible emissions is not in excess of five percent of the observation period (i.e., 30 seconds per ten-minute period). If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial ten-minute observation, immediately conduct a 30 minute observation. If the sum of the occurrence of visible emissions is greater than five percent of the observation period (i.e., 90 seconds per 30 minute period) the owner or operator shall either document and adjust the operation of the facility and demonstrate within 24 hours that the sum of the occurrence of visible emissions is equal to or less than five percent during a 30 minute observation (i.e., 90 seconds) or conduct a new Method 9 of Appendix A–4 of this part performance test using the procedures in Paragraph 2 of ***Monitoring*** within 30 calendar days according to Method 9 of Appendix A.
   ii) If no visible emissions are observed for 30 operating days during which an opacity standard is applicable, observations can be reduced to once every seven operating days during which an opacity standard is applicable. If any visible emissions are observed, daily observations shall be resumed.
c) If the maximum six-minute opacity is less than ten percent during the most recent Method 9 of Appendix A–4 of this part performance test, the owner or operator may, as an alternative to performing subsequent Method 9 of Appendix A–4 performance tests, elect to perform subsequent monitoring using a digital opacity compliance system according to a site-specific monitoring plan approved by the Administrator. The observations shall be similar, but not

necessarily identical, to the requirements in Paragraph (a)(2) of this section. For reference purposes in preparing the monitoring plan, see OAQPS "Determination of Visible Emission Opacity from Stationary Sources Using Computer-Based Photographic Analysis Systems." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality and Planning Standards; Sector Policies and Programs Division; Measurement Policy Group (D243–02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Preliminary Methods. [§60.48b(a)(3)]

Recordkeeping:

1. The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for fuel oil and natural gas for the reporting period. The annual capacity factor is determined on a twelve-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [§60.49b(d)(1)]
2. The owner or operator shall maintain records of opacity according to the following requirements: [§60.49b(f)]
   a) For each performance test conducted using Method 9 of Appendix A–4 of this part, the owner or operator shall keep the records including the following information: [§60.49b(f)(1)(i)-(iii)]
      i) Dates and time intervals of all opacity observation periods;
      ii) Name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and
      iii) Copies of all visible emission observer opacity field data sheets.
   b) For each performance test conducted using Method 22 of Appendix A–4 of this part, the owner or operator shall keep the records including the following information: [§60.49b(f)(2)(i)-(iv)]
      i) Dates and time intervals of all visible emissions observation periods;
      ii) Name and affiliation for each visible emission observer participating in the performance test;
      iii) Copies of all visible emission observer opacity field data sheets; and
      iv) Documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the owner or operator to demonstrate compliance with the applicable monitoring requirements.
   c) For each digital opacity compliance system, the owner or operator shall maintain records and submit reports according to the requirements specified in the site-specific monitoring plan approved by the Administrator. [§60.49b(f)(3)]
3. The owner or operator shall maintain records of the following information for each steam generating unit operating day: [§60.49b(p)(1)-(3)]
   a) Calendar date;
   b) The number of hours of operation; and
   c) A record of the hourly steam load.
4. The owner or operator is required to submit excess emission reports for any excess emissions that occurred during the reporting period. [§60.49b(h)(3)-(4)]
   a) Excess emissions are defined as all six-minute periods during which the average opacity exceeds the opacity standards and as any calculated 30-day rolling average NO_x emission rate that exceeds the applicable emission limits.
5. The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil or natural gas (or a mixture of these fuels) in combination with other fuels that are known to contain an insignificant amount of sulfur shall obtain and maintain at

the affected facility fuel receipts from the fuel supplier that certify that the oil meets the definition of distillate oil and gaseous fuel meets the definition of natural gas as defined in §60.41b and the applicable sulfur limit. For the purposes of this section, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition, natural gas, wood, and/or other fuels that are known to contain insignificant amounts of sulfur were combusted in the affected facility during the reporting period; or [§60.49b(r)(1)]

6. The owner or operator of an affected facility who elects to demonstrate compliance based on fuel shall develop and submit a site-specific fuel analysis plan to the Administrator for review and approval no later than 60 days before the date you intend to demonstrate compliance. Each fuel analysis plan shall include a minimum initial requirement of weekly testing and each analysis report shall contain, at a minimum, the following information: [§60.49b(r)(2)(i)-(iv)]
   a) The potential sulfur emissions rate of the representative fuel mixture in ng/J heat input;
   b) The method used to determine the potential sulfur emissions rate of each constituent of the mixture. For distillate oil and natural gas a fuel receipt or tariff sheet is acceptable;
   c) The ratio of different fuels in the mixture; and
   d) The owner or operator can petition the Administrator to approve monthly or quarterly sampling in place of weekly sampling.
7. All records required shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. [§60.49b(o)]

Reporting:

1. The owner or operator shall submit notification of the date of initial startup, as provided by §60.7. This notification shall include: [§60.49b(a)(1)-(3)]
   a) The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility;
   b) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels; and
   c) The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.
2. The owner or operator shall submit to the Administrator a report containing: [[§60.49b(q)(1)-(3)]
   a) The annual capacity factor over the previous twelve months;
   b) The average fuel nitrogen content during the reporting period, if residual oil was fired; and
   c) The results of any NOx emission test required during the reporting period, the hours of operation during the reporting period, and the hours of operation since the last NOx emission test.

EU0070 – Gas Turbine 5 (Combustion Turbine 5)			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0070	Gas Turbine No. 5, Stack & waste heat Boiler No. 7, Gas Turbine, Maximum Design Rate (Million Btu/Hr) 867 Primary Fuel – Natural Gas Secondary Fuel – No. 2 Fuel Oil	Date of Manufacture – 1974	EP07 (2004)

PERMIT CONDITION EU0070-001

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0511 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H_2SO_4)	10 $\mu g/m^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu g/m^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

1. The emission unit shall be limited to fuel oil with a sulfur content of no more than 0.05 percent sulfur by weight. (Consent Agreement)
2. The emission units shall be limited to natural gas, No. 2 Fuel Oil. (Consent Agreement)

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the fuel type used verifying a sulfur content less than 0.05 percent by weight. (Consent Agreement)
2. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.

3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The following deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis no later than 30 days after the end of the previous quarter:
   a) Fuel certification shall consist of the following:
      i) Submittal of a supplier Certificate for fuel oil sulfur content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)
      ii) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged to Boiler No. 104 and Combustion Turbine Nos. 5 through 7 and shall be completed by KCP&L GMO. (Consent Agreement)
2. The permittee shall report any change of fuel type to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the switch of fuel types.
3. The permittee shall report to the Air Pollution Control Enforcement Section no later than ten (10) days after any exceedance of 10 CSR 10-6.260 demonstrated by the appropriate recordkeeping forms.

Permit Condition EU0070-002

10 CSR 10-6.350
Emission Limitations and Emissions Trading of Oxides of Nitrogen

Emission Limitation:

1. In order to qualify for the exemption under 10 CSR 10-6.350(1)(B)2., the permittee shall operate Emission Unit 0070 less than 400 hours per control period[2] averaged over the three most recent years of operation.
2. Compliance with this rule shall not relieve the permittee of the responsibility to comply fully with applicable provisions of the Air Conservation Law and rules or any other requirements under local, state or federal law. Specifically, compliance with this rule shall not violate the permit conditions previously established under 10 CSR 10-6.060 or 10 CSR 10-6.065.

Monitoring:

The permittee shall install and operate a non-resettable hour meter or determine the hours of operation for Emission Unit 0070 during the control period.

Recordkeeping:

The permittee shall maintain records of the total operating hours during which fuel is consumed for Emission Unit 0070 during the control period.

Reporting:

1. If the exemption limit above is exceeded, the exemption shall not apply and the permittee must notify the staff director or designee within 30 days.

[2] The period beginning May 1 of a calendar year and ending on September 30 of the same calendar year.

2. If the permittee can demonstrate to the staff director or designee that the exemption limit was exceeded due to emergency operations or uncontrollable circumstances, the exemption shall apply.

PERMIT CONDITION EU0070-003

10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program
10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program

Emission Limitation:
The permittee shall obtain a CAIR Source Permit for Boiler No. 6 EU0060.

A CAIR Permit (Missouri Department of Natural Resource, Project Number 2008-04-057, ORIS Code 2098) is being issued to the permittee in conjunction with this Title V permit. (See Attachment Q)

Monitoring/Recordkeeping:
The permittee shall retain the most current CAIR permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:
Annual Compliance Certification. The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

EU0080 and EU0090 – No. 6 Jet Engine (Combustion Turbine 6) and No. 7 Jet Engine (Combustion Turbine 7)			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0080 and EU 0090	EU0080 – No. 6 Jet Engine, 275 Million BTU/Hr EU0090 – No. 7 Jet Engine, 296 Million BTU/Hr Primary Fuel – No. 2 Fuel Oil Secondary Fuel – Natural Gas	Date of Manufacture – 1968	EP08 and EP09 (2004)

Permit Condition EU0080-001 and EU0090-001

10 CSR 10-6.060
Construction Permits Required
Construction Permit 0190-009

Emission Limitation:
The permittee must operate Jet Turbine Nos. 6 and 7 in such a manner that their combined emissions are below the deminimis annual rates (NO_2 = 40.0 tons, SO_2 = 40.0 tons, VOC = 40.0 tons, CO = 100.0 tons, PM_{10} = 15.0 tons) (Special Condition 1)

Monitoring/Recordkeeping:

The permittee is required to demonstrate, on an annual basis that the Jet Turbine Nos. 6 and 7, in conjunction, operate at annual pollutant emission rates which are below the respective deminimis annual rates. This demonstration shall be in the form of an annual compliance report submitted to the Air Pollution Control Program. (Special Condition 2)

Reporting:

1. The permittee shall submit to the Air Pollution Control Program an annual report based on the amount (gallons of No. 2 Fuel Oil and cubic feet of natural gas) of fuel consumed. The annual report shall be submitted by the 30th day of January, and contain information for the immediately preceding calendar year. This report shall include the values of the annual emission levels of sulfur dioxide and nitrogen oxides (expressed as nitrogen dioxide), and shall include the data, calculations, and emission factors used to determine and substantiate the values of these emission levels (Special Condition 2).
2. The permittee, shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later ten (10) days after the end of the month, if records indicate that emissions from the turbines exceed the allowed emission rates.

PERMIT CONDITION EU0080-2 and EU0090-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds,
May 25, 2001 Consent Agreement

Emission Limitation:

1. The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 0.0511 pounds of sulfur dioxide per million BTUs actual heat input averaged on a 24-hour daily block average basis (Consent Agreement).
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO_2)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu g/m^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu g/m^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu g/m^3$)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H_2S)	0.05 ppm (70 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu g/m^3$)	½-hour average not to be exceeded over 2 times in any 5 consecutive days

Sulfuric Acid (H_2SO_4)	10 µg/m^3	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m^3	1-hour average not to be exceeded more than once in any 2 consecutive days

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to No. 2 Fuel Oil with a sulfur content of no more than 0.05 percent sulfur by weight and pipeline grade natural gas. (Consent Agreement)

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the fuel type used verifying a sulfur content less than 0.05 percent by weight. (Consent Agreement)
2. Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable. If this cannot be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The following deliverables are to be submitted to the Air Pollution Control Program's Enforcement Section on a quarterly basis no later than 30 days after the end of the previous quarter:
   a) Fuel certification shall consist of the following:
      i) Submittal of a supplier Certificate for fuel oil sulfur content (see Appendix 1). The certificate is completed by the fuel supplier and certifies the fuel is compliant, (Consent Agreement)
      ii) Submittal of a Certificate of Fuel Sulfur Content (see Appendix 1). This certifies that only compliant fuel was charged toBoilers Nos. 1 through 4 and Combustion Turbine Nos. 5 through 7 and shall be completed by KCP&L GMO. (Consent Agreement)
2. The permittee shall report any change of fuel type to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the switch of fuel types.
3. The permittee shall report to the Air Pollution Control Program's Enforcement Section no later than ten (10) days after any exceedance of 10 CSR 10-6.260 demonstrated by the appropriate recordkeeping forms.

EU0260A, EU0260B, EU0270A, EU0270B – Mechanical discharge exhausters located on top of the Fly Ash Silo Bin Bent Filters located on top of the Fly Ash Silo			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0260A	Ash is discharged into the silo and the clean air to the in-line filters then to the mechanical exhausters.	United conveyor co.	EP14
EU0260B	Ash is discharged into the silo and the clean air to the in-line filters then to the mechanical exhausters.	N/A	EP14
EU0270A	This vent will filter air displaced by the incoming ash in the Fly Ash Silo, MHDR-**6** ton/hr	United conveyor co.	EP14
EU0270B	This vent will filter air displaced by the incoming ash in the Fly Ash Silo, MHDR-**5** ton/hr	United conveyor co.	EP14

Permit Conditions EU0260A-001, EU0260B-001, EU0270A-001 and EU0270B-001

10 CSR 10-6.060
Construction Permits Required
10 CSR 10-6.220
Restriction of Emissions of Visible Air Contaminants
Construction Permit 0196-011

Operational Limitation:

All emission controls including bin vent filter and filter/separator proposed – in this permit application shall be well maintained and used as required to comply with the applicable regulations at any time this installation is in operation.(Special Condition 1)

Emission Limitation:

1. No person may discharge into the ambient air from any single source of emission whatsoever, any air contaminant:
   a) Of a shade or density equal to or darker than that designated 20 percent opacity; or
   b) Of an opacity as to obscure an observer's view to a degree equal to or greater than does smoke designated as 20 percent opacity.
2. Exception: A person may discharge into the atmosphere from any single source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants of a shade or density not equal to nor darker than 60 percent opacity; or of an opacity as to obscure an observer's view to a degree not equal to nor greater than does smoke designated as 60 percent opacity.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation using a certified Method 9 observer.

2. The following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment B and B1), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any Method 9 opacity test (see attachment B3) performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-6.220, or any malfunction which could cause an opacity exceedance.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. 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. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

(1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

(2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:

(A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:

1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
4. St. Louis metropolitan area. The open burning of household refuse is prohibited;

(B) Yard waste, with the following exceptions:

1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
   A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
   B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
   C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
   D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;

(3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

(4) Lake Road Generating Station may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Lake Road Generating Station fails to comply with the provisions or any condition of the open burning permit.

(A) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.

(5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.

(6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

i) Measures taken to mitigate the extent and duration of the excess emissions; and
j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

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

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
2) The permittee may be required by the Director to file additional reports.
3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
6) 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.
7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

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.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090 Restriction of Emission of Odors
This requirement is not federally enforceable.

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the Director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
   b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(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(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
      iii) Exception. Monitoring requirements which require reporting more frequently than semi 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, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7.A 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 semiannual 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(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(6)(C)1.E Title IV Allowances

This permit prohibits emissions which exceed any allowances the installation holds under Title IV of the Clean Air Act.

No permit revisions shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program if the increases do not require a permit revision under any other applicable requirement.

Limits cannot be placed on the number of allowances that may be held by an installation. The installation may not use these allowances, however, as a defense for noncompliance with any other applicable requirement.

Any allowances held by a Title IV installation shall be accounted for according to procedures established in rules promulgated under Title IV of the Clean Air Act.

KCP&L GMO Lake Road Plant submitted a Phase II Permit Application renewal on June 16, 2009, under 10 CSR 10-6-270, “Acid Rain Source Permits required.” Nitrogen oxides (NOx) and sulfur dioxide (SOx) limitations are referenced in the installation’s Phase II permits. The Phase II Acid Rain Permit was issued on February 3, 2010. The Phase II Acid Rain Permit is effective for a term of five years from January 1, 2010, through December 31, 2014.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)1.J Emissions Trading

None.

10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
a) The application requirements are included and specifically identified in this permit, or
b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,

c) The applicable requirements of the acid rain program,
d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit

in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
   b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
   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; and
   d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Scott Heidtbrink, Senior Vice President - Supply. 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) The Missouri Department of Natural Resources 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,
3) 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,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(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 B1

10 CSR 10-6.220 Opacity Emission Observation Log

This attachment may be used to help meet the recordkeeping requirements of Permit Conditions: EU0010-003, EU0020-003, EU0030-003, EU0040-003, EU0050-002, EU0060-002, EU0260A-001, EU0260B-001, EU0270A-001, and EU0270B-001.

Method 22 (Outdoor) Observation Log	
Emission Unit	
Observer	Date
Sky Conditions	
Precipitation	
Wind Direction	Wind Speed
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.	

Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

ATTACHMENT B2

10 CSR 10-6.220 Compliance Demonstration
Opacity Emission Observation

This attachment may be used to help meet the recordkeeping requirements of Permit Conditions: EU0010-003, EU0020-003, EU0030-003, EU0040-003, EU0050-002, EU0060-002, EU0260A-001, EU0260B-001, EU0270A-001, and EU0270B-001.

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done? (yes/no)

ATTACHMENT B3

10 CSR 10-6.220 Opacity Summary Report

This attachment may be used to help meet the recordkeeping requirements of Permit Conditions: EU0010-003, EU0020-003, EU0030-003, EU0040-003, EU0050-002, EU0060-002, EU0260A-001, EU0260B-001, EU0270A-001, and EU0270B-001.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ percent opacity.

Was the emission unit in compliance at the time of evaluation? _____ _____ _____
YES NO Signature of Observer

Attachment B4

10 CSR 10-6.220 Equipment Log

This attachment may be used to help meet the recordkeeping requirements of Permit Conditions: EU0010-003, EU0020-003, EU0030-003, EU0040-003, EU0050-002, EU0060-002, EU0260A-001, EU0260B-001, EU0270A-001, and EU0270B-001.

Inspection/Maintenance/Repair/Malfunction Log		
Date	Emission Unit/Equipment	Activities Performed

Attachment C

Maintenance/Inspection Activities Schedule and Log

Date	Maintenance Activities	Repair Actions	Replacements	Notes

Attachment D

OPACITY SUMMARY REPORT

PART I. INSTALLATION INFORMATION

Name of Company: KCP&L GMO Lake Road Generating Station
Address: 1413 Lower Lake Road
Saint Joseph, MO 64504

Report Period:
Cer./CEA: (date) (Hr)
Emission Limit:

Manufacturer/Model Number Stack/Process

Emission Point:
CDs CNTY & SOURCE #'s: Pollutant Monitored:

Total Source Operating Time in Report Period: (Min)

PART II. CAUSE OF EXCESS EMISSIONS (EE)	Duration of EE (Min)	Percent of Operating Time
A. Air Pollution Control Equipment Failure (01)		
B. Fuel Problem (02)		
C. Process Problem (03)		
D. Unknown Cause (Excess Emission) (04)		
E. Startup (05)		
F. Soot Blowing (06)		
G. Other Known Causes (Excess Emission) (07)		
H. Shutdown (08)		
I. Total (A + B + …E)		
Part III CAUSES OF COMS DOWNTIME	**Downtime (Min)**	**Percent of Operating Time**
A. Monitor Equipment Malfunction (01)		
B. Non-monitor Equipment Malfunction (02)		
C. Quality Assurance (03)		
D. Other Known Cause (Monitor Malfunction) (04)		
E. Unknown Cause (Monitor Malfunction) (05)		
F. Total (A + B + …E)		

Note: Percent Operating Time = [{EE (min) or Downtime (min)} / Total Operating Time] x 100

EXCESS OPAC EMISSION SUMMARY

Source: KCP&L GMO Lake Road Generating Station Quarter:_____ Year:_____

Source of Emissions: _____

The following information is reported in total time for the entire quarter identified above.

Excess Emission Duration _____ (hours)

If duration is other than zero, submit Visible Emission form.

Monitoring System Downtime Due to Quality Assurance _____ (hours)

If downtime, not including zero and span calibrations, is other than zero, submit downtime system Downtime form.

Monitoring System Downtime Excluding Downtime Due to Quality Assurance

_____ (hours)

Source Operating Time _____ (hours)

Reported by _____

Position Title _____

EXCESS EMISSION SUMMARY – VISIBLE EMISSIONS

Source: KCP&L GMO Lake Road Generating Station Report Period: ____/_____/_____ to ____/_____/_____

Source of Emissions: _____

Date	Time	Magnitude	Reason Message

EXCESS EMISSION SUMMARY – OPAC MONITORING SYSTEM DOWNTIME

Source: KCP&L GMO Lake Road Generating Station Report Period: ____/_____/_____ to ____/_____/_____

Source of Emissions: _____

Date	Time	Duration (D-H-M)	Reason Message

Attachment E
SO_2 EMISSION SUMMARY REPORT

PART I. INSTALLATION INFORMATION

Name of Company: KCP&L GMO Lake Road Generating Station
Address: 1413 Lower Lake Road
St. Joseph, MO 64504

Report Period:
Cer./CEA: (date) (Hr)
Emission Limit:

Manufacturer/Model Number Stack/Process

Emission Point:
Pollutant Monitored: SO_2 #RAVG

CDs CNTY & SOURCE #'s:

Total Source Operating Time in Report Period:_____ (hrs)

PART II. CAUSE OF EXCESS EMISSIONS (EE)	Duration of EE (Hrs)	Percent of Operating Time
A. Air Pollution Control Equipment Failure (01)		
B. Fuel Problem (02)		
C. Process Problem (03)		
D. Unknown Cause (Excess Emission) (04)		
E. Startup (05)		
F. Soot Blowing (06)		
G. Other Known Causes (Excess Emission) (07)		
H. Shutdown (08)		
I. Total (A + B + …E)		
Part III CAUSES OF CEMS DOWNTIME	**Downtime (Hrs)**	**Percent of Operating Time**
A. Monitor Equipment Malfunction (01)		
B. Non-monitor Equipment Malfunction (02)		
C. Quality Assurance (03)		
D. Other known Cause (Monitor Malfunction) (04)		
E. Unknown Cause (Monitor Malfunction) (05)		
F. Total (A + B + …E)		

Note: Percent Operating Time = [{EE (hrs) or Downtime (hrs)} / Total Operating Time] x 100

EXCESS SO_2 #RAVG EMISSION REPORT

Source: KCP&L GMO Lake Road Generating Station Quarter:_____ Year:_____

Source of Emissions: _____

The following information is reported in total time for the entire quarter identified above.

Excess Emission Duration _____ (hours)

If duration is other than zero, submit SO_2 #RAVG emission form.

Monitoring System Downtime Due to Quality Assurance _____ (hours)

If downtime, not including zero and span calibrations, is other than zero, submit downtime system Downtime form.

Monitoring System Downtime Excluding Downtime Due to Quality Assurance

_____ (hours)

Source Operating Time _____ (hours)

Reported by _____

Position Title _____

EXCESS EMISSION SUMMARY – SO_2 #RAVG

Source: KCP&L GMO Lake Road Generating Station Report Period: ____/_____/_____ to ____/_____/_____

Source of Emissions: _____

Date	Time	Magnitude	Reason Message

EXCESS EMISSION SUMMARY – SO_2 #RAVG MONITORING SYSTEM DOWNTIME

Source: KCP&L GMO Lake Road Generating Station Report Period: ____/_____/_____ to ____/_____/_____

Source of Emissions: _____

Date	Time	Duration (hr)	Reason Message

Attachment M

10 CSR 10-2.040 *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating.*

Calculating Q for Installation:

Boiler No. 1	192.0 MMBTU/hr
Boiler No. 2	192.0 MMBTU/hr
Boiler No. 3	238.0 MMBTU/hr
Boiler No. 4	311.0 MMBTU/hr
Boiler No. 5	336.0 MMBTU/hr
Boiler No. 6	980.0 MMBTU/hr
Boiler No. 8	358.0 MMBTU/hr

Q = 2607 MMBTU/hr

The allowable particulate matter emission rate for Boiler Nos. 1, 2, 3, 4, 5 and 6; therefore, is as follows:

$E\ (lbs/MMBTU) = 1.09 \times Q^{-0.259}$

Where

E = the maximum allowable particulate ER in pounds per million BRU of heat input rounded off to two (2) decimal places; and

Q = the installation heat input in millions of BTU per hour.

$E\ (lbs/MMBTU) = 1.09 \times Q^{-0.259}$

$E = 1.09 \times (2607)^{-0.259}$

$E = 0.142$ lbs/MMBTU

E = **0.14** lbs/MMBTU

UNIT COMPLIANCE TABLE- 10 CSR 10-2.040						
Emission Unit	Max. Heat Input (mmBtu/hr)	Fuel Type	PM Emission Factor*	Max Hourly Design Rate (fuel/hr)	Max Uncontrolled PM Emissions lbs/MMBtu	Max Allowable PM Emissions lbs/MMBtu
EU0010	192	Natural Gas	7.6 lbs/10^6 scf	0.19 mmcf/hr	0.0075	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	1.4 * 10^3gallons	0.024	0.14
EU0020	192	Natural Gas	7.6 lbs/10^6 scf	0.19 mmcf	0.0075	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	1.4 *10^3gallons	0.024	0.14
EU0030	238	Natural Gas	7.6 lbs/10^6 scf)	0.2373 mmcf	0.0076	0.14
		None	none	None	none	0.14
EU0040	311	Natural Gas	7.6 lbs/10^6 scf	0.310 mmcf	0.0076	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	2.27 *10^3 gallons	0.024	0.14
EU0050 (97.52 percent control device efficiency)	336	Pulverized Coal (Ash content 5.92 percent)	10A lbs/ton A = 5..82	17.456 ton	3.08	0.14
		Natural Gas	7.6 lbs/10^6 scf	0.335 mmcf	0.0076	0.14
EU0060 (97.52 percent control device efficiency)	980	Cyclone (Coal) (Ash content 5.92 percent)	2.1A lbs/ton A = 5.61	52.575 Tons	0.63	0.14
		Natural Gas	7.6 lbs/10^6 scf	0.977 mmcf	0.0076	0.14
EU0065	358	Natural Gas	7.6 lbs/10^6 scf	0.34095 mmcf	0.0072	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	2.407 *10^3 gallons	0.0222	0.14

Maximum Uncontrolled PM Emission Rate = (Emission Factor) x (Max Hourly Design Rate)/ (Heat Input)

Attachment N
NO_x Compliance Worksheet for EP-24

KCP&L GMO's Lake Road Generating Station
Buchanan County, S30, T57N, R35W

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Fuel Used	Column A (a) Monthly Amount of Fuel Combusted (include units)	Column B (b) NO_x Emission Factor (lbs/unit)	Column C (c) Monthly NO_x Emissions (Tons)
(d) Total NO_x Emissions Calculated for this Month in Tons:			
(e) 12-Month NO_x Emissions Total from Previous Month's Attachment A, in Tons:			
(f) Monthly NO_x Emissions Total (d) from Previous Year's Attachment A, in Tons:			
(g) Current 12-month Total of NO_x Emissions in Tons: [(d) + (e) - (f)]			

(a) Total amount of fuel combusted in boiler (EP-24). When combusting No. 2 Fuel Oil, report in Mgal; when combusting natural gas, report in MMCF.
(b) Emission factor for NO_x will be determined from stack emissions test. In the interim, the appropriate emission factor from the following should be used:
  1) When combusting No. 2 Fuel Oil in EP-24, use 9.8. lbs/Mgal;
  2) When combusting natural gas in EP-24, use 33.0 lbs/MMCF;
(c) Column A x Column B x 0.0005.
(d) Summation of [Column C] in Tons;
(e) 12-Month NO_x emissions total (g) from last month's Attachment A, in Tons;
(f) Monthly NO_x emissions total (d) from previous year's Attachment A, in Tons;
(g) Calculate the new 12-month NO_x emissions total. **A 12-Month NO_x emissions total (g) of less than 40.0 tons indicates compliance.**

Attachment O
Compliance Worksheet for EP-24

KCP&L GMO's Lake Road Generating Station
Buchanan County, S30, T57N, R35W

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Copy as needed.

Fuel Used	Column A (a) Monthly Amount of Fuel Combusted (include units)	Column B (b) CO Emission Factor (lbs/unit)	Column C (c) Monthly CO Emissions (Tons)
(d) Total CO Emissions Calculated for this Month in Tons:			
(e) 12-Month CO Emissions Total from Previous Month's Attachment B, in Tons:			
(f) Monthly CO Emissions Total (d) from Previous Year's Attachment B, in Tons:			
(g) Current 12-month Total of CO Emissions in Tons: [(d) + (e) - (f)]			

(a) Total amount of fuel combusted in boiler (EP-24). When combusting No. 2 Fuel Oil, report in Mgal; when combusting natural gas, report in MMCF.
(b) Emission factor for CO will be determined from stack emissions test. In the interim, the appropriate emission factor from the following should be used:
  1) When combusting No. 2 Fuel Oil in EP-24, use 16.7 lbs/Mgal;
  2) When combusting natural gas in EP-24, use 84.0 lbs/MMCF;
(c) Column A x Column B x 0.0005;
(d) Summation of [Column C] in Tons;
(e) 12-Month CO emissions total (g) from last month's Attachment B, in Tons;
(f) Monthly CO emissions total (d) from previous year's Attachment B, in Tons; and
(g) Calculate the new 12-month CO emissions total. **A 12-Month CO emissions total (g) of less than 100.0 tons indicates compliance**.

Attachment P

Missouri Department of Natural Resources
Air Pollution Control Program

TITLE IV: ACID RAIN PERMIT

In accordance with Titles IV and V of the Clean Air Act and Missouri State Rule 10 CSR 10-6.270, *Acid Rain Source Permits Required*, the State of Missouri issues this Acid Rain Permit.

Installation Name: **KCP&L-Greater MO Operations Co.-Lake Road**
ORIS Code: **2098**
Project Number: **2009-06-067**
Permit Number: **OP2010-006**
Unit ID: **6**
Effective Dates: **January 1, 2010 through December 31, 2014**

The permit application submitted for this source, as corrected by the State of Missouri Department of Natural Resources (MDNR), Air Pollution Control Program (APCP), Operating Permit Section, is attached. The owners and operators of this source must comply with the standard requirements and special provisions set forth in this application.

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by the United States Environmental Protection Agency. Pursuant to 40 CFR 72.84, *Automatic permit amendment*, this does not necessitate a revision to any unit SO_2 allowance allocations identified in this permit.

Pursuant to 40 CFR Part 76, the Missouri Department of Natural Resources Air Pollution Control Program approves the Phase II NO_X Compliance Plan submitted for this unit, effective for calendar years 2010 through 2014. In addition to complying with these NO_X limits, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the requirement to reapply for a NO_X compliance plan and requirements covering excess emissions.

This acid rain permit is effective for the five-year period shown above, per 40 CFR 72.69, *Issuance and effective date of acid rain permits*. The designated representative must submit an application for renewal of this permit no later than June 30, 2013, per 40 CFR 72.30, *Requirement to apply*, and in conjunction with the operating permit renewal application.

FEB 03 2010
Date

Director or Designee,
Department of Natural Resources

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ~ new ~ revised X for Acid Rain permit renewal

RECEIVED
2009 JUN 18 PM 12:17
AIR POLLUTION CONTROL PGM

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Facility (Source) Name Lake Road	State Missouri	Plant Code 2098

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

A	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
6	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Facility (Source) Name (from STEP 1) LAKE ROAD

Acid Rain - Page 2

Permit Requirements

STEP 3

Read the standard requirements.

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(I) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Effect on Other Authorities, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

STEP 3, Cont'd.

(2) Limiting the number of allowances a source can hold; *provided,* that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name **Scott Heidtbrink, D.R.**	
Signature Scott Heidtbrink	Date 6/16/09

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

Phase II NO_x Compliance Plan

Page 1 of 2

For more information, see instructions and refer to 40 CFR 76.9

This submission is: ☐ New ☒ Revised (Renewal)

STEP 1
Indicate plant name, State, and ORIS code from NADB, if applicable

Plant Name	State	ORIS Code
LAKE ROAD	MO	2098

STEP 2
Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

	ID# 6 / Type Cy	ID# / Type	ID# / Type	ID# / Type	ID# / Type	ID# / Type
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	☐	☐	☐	☐	☐	☐
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	☐	☐	☐	☐	☐	☐
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	☐	☐	☐	☐	☐	☐
(d) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	☐	☐	☐	☐	☐	☐
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	☐	☐	☐	☐	☐	☐
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	☐	☐	☐	☐	☐	☐
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	☒	☐	☐	☐	☐	☐
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	☐	☐	☐	☐	☐	☐
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	☐	☐	☐	☐	☐	☐
(j) NO_x Averaging Plan (include NO_x Averaging form)	☐	☐	☐	☐	☐	☐
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	☐	☐	☐	☐	☐	☐
(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging form)	☐	☐	☐	☐	☐	☐

STEP 2, cont'd.

	ID# / Type	ID# / Type	ID# / Type	ID# / Type	ID# / Type	ID# / Type
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (b)(2)(iii)(B), or (b)(2)	☐	☐	☐	☐	☐	☐
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal Form as appropriate)	☐	☐	☐	☐	☐	☐
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	☐	☐	☐	☐	☐	☐
(p) Repowering extension plan approved or under review	☐	☐	☐	☐	☐	☐

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).
Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.
Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name SCOTT HEIDTBRINK, D.R.
Signature Scott Heidtbrink Date 6/14/07

Attachment Q

TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT

In accordance with Title V of the Clean Air Act and Missouri State Rules 10 CSR 10-6.362, *Clean Air Interstate Rule Annual Nox Trading Program*, 10 CSR 10-6.364 *Clean Air Interstate Rule Seasonal NOx Trading Program*, and 10 CSR 10-6.366, *Clean Air Interstate Rule Sox Trading Program*, the State of Missouri issues this CAIR Permit.

Installation Name: **KCP&L GMO Lake Road Generating Station, ORIS Code: 2098**
Project Number: **2008-04-057, Permit Number: OP2007-005A**
Unit IDs: **Unit 6 and GT5**
Effective Dates: **May 1, 2009 through March 9, 2013**

The permit application submitted for this source, as corrected by the State of Missouri Department of Natural Resources' Air Pollution Control Program, Operating Permit Section, is attached. The owners and operators of this source must comply with the standard requirements and special provisions set forth in this application.

This CAIR Permit applies only to Units 6 and GT5 at KCP&L GMO Lake Road Generating Station.

This CAIR permit is effective for the five-year period shown above. The designated representative must submit an application for renewal of this permit no later than October 9, 2012, and in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

CAIR Permit Application
(for sources covered under a CAIR SIP)

For more information, refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, and 96.322

This submission is: New √Revised

STEP 1
Identify the source by plant name, State, and ORIS or facility code

Plant Name: Lake Road State: MO ORIS/Facility Code: 2098

STEP 2
Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO_x Annual	SO_2	NO_x Ozone Season
6	X	X	X
GT 5	X	X	X

STEP 3
Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date

Standard Requirements

(a) Permit Requirements.

(1) The CAIR designated representative of each CAIR NO_x source, CAIR SO_2 source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO_2 unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall:

(i) Submit to the permitting authority a complete CAIR permit application under §96.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §96.121, §96.221, and §96.321 (as applicable); and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NO_x source, CAIR SO_2 source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO_2 unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for the source and operate the source and the unit in compliance with such CAIR permit.

(3) Except as provided in subpart II, III, and IIII (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NO_x source, CAIR SO_2 source, and CAIR NO_x Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NO_x unit, CAIR SO_2 unit, and CAIR NO_x Ozone Season unit (as applicable) that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NO_x source, CAIR SO_2 source, and CAIR NO_x Ozone Season source (as applicable) and such CAIR NO_x unit, CAIR SO_2 unit, and CAIR NO_x Ozone Season unit (as applicable).

Plant Name (from Step 1): Lake Road

CAIR Permit Application
Page 2

STEP 3, continued

(b) Monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(2) The emissions measurements recorded and reported in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 shall be used to determine compliance by each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) with the CAIR NO_X emissions limitation, CAIR SO_2 emissions limitation, and CAIR NO_X Ozone Season emissions limitation (as applicable) under paragraph (c) of §96.106, §96.206, and §96.306 (as applicable).

(c) Nitrogen oxides emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X source and each CAIR NO_X unit at the source shall hold, in the source's compliance account, CAIR NO_X allowances available for compliance deductions for the control period under §96.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_X units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

(2) A CAIR NO_X unit shall be subject to the requirements under paragraph (c)(1) of §96.106 for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NO_X allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.106, for a control period in a calendar year before the year for which the CAIR NO_X allowance was allocated.

(4) CAIR NO_X allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Allowance Tracking System accounts in accordance with subparts FF, GG, and II of 40 CFR part 96.

(5) A CAIR NO_X allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_X Annual Trading Program. No provision of the CAIR NO_X Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.105 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_X allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_X allowance to or from a CAIR NO_X source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR NO_X unit.

Sulfur dioxide emission requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO_2 source and each CAIR SO_2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO_2 allowances available for compliance deductions for the control period under §96.254(a) and (b) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO_2 units at the source, as determined in accordance with subpart HHH of 40 CFR part 96.

(2) A CAIR SO_2 unit shall be subject to the requirements under paragraph (c)(1) of §96.206 for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §96.270(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR SO_2 allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.206, for a control period in a calendar year before the year for which the CAIR SO_2 allowance was allocated.

(4) CAIR SO_2 allowances shall be held in, deducted from, or transferred into or among CAIR SO_2 Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 96.

(5) A CAIR SO_2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO_2 Trading Program. No provision of the CAIR SO_2 Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR SO_2 allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFF, GGG, or III of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR SO_2 allowance to or from a CAIR SO_2 source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR SO_2 unit.

Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_X Ozone Season allowances available for compliance deductions for the control period under §96.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_X Ozone Season units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.

(2) A CAIR NO_X Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of §96.306 for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NO_X Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.306, for a control period in a calendar year before the year for which the CAIR NO_X Ozone Season allowance was allocated.

(4) CAIR NO_X Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Ozone Season Allowance Tracking System accounts in accordance with subparts FFFF, GGGG, and IIII of 40 CFR part 96.

(5) A CAIR NO_X allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_X Ozone Season Trading Program. No provision of the CAIR NO_X Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.305 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_X allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_X Ozone Season allowance to or from a CAIR NO_X Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

Plant Name (from Step 1): Lake Road

CAIR Permit Application
Page 3

STEP 3, continued

(d) Excess emissions requirements.
If a CAIR NO_X source emits nitrogen oxides during any control period in excess of the CAIR NO_X emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X unit at the source shall surrender the CAIR NO_X allowances required for deduction under §96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR SO_2 source emits sulfur dioxide during any control period in excess of the CAIR SO_2 emissions limitation, then:
(1) The owners and operators of the source and each CAIR SO_2 unit at the source shall surrender the CAIR SO_2 allowances required for deduction under §96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR NO_X Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO_X Ozone Season emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X Ozone Season unit at the source shall surrender the CAIR NO_X Ozone Season allowances required for deduction under §96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.
(1) Unless otherwise provided, the owners and operators of the CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.
(i) The certificate of representation under §96.113, §96.213, and §96.313 (as applicable) for the CAIR designated representative for the source and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §96.113, §96.213, and §96.313 (as applicable) changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96, provided that to the extent that subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(2) The CAIR designated representative of a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) including those under subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(f) Liability.
(1) Each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) shall meet the requirements of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(2) Any provision of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) that applies to a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO_X units, CAIR SO_2 units, and CAIR NO_X Ozone Season units (as applicable) at the source.
(3) Any provision of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) that applies to a CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) shall also apply to the owners and operators of such unit.

Plant Name (from Step 1): Lake Road

STEP 3, continued

(g) Effect on Other Authorities.
No provision of the CAIR NO_x Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source, CAIR SO_2 source, and CAIR NO_x Ozone Season source (as applicable) or CAIR NO_x unit, CAIR SO_2 unit, and CAIR NO_x Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Certification

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Scott Heidtbrink

Signature Scott Heidtbrink Date 9/13/07

Appendix 1

Variable Table

Supplier Certificate for Fuel Oil Sulfur Content

Certificate for Fuel Sulfur Content

Coal Yard & blending System Narrative

Variable	**Definition**
#coal/hour	Total Hourly, as-fired coal mass rate to Boiler No. 5 determined by summing the weight output from each pulverizer
#S/#coal	Sulfur to coal weight fraction of each daily, post-blend, aggregate coal sample collected by the automatic sampler during coal load out to the Boiler No. 5 day bunkers, as determined by a recognized ASTM analysis method
F_{blend}	S-to-SO_2 Conversion factor that adjusts for variable sulfur retention, based on the weight fraction of bituminous and sub-bituminous coals loaded to the Boiler No. 5 day bunker, determined as follows: **F_{blend} = 1.9 * w percent bituminous + 1.75 * w percent sub-bituminous**
w percent bituminous	The daily-weighted mass fraction of bituminous coal loaded to the Boiler No. 5 day bunker, as measured and recorded by the computerized fuel-blending system
w percent bituminous	The daily-weighted mass fraction of sub-bituminous coal loaded to the Boiler No. 5 day bunker, as measured and recorded by the computerized fuel-blending system
mmBtu (coal+gas)/hour	The total hourly, as fired heat input to Boiler No. 5 determined from the coal and gas firing rates and associated fuel heating values, determined as follows: **mmBtu(coal+ gas)/hour= #coal/hour*HV coal+NGrate*HVgas**
NGrate	The total hourly, as-fired volume of natural gas measured and recorded by the Boiler No. 5 gas-metering system, in units of mmcf/hour
HV coal	The as-fired heating value of each daily, post-blend, aggregate coal loadout to the Boiler No. 5day bunkers, as determined by a recognized ASTM analysis method, in units of mmBtu/#coal
HVgas	The daily, as-fired heating value of pipeline grade natural, as determined by a recognized ASTM analysis method, a “worst-case” gas heating value of 950 Btu/cf, or other gas-heating value factor supported by on – site records from the gas supplier, in units of Btu/ft^3 gas

St. Joseph Light & Power Company
Lake Road Plant
Supplier Certificate of Fuel Oil Sulfur Content

Under an agreement with the Missouri Department of Natural Resources and the United States Environmental Protection Agency, KCP&L Greater Missouri Operations Company (KCP&L GMO) must purchase No. 2 Fuel Oil with a sulfur content of not greater than 0.05 percent maximum by weight and obtain certification from the supplier that the oil purchased meets this specification. This "Supplier Certificate of Fuel Oil Sulfur Content" must be completed and returned to SJLP with each purchase order issued for No. 2 Fuel Oil

I certify, to the best of my knowledge and belief, that the No. 2 Fuel Oil supplied by _____ to KCP&L GMO's Lake Road Generating Station under GMO Purchase Order No. _____ had a sulfur content of not more than 0.05 percent by weight.

Signed:_____

Printed Name: _____

Title: _____

Company: _____

Date: _____

St. Joseph Light & Power Company
Lake Road Plant
Certificate of fuel Sulfur Content

KCP&L GMO, Under an agreement with the Missouri Department of Natural Resources and the United States Environmental Protection Agency, must not burn fuel in certain Lake Road Generating Station units with a sulfur content greater than 0.05 percent maximum by weight.

I certify, to the best of my knowledge and belief, that during the following time period _____ either Natural gas, Propane or No.2 Fuel Oil with a sulfur content of not more than 0.05 percent by weight was burned in the following Lake Road Generating Station units:
boilers No. 1,2,3,4, and Combustion Turbine Nos. 5, 6 and 7.

Signed:_____

Printed Name: _____

Title: _____

St. Joseph Light & Power Company

Date: _____

STATEMENT OF BASIS

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.

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. Part 70 Operating Permit Application, received February 27, 1997; revised November 29, 2001
2. 2000 Emissions Inventory Questionnaire, received March 28, 2001;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. May 25, 2001 Consent Decree between St. Joseph Light & Power Company and the Missouri Department of Natural Resources, Case No. 01CV74164, Div # 1;
5. Phase II Acid Rain Permit for Boiler No. 6, Project Number EX0210004020;
6. Construction Permit 0389-003;
7. Construction Permit 0689-002;
8. Construction Permit 0190-009;
9. Construction Permit 0196-011;
10. Construction Permit 062006-001

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.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
This rule had not been created at the time of the application; however, it has been determined to be applicable to the installation and therefore has been included in the operating permit.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
This rule had not been applied to EU0010, EU0020, EU0030, and EU0040 in the permit application; however, it has been determined to be applicable to the EU0010, EU0020, EU0030, and EU0040 and therefore has been included in the operating permit.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-2.200, *Restriction of Emission of Sulfur Compounds From Indirect Heating Sources*
This rule was rescinded from the Missouri Air Rules and Regulations as of July 30, 1997. This regulation has been replaced by 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds.

10 CSR 10-2.160, *Restriction of Emission of Sulfur Compounds*

This rule was rescinded from the Missouri Air Rules and Regulations as of July 30, 1997. This regulation has been replaced by 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds.

10 CSR 10-2.060, *Restriction of Emission of Visible Air contaminants*

This rule was rescinded from the Missouri Air Rules and Regulations as of September 28,1990. This regulation has been replaced by 10 CSR 10-6.220, Restriction of Emission of Visible Air contaminants.

10 CSR 10-2.030, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule was rescinded from the Missouri Air Rules and Regulations as of March 30, 2001. This regulation has been replaced by 10 CSR 10-6.400, Restriction of Emission of Particulate Matter from Industrial Processes.

10 CSR 10-2.080, *Emission of Visible Air Contaminates from Internal Combustion Engines*

The Air Pollution Control Program has decided that the rule was intended to be applicable only to mobile sources, therefore, it has not been included in the permit.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Pro*cesses

The applicant identified the following units in the operating permit application as subject to this rule. The units are either exempt or not subject to this rule as explained below.

EU-0080	No. 6 Jet Engine (Combustion Turbine No. 6)
EU-0090	No. 7 Jet Engine (Combustion Turbine No. 7)
EU-0110	Rotary Car Coal Unloading.
EU-0120	Coal Transfer belts.
EU-0130	Coal Storage.
EU-0140	Fly Ash Temporary Storage.
EU-0240	Crusher Building (Transferring, Dropping and Coal Crushing).
EU-0250	Truck Dump Area./Reclaim.
EU-0280A	Fly Ash Truck Unloading.
EU-0280B	Fly Ash Truck Unloading.
EU-0290	Conveyor Belts No. 6 and No. 7.
EU-0300	Conveyor Belt No. 8.
EU-0310	Conveyor Belts No. 1 and No. 2.
EU-0320	Emergency Coal Stockout Pile.
EU-0330	Conveyor Belt No. 4.

These units are exempted from this rule for the following reasons.

1. Under 10 CSR 10-6.400 Process weight means the total weight of all materials introduced into a source operation, including solid fuels, but excluding liquids and gases used solely as fuels. In the case of
   a) EU-0080 - No. 6 Jet Engine (Combustion Turbine No. 6)
   b) EU-0090 - No. 7 Jet Engine (Combustion Turbine No. 7)

   Liquids and gases used solely as fuels.
2. Under 10 CSR 10-6.400 the process weight rule does not apply to the following.
   a) Fugitive emissions

3. That is the case of EU0130 and EU0140
   a) The grinding, crushing and conveying operations at a power plant
   b) Emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter.
4. That is the case in EU-0280A & EU-0280B
5. Emission Point/unit 22 has been removed.

Construction Permit Revisions

Construction Permit 0389-003

The installation was issued a Construction Permit 0389-003 to construct two 7500 gas –fired turbines for the purpose of generating electrical power. These peaking units allow a utility to supply electrical power during times of high peak demand. The installation never installed these two (2) peaking units, therefore these two (2) turbines are not included in this operating permit. If the installation decided in the future to install these two (2) turbines, they need to go through the New Source Review Unit (NSR), since the installation date would be past the two (2) year time period allowed under 10 CSR 10-6.060, Construction Permits Required.

Construction Permit 062006-001

The installation was issued Construction Permit 062006-001 on June 2, 2006 to install a 358 MMBtu/hr dual-fired boiler. If this unit is installed, the permittee needs to comply with all of the special conditions in the construction permit as well as any applicable state or federal regulations. A revision to the Part 70 Operating Permit application is required for this within one year of equipment startup as part of this construction permit.

This modification to the operating permit (OP2007-005) is being issued in response to the requirement to revise the operating permit within one year of startup of the 358 MMBTU/hr boiler. The applicable special conditions of Construction Permit 2006-001 are included in this operating permit under Permit Condition EU0065-001. The construction permit special conditions requiring Stack Performance Testing were not included in the operating permit because they have been completed as of the time of issuance.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is Commenced After August 17, 1971.*

Boiler Nos. 1, 2, 3, 4, 5 and 6 are not subject to 40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction is Commenced After August 17, 1971,* because they were installed prior to the applicable date.

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for which Construction was Commenced After September 18, 1978*

Boiler Nos. 1, 2, 3, 4, 5 and 6 are not subject to 40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for which Construction was Commenced After September 18, 1978,* because they were installed prior to the applicable date.

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*

Boiler Nos. 1, 2, 3, 4, 5 and 6 are not subject to 40 CFR Part 60, Subpart Db, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, because they were installed prior to June 9, 1989, because they were installed prior to the applicable date. This subpart does, however apply to Boiler No. 8 which was constructed in 1999, and installed in June 2006.

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines*

EU0080 and EU0090 (Jet Engine Nos. 6 and 7) are not subject to 40 CRF Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines*. Because they were not newly manufactured for KCP&L GMO Lake Road Generating Station but they were re-located from another site and the turbines were built before October 3, 1977, and were not modified or reconstructed when moved to KCP&L GMO Lake Road Generating Station.

EU0070 Gas Turbine is not subject to 40 CRF Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines for which construction is Commenced After* October 3, 1977, because it was installed prior to the applicable date

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, Subpart Y, *Standards of Performance for Coal Preparation Plants*

The original equipment was installed prior to October 24, 1974, (coal processing and conveying equipment (Including breakers and crushers), coal storage systems, and coal transfer and loading systems) and not subject to the requirements of Subpart Y.

In 2000, the installation replaced a crusher. The Air Pollution Control Program received comments regarding the applicability of Subpart Y, from Henry Robertson of the Sierra Club, when the "draft" permit was placed on public notice in January of 2003. The crusher was the only piece of equipment in the process line replaced and there was no increase in emissions. The Air Pollution Control Program requested EPA assistance on the issue. A final decision has not been made on the applicability of Subpart Y and the issue is still being discussed. The Air Pollution Control Program and EPA have agreed to issue the operating permit without Subpart Y being applied to the crusher or process line. However, if a determination is made that Subpart Y is applicable, the operating permit will be "Re-Opened for Cause" to include the requirement.

Maximum Achievable Control Technology (MACT) Applicability

1. 40 CFR Part 63 Subpart DDDDD, *National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers And Process Heaters*
   Boiler No. 5 (Emission Unit EU0050) was subject to this regulation. However, as noted in Permit Condition EU0050-004, the United States Court of Appeals, District of Columbia Circuit ordered a full vacatur of 40 CFR Part 63 Subpart DDDDD. The vacatur has the same effect as if this MACT rule was never promulgated. This means there is no longer a September 13, 2007 compliance date for sources affected by this HAP source category. If and when the EPA promulgates an approved version of this MACT, these six emission units will be re-evaluated for applicability.

2. 40 CFR Part 63, Subpart YYYY, Combustion Turbines
   The permittee is subject to this subpart as it operates Combustion Turbines EU0070, EU0080, and EU0090 as part of a major source of HAP as defined in 40 CFR §63.2. The affected combustion turbines are subject to only the initial notification requirements of 40 CFR §63.9(b). This facility has submitted an initial notification. According to 40 CFR §63.6090(b), EU0070 through EU0090 are not subject to emission limits, work practice standards, performance testing, monitoring SSMP, site-specific monitoring plans, recordkeeping or reporting requirements.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:
1. Is subject to an emission limitation or standard, and
2. Uses a control device to achieve compliance, and
3. Has pre-control emissions that exceed or are equivalent to the major source threshold.

KCP&L GMO Lake Road Generating Station submitted their Operating Permit Application before the effective date of CAM, and therefore was not required to implement CAM in the "initial" operating permit. However, KCP&L GMO Lake Road Generating Station will be required to implement CAM when they renew their operating permit if the installation has CAM applicable units. KCP&L Lake Road Generating Station has some emission units where KCP&L GMO Lake Road should be looking for CAM requirments prior to submitting their operating permit renewal application.

Other Regulatory Determinations
EU0060-003.

Max. Allowable Emission Rate: calculation to show conversion of 1400.00 lbs SO_2/hr to lbs SO_2/mmBtu):
For Boiler No. 6 in the Consent Agreement

$$1.429\frac{lbsSO_2}{mmBtu} = \frac{1400\frac{lbsSO_2}{hr}}{980\frac{mmBtu}{hr}}$$

10 CSR 10-2.040 *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating.*

Calculating Q for Installation:

Boiler No. 1	192.0 MMBTU/hr
Boiler No. 2	192.0 MMBTU/hr
Boiler No. 3	238.0 MMBTU/hr
Boiler No. 4	311.0 MMBTU/hr
Boiler No. 5	336.0 MMBTU/hr
Boiler No. 6	980.0 MMBTU/hr
Boiler No. 8	358.0 MMBTU/hr

Q = 2607 MMBTU/hr

The allowable particulate matter emission rate for Boiler Nos. 1, 2, 3, 4, 5 and 6; therefore, is as follows:

$E\ (lbs/MMBTU) = 1.09 \times Q^{-0.259}$

Where

E = the maximum allowable particulate ER in pounds per million BRU of heat input rounded off to two (2) decimal places; and

Q = the installation heat input in millions of BTU per hour.

$E\ (lbs/MMBTU) = 1.09 \times Q^{-0.259}$

$E = 1.09 \times (2607)^{-0.259}$

$E = 0.142$ lbs/MMBTU

E = **0.14** lbs/MMBTU

UNIT COMPLIANCE TABLE- 10 CSR 10-2.040						
Emission Unit	Max. Heat Input (mmBtu/hr)	Fuel Type	PM Emission Factor*	Max Hourly Design Rate (fuel/hr)	Max Uncontrolled PM Emissions lbs/MMBtu	Max Allowable PM Emissions lbs/MMBtu
EU0010	192	Natural Gas	7.6 lbs/10^6 scf	0.19 mmcf/hr	0.0075	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	1.4 * 10^3gallons	0.024	0.14
EU0020	192	Natural Gas	7.6 lbs/10^6 scf	0.19 mmcf	0.0075	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	1.4 *10^3gallons	0.024	0.14
EU0030	238	Natural Gas	7.6 lbs/10^6 scf)	0.2373 mmcf	0.0076	0.14
		None	none	None	none	0.14
EU0040	311	Natural Gas	7.6 lbs/10^6 scf	0.310 mmcf	0.0076	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	2.27 *10^3 gallons	0.024	0.14
EU0050 (97.52 percent control device efficiency)	336	Pulverized Coal (Ash content 5.92 percent)	10A lbs/ton A = 5..82	17.456 ton	3.08	0.14
		Natural Gas	7.6 lbs/10^6 scf	0.335 mmcf	0.0076	0.14
EU0060 (97.52 percent control device efficiency)	980	Cyclone (Coal) (Ash content 5.92 percent)	2.1A lbs/ton A = 5.61	52.575 Tons	0.63	0.14
		Natural Gas	7.6 lbs/10^6 scf	0.977 mmcf	0.0076	0.14
EU0065	358	Natural Gas	7.6 lbs/10^6 scf	0.34095 mmcf	0.0072	0.14
		No. 2 Fuel Oil	3.3 lbs/10^3 gal	2.407 *10^3 gallons	0.0222	0.14

Maximum Uncontrolled PM Emission Rate = (Emission Factor) x (Max Hourly Design Rate)/ (Heat Input)

Emission Units 0010, 0020, 0030, 0040 and EU0065 are in compliance and maximum potential emissions are less than the emission limits for all possible fuel types. Therefore the compliance calculations satisfy the monitoring requirements.

Since maximum uncontrolled PM emissions lbs/MMBtu for EU0050 and EU0060 are more than the Maximum Allowable PM Emissions lbs/MMBtu limits when using Coal. Therefore, the installation is required to have control devices on these two units and monitor the operation of the control device to satisfy the monitoring requirements.

EU0070 (Gas Turbine 5, Stack and waste heat Boiler No. 7) is not an Indirect Heating Source, and the waste heat boiler No. 7 is not operable, therefore it is not subject to rule 10 CSR 10-2.040 (Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating Required)

May 25, 2001, Consent Decree

The installation was required by consent decree to submit a compliance attainment report summarizing the fulfillment of the compliance measures and requirements set forth in the consent decree no later than 30 days after the consent decree is approved by the Court. Since the installation has already completed the Compliance Attainment Report, the conditions are not included in the operating permit.

KCP&L GMO Lake Road Generating was requested by consent decree to conduct a stack test on Boiler No. 5 to confirm the appropriateness of the equation listed under Permit Condition EU0050-003 for monitoring compliance with its SO_2 emission limit. The installation was also requested to submit a detailed test protocol to Air Pollution Control Program for review and approval within thirty days after the consent decree is approved by the court. Testing must be conducted no later than 60 days after approval of the test protocol. Since the installation has already completed the Stack test, and a detailed test protocol, the conditions are not included in the operating permit.

10 CSR 10-6.060, *Construction Permits Required*

Construction Permit 0196-011 is for the installation of ash silos and mechanical exhausters. The controls on the mechanical exhausters are the filter/separators for the electrostatic precipitator (EU0050 and EU0060) and the bin vent filters. Since the monitoring and recordkeeping requirements of EU0050-EU0060 already contain provisions for the electrostatic precipitator, the conditions were not repeated on EU0260A, EU0260B, EU0270A and EU0270B.

10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*

Emission Units EU0050 and EU0060 contain COMS. The provisions of 10 CSR 10-6.220(3)(H)5. allow the installation the opportunity to request alternate monitoring methods if approved by the Director. The installation has not requested any alternate methods on the COMS units, therefore those provisions of the regulation were not included in the operating permit.

Boiler No. 8 (EU0650) is not subject to this regulation because it is subject to the opacity standard set in 40 CFR Part 60 Subpart Db.

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

The standard wording of emission limits for EU0010 through EU0060 under 10 CSR 10-6.260 is "No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 8.6 pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period", However, the Missouri Department of

Natural Resources Operating Permit Unit goes by the most stringent limit, which was indicated in May 25, 2001 Consent Agreement.

The standard wording of emission limits for EU0070 through EU0090 under 10 CSR 10-6.260 is "No person shall cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period", However, the Missouri Department of Natural Resources Operating Permit Unit goes by the most stringent limit which was indicated in May 25, 2001 Consent Agreement.

Boiler No. 8 (EU0650) is not subject to this regulation because it is subject to the sulfur standard set in 40 CFR Part 60 Subpart Db.

10 CSR 10-6.270, *Acid Rain Source Permits Required*

Boiler No. 6 and Combustion Turbine No. 5 serve a generator greater than 25 MW. However, Combustion Turbine No. 5 commenced operation before 1990, and the Acid Rain provisions do not include combustion turbines commencing operation before 1990 (see 40 CFR Part 72.6). Therefore, Boiler No. 6 is the only unit at the installation that meets the definition of affected facility under the Acid Rain Program.

10 CSR 10-6.350, *Emission Limitations and Emissions Trading of Oxides of Nitrogen*

10 CSR 10-6.350(1)(A) states, "This rule applies to any fossil fuel-fired electric generating unit that serves a generator with a nameplate capacity of greater than 25 MW." Since Boiler Nos. 1, 2, 3, 4, 5 and Jet Turbine Nos. 6 and 7 do not serve generators with a nameplate capacity greater than 25 MW, 10 CSR 10-6.350 is not applicable to those units.

Gas Turbine No. 5 (EU0070) serves a generator with a nameplate capacity greater than 25 MW. However, 10 CSR 10-6.350(1)(B)2. exempts internal combustion engines which operate less than 400 hours per year, averaged over the most recent three years. In the years 2000, 2001, and 2002, Gas Turbine No. 5 operated an average of 268.8 hours per year.

Several portions of 10 CSR 10-6.350 which pertain to Department actions were not included in the permit conditions, since the installation is not responsible for the Department actions identified in 10 CSR 10-6.350. These provisions from the initial rule filed on February 15, 2000, are identified in: 10 CSR 10-6.350(3)(B)2.; the equations of (3)(B)3.A.(III) and (3)(B)3.B.(II); (3)(B)4.B.; (3)(B)4.C.; (3)(B)4.D.(II); (3)(B)4.E.; (3)(B)5.B.; (3)(B)8.; (3)(B)9.; and (3)(B).10.A.-H. These provisions from the December 4, 2002, amendments are identified in: 10 CSR 10-6.350(3)(B)2.; the equations of (3)(B)3.A.(III) and (3)(B)3.B.(II); (3)(B)4.B.; (3)(B)4.C.(II); (3)(B)4.D.(II); (3)(B)4.E.; (3)(B)5.B.; (3)(B)8.; (3)(B)9; and (3)(B)10.A-H.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Process*

Pursuant to 10 CSR 10-6.400 (B)12, the grinding, crushing and conveying operation at a power plant are exempted from 10 CSR 10-6.400 rule, therefore EU0150, EU0260A, EU0260B, EU0270A and EU0270B are exempted under this rule, because they fall under conveying operation

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

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program 's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Jill Wade, P.E.
Environmental Engineer

CERTIFIED MAIL: 70082810000020167091
RETURN RECEIPT REQUESTED

Mr. Scott Heidtbrink
KCP&L – GMO Lake Road Generating Station
1413 Lower Lake Road
P.O. Box 998
St. Joseph, MO 64502

Re: KCP&L – GMO Lake Road Generating Station, 021-0004
Permit Number: **OP2007-005A**

Dear Mr. Heidtbrink:

Enclosed with this letter is your revised Part 70 operating permit. This revision is being issued to include the installation of Boiler #8, a 358 MMBtu/hr duel fired boiler which was authorized by construction permit 2006-001 on June 2, 2006. This unit is subject to 40 CFR Part 60 Subpart Dc and the provisions of this subpart that apply to Boiler #8 are also included in this operating permit revision.

This revision also removed the requirements of 40 CFR Part 63 Subpart DDDDD which were applied to Boiler #5 in the original permit because this subpart was vacated by the United States Court of Appeals, District of Columbia Circuit. Other additions to this permit include the CAIR Permit as Attachment Q and updates to standard permit language within the Core Permit Requirements and General Permit Requirements. 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.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 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 AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jill Wade, P.E., at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwk

Enclosures

c: Kansas City Regional Office
PAMS File: 2007-11-067