



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Michael L. Parson, Governor

Carol S. Comer, Director

November 12, 2020

Stephanie Hirner  
Manager, Air Permitting and Compliance  
Lake Road Generating Station  
1413 Lower Lake Road  
St. Joseph, MO 64504

RE: Part 70 Operating Permit Minor Modification - Permit Number OP2017-046A  
Project Number: 2020-08-035; Installation Number: 021-0004

Dear Stephanie Hirner,

Your Part 70 Operating Permit OP2017-046 is being modified in response to your August 25, 2020 request. Your request changes the unit-specific monitoring of Boiler 6 (EU0060) and Gas Turbine 5 (EU0070) for the Acid Rain Program (ARP) and Cross-State Air Pollution Rule (CSAPR) Program at your Lake Road Generating Station. For Boiler 6 (EU0060), the monitoring requirements will change from the continuous emission monitoring system (CEMs) to excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75 appendices D and E. For Turbine 5 (EU0070), the monitoring requirements will change from the low mass emissions excepted monitoring (LME) requirements for gas- and oil-fired units to excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75 appendices D and E. According to the Title V Permit Revision Requirements in Permit Condition 010, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2), 97.506(d)(2), or 97.606(d)(2) and 70.7(e)(2)(i)(B). The Table for TR Monitoring Provisions reflects the changes in monitoring for the Boiler 6 (EU0060) and Gas Turbine 5 (EU0070). In order to ensure that you are complying with the correct version of this Operating Permit, please replace pages 21 and 22 with the revised pages 21A and 22A.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to



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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 regarding this modification, please do not hesitate to contact Joseph Miller at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in blue ink that reads "Kendall B. Hale". The signature is written in a cursive style.

Kendall B. Hale  
Permits Section Chief

KBH:jmj

Enclosures

c: Kansas City Regional Office  
PAMS File: 2020-08-035



# PART 70

## PERMIT TO OPERATE

**Operating Permit Number:** OP2017-046A  
**Installation Name:** Lake Road Generating Station  
**Installation ID:** 021-0004  
**Project Number:** 2020-08-035

### **Description of Intermediate Significant Modification:**

Lake Road Generating Station submitted a request dated August 25, 2020 to change the unit-specific monitoring requirements of Boiler 6 (EU0060) and Gas Turbine 5 (EU0070) for the Acid Rain Program (ARP) and Cross-State Air Pollution Rule (CSAPR) Program.

For Boiler 6 (EU0060), the SO<sub>2</sub> and heat input monitoring requirements changed from the continuous emission monitoring system pursuant to 40 CFR Part 75 Subpart B to the excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75 appendix D. The NO<sub>x</sub> monitoring requirements changed from the continuous emission monitoring system pursuant to 40 CFR Part 75 Subpart H to the excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75 Appendix E.

For Turbine 5 (EU0070), the SO<sub>2</sub> and heat input monitoring requirements changed from the low mass emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR Part 75.19 to the excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75 appendix D. The NO<sub>x</sub> monitoring requirements changed from the low mass emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR Part 75.19 to the excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75 Appendix E.

According to 40 CFR 97.406(d)(2), 97.506(d)(2), and 97.606(d)(2), this permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements (pursuant to 40 CFR 97.430 through 97.435, 97.530 through 97.535, and 97.630 through 97.635), and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B).

	monitoring) and 40 CFR part 75, subpart H (for NO <sub>x</sub> monitoring)				
SO <sub>2</sub>	EU0060 <sup>1</sup>	EU0060 <sup>2</sup> EU0070 <sup>2</sup>	-----	EU0070 <sup>1</sup>	-----
NO <sub>x</sub>	EU0060 <sup>1</sup>	-----	EU0060 <sup>2</sup> EU0070 <sup>2</sup>	EU0070 <sup>1</sup>	-----
Heat Input	EU0060 <sup>1</sup>	EU0060 <sup>2</sup> EU0070 <sup>2</sup>	-----	EU0070 <sup>1</sup>	-----

- 1) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.630 through 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
- 2) The permittee must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA’s website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
- 3) The permittee that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO<sub>x</sub> Annual Trading Program), 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and/or 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative monitoring system is available on the EPA’s website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
- 4) The permittee that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.534 (TR NO<sub>x</sub> Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO<sub>2</sub> Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO<sub>x</sub> Annual Trading Program), 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and/or 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA’s website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.]
- 5) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.534 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.630 through 97.634 (TR SO<sub>2</sub> Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit’s monitoring system description.

**TR NO<sub>x</sub> Annual Trading Program requirements (40 CFR 97.406)**

**(a) Designated representative requirements.**

The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

<sup>1</sup> Monitoring requirements until the installation transitions to 40 CFR Part 75 Appendix D and Appendix E.

<sup>2</sup> Monitoring requirements after the installation transitions to 40 CFR Part 75 Appendix D and Appendix E.

**(b) Emissions monitoring, reporting, and recordkeeping requirements.**

- (1) The permittee, and the designated representative, of each TR NO<sub>x</sub> Annual source and each TR NO<sub>x</sub> Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO<sub>x</sub> Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO<sub>x</sub> Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

**(c) NO<sub>x</sub> emissions requirements.**

- (1) TR NO<sub>x</sub> Annual emissions limitation.
  - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO<sub>x</sub> Annual source and each TR NO<sub>x</sub> Annual unit at the source shall hold, in the source's compliance account, TR NO<sub>x</sub> Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO<sub>x</sub> emissions for such control period from all TR NO<sub>x</sub> Annual units at the source.
  - (ii). If total NO<sub>x</sub> emissions during a control period in a given year from the TR NO<sub>x</sub> Annual units at a TR NO<sub>x</sub> Annual source are in excess of the TR NO<sub>x</sub> Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
    - (A). The permittee of the source and each TR NO<sub>x</sub> Annual unit at the source shall hold the TR NO<sub>x</sub> Annual allowances required for deduction under 40 CFR 97.424(d); and
    - (B). The permittee of the source and each TR NO<sub>x</sub> Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (2) TR NO<sub>x</sub> Annual assurance provisions.
  - (i). If total NO<sub>x</sub> emissions during a control period in a given year from all TR NO<sub>x</sub> Annual units at TR NO<sub>x</sub> Annual sources in the state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO<sub>x</sub> emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO<sub>x</sub> Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO<sub>x</sub> emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state for such